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**SOUTH DOWNS NATIONAL PARK AUTHORITY
PLANNING COMMITTEE**

A meeting of the Planning Committee will be held online at **10.00 am on Thursday, 13th August, 2020**

Trevor Beattie, Chief Executive (National Park Officer)

**AGENDA
PART I**

- 1. Apologies for absence**
- 2. Declaration of interests**
To enable Members to declare to the meeting any disclosable interest they may have in any matter on the agenda for the meeting.
- 3. Minutes of previous meeting held on 9 July 2020** (Pages 5 - 12)
To approve as a correct record the minutes of the Planning Committee meeting held on 9 July 2020.
- 4. Matters arising from the previous meeting minutes**
To enable any matters arising from the 9 July 2020 Planning Committee minutes that are not covered elsewhere on this agenda to be raised.
- 5. Updates on previous Committee decisions**
To receive any updates on previous Committee decisions.
- 6. Urgent matters**
To consider any matters on the agenda which the Chair agrees should be considered as a matter of urgency due to special circumstances.

DEVELOPMENT MANAGEMENT

- 7. Application Number: SDNP/19/03366/OUT - Plumpton College** (Pages 13 - 60)
Local Authority: Lewes District Council
Proposal: Hybrid application (part Full/part Outline) for new and replacement campus development, including additional and replacement buildings, plus alteration to access, circulation, parking and Infrastructure relating to improvements to Wales Lane, construction of new main campus car park plus road access, new Village Green, new buildings on sites 7 and 8 plus associated infrastructure.
Address: Plumpton College, Ditchling Road, Plumpton. BN7 3AE.
To consider a report by the Director of Planning (Report PC20/21-06).
- 8. Application Number: SDNP/19/05270/OUT - Pickwick, Amberley** (Pages 61 - 82)
Local Authority: Horsham District Council
Proposal: Outline planning application with all matters reserved for a development of up to seven units of various sizes. Demolition of the existing dwelling, swimming pool building and garages.
Address: Pickwick, Turnpike Road, Amberley. BN18 9LX.
To consider a report by the Director of Planning (Report PC20/21-07).

9. **Application Number: SDNP/20/01676/FUL - Ditchling Rugby Club** (Pages 83 - 126)
Local Authority: Lewes District Council
Proposal: To retain the use of the land on a permanent basis for one rugby pitch for Ditchling Rugby Club, with associated use of the Cricket Club Car Park and Clubhouse, following temporary permission granted under reference SDNP/16/05154/FUL.
Address: Land at Keymer Road, Ditchling, East Sussex.
To consider a report by the Director of Planning (Report PC20/21-08).
10. **Application Number: SDNP/19/06071/FUL - The Old Pub Car Park, Slindon** (Pages 127 - 158)
Local Authority: Arun District Council
Proposal: Planning Application for Two Semi-Detached 1.5 Storey 2 Bedroom Cottages, Open and Covered Car Parking and Cycle Stores, including Re-provided Car Parking and Cycle Stores for Lea Cottage and The Old Stable, Hard and Soft Landscaping and Boundary Treatments, and Other Works.
Address: The Old Pub Car Park School Hill Slindon Arundel West Sussex BN18 0R
To consider a report by the Director of Planning (Report PC20/21-09).

STRATEGY & POLICY

11. **Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD) - draft for consultation** (Pages 159 - 210)
To consider a report by the Director of Planning (Report PC20/21-10).
12. **Adoption of the Sustainable Construction Supplementary Planning Document (SPD)** (Pages 211 - 320)
To consider a report by the Director of Planning (Report PC20/21-11).

Members of the Planning Committee

Alun Alesbury, Heather Baker, Janet Duncton, Thérèse Evans, Barbara Holyome, Diana van der Klugt, Gary Marsh, William Meyer, Robert Mocatta, Vanessa Rowlands and Andrew Shaxson

Ex officio Members (may participate on Policy items but not vote): Ian Phillips

Members' Interests

SDNPA Members have a primary responsibility for ensuring that the Authority furthers the National Park Purposes and Duty. Members regard themselves first and foremost as Members of the Authority, and will act in the best interests of the National Park as a whole, rather than as representatives of their appointing body or any interest groups.

Members are required to declare any disclosable pecuniary interest that is not already entered in the Authority's register of interests, and any personal interest and/or public service interest (as defined in Paragraph 18 of the Authority's Code of Conduct) they may consider relevant to an item of business being considered at the meeting (such disclosure to be made at the commencement of the meeting, or when the interest becomes apparent).

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Public Participation

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Unconfirmed Planning Committee Meeting Minutes to be approved at the next meeting

SOUTH DOWNS NATIONAL PARK AUTHORITY

PLANNING COMMITTEE 09 JULY 2020

Held: online via Zoom videoconferencing, at 10am.

Present: Alun Alesbury (Chair), Heather Baker, Thérèse Evans, Barbara Holyome, Diana van der Klugt, Gary Marsh, William Meyer, Robert Mocatta, Vanessa Rowlands and Andrew Shaxson

Officers: Tim Slaney (Director of Planning), Rob Ainslie (Development Manager), Mike Hughes (Major Planning Projects and Performance Manager), Becky Moutrey (Solicitor), Richard Sandiford (Senior Governance Officer) and Sara Osman (Governance Officer).

Also attended by: Richard Ferguson (Development Management Lead), Stella New (Senior Development Management Officer), Amy Tyler-Jones (Senior Planning Policy Officer), Jack Trevelyan (Enforcement Officer), Jeremy Burgess (Landscape and Biodiversity Lead (Water)) and Ruth Childs (Landscape Officer).

OPENING REMARKS

1. The Director of Planning welcomed new Members to the meeting and informed those present that:
 - Due to the current Coronavirus pandemic full meetings were not able to be held at the Memorial Hall until further notice, hence the meeting of the South Downs National Park Authority was held using the Zoom Cloud Meetings software.
 - The meeting was being webcast by the Authority and would be available for subsequent on-line viewing. Anyone entering the meeting was considered to have given consent to be filmed or recorded, and for the possible use of images and sound recordings for webcasting and/or training purpose
2. The Senior Governance Officer confirmed the Members of the Planning Committee who were present, that the meeting was quorate and reminded Members of the protocol that would be followed during the online meeting.

ITEM 1: ELECTION OF CHAIR

3. The election process was presided over by the Director of Planning and Senior Governance Officer. Members were invited to nominate themselves for Chair of Planning Committee until the first meeting following the Authority AGM in 2021. One nomination was received from Alun Alesbury.
4. As Alun Alesbury was the only nomination Alun Alesbury was duly elected as Chair of the Planning Committee until the first Planning Committee meeting after the Authority AGM in 2021.
5. Alun Alesbury took the Chair and presided over the rest of the meeting.
6. The Chair welcomed Andrew Shaxson and Janet Duncton to the Committee, and thanked departing Committee Member Pat Beresford for his service to the Committee.

ITEM 2: ELECTION OF DEPUTY CHAIR

7. The election process was presided over by the Chair, and Members were invited to nominate themselves for Deputy Chair of Planning Committee until the first meeting following the Authority AGM in 2021. One nomination was received from Heather Baker.
8. As Heather Baker was the only nomination, Heather Baker was duly elected as Deputy Chair of the Planning Committee until the first Planning Committee meeting after the Authority AGM in 2021.

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9. The Chair reminded those present that:

- SDNPA Members had a primary responsibility for ensuring that the Authority furthers the National Park Purposes and Duty. Members regarded themselves first and foremost as Members of the Authority, and would act in the best interests of the National Park as a whole, rather than as representatives of their appointing body or any interest groups.

ITEM 3: APOLOGIES FOR ABSENCE

10. Apologies were received from Janet Duncton.

ITEM 4: DECLARATION OF INTERESTS

11. Vanessa Rowlands declared a non-prejudicial interest in item 9, SDNP/20/01693/FUL Cowdray Park, as both the applicant and the speaker for this item, Adam Coxen, were known to her.
12. Heather Baker declared a non-prejudicial interest in item 11, Affordable Housing SPD, as she had been the Chair of the SDNPA Affordable Housing Task and Finish Group but had not been involved since that work was completed.
13. Thérèse Evans declared a public service interest in agenda item 10, SDNP/20/01263/FUL Whitewool Farm, which was in the Winchester City Council (WCC) area where she was a Councillor. She had not had any involvement in that application.
14. Thérèse Evans declared a public service interest in agenda item 11, Affordable Housing SPD, as comments had been received by Winchester City Council (WCC) where she is a Member.
15. Thérèse Evans also declared a public service interest in agenda item 13, Appeals Update, as she had been the Chair of Planning Committee at Winchester City Council when the decision was made for SDNP/18/00679/FUL Land at Abbots Worth House. She also noted that the appeal for SDNP/19/02763/CND Joinery & Boxwood, Owslebury, was also in the WCC area but she had not had any involvement in that application as it was a delegated decision.
16. Robert Mocatta declared a non-prejudicial interest in item 10, SDNP/20/01263/FUL Whitewool Farm, as the speaker for this item, Jamie Butler was known to him. He was also an East Hampshire District Councillor and his ward included East Meon.

ITEM 5: MINUTES OF PREVIOUS MEETING HELD ON 11 JUNE 2020

17. The minutes of the previous meeting held on 11 June 2020 were agreed as a correct record and signed by the Chair, subject to the following amendment:
 - Due to technical issues, Gary Marsh left the meeting after the debate for item 8 and was unable to re-join. Therefore, minute 440 should be moved to follow minute 448, and should read: 'Due to technical difficulties Gary Marsh was no longer present in the meeting at 15:30'.

ITEM 6: MATTERS ARISING FROM PREVIOUS MINUTES

18. There were none.

ITEM 7: UPDATES ON PREVIOUS COMMITTEE DECISIONS

19. The decision has been issued for SDNP/18/05385/FUL - The Henry Warren Club and Land North East of Prestwood, Nyewood (Nyewood Village Hall).
20. The decision has been issued for SDNP/19/04275/CND - Broad View Farm, Binsted.

ITEM 8: URGENT ITEMS

21. There were none.

ITEM 9: SDNP/20/01693/FUL – Cowdray Park Treehouses.

22. The Case Officer presented the application, referred to the update sheet and gave the following verbal update:

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- One further point of clarification had been received from a Member asking whether any units could be sold leasehold or for time share. The Officer responded that the applicant's company is a holiday let business and selling their units to third parties as leaseholds or time shares does not form part of their business model.
23. The following public speakers addressed the Committee:
- Adam Coxen spoke in support of the application as the applicant.
24. The Committee considered the report by the Director of Planning (Report PC20/21-01), the update sheet and the public speaker comments, and requested clarification as follows:
- Would interpretation signage be used to inform visitors about the landscape-led design and sustainable construction of the treehouses, and of the cultural heritage of the site?
 - Condition 5 stipulated that a Site Management Plan should be submitted prior to first use of the development, and should include details of fire and BBQ rules. Would fires be permitted on this wooded site?
 - What was in place to prevent the proposed footpaths, going through site from parking areas to treehouses, creating a semi-urbanised feel once established, and visitors wandering off the formal paths?
 - Were there cycle storage facilities to encourage sustainable travel to the site?
 - What processes were in place for monitoring the state of the units over time, to ensure that they continued to preserve and enhance the landscape? Had consideration been taken regarding what happened to the units and the site once the units came to their end of life?
25. In response to questions, Officers clarified:
- The applicant intended to continue working closely with the Cowdray Estate and SDNPA access teams to provide a heritage trail on the wider estate. They planned to provide their own interpretation to tell the story of the site and also promote Dark Night Skies to visitors.
 - Condition 5 ensured that rules should be in place stating that no fires or BBQs would be allowed on the site, including disposable BBQs.
 - Footpaths would only be provided solely to the units themselves and visitors would not be encouraged to wander through woodland. This could be strengthened through the Site Management Plan required in Condition 5, and maintenance of the understorey could be secured by extending the landscape management scheme required by Condition 10.
 - Lockable storage for cycles would be provided elsewhere on the site, but not by the units themselves.
 - The units were designed to last at least as long as the 30-year lease for the site. A detailed Landscape and Ecological Management Plan had been submitted with the proposal, and whilst development of this nature in woodland would not ordinarily constitute enhancement, this development would bring the woodlands back into formal management which would achieve the National Park's first Purpose. A number of cultural heritage enhancements would also be delivered to the Historic Parkland on the Estate, including the restoration of historic rides and a Haha.
26. The Committee discussed and debated the application, making the following comments:
- Members acknowledged the extensive collaborative working which had taken place between the Applicants and Officers, in order to develop and amend the previous plans, and that they had addressed comments previously raised by Committee.

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- Members noted that all concerns raised from the previous application had been answered satisfactorily. The proposed units were sustainable, the finishes fitted in with the surroundings, and the designs had been adapted to fit each site individually.
 - Concern was raised that this may set a precedent for applications for treehouses elsewhere in the Park, and Members emphasised that each application should be considered on its own merits, taking into account the landscape in which they were sited.
 - Further concerns were raised that monitoring the state of the site was not covered over a sufficiently long time period, and related more to the landscape than the units themselves. It was proposed that there should be an additional condition to require monitoring of the state of the units over their lifespan and to cover what should occur when the buildings came to end of life.
 - Conditions 20 and 21 stated that details should 'be provided', and it was proposed that these should be amended to read that details should 'be submitted to and approved in writing by the Local Planning Authority'.
27. It was proposed and seconded that the application be approved subject to the following amendments:
- An additional Condition to be added relating to monitoring the physical structures of the treehouses, and measures to address the end of life of the treehouses.
 - Conditions 5 & 10 to be strengthened in relation to keeping to the formal footpaths and preventing any urbanisation of the woodland sites;
 - Conditions 20 and 21 be amended to read that details should 'be submitted to and approved in writing by the Local Planning Authority'.
28. **RESOLVED:** That planning permission be granted subject to the conditions set out in paragraph 10.1 of the officer's report, and subject to the following, the final form of words to be delegated to the Director of Planning in consultation with the Chair of the Planning Committee:
- An additional Condition to be added relating to monitoring the physical structures of the treehouses, and measures to address the end of life of the treehouses.
 - Conditions 5 & 10 to be strengthened in relation to keeping to the formal footpaths and preventing any urbanisation of the woodland sites;
 - Conditions 20 and 21 be amended to read that details should 'be submitted to and approved in writing by the Local Planning Authority'.
29. The meeting adjourned for a 5-minute comfort break. On resumption of the meeting the Senior Governance Officer confirmed the Members of the Planning Committee who were present and that the meeting was quorate.
30. Jeremy Burgess (Landscape and Biodiversity Lead (Water)) and Ruth Childs (Landscape Officer) joined the meeting.

ITEM 10: SDNP/20/01263/FUL – Whitewool Farm.

31. The Case Officer presented the application, referred to the update sheet and gave the following verbal update:
- The Landscape Officer had withdrawn their objection following information provided by Natural England. Their response was now a neutral response, however their concerns regarding the wetland habitat in the wider area still stood.
32. The following public speakers addressed the Committee:
- Jamie Butler spoke in support of the application as the applicant.

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33. The Committee considered the report by the Director of Planning (Report PC20/21-02), the update sheet and the public speaker comments, and requested clarification as follows:

- Members sought further information on the benefits of this scheme to the wider catchment area and downstream of the site, and confirmation that the land would not become saturated with nitrates.
- How would developers further downstream purchase 'credits' to offset nitrates produced as a result of their development, and was there a national standard for nitrate offsetting credits? How was this monitored?
- How were nitrate levels measured and how often would this need to be done?
- Could the Landscape Officer explain what led to a change of view from objecting to the proposal to a neutral position?
- Where would the extracted soil go and what impact would it have on the landscape?
- Were there any other schemes like this in the National Park that had set a precedent?

34. In response to questions, Officers clarified:

- The Biodiversity Lead clarified that nitrates from the surrounding farmland would be absorbed by the plants specifically selected for the proposed wider river catchment area, and that this would reduce levels of nitrates flowing downstream. A key point for consideration in the management of the site was that it needed to stay a wetland to ensure plant take-up of nitrates.
- Natural England had created a national standard for nitrate offsetting credits. Developers would approach the farm and submit details to Natural England, who would decide whether the site would be able to offset the nitrates produced as a result of the Development scheme. There was a legal obligation on the landowner to notify the SDNPA of any schemes which came forward to use nitrate offsetting credits. This would be regulated through the S106 legal agreement.
- The Biodiversity Lead explained that to monitor nitrate levels, water samples would be taken above and below the site to compare how much nitrate entered and left. From these figures the amount of nitrate absorbed on the site could be calculated. The frequency of sampling was dictated by Natural England's processes. The case officer added that the SDNPA would monitor the capacity of site through the S106 legal agreement, which would oblige the applicant to provide this information alongside any developments that propose to use the site to offset nitrates of a scheme.
- The Landscape Officer responded that, whilst they could see the ecological benefits of the proposed wetland, they had not been convinced there was sufficient evidence the land would stay wet in the long term. The application did not provide details covering a full year cycle, and figures supplied were taken during winter months only. However, following discussions with Natural England, they were reassured that there had been sufficient improvements in the design to improve water flow rates, and on this basis had changed their view to a neutral position.
- The majority of soil from the site would be used in regrading and re-profiling the landscape on the site. Condition 6 set out details on the disposal of any waste from the site and this would be covered by the discharge of conditions.
- There were similar, smaller schemes taking place in the National Park which did not require planning permission, however these have set a good precedent for processes and monitoring of such sites.

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35. The Committee discussed and debated the application, making the following comments:

- Members supported the ‘stage zero’ approach as an important way forward in conserving and enhancing the landscape, and an improvement to the habitat of this site would be of benefit to the Park.
- The benefits of the proposal were recognised, including: more water would be kept upstream, reducing the risk of flooding downstream; water quality would be improved and the river would be encouraged to follow its natural path to counteract man-made canalisation of the rivers course in the past.
- Members considered that wet woodland and water meadows were rare landscapes which had been lost in this area, and that restoring them would be beneficial and increase biodiversity that would otherwise no longer exist on this site.
- Some concerns were raised about the process of offsetting, and that whilst it was good that nitrates be absorbed from the local farmland, it would not prevent nitrates from developments affecting waterways further downstream.
- There was some concern amongst some Members that this application had been brought before Committee prematurely, and as ‘stage zero’ was a very new approach, the application should be deferred in order that Members could be thoroughly briefed on the process. However other Members were satisfied with the Officer presentation and answers to points of clarification.
- It was agreed that the ecological survey was not done at the best time of year, or for a long enough period, and Members asked that a stipulation be required in the S106 legal agreement for several surveys to be done over the whole year.
- On-balance, Members agreed that there were many positive benefits to this scheme and they noted that no objections were raised by the experts that had been consulted.

36. It was proposed and seconded to vote on the officer’s recommendations.

37. **RESOLVED:**

1) That planning permission be granted subject to:

- The completion of a S106 legal agreement, the final form of which is delegated to the Director of Planning, to secure the following:
 - a) The scheme is secured and managed for the lifetime of the development which relies on it as mitigation.
 - b) Appropriate arrangements for the management and monitoring of the wetland and its performance of capturing nitrates; an agreed nitrogen saving budget for offsetting development; provision of remedial measures as necessary; appropriate funding, responsibilities and mechanisms to ensure compliance of the above by appropriate organisations.
- The completion of further ecological surveys regarding protected species on site, principally within the stream corridor, and provision of a suitable policy compliant mitigation and enhancement ecological strategy to the satisfaction of the SDNPA, the consideration of which is delegated to the Director of Planning; and
- The conditions as set out in paragraph 10.1 of this report and any additional conditions, the form of which is delegated to the Director of Planning, to address any mitigation and strategy matters that arise from the completion of further ecological surveys.

2) That authority be delegated to the Director of Planning to refuse the application with appropriate reasons if:

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- a) The S106 Agreement is not completed or sufficient progress has not been made within 6 months of the 9 July 2020 Planning Committee meeting.
 - b) The additional ecological surveys and provision of a suitable policy compliant mitigation and enhancement strategy is not completed or sufficiently progressed within 6 months of the 9 July 2020 Planning Committee meeting.
38. Jeremy Burgess (Landscape and Biodiversity Lead (Water)) and Ruth Childs (Landscape Officer) left the meeting.
39. The meeting adjourned for a 5-minute comfort break. On resumption of the meeting the Senior Governance Officer confirmed the Members of the Planning Committee who were present and that the meeting was quorate.
40. Ian Phillips joined the meeting.

ITEM 11: Adoption of Affordable Housing SPD

41. The Senior Planning Policy Officer reminded Members of the report content, referred to the update sheet and gave the following verbal update:
- The new paragraph outlined in the update sheet should be amended so that the second to last line should read: 'Policy SD29 requires all affordable housing on rural exception sites to be affordable and provided so in perpetuity'.
42. The Committee considered the report by the Director of Planning (Report PC20/21-03), the update sheet and the public speaker comments, and requested clarification as follows:
- How would the affordable housing mix be worked out for rural exception sites, considering that Parish Councils have differing requirements for housing needs in their area?
 - Confirmation that all affordable provided through Whole Estate Plans should be provided in perpetuity.
43. In response to questions, Officers clarified:
- All policies should be read together. If a good reason was given why the policy for smaller units should be diverted from, it would be considered.
 - The SDP clarified that affordable housing provided through Whole Estate Plans would be expected to be in perpetuity.
44. The Committee discussed and debated the SPD, making the following comments:
- Members welcomed this document as it would help deliver more affordable housing for young people and families on low income. It would also provide more clarity for developers regarding financial contributions.
45. **RESOLVED:** The Committee:
- 1) Noted the content of the Consultation Statement (Appendix 1 of the Officer's report); and
 - 2) Adopted the revised Affordable Housing SPD (Appendix 2 of the Officer's report).

ITEM 12: Enforcement Update

46. The Committee considered the report by the Director of Planning (Report PC20/21-04) and requested clarification as follows:
- Could the report contain more detail on enforcement issues, to provide evidence of outcomes of enforcement actions or outstanding cases? Members comments that there was a high number of cases closed due to 'no breach', and more detail on this would be welcomed.

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47. In response to questions, Officers clarified:
- It was agreed that more detailed information should be supplied in the enforcement report to enable Members to better understand enforcement issues and resolutions.
48. **RESOLVED:** Members noted the update on enforcement action.
- ITEM 13: Summary of Appeal Decisions Update**
49. The Committee considered the report by the Director of Planning (Report PC20/21-05) and requested clarification as follows:
- Were parish councils informed of information in this report?
50. In response to questions, Officers clarified:
- The officer clarified that the report was publicly available on the SDNPA website as part of the papers for this meeting, and all Parish Councils were informed when the meeting agenda was available. Parish Councils who had submitted comments to an appeal would have been sent a copy of the inspector's report on that appeal.
51. **RESOLVED:** Members noted the outcome of appeal decisions.
52. The Chair closed the meeting at 1.45pm.

CHAIR

Signed: _____

Agenda Item 07
Report PC20/21-06

Report to	Planning Committee
Date	13 August 2020
By	Director of Planning
Local Authority	Lewes District Council
Application Number	SDNP/19/03366/OUT
Applicant	Plumpton College
Application	Hybrid application (part Full/part Outline) for new and replacement campus development, including additional and replacement buildings; plus alteration to access, circulation, parking and infrastructure relating to improvements to Wales Lane; construction of new main campus car park plus road access; new Village Green; new buildings on sites 7 and 8 plus associated infrastructure.
Address	Plumpton College, Ditchling Road Plumpton BN7 3AE

Recommendation:

1) That planning permission be granted subject to:

- The completion of a **SI06** legal agreement, the final form of which is delegated to the **Director of Planning**, to secure the following:
 - a) **Staff accommodation occupation restrictions limiting the occupation of the dwellings to persons solely or mainly employed at the College**
 - b) **Provision of a Landscape & Ecological Management Plan (LEMP)**
 - c) **Secure the use of the existing cycle path along the eastern boundary for the future use of cyclists and equestrians**
 - d) **Travel plan & Travel Plan Audit Fee, and bus control measures for the Estate Road**
 - e) **Highways works in accordance with a Section 278 agreement (including bus stop and junction improvements)**
 - f) **The phasing of the development and associated studies**
- The completion of further ecological surveys regarding bats on site and provision of a suitable, policy compliant, mitigation and enhancement ecological strategy to the satisfaction of the **SDNPA**, the consideration of which is delegated to the **Director of Planning**; and
- The conditions as set out in paragraph 10.2 of this report and any additional conditions, the form of which is delegated to the **Director of Planning**, to address any mitigation matters that arise from the completion of the further ecological surveys.

2) That authority be delegated to the Director of Planning to refuse the application with appropriate reasons if:

- a) **The SI06 Agreement is not completed or sufficient progress has not been made within 6 months of the 13 August 2020 Planning Committee meeting.**

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- b) The additional ecological surveys and provision of a suitable policy compliant mitigation and enhancement strategy is not completed or sufficiently progressed within 6 months of the 13 August 2020 Planning Committee meeting.**
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Executive Summary

Plumpton College is situated to the north of Ditchling Road. It is a further and higher education establishment with approximately 3000 full and part time students studying a range of land-based courses. Around 200 students currently live on site, as do a number of teaching staff and farm workers, the latter in farm workers cottages along Wales Lane.

The applicant's overall aim for the proposal is to ensure that the college retains its standing as a leading centre for land based education in the UK. The proposals seek to replace older building stock with purpose built facilities, reflecting the change in agricultural practices and the national shift towards sustainable farming practice, alongside the role modern technology now plays in the field. There is a demand for additional living accommodation for students and staff, reflected in the waiting list for student accommodation and particularly given the availability and cost of housing in this area.

The proposal also seeks to address the site's current internal road layout and circulation, improving the interaction between vehicles and students, and providing a dedicated route for the public bus and coaches to the front of the site.

The scheme follows extensive and detailed pre-application discussions with officers and through Design Review Panel workshops. The subsequent landscape-led Masterplan and Landscape Strategy provides the basis for this hybrid planning application.

The proposal will be delivered over a number of phases over a number of years and therefore the applicant has requested a longer time limit of 7 years for the submission of reserved matters applications associated with the later phases.

I. Site Description

- I.1 Plumpton College is a leading land based educational college in the UK. Established in 1926, it has developed and expanded over a number of years, more recently between 2006 -2014 with the creation of new buildings providing additional learning and animal care facilities, the Winery buildings, as well as student accommodation. The College has 3000 students (full and part time) and 300 staff (teaching and non-teaching).
- I.2 The campus also contains a number of agricultural buildings including the piggery buildings, wine centre and the large barns associated with Lambert Farm to the west; the machinery workshop, riding area and stables to the east.
- I.3 The College's educational offering includes sustainable farming and cultivation practices, animal management and veterinary nursing, countryside and equine management, forestry, arboriculture and horticulture. It is a UK centre of excellence for education, training and research in viticulture. The college offers a variety of courses from 16years+, apprenticeships and university courses. The College livestock consists of a 260 strong dairy herd, 1000 sheep, 130 sows and 65 horses.
- I.4 Plumpton College is located on the northern side of Ditchling Road and within the southern part of Plumpton Parish. The site is located approximately 2 miles to the south of Plumpton Green Village and approximately 4 miles north west of Lewes. The application site lies outside the settlement policy boundary in an area of countryside, and within the boundary of Plumpton Parish Neighbourhood Plan.
- I.5 The application site covers approximately 16 hectares of land comprising the college campus with existing buildings, car parking and circulation routes. There are two accesses on to the site from Ditching Road, located to the east and west of the campus.

- 1.6 The site is within the Adur to Ouse Scarp Footslopes Landscape Character Area where key characteristics include undulating lowland landscape at the foot of the Adur to Ouse Downs scarp, large straight-sided arable fields, chalk springs and the visually dominant steep chalk scarp to the south which provides impressive panoramic views of the surrounding landscape of woodland and farmland mosaic.
- 1.7 The South Downs Way footpath runs along this steep scarp immediately south of the site and from where it is possible to view Plumpton College in its entirety, placing it within the wider context of the surrounding landscape and beyond with views of the High Weald and North Downs to the north.
- 1.8 St Michael and All Angels Church is located towards the centre of the site and is a Grade I listed building. To the immediate east of the site lies Plumpton Place a Grade II* Listed Building within a Grade II* Listed Park and Garden. Plumpton Place also contains the Moat Barn a Grade II Listed Building on the College's eastern boundary and the Cottages and Gateway, again Grade II Listed and located to the west of the house forming the entrance to the gardens.
- 1.9 The current layout of buildings on this campus site are largely contained to either the east or west of the site with the church in the centre and a large open field to the front of the site, bordered by Wales Farm Lane to the west and the eastern vehicle access which later gives way to a Public Right of Way (Footpath Plumpton 17).
- 1.10 The area benefits from a well developed network of rights of way and indeed public footpaths run east-west across the site in front of St Michael's church and continue north-south around the church and through the site, meeting a north-south footpath that travels along the eastern access to the village of Plumpton Green, approximately 2.5km north of the site.

2. Relevant Planning History

- 2.1 There is extensive planning history spanning the last 70 years and relating to new and extended teaching accommodation, animal facilities, workshops and offices, as well as parking, residential accommodation and signage. The most relevant is the pre-application discussion which began in 2016 (see below):
- 2.2 SDNP/16/04980/PRE - Development of master plan for new, replacement buildings on college campus and college farm. Plus provision of improved access to main campus, revision to parking facilities and sports and recreation facilities. Pre-application advice given 27th November 2017.
- 2.3 The feedback provided to the applicant emphasised the importance of understanding and appreciating the college as seen from the adjacent escarpment; the need to demonstrate a landscape-led approach in producing a master plan which considers surrounding heritage assets, historic landscape context and quality of the spaces around buildings. Within this framework, advice was provided regarding built forms, multifunctional open landscape areas, roofscapes, car park layout and road hierarchy.
- 2.4 The landscape-led Masterplan and Landscape Strategy which came out of these pre-application discussions forms the basis for this hybrid planning application.

3. Proposal

- 3.1 The application proposes additional and replacement campus buildings, alterations to the two accesses from B2116 Ditchling Road, car parking and alterations to the internal road circulation which would be carried out over a number of phased development stages.
- 3.2 The application is a hybrid application: part full planning application and part outline. The full planning application element occurs in Phase 1. The outline element relates to phases 2, 3 and 4 and considers access and layout, with scale, landscaping and appearance being reserved matters and requiring the submission of additional details in the future.

3.3 The details of the development proposed are explained below, but broadly speaking the proposals fall into 4 phases depending on the College's priorities:

- Phase 1 (full planning application) – high priority to be delivered within a year;
- Phase 2 (outline)– high-medium, delivered in 1-3 years;
- Phase 3 (outline) – medium-low, delivered in 2-5 years;
- Phase 4 (outline) – low priority, delivered in 5-7 years.

Full Planning Application (Phase 1)

3.4 Full planning permission is sought for the following:

- Agri-Food Hub building (site 7): replacing an area of existing polytunnels, to the north of the horticultural design centre. The two story building proposed is designed to create a gateway and reception centre for meetings and events, a business development centre and demonstration facilities. A mono pitched, green roof will span the building, which takes advantage of the changes in level, with the single storey form facing south and the more visually dominant elements of the two storey form facing north. The principal elevation and entrance face north into the site with a maximum building height of 10.5m reducing to approx. 5.5m to the rear (south) facing.
- The materials used in the external construction of this building would include local stock brick, corrugated agricultural panels in light grey, with other elements of flint cobbles feature panels and cedar vertical cladding.
- In addition, a small building housing a centralised heating plant (CHP) providing heat for the Agri-Food Hub building is proposed to be located on the other (west) side of the service road. This would be a single storey building with mono-pitch 'green' roof with height ranging from approximately 5m to 6.2m. The total floor area for the two buildings is 2,083sqm.
- New main car park: The construction of a new main campus car park and associated internal access on the site of the former piggery. This car park will provide 205 car parking spaces including 4 disabled spaces. The landscaping here would include hedges and trees and would be multifunctional, addressing water management, providing mitigation for visual impact, particularly from higher vantage points, and providing opportunities for biodiversity net gain and climate change adaptation. This main car park would allow a number of ad hoc car parking areas sporadically sited around the campus to be removed.
- New Pig Unit (site 8): New specialist pig unit to serve Lambert Farm to replace the existing piggery being demolished to make way for the main car park. The new unit would comprise three shallow pitched roof buildings featuring retractable fabric panels to allow for cross-ventilation above pre-cast concrete panels. The heights to apex range from approximately 5m to 6.6m. As a comparison, the adjacent straw/machinery barn at Lambert Farm is 9.5m. The new buildings have a total floor area of 2,411sqm resulting in a net gain of 592sqm following the demolition of the existing unit.
- Alterations to the existing western access include road widening at the junction with the B2116 (from approximately 17-18m to approximately 25m) to improve visibility and the two-way flow of traffic which includes coach/bus and other large farm vehicles. The existing footways will be extended into the site and resurfaced. Tactile paving and dropped kerbs will be installed at the entrance. The work also includes some regrading work at the site's entrance to improve the gradient on approach to the Ditchling Road which will result in the loss of some hedgerow, however a replacement indigenous hedge would be provided. The works at the junction would be the subject of a Section 278 Agreement with the Highway Authority as they relate to the adopted highway.

- Moving further north into the College, it is proposed to widen Wales Farm Lane to 6m in order to provide a 1.5m pedestrian path on one side. Where this results in the loss of existing planting - principally where it forms front boundaries with the College's residential properties – replacement indigenous hedges are proposed.
- The Village Green is intended to be a landscape hub which links the two sides of the college. It is intended to create a visual focus that will be an integral part of the green swathe running north-south through the College. It comprises a low-level landscaped amphitheatre which takes advantage of the level change (sloping south west to north east) to create seating of CorTen steel risers, grassed between, which feather into the existing ground levels. The intention is that this area will create an outdoor space for events, teaching and demonstrations, as well as an area for open days and sports events.

Outline Planning Application

- 3.5 The outline part of the application comprises new and replacement buildings and alterations to access, circulation and parking. These outline elements are to be considered in terms of access and layout with all other matters reserved. Details of the outline aspect of the proposal are as follows:

Table 1: Development in Outline

Site	Proposal	Phase
1 – Main College Building	New east wing to provide additional student residential accommodation and office space. Additional floor space 425m² <ul style="list-style-type: none"> - 14 one-person student bedrooms for students with specific accommodation needs or safeguarding requirements - 100m² of office accommodation to allow larger groups of staff to work together more efficiently - Two storeys - Design to match the detail and scale of the existing building 	2
2 – Main College Building	Extensions and alterations to the eastern element of the main college building, to provide additional student accommodation, and new entrance hub and forum. Total additional floor space 215m² <ul style="list-style-type: none"> - Two storey extension - 5 student bedrooms 	3
3 – Main College Building	First floor extension to the rear of the main building to provide student bedrooms and 3 storey wing to the northern end of the hostel to provide staff accommodation. Total additional floor space 408m² <ul style="list-style-type: none"> - 5 student bedrooms - 12 x 1 person en-suite staff bedrooms 	3
4 – New Student Accommodation Block	A new building to provide 27 student bedrooms and 3 staff flats on the site of the existing Caretakers bungalow. Total additional new floor space 1261m² <ul style="list-style-type: none"> - 27 one-person student bedrooms - 3 x 1 bed staff flats - 3 storey block - Proposed to be a landmark building with bespoke design 	3

5 – New Staff Accommodation	<p>Construction of two new pairs of semi-detached dwellings following the demolition of a pair of existing semi-detached staff cottages located on the western side of Wales Lane. This element has been amended during the application process to reduce the footprint and scale. Total additional floor space 277m²</p> <ul style="list-style-type: none"> - 4 x 2 bedroom staff dwellings 	4
6 – New Staff Cottages	<p>4 new staff cottages north of existing cottages on the western side of Wales lane (to the north of site 5). Total floor space 436m²</p> <ul style="list-style-type: none"> - Two storey dwellings - Two pairs of semi-detached dwellings - 4 x 2 bedroom dwellings 	4
9 – Forestry Training Facility and Horticulture	<p>A new forestry training facility and horticulture unit with secure storage facility for agricultural vehicles and equipment. Total new additional floor space 1350m²</p> <ul style="list-style-type: none"> - Seeking to move the vehicle and storage facility away from the central campus - A new northern perimeter road will link this site to the tractor training and forestry practical area. - Single storey pitched roof buildings with a maximum ridge height of 8 metres 	4
10 – Replacement Sports Hall	<p>New sports hall to replace the existing which will be demolished under these proposals (site 13) and to provide enhanced facilities. To be located to the north of the equine unit, close to the sports field to the east. Total additional floor space 2150m²</p> <ul style="list-style-type: none"> - Largely single story with mezzanine element - Max height 10-12 metres - Proposed to be a landmark building with bespoke design 	3
12 – Replacement indoor riding school	<p>Replacement indoor riding school on the same site and on the same footprint as the existing and the provision of a new equine outdoor arena to the west of the stables.</p> <ul style="list-style-type: none"> - Similar size as the existing building - No additional floor area 	4
13 – New Lecture Suite	<p>New student forum/hub, new library and tiered lecture theatre, refectory and entertainment facilities on the location of the existing sports hall. Total additional floor area 307m² (Sports hall to be demolished 993m² new building 1300m²).</p> <ul style="list-style-type: none"> - Two storey building, max 12m ridge height - Existing library in the west wing of main building will be converted to offices - Proposed to be a landmark building with bespoke design 	4
14 – New Student Accommodation Complex	<p>A new student/staff accommodation complex providing 40 student bedrooms and 4 one-bedroom staff flats. Located to the west of the existing workshops and site 16 and to the east of the new village green. Total additional floor space 1400m².</p>	4

	<ul style="list-style-type: none"> - Two storey accommodation blocks - Used to accommodate HE students studying full time - En-suite accommodation but cooking and dining facilities will be shared with the main campus 	
I5 – Addition to the Veterinary Nursing Centre	A new extension to the south of the existing animal care centre, to provide additional surgery facilities and practical areas. Total additional floor space 520m²	2
I6 – A New Design Centre	<p>New design centre, workshops and forge from the replacement and adaptation of an existing single storey workshop building to provide a new specialist engineering and electronics teaching complex. New building 750m², 457m² building to be demolished. Total new floor space 293m²</p> <ul style="list-style-type: none"> - To maintain agricultural machinery and other types of vehicle - Single story building proposed - Will adjoin existing workshops 	2

Access and Car Parking

- 3.6 In addition, Phase 2 of the development would include alterations to the eastern access arrangements, similar to that of the west, with road widening, providing a pedestrian footway and improvements to the existing bus stops on both the north and south side of Ditchling Road adjacent to the east access. A S278 Highways agreement will cover these works, secured through the S106 agreement.
- 3.7 A proposed Estate Road to carry coaches and the public bus along the site's frontage avoids the need for these larger vehicles to enter more deeply into the campus. This would operate on a one-way system entering the site from the existing west access and leaving via the existing east, with pickup/drop off along the southern portion of the site around Front Field. To the northern part of the site, a northern perimeter road for agricultural vehicles is proposed together with a new attenuation pond.
- 3.8 The application also proposes new and rationalised parking arrangements which seek to address the current situation where a number of small, ad hoc parking areas exist across the site. In total 585 parking spaces will be provided compared to an existing 428 spaces. The main campus car parks will be car park 7 (the details of which fall into Phase 1 Full planning element above) and an extension to the existing car park on the eastern side of the campus. The rationale is to focus parking away from the more sensitive areas of the site (for example at the front of the College) and further separate cars and pedestrians. The outline application also seeks to increase the cycle parking provision on site with an increase of 3 cycle stores, although exact numbers of cycle parking spaces have not been provided; this would be covered by future reserved matters applications.
- 4. Consultations**
- 4.1 A summary of the consultee responses that have been provided on this planning application is given below.
- 4.2 **Environment Agency** - No objection:
- suggest an informative to advise the applicant that the drainage arrangements may require an environmental permit.

4.3 **Historic England – Comment:**

- Historic England do not have concerns in principle regarding the masterplan and the works proposed. Plumpton Place and its garden are screened from the agricultural college by a dense area of woodland, and so the proposals in the masterplan would have a limited impact through changes to their setting. Moat Barn is situated on the edge of the campus, adjacent to the main college building and site, however they do not think that the extension to the main college building would have a great impact on the significance of the barn through changes to its setting, provided that the extension is sensitively designed.
- Site 14 is new student accommodation of four, two storey blocks overlooking a re-developed village green which would include enhanced views to and from the church. Historic England do not have concerns in principle regarding the construction of new accommodation in this location or to the landscaping to provide a village green. However, the design of both the buildings and the green would be critical to the success of this, to ensure that the significance of the church is not harmed through changes to its setting.

Updated comments following the provision of additional information in respect of Village Green:

- Historic England note that the sections provided indicate that the slope and steps fall over a relatively small height of c.2.2m. This would appear less dramatic than previously envisaged and less harmful in character to the significance of the church. This addresses much of their previous concerns in this regard, notwithstanding that the requested visualisations have not been provided. Historic England note that the latest landscape report states that existing secondary planting to the north of the church would be thinned to allow selective views in and out. This could impact on the Church's sense of tranquillity and isolation. Historic England wish to better understand what is proposed to be removed [in terms of vegetation] and note that this needs to be carefully managed as to not impact on the isolated character of the church, which contributes to its significance. It is noted that if the LPA is minded to approve this application this aspect could be managed by condition.

Officer note: The applicant's landscape specialist has confirmed there will be no thinning of the landscaping surrounding St Michael Church and this can be controlled through condition.

4.4 **ESCC Ecology - Initial objection – pending further ecological surveys:**

- Scheme will result in more than 10% biodiversity net gain;
- Accepted that potential for reptiles to be present on site is reduced;
- Presence of Great Crested Newts on site is unlikely, no mitigation required;
- Dormice are unlikely to be impacted by the Phase I works, additional surveys required for later phases;
- Proposed mitigation for birds (including those of the Red and Amber list) and for loss of habitat for species throughout the development is acceptable.
- Further clarity/information is required in respect of bats, including emergence/re-entry surveys;
- Clarity sought regarding the statements concerning the Forest Schools building in the reports;
- Further information/clarity required where bat roosts have been confirmed or identified as having potential, including St Michaels Church, Main College Building, Plumpton Place.
- Additional surveys required for trees identified as having moderate or high bat roost potential.
- A European Protected Species Licence will be required if roosting bats are confirmed in a tree to be lost.

Officer note: Following a meeting in July with officers, the applicant and county ecologist, it was agreed that sufficient information was available for roosting bats but that further survey work for bat activity should be undertaken in July/August including static detectors and building on the survey work already carried out. Subsequent surveys should also follow in September/October. A Biodiversity Method Statement will be produced which would also include mitigation/precautionary measures for i) badgers, ii) buildings with bat roost potential (but no evidence of bats) and iii) details of soft felling for trees.

- 4.5 **ESCC Highways** – No objection subject to the following points being addressed at this stage and/or provided at reserved matters stage:
- Internal new coach/public bus access details and route to be provided
 - Road Safety Audit on proposed access arrangements for both access points onto the B2116 together with appropriate Designers Response as necessary.
 - Satisfactory on-site parking in accordance with ESCC's parking guidelines
 - Satisfactory on- site turning area.
 - Details of highway improvements to provide suitable pedestrian links from the site to include extension to/widening of existing footway/s from site accesses to connect to improved bus stops on the B2116.
 - Suitable uncontrolled crossing point/s on the B2116 to reach bus stops.
- 4.6 **Lead Local Flood Authority East Sussex County Council** - No objection in principle, subject to conditions.
- Note that the applicant is unable to undertake infiltration testing at this time and advise that the revised drainage strategy, which excludes the use of infiltration systems, is acceptable in principle.
 - Whilst information has not been provided in respect of a 'network' model of the hydraulic calculations, the Lead Local Flood Authority note that in this instance, given the available space on site to increase attenuation storage if necessary, this issue can be addressed through conditions.
- 4.7 **Lewes District Council Flood and Water Management Team** – No objection:
- following the submission of an amended drainage strategy, no objection subject to conditions. It has been recommended that a condition be added regarding infiltration features within the chalk catchment area.
- 4.8 **ESCC Archaeologist** - No objection subject to conditions:
- Archaeological remains survive within the Phase I development sites and further targeted archaeological investigations will now be required and are controlled by condition.
- 4.9 **Environmental health** – No response:
- comments from pre-application engagement recommended conditions regarding site investigation, remediation and verification in respect of contaminated land, a condition relating to the removal of asbestos, and the submission of a CEMP (Construction Environment Management Plan).
- 4.10 **Lewes District Council** - No objection.
- The Council consider that a robust Travel Plan will be required along with future monitoring. The Council also request that a renewable energy scheme is secured, and that energy usage is considered across the development as a whole.

4.11 **Design Review Panel:**

Design Review Panel involvement was provided through a series of meetings and workshops at pre-application stage. Key points raised at pre-application stage were as follows:

- A master plan is required which considers the spaces, the relationship to the grade I listed church as well as the nature and quality of the routes between the buildings.
- The masterplan should incorporate an appreciation of the college as seen from the escarpment and include a clear idea of the quality of spaces formed by the collection of buildings.
- Landscape led character areas should be demonstrated which set a vision for these areas with building and landscape/public realm typologies
- The landscape setting is vital to the College. The proposal should incorporate an understanding of the landscape context and how the heritage assets sit in the landscape
- The roofscape should be considered as part of the landscape and should contribute to the sense of place
- The parking should be dispersed and prevented from dominating the site.
- A strong strategy for the roads and their hierarchy is required. The detail of the roads is an important element and can be used to support landscape character
- Internal routes, green spaces and the structure of the landscape strategy should reflect the wider landscape and historic character whilst also being functional and reflective of the varying uses of the college.
- The concept of a village green at the heart of the college was supported. The green swathe though the middle of the site was considered to be a vitally strong element
- Water management should be considered as part of the landscape strategy
- Roads should follow contours but strike a balance between concealing development, complementing the landscape and retaining their function
- Information should be submitted regarding the renewable energy strategy

4.12 **Design Officer** - No objection subject to conditions.

- Full application element: The Agri-food hub - the use of flint feature walls at ground level is welcomed; they introduce a (locally) distinctive material and add visual interest, also welcomed is the use of locally-sourced bricks for external walls.
- Details should be secured by condition to include rainwater goods and proposed green roof.
- The supporting information sets out expectations for climate change and the sustainable use of resources for the proposed building but it does not specifically detail BREEAM standards or specific credits, nor does it specify SAP calculations for emission and efficiency rates. This will need to be addressed by condition.

4.13 **Historic Environment** - No objection:

- The masterplan is considered to form a sound base for the future development of the campus and the plan is considered to show clear regard for the setting of the listed church.

4.14 **Landscape** – Neutral:

- The application has been driven by a strong Landscape Strategy and the overall aims of the masterplan are supported in landscape terms. However, the application documents themselves have been difficult to navigate and the landscape-led approach set out in the

masterplan has been somewhat lost in translation as details have been pulled together. The approach really needs to continue all the way through the application to final details.

- A number of comments were made in respect of planting but it was acknowledged that these matters could be satisfactorily dealt with by conditions. Concern was also raised in respect of lighting and with regards to the scale and hierarchy of the roads.
- In respect of eco systems services, concern was raised that the information submitted does not fully meet the criteria of policy SD2 and that opportunities have been missed to demonstrate how the scheme could deliver multiple benefits.

Officer note: a DEFRA Metric calculation has since been provided which demonstrates an increase above 10% biodiversity net gain as required by Policy.

4.15 **Dark Night Skies Officer – comment:**

- There is an obvious regard for dark skies in all aspects of their development, and it's refreshing to see that the applicant is proposing to use shutters/blinds on the piggery. These are important sources of light that are quite difficult to control, so the intention to update these facilities in a way that would render the internal light spill to zero is welcomed.
- As for the car park; the lighting layout is acceptable. The illuminance is appropriate as are the fittings as they shed the right level of light and they are the right CCT colour (which is very important in this area).
- So long as all external lighting follows our technical advice note (which it appears to do in the lighting plan), then this would be acceptable. Given the existing footprint of the site, I would estimate that upgrading to more efficient luminaires will reduce their overall impact.
- While it is welcomed that the lights will only be on when required and subject to curfew it would be good to know the intended time of use. For example, how long will the car park light be required for? Is there a 'need' for late night use or off at an earlier time? While this is to be addressed in the later design, I would recommend that lights are curfewed as early as possible – or that smart switching (e.g. turning parts of the car park off) be used.

4.16 **Plumpton Parish Council – Support:**

- The Parish Council consider that the application is in line with Plumpton Parish Neighbourhood Plan policy 8 and support the application.
- It is noted that the application also gives support for a cycle path to connect Plumpton Railway station with the College which is included in the Neighbourhood plan.
- The Parish Council raise concern regarding the current speed limit of the B2116 and request that consideration be given to reducing the limit from Streat Lane to Plumpton Lane.

5. **Representations**

5.1 Letters of objection have been received from 2 separate households raising the following concerns:

- Current lack of traffic calming and speed restrictions;
- Concern regarding the impact to the rural location and entrance to the registered park and garden as a result of the alterations to the access and roads;
- Impact to the amenity of the occupants of Plumpton Place;
- Concern regarding the existing drainage adjacent to the driveway of Plumpton Place;

- Concern that the impact to the setting of Plumpton Place and the associated listed barn and registered historic park and garden have not been appropriately considered;
- Concern regarding a lack of prior consultation with the occupants of Plumpton Place;
- Concern regarding the additional and replacement buildings close to the boundary and the impact to Plumpton Place, Moat Barn and their settings;
- Concern that the significance of Moat Barn is not fully understood;
- Concern regarding ecology and the roosting potential of Moat Barn.

5.2 One letter of support has been received raising the following points:

- The importance to the local community of the development of the college and its increasing integration with the local community;
- The college management is well regarded and appreciated locally.

5.3 Letters have been received from 2 separate households commenting on the application and neither supporting nor objecting but raising the following points:

- Concern regarding the scale of development to the west of the campus, particularly site 5;
- Comment regarding the visibility of the existing roofing material for the winery;
- Concern that some of the estate may be disposed of to pay for the proposals;
- Impact of the proposals, including hard landscaping on the rural character of the B2116 and request that the entrance/road works minimise urbanising effects;
- Query regarding the new pedestrian crossing;
- Request for Streat Parish Meeting and Streat Ridge Residents Association to be consulted;
- Concern regarding the impact of lighting to views and dark skies;
- Concern regarding the impact to existing views as a result of the new buildings.

6. Planning Policy Context

6.1 Applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The statutory development plans are the **South Downs Local Plan 2014-33** and the **Plumpton Neighbourhood Development Plan 2017-2030 adopted on 12th April 2018**. The policies of most relevance are set out 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 National Planning Policy Framework (NPPF) dated 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.

- 6.4 The NPPF has been considered holistically in the determination of this application, although it is considered that the following sections are of particular relevance:
- Section 2: Achieving Sustainable Development
 - Section 4: Decision-making
 - Section 6: Building a strong, competitive economy
 - Section 8: Promoting healthy and safe communities
 - Section 9: Promoting sustainable transport
 - Section 12: Achieving well-designed places
 - Section 14: Meeting the challenge of climate change, flooding and coastal change
 - Section 15: Conserving and enhancing the natural environment
 - Section 16: Conserving and enhancing the historic environment
- 6.5 In addition to the above, it is considered that paragraphs 7, 8, 10, 11, 47, 48, 83, 84, 91, 98, 102, 103, 127, 131, 148, 163, 170, 172, 175, 184, 189, 192, 193, 194, 196 and 197 of the NPPF are particularly relevant to the determination of this application. Of these, paragraphs 189 - 192 require the SDNPA to identify and assess the significance of heritage assets and to take account of the desirability to sustain and enhance this significance.
- 6.6 At paragraph 192, the NPPF states that when determining planning applications that affect heritage assets, Local Planning Authorities should take account of;
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable use consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 6.7 Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting; and (paragraph 194) where the proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, Local Planning Authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefit that outweigh that harm or loss; or (paragraph 195) where the proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- Town and Country Planning (Listed Building and Conservation Areas) Act 1990
- 6.8 Section 66 of the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 is also relevant. It relates to the grant of planning permission and states “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”.
- Major Development
- 6.9 Officers are of the view that the proposal does not constitute major development for the purposes of paragraph 172 of the NPPF (2019). Accompanying footnote 55 advises 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.

7. Planning Policy

7.1 The planning policies of the South Downs Local Plan (SDLP) of most relevance to the assessment of this application are:

- SD1 - Sustainable Development
- SD2 - Ecosystems Services
- SD4 - Landscape Character
- SD5 – Design
- SD6 - Safeguarding Views
- SD7 – Relative tranquillity
- SD8 - Dark Night Skies
- SD9 - Biodiversity and Geodiversity
- SD11 - Trees, Woodland and Hedgerows
- SD12 – Historic Environment
- SD13 – Listed buildings
- SD16 – Archaeology
- SD17 – Protection of the water environment
- SD19 – Transport and accessibility
- SD21 – Public realm, highway design and public art
- SD22 - Parking Provision
- SD25 – Development strategy
- SD34 – Sustaining the local economy
- SD42 – Infrastructure
- SD43 – New and existing community facilities
- SD45 - Green Infrastructure
- SD48 – Climate change
- SD50 - Sustainable Drainage Systems

7.2 The following key policies of the Plumpton Parish Neighbourhood Development Plan (NDP) are considered of most relevance to the assessment of this application and these policies are also considered to be compliant with the more up-to-date Local Plan and the NPPF:

- Policy 2: New-build environment and design
- Policy 3: Landscape and biodiversity
- Policy 4: Sustainable drainage and wastewater management
- Policy 8: Plumpton College

The South Downs National Park Partnership Management Plan

7.3 The Environment Act 1995 requires National Parks to produce a Management Plan setting out strategic management objectives to deliver the National Park Purposes and Duty. National Planning Policy Guidance (NPPG) states that Management Plans “contribute to setting the strategic context for development” and “are material considerations in making decisions on individual planning applications”. The South Downs Partnership Management Plan, as amended for 2020-2025 on 19 December 2019, sets out a Vision, Outcomes, Policies and a Delivery Framework for the National Park over the next five years. The policies of most relevance here are numbers 1, 2, 3, 4, 5, 6, 9, 11, 15, 24, 25, 28, 35, 39, 50, 45 and 56.

8. Planning Assessment

8.1 The main issues for consideration are:

- Principle of development;
- Landscape character and visual impact;
- Dark Night Skies;
- Effect on heritage and archaeological assets;
- Impact on ecology;
- Highway safety;
- Residential amenity;
- Sustainable construction

8.2 The design of the scheme is considered within each of the above sections. This is in line with the landscape-led and ecosystem services policies of the Local Plan.

Principle of development

8.3 The over-arching aims of the proposal are to replace older building stock and the ad hoc development which has occurred organically over the site's history, with modern facilities which are well related to each other and which reflect the changes in agricultural practice and the increasing use of relatively sophisticated technology. The proposal seeks to improve vehicle and pedestrian circulation around the campus, and to improve the environmental infrastructure – including water and energy conservation, improved drainage, Green Infrastructure (GI) and landscaping.

8.4 The principle of the development is considered to be acceptable and the aims of the proposal are considered to be in line with the purposes and duty of the South Downs National Park. Local Plan Policy SD34 (Sustaining the Local Economy) in particular seeks to support development proposals which protect businesses linked to the National Park's key sectors of farming, forestry and tourism and which provide flexibility for established businesses to secure future resilience and protect local jobs and encourage closer ties between rural businesses. The College plays an important role in the local economy and the economic and social well-being of local communities.

8.5 The application is supported by a Landscape Strategy and Design Codes which are intended to guide the campus towards a more coherent layout in terms of architecture and urban design, set within a landscape-led approach. It is submitted along with an Ecosystems Services Statement in accordance with Policy SD2.

8.6 Through a series of consultation exercises and negotiations with officers, the proposal has followed a landscape-led approach, which has secured a strong landscape strategy and provides numerous benefits throughout the scheme's design, taking into account the site's sensitivities as well as the needs of the college. On this basis, it is considered the proposal complies with the requirements of policies SD4 (Landscape Character) and SD5 (Design).

Landscape character and visual impact

8.7 The college campus is made up of three separate character areas which are linked by public routes through the site. Two routes run north-south, perpendicular to Ditchling Road, through the site and typically buildings 'hang' off these routes. The west side is typified by more practical, functional agricultural buildings and the east is more typically education institution in character. The central part of the site is open in character with St Michael's and All Angels church at its centre and open green areas to the front and rear extending to the northern site boundary. The central area (which will be the site of the new village green) currently comprises a collection of small scale, ad-hoc buildings and hard surfacing associated with a small car park and tractor training area.

- 8.8 The church has a setting which is crucial to its own historic character, enclosed by a landscape strip which includes mature trees and with a public right of way which runs east west along its frontage. Combining the three character elements is fundamental to the delivery of the scheme and key to the landscape strategy.
- 8.9 The development strategy was designed through a series of workshops with the Design Review Panel and officers and led the applicant to aim to respect the 'H' form of development when viewed on plan. New buildings are focussed within the existing built form areas and the open spaces to the north and south of the church are strengthened and given new purpose, whilst conserving the setting of the church. Pedestrian and vehicular routes linking the two sides of the college have been rationalised, so that the various users (students/visitors/agricultural traffic) have clear, legible routes that respect the linear character of the site.
- 8.10 These proposals are set within a comprehensive planting framework including the new village green, swales and attenuation pond in the centre of the site, creating a cohesive GI link, contributing to biodiversity gain across the college campus and respecting and conserving the setting of the church.
- 8.11 The South Downs escarpment rises to the south of the site and is visually dominant. The view from the South Downs Way atop this escarpment takes in the whole site and it is from this vantage point that it is possible to appreciate the 'H' form described above. The site is well contained within this form between the access roads east and west.

The Full Element Phase

- 8.12 The full element of this planning application relates to Site 7 The Agri-Food Hub, with adjacent car park and 'village green' and site 8, the New Piggery. A full description of these elements is provided in section 3.4 above. All other elements are in outline, with only layout and access falling to be considered here.
- 8.13 Site 7, The Agri-Food Hub, is to the west of the campus and directly north of the existing Horticultural Unit. It is a two storey mono-pitch building which takes advantage of the change in levels here and reads as single storey from the south and two storey from the north. Its scale, mass and height are proportionate to other buildings on campus. Its contemporary aesthetic identifies it as a key landmark building, which is reflective of its function as a 'gateway' and reception centre for meetings and events, a business development centre and demonstration facilities. The building has a living green roof membrane system.
- 8.14 The Agri-Food Hub replaces a collection of single storey structures, a detached garage and poly tunnel. The new building would be set back into the site behind existing buildings to the south and will be read in context with the existing built form on the site. Views from the South Downs escarpment will be tempered by the building's green roof and the Winery, Animal Care Centre and Horticultural buildings in the foreground. This building is served by a small ancillary centralised heating plant (CHP) located to the west.
- 8.15 The existing piggery buildings will be demolished to make way for the new main car park directly north west of the Agri-Food Hub building. This location has been selected to provide a clear and simple arrival and parking strategy, which eliminates the need for visitors to delve further into the main college campus and avoids conflict with other non-motorised users.
- 8.16 This car park provides 205 spaces (including 4 disabled) and is laid out to represent smaller clusters of parking with room around and between for multifunctional planting which provides screening to minimise visual impact, lessen glare, and to provide biodiversity opportunities and improved GI and green connectivity around the campus.
- 8.17 The Landscape officer has raised concerns about the plant species selection illustrated on the supporting landscaping plans. Whilst on the whole, the car park design is considered to

be very positive, it is noted that the submitted planting scheme lacks larger native trees which provide benefits such as closed canopies (to mitigate visual impact and provide green corridors/biodiversity opportunities). This would be controlled by condition requiring the details of planting to be submitted and approved in advance by the Local Planning Authority.

- 8.18 Water run-off from the green roof of the Agri-Hub buildings, the car park and the permeable surfaces will drain via new swales into the attenuation pond at the north as part of improvements to the 'blue infrastructure' on site, in line with the submitted ecosystems service statement. The car park surface is permeable and run-off will first drain into subterranean storage tanks which will intercept and clean the runoff before being discharged to the swales and attenuation pond.
- 8.19 The new Village Green is located immediately east of the car park and Agri-Hub building forming part of the central green swathe along the north-south axis with the church at its centre. The Village Green is designed to be a landscape hub connecting the college campus as a whole by linking the two sides. The form of the village green is low level terracing, with natural seating areas created by Corten risers following the natural contour of the land as it slopes gently to the north east. This creates a natural 'amphitheatre' providing socialising space, outdoor teaching arena and space for open days and other outdoor events.
- 8.20 The comprehensive landscaping scheme links the village green with the development to the east and west and the green swathes north and south of the church and college. The gentle gradient of the grass surface associated with the Village Green will allow for surface water to be absorbed naturally, with excess storm water again being directed into the swales and attenuation pond to the north.
- 8.21 The village green will be screened from wider public view by the church and the existing planting surrounding it. Any glimpsed views will read as a part of the natural green swathe running through the centre of the site.
- 8.22 Staying with the full element of the planning application, a modern specialist pig unit is proposed at Site 8 to the northwest edge of the campus and to the rear of the existing modern agricultural buildings which make up Lambert Farm. The replacement pig unit comprises 3 modern, utilitarian, simple, shallow pitched units, the largest of which is Building A at 4.6m to eaves and 6.6m to ridge. The location for the replacement pig unit to the rear of modern, much larger buildings, at Lambert Farm will help ameliorate any visual impact. Views from the north will be screened by the proposed structural landscape buffer, which will also provide a sense of physical and visual containment.
- 8.23 This hybrid application – both the full and outline elements - has been driven by a strong Landscape Strategy and Master Plan, which has been informed through consultation with the National Park through officer and Design Review Panel workshops. Each full element (Site 7 including the car park, Village Green and Site 8) is supported by their own Design and Access Statements, full landscape plans and detailed design drawings.

Outline element

- 8.24 A Design Code has been produced which sets out design principles and philosophies and covers the remaining outline elements (see Table 1: Development in Outline above). This document suggests that early consideration of the detailed design for the phase I work (the full element) has informed the design parameters for the different forms of development across the site as a whole and will influence future phases. In broad terms this includes consideration of scale and mass, design principles, roof forms and external materials.
- 8.25 Whilst this document is a broad brush approach to the remaining outline elements, it does mean the development has been considered as a whole and further details are provided by condition and as part of the reserve matters applications.

Dark Night Skies/lighting

- 8.26 The application is supported by a Lighting Strategy which identifies the site as a E1b Transitional Zone, outside the Dark Sky Core and buffer zone. However, this is a relatively large site in an otherwise rural location and therefore lighting is a key consideration.
- 8.27 Comments from the Dark Night Skies officer acknowledges the regard for dark skies in this proposal. The use of shutters/blinds on the piggery buildings is supported as is the car park lighting layout.
- 8.28 In terms of lighting curfews, the Lighting Strategy sets out the complex nature of the site which includes the livestock farming enterprise but also suggests curfews can be imposed on other non-critical parts of the site. A requirement to submit further details of lighting appropriate to each phase of the outline development would be required by condition.
- 8.29 In terms of the full planning element - Sites 7 and 8 including car park 7 and the village green - it is considered appropriate to request additional lighting details also by way of condition. These details should include the curfew times, anticipated late-night use and smart switching considerations.
- 8.30 The original drawings for Car Park 7 layout (3219/CP/PI) and Village Green (3219/VG/PI) illustrate a number of 5m high lampposts, which do not form part of the submitted lighting strategy and are not supported in this sensitive location. Lampposts have subsequently been withdrawn from the scheme and amended plans provided.

Effect on heritage and archaeological assets

- 8.31 Heritage and archaeological assets have been identified on and adjacent to the site including St Michael and All Angels Church a Grade I listed building at the centre of the campus, Plumpton Place a Grade I* listed building and Registered Park and Garden along with its ancillary Moat Barn, a Grade II listed building, on the adjacent site to the east. The potential for archaeological remains to be present on site has been identified through a series of archaeological reports submitted during the process of this application and in consultation with the County Archaeologist.
- 8.32 The church has been of key importance throughout the design and master planning process, and, as set out in the LVIA, it has been the centre of focus when dealing with building hierarchy to ensure its setting has sufficient 'space' to remain an iconic and visible heritage asset.
- 8.33 The Agri-food Hub is located to the north west of St Michael and All Angels Church. It is to the rear of the existing buildings on the west side of the church with its principle elevation facing north. It remains subordinate in height taking advantage of the change in levels. The church benefits from dense tree screening along its east, north and the majority of its west boundary. This screening will be bolstered as part of the landscaping for the new village green, a soft landscaped green which provides some informal seating in the style of a natural amphitheatre using the contours on site.
- 8.34 Plumpton Place is a Grade I* listed building and Registered Park and Garden, whilst the adjacent Moat Barn and Cottages and Gateway are Grade II listed. Historic England notes in its consultation response that Plumpton Place "derives much of its significance from its historical and illustrative value as a post-medieval manor house which was extensively re-modelled by Lutyens.... its associated gardens were laid out by him and Gertrude Jekyll, and the combined whole of the house set within its designed garden makes Plumpton Place of particular interest."
- 8.35 Letters of objection have been received from Plumpton Place raising concerns that heritage assets including Plumpton Place, its Registered Park and Garden, Cottages and Moat Barn have not been given proper consideration. The concerns range from access, circulation, parking and infrastructure alterations and impact on residential amenity (the latter is dealt

within the section below).

- 8.36 The proposal has been amended in response to these comments and the eastern entrance driveway drawn further away from the pillars at the entrance to Plumpton Place and the surface re-graded with an interception swale to the front of the main college building to deal with surface water drainage.
- 8.37 Historic England and officers have considered the impact of the proposals on heritage assets including Plumpton Place, its gardens, the Moat Barn and Cottages and Gateway, and these assets have been explored within the submitted application documents including the LVIA, Planning Statement and supporting Noise Assessment. Taking all the advice into consideration it is considered that the proposals will not harm these designated heritage assets. Plumpton Place, the Cottage and Gateway are screened from the college by an existing area of woodland therefore the proposal will have little impact on setting. The Moat Barn is set on the edge of the campus and the alterations adjacent to the main building and Site 1 will not impact on the significance of the barn's setting. The backdrop to these buildings would historically have been agricultural fields, and therefore the historic setting has already been considerably altered by the existing college buildings.
- 8.38 It is acknowledged that in terms of the Moat Barn, sites 1, 3 and 4 (outline development falling into Phases 2 and 3 and subject to further approval under Reserved Matters applications) may be visible from its setting edge, however, given these works are to extend or replace existing buildings, respecting existing heights and scale, and are confined to the eastern access road which separates the built form from Plumpton Place and the Moat Barn, it is considered that these elements will not materially affect or harm the setting of these Registered Heritage assets, or their residential amenities. This view is shared by Historic England.
- 8.39 An initial desk based archaeological assessment submitted with the application identified high potential for archaeological deposits with the site. During the progress of the application a Written Scheme of Investigation was produced and with the agreement of the County Archaeologist the investigation work carried out with the results of this field work provided in the ASE Archaeological and Geoarchaeological Evaluation Report (report ref: 2019353).
- 8.40 These reports demonstrate that archaeological remains survive within the Phase 1 development area (the full planning element). Later prehistoric evidence was also located to the north of the church, and a possible medieval structure to the northwest of the church. Structural remains associated with the former Wales Farm were also encountered. In light of the potential for impacts to heritage assets of archaeological interest, it is appropriate to use conditions to secure an additional programme of archaeological works and additional investigation for each phase of development.
- 8.41 In assessing this proposal regard has been had to the NPPF 'Proposals affecting heritage assets' (in particular paragraphs 190, 192, 193, 194, 196) and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires planning authorities, when considering whether to grant planning permission for development which affects a listed building or its setting, to 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.
- 8.42 Where initial concern was raised by Historic England regarding the details of the village Green and thinning vegetation in close proximity to the church, these concerns have been overcome by the submission of sectional details and confirmation that not thinning will take place, respectively. Where the October 2019 Written Scheme of Investigation for Archaeological Trial Trench Evaluations has identified that archaeological remains survive in the Phase 1 area, this too can be satisfactorily mitigated for by the appropriate planning conditions.

- 8.43 Overall, and for the reasons given above, the proposal is not considered to cause harm to any heritage asset and it will preserve the setting of proximate listed buildings.

Ecosystems services and ecology

- 8.44 Policy SD2 requires development to have a positive impact on ecosystems services. The submitted Ecosystems Services Statement and Ecology and Landscape Collaborative Statement outline these multiple benefits, which include improvements to the 'blue infrastructure' through the introduction of swales and an attenuation pond in the centre of the site to deal with run-off, and also creating new open water and wetland habitat, providing benefits for ecology and educational purposes.
- 8.45 These proposals have been informed by a strong landscape strategy and planting framework which provides significant areas of new planting across the site, replacing areas of car parking and buildings. The planting strategy links the car park to the new village green and the green swathe to the north, creating GI corridors and biodiversity opportunities across the campus.
- 8.46 A separate report outlining the loss and gain in hedgerows and trees on site has been provided to consolidate information featured across the various landscape and ecology reports. The loss and gains for Phase I (full planning application element) is clearly known and detailed. This indicates that of the 53 trees being lost in this phase, 168 new trees are being planted. As for the later phases in the outline element, this report serves to provide parameters for each phase, the full details of which will be provided through later submissions where landscape is a reserved matter. This document does demonstrate that whilst there will be tree and hedgerows lost to the proposal this is mitigated for by significant amounts of additional tree and hedge planting.
- 8.47 The College is a leader in sustainable farming and food production, and its forestry and horticulture departments are ideally placed to manage its green environment.
- 8.48 Policy SD9 requires proposals to demonstrate that they have identified and incorporated opportunities for net gains in biodiversity.
- 8.49 An analysis of biodiversity gain/loss using the DEFRA Metric Tool has been carried out which initially indicates a 67% biodiversity net gain. However, this is caveated by the applicant's ecologist who advises that due to the scale and complexity of the site, this figure does not allow for tree and hedgerow loss against replanting. However, the county ecologist has confirmed that the proposed development would result in a biodiversity net gain in excess of the required 10%.
- 8.50 The application is supported by a suite of ecological surveys including amphibian, reptile and breeding birds reports, and Bat Roost Appraisals and Bat Activity Survey reports (and subsequent supplementary reports). At a meeting with officers, the applicant, their ecologist and the county ecologists it was agreed that sufficient information was available for roosting bats but that further survey work for bat activity would be undertaken in July/August, including static detectors, building on the survey work already carried out. Subsequent surveys would follow in September/October. The results of this work would be presented in a Biodiversity Method Statement.
- 8.51 The county ecologist accepts that it is unlikely that Great Crested Newts are on site. Avoiding the breeding bird period, plus the provision of 10 sparrow terraces and 11 house martin boxes, along with the creation of replacement habitat throughout the development and approximately 100 boxes of various types is acceptable mitigation for breeding birds.
- 8.52 It is accepted that most of the site is unsuitable for reptiles but the county ecologist wishes to see a precautionary approach to the clearance of any potentially suitable habitat which will be set out in a biodiversity method statement. This method statement will also cover additional surveys and include monitoring for badgers (to monitor a sett on site which appears to have been abandoned) and dormice as part of the later phases of development, together with the additional, agreed surveys for bats.

8.53 The Biodiversity Method Statement will also include mitigation/precautionary measures for badgers and buildings with bat roost potential (but no evidence of bats) together with details of soft felling for trees.

8.54 This application is recommended for approval subject to the submission of satisfactory additional bat activity survey information and the Biodiversity Method Statement, with any arising conditions being delegated to the Director of Planning.

Accessibility, highway safety and sustainable travel:

8.55 One of the overarching aims of this proposal is to improve public transport links to the College and the interaction between vehicles and students on campus. The proposal includes offsite highways works to provide a new bus stop and improvements to the existing bus stops adjacent to the eastern access, which will be secured through S106/S278 agreement.

8.56 Highway safety is improved by work to both existing junctions and accesses. Accesses will be widened to allow for 2-way traffic and new footways into the campus, and improved footway connections to the public bus stops on B2116. A new public bus stop will also be provided within the site on the Estate Road. A one-way system for the public bus and coaches within the site will also be introduced which removes the need for these larger vehicles to enter and manoeuvre further into the site to drop off/pick up.

8.57 The proposed Estate Road will run along Front Field, and as noted above, will cater for the daily coach and public bus service which serves the site. The Estate Road will operate a one-way system for coaches and the public bus, entering the site from the west and exiting from the east access. Outside peak drop off/pick up hours, the Estate Road will become a pedestrian access only with no right of access to other vehicles. However, some degree of flexibility is required to cater for the public bus, in particular to allow for lateness, altered timetables etc. This will require some form of bus control measure, the precise details of which will be secured through a S106 agreement in conjunction with the County Highways Department. Remodelled visitors and disabled parking will be provided to the front of the college which will form part of Phase 2.

8.58 The public bus currently services the site 3 times a day, entering and leaving via the eastern access which results in the need for reversing manoeuvres on campus, usually within the car park to the east. The Estate Road will overcome the need for coaches and the public bus to enter further into the site and the need for such reversing manoeuvres which represents a safety benefit of the proposals. The proposed Estate Road forms part of the outline application (Phase 2), the principle of such a road in this location is acceptable and more detailed information will be submitted through the subsequent reserved matters application.

8.59 Widening both of the site's existing vehicular accesses will allow 2 vehicles to pass at the site's entrance which, it is understood, has previously been an issue because of the nature of the college and farm traffic. The Wales Lane access improvements fall in Phase 1 and will require a Section 278 agreement, as will those access improvements to the east access which fall within Phase 2.

8.60 Despite earlier concerns that the works to improve the existing accesses at the college would result in the loss of vegetation to achieve desired sight lines, it has been demonstrated through submitted drawings that visibility can be achieved by managed cutting back, necessary only where the vegetation overhangs the highway.

8.61 The proposal includes new and rationalised parking arrangements, focussing the majority of parking in two primary areas: the main campus car parks will be car park 7 (the details of which fall into Phase 1, the full planning element) accessed from the site's west access and an extension to the existing car park on the eastern side of the campus on the site of an existing open riding arena.

- 8.62 A number of small, ad hoc parking areas are removed as part of this proposal whilst others located adjacent to existing buildings are retained. A total of 585 parking spaces will be provided compared to the existing 428 spaces.
- 8.63 Four bike stores (an increase of 3 stores) are shown on the supporting plans linked to 'bicycle traffic routes' through the site. The provision of these bike stores is linked to particular phases of the development. For example, bike storage is proposed adjacent to site 10 (New Sports Hall) and the extension to the eastern car park which all fall within Phase 3 of the development and form part of the outline application. Full details of all of the development in Phase 3 including the car and bicycle parking will be provided as part of future reserved matters applications.
- 8.64 The northern perimeter road for tractors/farm and forestry vehicles separates these larger vehicles from the internal road system and pedestrian and cycle traffic. This element falls within Phase 3, additional details will be provided through the reserve matters application. As a general comment, the proposal does not provide any real information on the road hierarchy proposed, however given the phased nature of the development additional information will need to be secured to cover these points.
- 8.65 As set out in the Plumpton Parish Neighbourhood Plan 2017-2020, there is an aspiration to connect the South Downs Way and the College to Plumpton Green village (and railway station) via a cycle way. Currently there is an existing permissive cycleway/bridleway running along the site's eastern boundary which is also a definitive public footpath. It is shown on the East Sussex Rights of Way iMap and terminates at the northern extent of college land. Not all of the requisite land to form this link, end to end, is within the College's control and the most northern section is in the control of third party landowners.
- 8.66 The College has confirmed its commitment to assisting in the further negotiations with all parties to secure the final route and its willingness to continue to work with other stakeholders to complete the path. The continued provision of the existing permissive cycleway/bridleway indefinitely for the use of cyclists and equestrians for the lifetime of the development will be secured through the S106 agreement.

Residential amenity:

- 8.67 The RF Environmental noise assessment concludes that the existing noise levels generated by the college are not likely to cause adverse impacts to Plumpton Place. The operation phase of the new East Wing extension is not considered to lead to adverse noise impacts and the main car park proposed to the west of the campus site and proposed in Phase 1 is likely to lead to a reduction in vehicles using the eastern access.
- 8.68 It is however acknowledged that the construction phase for sites to the eastern edge of the campus may present short term impacts to Plumpton Place and Moat Barn. These will be mitigated through a Construction Environment Management Plan required by condition.
- 8.69 Sites 1 – 4 are considered in outline and additional details for scale and appearance will be required as part of a Reserve Matters application. Given the separation distances between Plumpton Place and the existing (and proposed) campus building there is unlikely to be any material increase in overlooking. The existing Moat Barn is used for storage as evidenced by the photos in the Parker Dann letter dated 13th March 2020 and although there are a number of small casement windows in the west elevation these do not serve residential accommodation for which overlooking would be a consideration.

Sustainable construction

- 8.70 The supporting information sets out expectations for climate change and the sustainable use of resources for the Phase 1 full planning element (site 7 Agri-hub building) to comply with SD 48: Climate Change and the South Downs Sustainable Construction Supplementary Planning Document (draft 2020). This building is designed to achieved BREEAM Rating Excellent. The green roof is not only a visual enhancement in this sensitive location but also

contributes to reducing surface water run-off and provides additional insulation (as a low/zero carbon mechanism for controlling heating and cooling). The external fabric of the building will include insulated panels with a more traditional masonry cavity wall construction which will achieve a 'medium thermal mass' ensuring the building retains heat efficiently. Inside the building, water conservation would be achieved through flow restricting fittings.

- 8.71 Site 7 also includes a biomass Combined Heat and Power House (CHP) which the supporting Sustainability Statement has suggested will serve the Agri Hub building with heating and hot water and with the potential to connect to the existing Horticultural Centre which is currently served by oil-fired heating system. Site 8 (the new pig unit) is an open sided building for which a BREEAM rating is not applicable. However, it is proposed to install PV panels on the longer of the 3 buildings.
- 8.72 The car park 7 which falls within phase I includes 16 EV charging points and makes provision for additional future points by providing the necessary underground ducting to allow for future demand as it arises.
- 8.73 In terms of the outline element of this hybrid application, the submitted Sustainability Statement confirms that the new staff residential accommodation on sites 5 and 6 will comply with policy SD48 by meeting 19% CO2 reduction and water consumption of no more than 110l per day. The new student/staff accommodation (site 14) will achieve BREEAM Excellent, as will the proposed standalone Sports Hall (site 10), Lecture Suite (site 13) and student/staff block accommodation (site 4). The sites which are in effect extensions to existing buildings (for example the Main Building) are unlikely to meet 'Excellent' because of the requirement to respect the external appearance of the existing building and the limitations this then places on choice of materials. Notwithstanding this, it is anticipated that a BREEAM Very Good rating should be achievable.
- 8.74 The mechanisms for achieving the standards set out in Policy SD48, will be secured through planning conditions requiring design stage sustainable construction reports to be submitted and approved prior to commencement and requiring the subsequent submission of post completion reports.

Other matters

- 8.75 The site falls within Flood Zone 1 however the submitted Flood Risk Assessment identifies the potential for surface water flooding in the SE corner of the site associated with run-off from the steep sloping terrain to the south. To address this, an interception swale is provided to the south of the college main building along with cellular storage tanks which discharge to the existing storm system.
- 8.76 The drainage strategy seeks to use individual SuDS solutions for each phase of development alongside the existing drainage system. The drainage strategy proposes a combination of infiltration features, and attenuation where appropriate to the site's underlying geology. Following detailed discussions with the Lead Local Flood Authority, further intrusive site investigations, including infiltration testing, will be secured by condition.
- 8.77 Permeable surfacing replaces much of the existing hardstanding and the drainage information provided suggests this will perform similarly to greenfield conditions providing improvements over the existing runoff rates.
- 8.78 As evidenced by this report, the application has been submitted in full and outline to be phased over a period of 7 years. Given the extensive scope of the proposed works and the complex nature of the site as a FE college and working farm along with funding requirements, it is considered appropriate to agree to this extended phasing period. A development phasing plan that includes time scales for the submission of reserved matters applications and the commencement of each phase will be secured through a S106 clause

9. Conclusion

- 9.1 Plumpton College is a leading land based education centre in the UK which has grown organically over the years and outgrown many of the associated teaching and farming buildings. This proposal seeks to improve the physical built form and layout, access to the site via public transport and circulation around the campus for both pedestrians and vehicles. These improvements are set within a landscape master plan which also includes improvements to the environmental infrastructure – landscaping, biodiversity, water and energy conservation.
- 9.2 The scheme will secure a number of benefits including involving the sustainable construction of new buildings, public access and transport improvements, landscape connectivity, GI and biodiversity.
- 9.3 Set against the backdrop of a strong landscape led approach to design, the details in some areas do need securing through appropriately worded conditions. Where this relates to landscaping and lighting it has been necessary to use pre-commencement conditions as these elements are considered to go to the heart of the permission.
- 9.4 Overall and based on the above assessment, it is considered that the proposal would accord with the South Downs Local Plan 2019 and Plumpton Parish Neighbourhood Plan (2017-2030), relevant National Planning Policy Framework policies and the South Downs National Park Partnership Management Plan.

10. Recommendation and Conditions

- 10.1 The application is recommended for approval, subject to the following:
1. It is recommended to grant permission subject to:
 - The completion of a S106 legal agreement, the final form of which is delegated to the Director of Planning, to secure the following:
 - a) Staff accommodation occupation restrictions limiting the occupation of the dwellings to persons solely or mainly employed at the College
 - b) Provision of a Landscape & Ecological Management Plan (LEMP)
 - c) Secure the use of the existing cycle path along the eastern boundary for the future use of cyclists and equestrians
 - d) Travel plan & Travel Plan Audit Fee, and bus control measures for the Estate Road
 - e) Highways works in accordance with a Section 278 agreement (including bus stop and junction improvements)
 - f) The phasing of the development and associated studies
 - The completion of further ecological surveys regarding bats on site and provision of a suitable, policy compliant, mitigation and enhancement ecological strategy to the satisfaction of the SDNPA, the consideration of which is delegated to the Director of Planning; and
 - The conditions as set out in paragraph 10.2 of this report and any additional conditions, the form of which is delegated to the Director of Planning, to address any mitigation matters that arise from the completion of the further ecological surveys.
 2. That authority be delegated to the Director of Planning to refuse the application with appropriate reasons if:
 - a) The S106 Agreement is not completed or sufficient progress has not been made within 6 months of the 13 August 2020 Planning Committee meeting.

- b) The additional ecological surveys and provision of a suitable policy compliant mitigation and enhancement strategy is not completed or sufficiently progressed within 6 months of the 13 August 2020 Planning Committee meeting.

10.2 Planning Conditions

Time

1. The development which forms Phase 1 (as defined on drawing number 1319/MP/P26 Revision A) hereby permitted, shall begin before the expiration of three years from the date of this permission.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

Reserved matters/phasing

2. The development which forms phases 2, 3 and 4 (as defined on drawing number 1319/MP/P26 Revision A) hereby permitted, shall begin before the expiration of seven years from the date of this permission, or before the expiration of two years from the date of the approval of the last Reserved Matters, as defined in condition 3, whichever is the later.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

3. No development that forms part of Phases 2, 3 or 4 hereby permitted shall commence until details of the:
 - i) Scale;
 - ii) Appearance;
 - iii) Landscape;

(herein after called 'the Reserved Matters') have been submitted to and approved in writing by the Local Planning Authority. Applications for the approval of the Reserved Matters shall be made within seven years of the date of this permission. The development shall accord with the approved details and the approved design code which shall be submitted in accordance with Condition 5 below.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

Conditions for all phases

4. The development hereby permitted shall be carried out in accordance with the plans and reports listed below under the heading 'Plans Referred to in Consideration of this Application', except where additional or amended information is required by a condition attached to this consent.

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

5. Notwithstanding the information submitted, and prior to the submission of the first reserved matters application, a detailed design code for the development shall be submitted to and approved in writing by the Local Planning Authority. The design code shall demonstrate detailed parameters for the physical development of Phases 2, 3 and 4 and should build on the landscape led approach, the masterplan and the design rationale for Phase 1. The development shall thereafter be carried out in accordance with the approved design code.

The design code shall include the following:

- i) Principles for determining external materials and finishes, including colour palette;
- ii) Principles for determining details of windows and doors including scale, type and materials, as well as measures to protect dark night skies;

- iii) Strategy for determining architectural details and external features, including eaves, roof profiles, green roof systems, rainwater goods and balconies or terraces;
- iv) Strategy for determining height, scale, massing and roof forms, including where relevant, relationship to the existing and adjacent building(s);
- v) Strategy for the hierarchy of roads and routes, including details of surface materials (colour and texture)

Reason: To ensure appropriate design and appearance in the interests of protecting the visual amenity/character of the development and the surrounding area and to accord with South Downs Local Plan policies SD4 and SD5.

6. No development shall take place until the applicant has secured the implementation of a programme of archaeological works in accordance with a written scheme of investigation which has first been submitted to and approved in writing by the Local Planning Authority.

Reason: To enable the recording of any items of historical or archaeological interest, in accordance with policies SD12 and SD16 of the South Downs Local Plan 2019 coupled with the requirements of paragraphs 189-199 of the National Planning Policy Framework 2019.

7. No development shall take place until full design details of the surface water drainage, which shall follow the principles of sustainable drainage as far as practicable, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and the surface water drainage system shall be retained as approved thereafter.

The detailed drainage design should include/be informed by the following:

- i) The findings of an intrusive site investigation including infiltration testing to BRE365 and groundwater monitoring. The use of infiltration systems should be prioritised wherever feasible;
- ii) In those areas of the site where infiltration is not suitable, surface water discharge rates from new buildings should not exceed the equivalent mean greenfield runoff rates (Q_{bar}) for all rainfall events, including those with 1 in 100 (+40% for climate change) annual probability of occurrence. Evidence of this (in the form of hydraulic calculations) should be submitted with the detailed drainage drawings. The hydraulic calculations should take into account the connectivity of the different surface water drainage features. The entire network, including the existing drainage system, should be modelled;
- iii) The interception swale proposed to mitigate surface water flood risk related to a surface flow path arising circa 300m to the south of the site should be served by a high/level overflow outfalling to a suitable discharge point;
- iv) The details of the outfall of the proposed attenuation pond and how it connects into the existing watercourse should be provided as part of the detailed design. This should include cross sections and invert levels;
- v) The condition of the ordinary watercourse which will take surface water runoff from the development shall be investigated before discharge of surface water runoff from the development is made. Any required improvements to the condition of the watercourse and/or network shall be carried out prior to construction of the outfall;
- vi) The condition of the existing onsite drainage network should be investigated by a CCTV survey. If necessary, the applicant should carry out improvements to the condition of the sewer and the existing connection;
- vii) The detailed design shall include information on how surface water flows exceeding the capacity of the surface water drainage features will be managed safely;
- viii) The detailed design of drainage features (attenuation ponds, tanks and permeable pavement) shall be informed by findings of groundwater monitoring between autumn and spring. The design should leave at least a 1m unsaturated zone between the base

of the ponds and the highest recorded groundwater level. If this cannot be achieved, details of measures which will be taken to manage the impacts of high groundwater on the drainage system should be provided.

The submitted details should reference the details required by condition 8, chalk infiltration testing and have regard to the landscaping details required by conditions 20 and 51.

Reason: To ensure satisfactory surface water drainage, that meets the requirements of policy SD50 of the South Downs Local Plan 2019.

8. Prior to the commencement of development and subject to the findings of the filtrations tests referred to in Condition 7i, should it be confirmed that the chalk is suitable for the use of soakaways, a detailed plan shall be submitted to and approved by the Local Planning Authority. The plan should describe how and where sustainable urban drainage will be used to ensure that diffuse pollutants which might arise from this development in the future will be reduced and so reduce the risk of increasing pollutants in the chalk aquifer. The plan shall include details of a management plan to maintain these features and the scheme shall have regard to the Brighton CHaMP (Chalk Management Partnership) project. The development shall be carried out in accordance with the approved details and retained thereafter.

Reason: To ensure satisfactory drainage and to protect the chalk aquifer.

9. No development shall take place until a maintenance and management plan for the entire drainage system has been submitted and approved in writing by the Local Planning Authority.

The management plan should also include:

- i) details of the organisation/appropriate authority responsible for managing all aspects of the surface water drainage system including piped drains, and written confirmation that the identified organisation/appropriate authority is satisfied with the submitted details;
- ii) evidence that these responsibility arrangements will remain in place throughout the lifetime of the development.

The development shall be carried out and operated in accordance with the approved details.

Reason: To ensure satisfactory drainage, that meets the requirements of policy SD50 of the South Downs Local Plan 2019.

10. No development shall take place until 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 have been submitted and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and retained thereafter.

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

11. No development shall take place, including demolition on site, until an agreed pre-commencement condition survey of the surrounding highway network has been submitted to and approved in writing by the Local Planning Authority. Any damage caused to the highway as a direct consequence of the construction traffic shall thereafter be rectified and the highway network restored to the pre-commencement survey condition at the applicant's expense.

Reason: In the interests of highway safety and the amenities of the area and to comply with South Downs Local Plan 2019 Policy SD21.

12. No construction/demolition activities shall take place, other than between 08:00 to 18:00 hours (Monday to Friday) and 08:00 to 13:00 hours (Saturday) with no construction/demolition on Sunday or Public Holidays, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To protect the amenity of local residents.

13. Deliveries associated with the construction work shall be limited to using the Wales Farm Lane access and shall take place only between 06:30 to 18:00 hours (Monday to Friday) and 06:30 to 13:00 hours (Saturday) with no construction related deliveries on Sunday or Public Holidays.

Reason: To protect the amenity of local residents.

14. In the event that contamination is found at any time when carrying out the approved development it must be reported in writing within 24 hours to the Local Planning Authority. The development shall not be first occupied until;
- i) an investigation and risk assessment has been undertaken in accordance with a scheme that shall first have been submitted to and approved in writing by the Local Planning Authority, and
 - ii) where remediation is necessary a remediation scheme must be submitted to and approved in writing by the Local Planning Authority. Any remediation shall be fully implemented in accordance with the approved scheme before the development is brought into use, and
 - iii) a verification report for the remediation shall be submitted in writing to the Local Planning Authority before the development is first brought into use.

Reason: In the interests of amenity and to protect the health of future users and occupiers of the site from any possible effects of contaminated land, in accordance with policy SD55.

15. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no development permitted by Classes A, B, C, D, E, F of Part 1, and Class A of Part 2 of the Order shall be carried out without the prior written consent of the Local Planning Authority.

Reason: To protect the amenities of the locality and neighbouring properties and to maintain a good quality environment.

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

Reason: To safeguard the landscape character of the site.

Phase 1

17. No development including groundworks or works of demolition hereby permitted shall take place on Phase 1 until a Construction Environmental Management Plan (CEMP) for this phase has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved CEMP shall be implemented and adhered to throughout the construction period unless otherwise agreed in writing by the Local Planning Authority. The CEMP shall provide details as appropriate but should include:

- An indicative programme for carrying out the works;
- The anticipated number, frequency and types of vehicles used during construction;
- The method of access and routing of vehicles during construction;
- Details of the parking of vehicles by site operatives and visitors;
- Details of the location of site office and welfare facilities;
- Details of the loading and unloading of plant, materials and waste;

- Details of the storage of plant and materials used in construction of the development;
- Details of the provision of loading / offloading areas;
- 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);
- The erection and maintenance of security hoarding;
- Management measures being taken to ensure no burning of construction materials on site;
- Measures to control the emission of dust and dirt during the demolition / construction process;
- 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 the use of noise mitigation barriers
- Details of any flood lighting, including location, height, type and direction;
- Ecological mitigation measures, in accordance with the approved mitigation and enhancement ecological strategy/Biodiversity Method Statement;
- A scheme for recycling / disposing of waste, including any asbestos, resulting from demolition and construction works;
- A method to record the quantity of recovered material (re-used on site or off site), and
- Details of public engagement both prior to and during the construction works.

Reason: To enable the Local Planning Authority to control the development in the interest of maintaining a safe and efficient highway network, in the interests of amenity, to conserve and enhance the landscape character and biodiversity of the area and to ensure no adverse impacts on protected species.

18. No development shall take place on phase I until details of the western access, road and footway associated with phase I (as illustrated on Access Plan and Site Location 7081_101 T3) have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with those approved details prior to phase I being brought into use.

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

19. No development shall take place on phase I hereby permitted, until details of the specification and position of fencing and any other measures to be taken for the protection of retained trees from damage before or during the course of development, have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall accord with BS: 5837:2012 Trees in relation to design, demolition and construction. The development shall be carried out in accordance with the approved details and the means of protection shall be installed prior to the commencement of development and thereafter retained until all plant equipment and surplus materials, relevant to this phase, have been removed from the site. Nothing shall be stored or placed in any area protected and the ground levels within these areas shall not be altered without the prior written agreement of the Local Planning Authority.

Reason: In the interests of amenity and conserving and enhancing the landscape character of the area and to comply with policy SD11 of South Downs Local Plan 2019.

20. Notwithstanding the details shown on Planting Plan K (hla353104), Planting Plan LMN (hla353105/A), Planting Plan OPQ (hla353106), Planting Plan RST (hla353107/A), Planting

Plan U (hla353108) and Planting Plan V W (hla353109), no development shall take place on Phase I hereby permitted until a detailed planting scheme has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

The details shall include but are not limited to the following:

- i) Planting plans
- ii) Schedule of plants, trees and shrubs, noting planting sizes and proposed numbers/densities where appropriate;
- iii) retained areas of grassland cover, scrub, hedgerow and trees;
- iv) Planting methods, including specification and surfaces for underground structures such as tree pits;
- v) Surface water drainage and above ground rainwater harvesting solutions (in accordance with the details required under Conditions 7 and 8).

Reason: In the interests of amenity and conserving and enhancing the landscape character of the area, and to accord with South Downs Local Plan 2019 policies SD2, SD4 and SD5.

21. All soft landscaping works shall be carried out in accordance with the approved details and shall be implemented in the first planting and seeding season following commencement of the use of phase I of the development, unless otherwise agreed in writing by the Local Planning Authority. All shrubs, trees and hedge 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 Local Planning Authority.

Reason; In the interests of amenity and conserving and enhancing the landscape character of the area and to comply with South Downs Local Plan 2019 policies SD2, SD4, SD9, SD11.

22. Notwithstanding the information submitted, no development shall take place on the Phase I site 7 (Agri-hub building, car park 7 and Village Green) until full details of the hard landscape works as they relate to these elements have been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed existing and finished levels and/or contours, hard surfacing materials, minor artefacts and structures (including Corten risers, public art, furniture, refuse or other storage units, signs etc.). Development shall thereafter be carried out in accordance with the approved details.

Reason: In the interests of the character and amenities of the area and to ensure a development of high quality and to accord with the South Downs Local Plan 2019 policies SD2, SD4.

23. The hard landscaping works shall be carried out in accordance with the approved details. All hard landscaping shall be completed in full before phase I of the development is brought into use, or in accordance with a programme to be agreed in writing by the Local Planning Authority.

Reason; In the interests of amenity and conserving and enhancing the landscape character of the area, and to comply with South Downs Local Plan 2019 policy SD5.

24. No development above slab level shall commence on phase I hereby permitted, until detailed proposals for the disposal of foul water for phase I have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and shall be implemented prior to the occupation of this phase.

Reason: To ensure satisfactory provision of foul drainage.

25. No development shall take place until details, including plans and cross sections of the existing and proposed ground levels associated with development in Phase I, have been submitted to and approved in writing by the Local Planning Authority. The development shall not be completed other than in accordance with the approved details.

Reason: To ensure a satisfactory relationship between the new and existing development.

26. No development of phase I hereby permitted shall commence above slab level, until a detailed lighting management strategy has submitted to and approved in writing by the Local Planning Authority. The scheme shall accord with the principles of the External Lighting Assessment Issue 2, received 20.03.2020 and the South Downs National Park Dark Skies Technical Advice Note April 2018.

The lighting management strategy should specify but is not limited to the following:

- i) The type and location of all external lighting to be installed in Phase I. Such details shall include a layout plan with beam orientation and a schedule of the equipment to be used in the design (luminaire type, mounting height, aiming angles and luminaire profiles);
- ii) Details of lighting curfews, the use of timing controls and smart control technology across the different parts of Phase I
- iii) The use of internal blinds/shutters.

The details should demonstrate how lighting is being kept to a minimum and the design of luminaires should prevent upward glow. The design and location of external lighting should respond to ecological and visual sensitivities.

The lighting shall be installed, maintained and operated in full accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority. No other external lighting shall be installed without the prior written approval of the Local Planning Authority.

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

27. No development within Phase I (insofar as it relates to Site 7 Agri-hub and Combined Heat and Power building, and Site 8 Pig Unit) shall commence above slab level, until details and samples of the materials and finishes to be used in the external construction have been submitted to and approved in writing by the Local Planning Authority. For the purpose of Site 7 Agri-Hub building, the submission shall include details of a sample panel showing the flint feature wall and locally sourced brick and shall include brick type, source, bond and mortar type. The development shall be carried out in accordance with the approved details.

Reason: In the interests of the character and amenities of the area and to ensure a development of high quality, and to accord with the South Downs Local Plan 2019 policies SD2, SD4 and SD5.

28. No development of phase I hereby permitted shall commence above slab level until details of the positions, design, materials, height and type of all means of enclosure within phase I have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and shall be installed prior to the occupation of phase I.

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

29. No development of phase I, (insofar as it relates to Site 7 Agri-hub building) hereby permitted shall commence above slab level, until detailed information in a design stage sustainable construction report has been submitted to and approved in writing by the Local Planning Authority. The design stage sustainable construction report shall demonstrate that the development will achieve BREEAM New Construction Design 'Excellent'.

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 development demonstrates a high level of sustainable performance to address mitigation of and adaptation to predicted climate change in accordance with Policy SD48 of the South Downs Local Plan 2019.

30. Within 6 months of the first occupation of the Phase I, Site 7 (Agri-Food Hub) building hereby permitted, a post completion sustainable construction report shall be submitted to and approved in writing by the Local Planning Authority. The report shall demonstrate that the development has complied with the details and requirements of condition 29 and shall include a post-construction assessment which has been prepared by a licenced BREEAM assessor and the certificate which has been issued by BRE Global, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure development achieves a high level of sustainable performance to address mitigation of, and adaptation to, predicted climate change in accordance with Policy SD48 of the South Downs Local Plan 2019.

31. No development of phase I, site 7 (insofar as it relates to the Agri-food Hub and Combined Heat and Power Building) hereby permitted shall commence above slab level until details of the green roof including membrane system, planting and maintenance plan, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: In the interests of the character and amenities of the area and to ensure a development of high quality, and to accord with the South Downs Local Plan 2019 policies SD2, SD4 and SD5.

32. No development of Phase I, site 7 (insofar as it relates to the Agri-food Hub) hereby permitted shall commence above slab level, until details of the fenestration, eaves canopy, rainwater goods, external stairs, ramped walkway, terrace and balcony have been submitted to and approved in writing by the Local Planning Authority. The details should clearly show the construction of the element, details of the finish and the relationship/ junction with the building elevation. The development shall be carried out in accordance with the approved details.

Reason: In the interests of the character and amenities of the area and to ensure a development of high quality and to accord with the South Downs Local Plan 2019 policies SD2, SD4 and SD5.

33. Phase I of the development hereby permitted, shall not be occupied/brought in to use until the archaeological site investigation and post-investigation assessment (including provision for analysis, publication and dissemination of results and archive deposition) has been completed for this phase and submitted to and approved in writing by the Local Planning Authority. The archaeological site investigation and post-investigation assessment shall be undertaken in accordance with the programme set out in the written scheme of investigation approved under Condition 6.

Reason: To enable the recording of any items of historical or archaeological interest, in accordance with policies SD12 and SD16 of the South Downs Local Plan 2019 coupled with the requirements of paragraphs 189-199 of the National Planning Policy Framework 2019.

34. Phase I of the development hereby permitted, shall not be occupied until a drainage validation report has been submitted to and approved in writing by the Local Planning Authority. The report shall include as built designs, along with evidence (including photographs) to demonstrate that the drainage system for phase I has been implemented as per the final agreed detailed drainage designs, including levels, gradients and depths (in accordance with condition 7).

Reason: To ensure satisfactory drainage, that meets the requirements of policy SD50 of the South Downs Local Plan 2019.

35. Phase I of the development hereby permitted shall not be occupied until details of the cycle parking for phase I, including position, design, materials and finishes, have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to the occupation of Phase I and thereafter retained for the parking of cycles.

Reason: In order that the development makes satisfactory provision for cycles and to meet the objectives of sustainable development.

36. The phase I development hereby permitted shall not be occupied/brought into use until details of refuse and recycling storage for this phase have been submitted to and approved in writing by the Local Planning Authority. The approved refuse and recycling storage facilities shall be implemented prior to the occupation of phase I and thereafter retained.

Reason: To ensure that adequate provision is made for the storage of refuse and recyclable materials and to protect the character and amenity of the area.

37. Prior to phase I hereby permitted first being occupied/brought in to use, the permanent signage for the site at the Western Access shall be erected clear of the highway verge and not obstruct visibility of drivers using the access where it joins the public highway. The signage shall be installed in accordance with details that have first been submitted to and approved in writing by the Local Planning Authority.

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

38. Prior to phase I first being occupied/brought into use, visibility splays in accordance with approved plan 10357_104 T5 shall be provided and thereafter retained in accordance with that approved plan.

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

39. Prior to the occupation of phase I, site 7 (insofar as it relates to the Agri-food Hub building) car park 7 shall be implemented in accordance with the parking layout shown on drawing 3219/CP/PI Revision A. Further details of the 16 Electric Vehicle Charging points shown on the drawings shall be submitted to and approved in writing the Local Planning Authority. Thereafter the area shall be retained for this use and shall not be used other than for the parking of cars.

Reason: To provide adequate space for the parking of vehicles.

Phase 2

40. No development shall take place on Phase 2 until details of the eastern vehicular access, road and footway associated with that phase have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to phase 2 being occupied/brought in to use.

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

41. Prior to Phase 2 first being occupied/brought in to use, the permanent signage for the site at the Eastern Access, shall be erected clear of the highway verge and not obstruct visibility of drivers using the access where it joins the public highway. The signage shall be installed in accordance with details that have first been submitted to and approved in writing by the Local Planning Authority.

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

42. Prior to phase 2 first being occupied/brought into use, visibility splays at the eastern access in accordance with approved plan I0357_I04 T5 shall be provided and thereafter retained in accordance with that approved plan.

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

Phases 2, 3 and 4

43. No development including groundworks or works of demolition hereby permitted shall take place on:

- a) Phase 2
- b) Phase 3
- c) Phase 4

until a Construction Environmental Management Plan (CEMP) for the relevant phase has been submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved CEMP shall be implemented and adhered to throughout the construction period unless otherwise agreed in writing by the Local Planning Authority. The CEMP shall provide details as appropriate but should include:

- An indicative programme for carrying out the works;
- The anticipated number, frequency and types of vehicles used during construction;
- The method of access and routing of vehicles during construction;
- Details of the parking of vehicles by site operatives and visitors;
- Details of the location of site office and welfare facilities;
- Details of the loading and unloading of plant, materials and waste;
- Details of the storage of plant and materials used in construction of the development;
- Details of the provision of loading / offloading areas;
- 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);
- The erection and maintenance of security hoarding;
- Management measures being taken to ensure no burning of construction materials on site;
- Measures to control the emission of dust and dirt during the demolition / construction process;
- 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 the use of noise mitigation barriers;
- Details of any flood lighting, including location, height, type and direction;
- Ecological mitigation measures, in accordance with the approved mitigation and enhancement ecological strategy/Biodiversity Method Statement;
- A scheme for recycling / disposing of waste, including any asbestos, resulting from demolition and construction works;
- A method to record the quantity of recovered material (re-used on site or off site), and
- Details of public engagement both prior to and during the construction works.

Reason: To enable the Local Planning Authority to control the development in the interest of maintaining a safe and efficient highway network, in the interests of amenity, to conserve

and enhance the landscape character and biodiversity of the area and to ensure no adverse impacts on protected species.

44. No development shall take place on:

- a) Phase 2
- b) Phase 3
- c) Phase 4

hereby permitted, until details of the specification and position of fencing and any other measures to be taken for the protection of retained trees from damage before or during the course of development, have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall accord with BS: 5837:2012 Trees in relation to design, demolition and construction. The development shall be carried out in accordance with the approved details and the means of protection shall be installed prior to the commencement of development and thereafter retained until all plant equipment and surplus materials, relevant to that phase, have been removed from the site. Nothing shall be stored or placed in any area protected and the ground levels within these areas shall not be altered without the prior written agreement of the Local Planning Authority.

Reason: In the interests of amenity and conserving and enhancing the landscape character of the area and to comply with policy SD11 of South Downs Local Plan 2019.

45. No development above slab level shall take place on

- a) Phase 2
- b) Phase 3
- c) Phase 4

until detailed proposals for the disposal of foul water for the relevant phase have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and shall be implemented prior to the occupation of the relevant phase.

Reason: To ensure satisfactory provision of foul drainage.

46. No development above slab level shall take place on

- a) Phase 2
- b) Phase 3
- c) Phase 4

until detailed information in a design stage sustainable construction report has been submitted to and approved in writing by the Local Planning Authority. The design stage sustainable construction report shall accord with the details set out in the submitted Sustainability Statement (Issue 3, dated July 2020) and demonstrate that the relevant buildings within the relevant phase are capable of meeting the target performance standards set out in section 2.08 and Appendix A of this document, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of, and adaptation to, predicted climate change in accordance with Policy SD48 of the South Downs Local Plan 2019.

47. Within 6 months of the first occupation of

- a) Phase 2
- b) Phase 3
- c) Phase 4

a post completion sustainable construction report shall be submitted to and approved in writing by the Local Planning Authority. The report shall demonstrate, including written

documentary evidence, that the relevant buildings within the relevant phase of the development have complied with the details and requirements of condition 46, including where applicable a post-construction assessment which has been prepared by a licenced BREEAM assessor and the certificate which has been issued by BRE Global, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure development demonstrates a high level of sustainable performance to address mitigation of, and adaptation to, predicted climate change in accordance with Policy SD48 of the South Downs Local Plan 2019.

48. No development shall take place on

- a) Phase 2
- b) Phase 3
- c) Phase 4

until details, including plans and cross sections of the existing and proposed ground levels associated with development in Phase 1, have been submitted to and approved in writing by the Local Planning Authority. The development shall not be completed other than in accordance with the approved details.

Reason: To ensure a satisfactory relationship between the new and existing development.

49. No development hereby permitted shall commence above slab level on

- a) Phase 2
- b) Phase 3
- c) Phase 4

until a detailed lighting management strategy for the relevant phase has been submitted to and approved in writing by the Local Planning Authority. The scheme shall accord with the principles of the External Lighting Assessment Issue 2 received 20.03.2020 and the South Downs National Park Dark Skies Technical Advice Note April 2018.

The lighting management strategy should specify but is not limited to the following:

- i) The type and location of all external lighting to be installed. Such details shall include a layout plan with beam orientation and a schedule of the equipment to be used in the design (luminaire type, mounting height, aiming angles and luminaire profiles);
- ii) Details of lighting curfews, the use of timing controls and smart control technology across the different parts of the scheme;
- iii) The use of internal blinds;

The details should demonstrate how lighting is being kept to a minimum and the design of luminaires should prevent upward glow. The design and location of external lighting should respond to ecological and visual sensitivities.

The lighting shall be installed, maintained and operated in full accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority. No other external lighting shall be installed without the prior written approval of the Local Planning Authority.

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

50. No development hereby permitted shall commence above slab level on:

- a) Phase 2
- b) Phase 3
- c) Phase 4

until details and samples of the materials and finishes to be used in the construction of buildings, of each element within the relevant phase, have been submitted to and approved

in writing by the Local Planning Authority. The submitted details shall be informed by the design code approved under Condition 5 and the development shall be carried out in accordance with the approved details.

Reason: In the interests of the character and amenities of the area and to ensure a development of high quality.

51. No development hereby permitted shall commence above slab level on:

- a) Phase 2,
- b) Phase 3,
- c) Phase 4,

until details of the soft landscaping associated with each element permitted within the relevant phase has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details

The details shall include, but are not limited to the following:

- i) Planting plans
- ii) Schedule of plants noting planting sizes and proposed numbers/densities where appropriate;
- iii) retained areas of grassland cover, scrub hedgerow and trees;
- iv) Planting methods, including specification and surfaces for underground structures such as tree pits;
- v) Surface water drainage and above ground rainwater harvesting solutions, (in accordance with the details required under conditions 7 and 8)

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

52. All soft landscaping works shall be carried out in accordance with the approved details and shall be implemented in the first planting and seeding season following commencement of the use of the relevant phase of the development, unless otherwise agreed in writing by the Local Planning Authority. All shrubs, trees and hedge 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 Local Planning Authority.

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

53. No development hereby permitted shall commence above slab level on:

- a) Phase 2
- b) Phase 3
- c) Phase 4

until full details of the hard landscaping associated with each element permitted within the relevant phase has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

The hard landscaping details shall include, but are not limited to the following:

- i) Samples/ specification of hard surfacing materials (including car parking areas)
- ii) Layout of surfaces including any kerbs, edges steps and ramps
- iii) Location and details of any structures or minor artefacts (including public art, furniture, refuse or other storage units, signs etc.)
- iv) Proposed and existing levels and falls

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

54. The hard landscaping works shall be carried out in accordance with the approved details. All hard landscaping shall be completed in full before the relevant phase of the development is brought into use, or in accordance with a programme to be agreed in writing by the Local Planning Authority.

Reason; In the interests of amenity and conserving and enhancing the landscape character of the area, and to comply with South Downs Local Plan 2019 policy SD5.

55. No development hereby permitted shall commence above slab level on:
- a) Phase 2
 - b) Phase 3
 - c) Phase 4

until details of the positions, design, materials, height and type of means of enclosure to be erected within the relevant phase have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and shall be installed prior to the occupation of the relevant phase.

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

56. No development hereby permitted shall commence above slab level on:
- a) Phase 2
 - b) Phase 3
 - c) Phase 4

until details illustrating the car park bay layouts and turning spaces, and EV charging points for the relevant phase have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to the relevant phase being occupied/brought in to use. Thereafter the area shall 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 and to provide adequate space for the parking of vehicles.

57. The development hereby permitted on:
- a) Phase 2
 - b) Phase 3
 - c) Phase 4

shall not be occupied/brought in to use until the archaeological site investigation and post-investigation assessment (including provision for analysis, publication and dissemination of results and archive deposition) for the relevant phase has been completed and submitted to and approved in writing by the Local Planning Authority. The archaeological site investigation and post-investigation assessment shall be undertaken in accordance with the programme set out in the written scheme of investigation approved under Condition 6.

Reason: To enable the recording of any items of historical or archaeological interest, in accordance with policies SD12 and SD16 of the South Downs Local Plan 2019 coupled with the requirements of paragraphs 189-199 of the National Planning Policy Framework 2019.

58. The development hereby permitted on:
- a) Phase 2
 - b) Phase 3
 - c) Phase 4

shall not be occupied until a drainage validation report has been submitted to and approved in writing by the Local Planning Authority. The report shall include as built designs, along with evidence (including photographs) to demonstrate that the drainage system has been implemented as per the final agreed detailed drainage designs, including levels, gradients and depths (in accordance with condition 7).

Reason: To ensure satisfactory drainage, that meets the requirements of policy SD50 of the South Downs Local Plan 2019.

59. The development hereby permitted on:

- a) Phase 2
- b) Phase 3
- c) Phase 4

shall not be occupied until details of the cycle parking including position, design, materials and finishes have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to the relevant phase being occupied/being brought in to use. The area shall thereafter be retained for that use and shall not be used other than for the parking of cycles.

Reason: In order that the development makes satisfactory provision for cycles and to meet the objectives of sustainable development.

60. The development hereby permitted on

- a) Phase 2
- b) Phase 3
- c) Phase 4

shall not be occupied/brought into use unless and until details of refuse and recycling storage for the relevant phase have been submitted to and approved in writing by the Local Planning Authority. The approved refuse and recycling storage facilities shall be implemented prior to the occupation of the relevant phase and thereafter retained.

Reason: To ensure that adequate provision is made for the storage of refuse and recyclable materials and to protect the character and amenity of the area.

Informatives

1. Please note that this development, with regard to the drainage arrangements, 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/guidance/discharges-to-surface-water-and-groundwater-environmental-permits>
2. Your attention is drawn to the provisions of the Countryside and Rights of Way Act 2000 and Wildlife and Countryside Act 1981 (as amended) and in particular to Sections 1 and 9. These make it an offence to:
 - kill or injure any wild bird,
 - damage or destroy the nest of any wild bird (when the nest is being built or is in use),
 - damage or destroy any place which certain wild animals use for shelter (including all bats and certain moths),
 - disturb certain wild animals occupying a place for shelter (again, all bats and certain moths).

The onus is therefore on you to ascertain whether such birds, animals or insects may be nesting or using the tree(s), the subject of this consent, and to ensure you do not contravene the legislation. This may, for example, require delaying works until after the nesting season for birds. The nesting season for birds can be considered to be March to

September. You are advised to contact Natural England for further information (tel: 0845 601 4523).

3. The applicant is advised to enter into a Section 59 Agreement under the Highways Act, 1980 to cover the increase in extraordinary traffic that would result from construction vehicles and to enable the recovery of costs of any potential damage that may result to the public highway as a direct consequence of the construction traffic. The applicant is advised to contact the Transport Development Control Team (01273 482254) in order to commence this process.
4. The applicant will be required to obtain a permit for any highway works in accordance with the requirements of the Traffic Management Act, 2004. The applicant should contact East Sussex Highways (0345 60 80 193) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the permit 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 East Sussex Highways (0345 60 80 193)
6. The applicant is advised that the erection of temporary directional signage should be agreed with East Sussex Highways (0345 60 80 193) prior to any signage being installed.

11. Crime and Disorder Implications

- 11.1 It is considered that the proposal does not raise any crime and disorder implications. The college campus is well managed and has a number of teaching staff and a caretaker living on site. The public and private areas of the college remain clearly legible and identified. The development will not change that status quo.

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

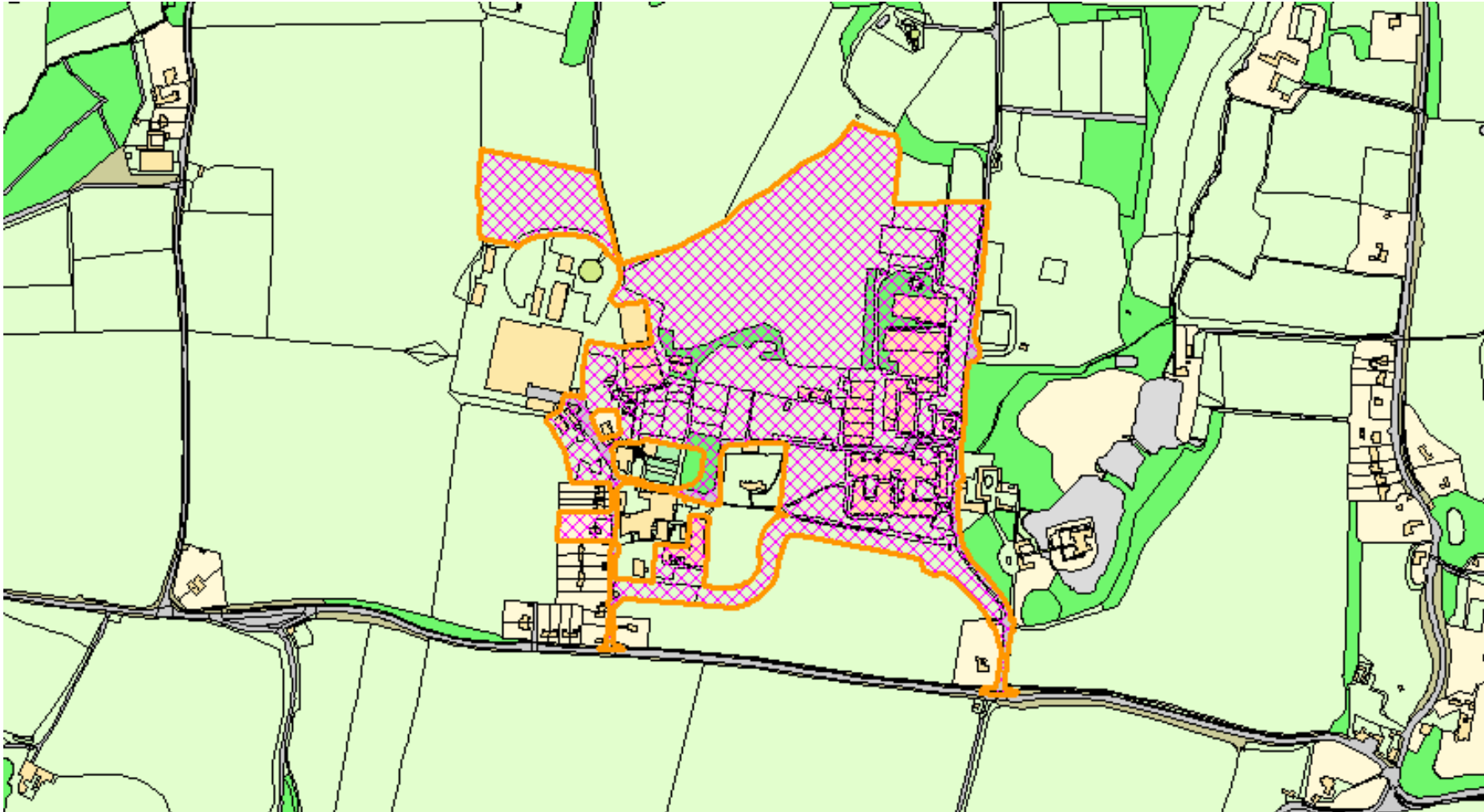
- 14.1 The applicant has engaged in extensive and detailed pre-application discussions with officers and through Design Review Panel workshops. During the consideration of the current application, the SDNP and applicant have held additional meeting with statutory consultees to ensure that a development is brought forward that conserves and enhances the natural beauty, cultural heritage and wildlife of the Park.

TIM SLANEY

Director of Planning

South Downs National Park Authority

Contact Officer: Jane Rarok
Tel: 07469 851683
email: jane.rarok@southdowns.gov.uk
Appendices
1. Site Location Map
2. Plans Referred to in Consideration of this Application
SDNPA
Consultees
Legal Services & Major Planning Projects and Performance Manager
Background Documents
Full Details of all planning application documents, plans and consultation responses
South Downs Local Plan
National Planning Policy Framework 2019
South Downs Partnership Management Plan 2020 2025
Plumpton Parish Neighbourhood Plan 2018



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Plans Referred to in Consideration of this Application

Plan type	Reference	Version	Date on plan	Date received	Status	Plan description
Plans	I319/MP/P1	-	01/12/2019	22/01/2020	Approve	Site Location Plan
Plans	I319/MP/P2	A	19/03/2020	20/03/2020	Approve	Block Plan
Plans	I319/MP/P3	-	01/12/2019	22/01/2020	Approve	Site Layout as Existing 1
Plans	I319/MP/P4	-	01/12/2019	22/01/2020	Approve	Site Layout as Existing 2
Plans	I319/MP/P5	-	01/12/2019	22/01/2020	Approve	Site Layout as Existing 3
Plans	I319/MP/P6	-	01/12/2019	22/01/2020	Approve	Site Layout as Existing 4
Plans	I319/MP/P7	-	01/12/2019	22/01/2020	Approve	Site Layout as Existing 5
Plans	I319/MP/P8	-	01/12/2019	22/01/2020	Approve	Site Layout as Existing 6
Plans	I319/MP/P9	-	01/12/2019	22/01/2020	Approve	Site Layout as Existing 7
Plans	I319/MP/P10	A	19/03/2020	20/03/2020	Approve	Site Layout Showing Removed 1
Plans	I319/MP/P11	A	19/03/2020	20/03/2020	Approve	Site Layout Showing Removed 2
Plans	I319/MP/P12	-	01/12/2019	22/01/2020	Approve	Site Layout Showing Removed 3
Plans	I319/MP/P13	-	01/12/2019	22/01/2020	Approve	Site Layout Showing Removed 4
Plans	I319/MP/P14	-	01/12/2019	22/01/2020	Approve	Site Layout Showing Removed 5
Plans	I319/MP/P15	-	01/12/2019	22/01/2020	Approve	Site Layout Showing Removed 6
Plans	I319/MP/P16	-	01/12/2019	22/01/2020	Approve	Site Layout Showing Removed 7
Plans	I319/MP/P17	A	19/03/2020	27/03/2020	Approve	Site Layout as Proposed

Plans	1319/MP/P18	A	19/03/2020	20/03/2020	Approve	Site Layout Detail as Proposed 1
Plans	1319/MP/P19	A	19/03/2020	20/03/2020	Approve	Site Layout Detail as Proposed 2
Plans	1319/MP/P20	-	01/12/2019	22/01/2020	Approve	Site Layout Detail as Proposed 3
Plans	1319/MP/P21	-	01/12/2019	22/01/2020	Approve	Site Layout Detail as Proposed 4
Plans	1319/MP/P22	-	01/12/2019	22/01/2020	Approve	Site Layout Detail as Proposed 5
Plans	1319/MP/P23	-	01/12/2019	22/01/2020	Approve	Site Layout Detail as Proposed 6
Plans	1319/MP/P24	-	01/12/2019	22/01/2020	Approve	Site Layout Detail as Proposed 7
Plans	1319/MP/P25	A	19/03/2020	20/03/2020	Approve	Site Layout Parking and Circulation as Proposed
Plans	1319/MP/P26	A	19/03/2020	20/03/2020	Approve	Site Layout Phasing Plan
Plans	1319/MP/P27	-	01/12/2019	22/01/2020	Approve	Site Layout Sources of Light Pollution - Baseline Plan
Plans	3219/P1	B	19/03/2020	27/03/2020	Approve	Phase 1 Block Plan
Plans	3219/S7/P7.1	-	01/12/2019	22/01/2020	Approve	Phase 1 - Site 7 Proposed Site Layout
Plans	3219/S7/P7.2	A	13/07/2020	13/07/2020	Approve	Phase 1 - Site 7 Proposed Site Layout Detail
Plans	3219/S7/P7.4	-	01/12/2019	22/01/2020	Approve	Ground Floor Plan
Plans	3219/S7/P7.5	-	01/12/2019	22/01/2020	Approve	First Floor Plan
Plans	3219/S7/P7.6	-	01/11/2019	22/01/2020	Approve	Roof Plan
Plans	3219/S7/P7.7	-	01/11/2019	22/01/2020	Approve	South-East & North-East Elevations

Plans	3219/S7/P7.8	-	01/11/2019	22/01/2020	Approve	North-West & South-West Elevations
Plans	3219/S7/P7.9	-	01/12/2019	22/01/2020	Approve	Cross - Section A-A
Plans	3219/S7/P7.10	-	01/12/2019	22/01/2020	Approve	Cross - Section B-B
Plans	3219/S7/P7.11	-	01/12/2019	22/01/2020	Approve	Cross - Section C-C
Plans	3219/S7/P7.12	-	01/12/2019	22/01/2020	Approve	CHP House - Plans and Elevations
Plans	3219/S8/P8.1	B	13/07/2020	13/07/2020	Approve	Phase I - Site 8 Proposed site layout detail
Plans	3219/S8/P8.3	A	19/03/2020	20/03/2020	Approve	Building A -Floor and roof plans
Plans	3219/S8/P8.4	A	19/03/2020	20/03/2020	Approve	Building A - Elevations
Plans	3219/S8/P8.5	-	01/12/2019	22/01/2020	Approve	Building BI-B2 – Floor and roof plans
Plans	3219/S8/P8.6	-	01/12/2019	22/01/2020	Approve	Building BI-B2 - Elevations
Plans	3219/S8/P8.7	-	01/12/2019	22/01/2020	Approve	Building C – Floor and roof plans
Plans	3219/S8/P8.8	-	01/12/2019	22/01/2020	Approve	Building C – Elevations
Plans	3219/S8/P8.9	-	01/12/2019	22/01/2020	Approve	Contextual elevations
Plans	3219/CP/PI	A	13/07/2020	13/07/2020	Approve	Phase I - Car Park 7 Proposed Site Layout Detail
Plans	3219/VG/PI	A	13/07/2020	13/07/2020	Approve	Phase I - Village Green Proposed Site Layout Detail
Plans	7081_I01	T3	10/02/2020	28/02/2020	Approve	Access plan and site location
Plans	7081_I02	T4	10/02/2020	28/02/2020	Approve	Access plan and coach swept paths

Plans	I0357_I03	T5	16/04/2020	21/04/2020	Approve	Drop off layby design
Plans	I0357_I04	T5	28/04/2020	28/04/2020	Approve	Access visibility splays
Plans	0115/P105		01/09/2017	17/07/2019	Approve	Parking layout as existing
Plans	HLA NH		19/03/2020	20/03/2020	Approve	Photographs Looking Towards Village Green Area (Annotated)
Plans	HLA 353 201		19/03/2020	20/03/2020	Approve	Section X-X Village Green
Plans	HLA 353 101		06/01/2020	07/02/2020	Approve	Planting plans A B C D
Plans	HLA			20/03/2020	Approve	Artistic impression of proposed village green
Report	MJB Architecture	Issue 2	01/12/2019	20/03/2020	Approve	Design and Access Statement
Report	MJB Architecture	Issue 4	01/07/2020	14/07/2020	Approve	Individual Development Site Details
Report	MJB Architecture	Issue 2	01/12/2019	20/03/2020	Approve	External lighting Assessment
Report	MJB Architecture	Issue 2	01/12/2019	20/03/2020	Approve	Planning Statement
Report	MJB Architecture		01/07/2019	22/01/2020	Approve	Planning Statement Appendix A
Report	MJB Architecture		01/07/2019	22/01/2020	Approve	Planning Statement Appendix B
Report	MJB Architecture		01/07/2019	22/01/2020	Approve	Planning Statement Appendix C
Report	MJB Architecture	Issue 3	01/07/2020	14/07/2020	Approve	Sustainability statement
Report	MJB Architecture	Issue 2	01/12/2019	20/03/2020	Approve	Waste minimisation statement
Report	MJB Architecture		01/12/2019	22/01/2020	Approve	Site 7 Design and Access Statement

Report	MJB Architecture		01/12/2019	22/01/2020	Approve	Site 7 Sustainability statement
Report	MJB Architecture		01/12/2019	22/01/2020	Approve	Site 8 Pig Unit Design and Access statement
Report	190650/2019353		Dec 2019	30/01/2020	Approve	Archaeological and Geological Evaluation report
Report	10357		01/02/2020	28/02/2020	Approve	Flood Risk Assessment
Report	HLA 196 R10	A	01/07/2019	16/07/2019	Approve	Landscape Strategy and Appendices
Report	HLA 196 R01	B	10/7/2019	16/07/2019	Approve	Landscape and visual impact assessment
Report	7081/2.3		01/07/2019	12/07/2019	Approve	Transport assessment
Report	RFE-02339-19-01		01/04/2019	12/07/2019	Approve	Environmental Assessment
Report	161133/2019225		01/08/2019	13/08/2019	Approve	Heritage Statement
Report	161133/2019225		01/08/2019	13/08/2019	Approve	Archaeological desk based assessment
Report	190650		01/10/2019	06/11/2019	Approve	Written Scheme of Investigation
Report	UR2019-131		08/07/2019	10/07/2019	Approve	Utilities Report
Report	10357	Addendum	01/04/2020	28/04/2020	Approve	Flood Risk Assessment – Addendum Report April 2020
Report	The Ash Partnership		01.06.2020	23.06.2020	Approve	Supplementary Breeding Bird Survey Report
Report	MJB Architecture	Issue 1	01.07.2020	14/07/2020	Approve	Loss and gain of hedgerow and trees

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Report to	Planning Committee
Date	13 August 2020
By	Director of Planning
Local Authority	Horsham District Council
Application Number	SDNP/19/05270/OUT
Applicant	Mr James Thorns
Application	Outline planning application with all matters reserved for a development of up to seven units of various sizes. Demolition of the existing dwelling, swimming pool building and garages.
Address	Pickwick, Turnpike Road, Amberley, BN18 9LX

Recommendation:

- 1) That planning permission be granted subject to the conditions set out in paragraph 10.1 of the report and a legal agreement to secure two affordable dwellings;**
 - 2) That authority be delegated to the Director of Planning to refuse the application with appropriate reasons if the legal agreement is not completed or sufficient progress not made within 6 months of the Planning Committee meeting of 13 August 2020.**
-

Executive Summary

The application site is located on the southern edge of Amberley within the defined settlement boundary and has an existing residential use, being occupied by a single dwelling and associated ancillary outbuildings including garages and indoor swimming pool.

Outline planning permission, with all matters reserved, is sought for the demolition of the existing buildings and the provision of up to seven new dwellings. Heads of Terms have been agreed for a legal agreement to secure a policy compliant level and tenure of affordable housing.

Whilst access is a reserved matter, vehicular access could in principle be acceptably achieved via the existing access off Turnpike Road. It is also considered that the proposal is capable in principle of achieving the relevant policy requirements in regard to design and landscape, ecology, dark night skies, drainage, parking and impacts upon neighbouring amenity via a future reserved matter(s) application.

The application is placed before Members as the site is in a sensitive edge-of-settlement location and would be a relatively significant development within Amberley village.

I. Site Description

- I.1** The site relates to a 0.3ha parcel of land on the southern edge of Amberley village, currently accessed directly off the B2139 (Turnpike Road.) The site, alongside the existing development at Strawberry Villas and allocation site immediately to the north, is somewhat separated from the main part of the settlement which lies mainly to the north.
- I.2** The existing large dwelling on the site is of modern brick construction of no particular architectural merit. There are a number of single storey outbuildings, comprising a brick swimming pool block, a brick garage building, a single storey timber office building and refuse

storage. A watercourse flows along the eastern boundary of the site, and the northern, western and southern boundaries are defined by large conifer trees. The garden area is overgrown.

- 1.3 The field immediately to the north is allocated for housing through the Amberley Neighbourhood Plan (2017) and planning permission was recently granted for 14No dwellings under SDNP/19/04886/FUL. Immediately to the west is a detached dwelling (Downsland) and there is a small, 12-unit rural exception scheme at Newland Gardens to the north west. There is a public footpath (No 3708) linking Newland Gardens with the village to the north and west, however the application site has no pedestrian access to this footpath or to the playing field to the east, and there is no pedestrian access along Turnpike Road.
- 1.4 The site is within 300m (at its closest point) of Amberley Wildbrooks Site of Special Scientific Interest (SSSI) and the Arun Valley Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar wetland site, and within 12km of The Mens SAC. The site is located within the Dark Skies Intrinsic Zone of Darkness (E1a), which is classified as 'dark sky.'

2. Relevant Planning History

- 2.1 The following planning history is relevant to the application site:

- SDNP/19/00304/FUL. Redevelopment and conversion of Pickwick to form 4 dwelling houses and one new dwelling house in the curtilage. Withdrawn 09.04.2019
- SDNP/19/02698/OUT Demolition of the existing building and outbuildings and replacing with 9 new dwellings in a mixture of detached, semi-detached and terrace design. Refused 11.10.2019 for the following reasons:

The reasons for refusal were:

- 1) The quantum of development proposed, which has not been demonstrably informed by any assessment of landscape capacity, would result in a form of development that is harmful to the landscape character of the area and negatively impact views in to the settlement from the South Downs Way. The proposal therefore fails to meet the National Park's First Purpose, policies SD4, SD5, SD6 and SD25 of the South Downs Local Plan (2014-33), policies EN1, EN2, HD2, HD4 and HD6 of the Amberley NDP (2017) and the National Planning Policy Framework (2019).
- 2) In the absence of a completed legal agreement, the proposals fail to secure a level, mix and tenure of onsite affordable housing that would accord with policy SD26 and SD28. The proposal is therefore contrary to policies SD26 and SD28 of the South Downs Local Plan (2014-33).
- 3) Insufficient evidence has been provided to demonstrate that the development would not impact habitats or species, or that this could be adequately mitigated for. The proposal is therefore contrary to policy HD6 of the Amberley Neighbourhood Development Plan (2017), SD9 of the South Downs Local Plan (2014-33), the National Planning Policy Framework (2019) and the First Purpose of the National Park.
- 4) Insufficient information has been provided to demonstrate that the development would not have an unacceptable impact on highway safety, or that highway safety could be protected and enhanced. The proposal is therefore contrary to policy GA4 of the Amberley Neighbourhood Development Plan (2017), SD21 of the South Downs Local Plan (2014-33), and the National Planning Policy Framework (2019).

- 2.2 The following planning history relates to the adjacent site immediately north allocated for a minimum of six dwellings under HD5 of the Amberley Neighbourhood Development Plan (2017)
- SDNP/19/04886/FUL Resubmission of planning application SDNP/18/05657/FUL for the development of 14 new residential dwellings consisting 2No. one bedroom and 3No. two bedroom apartments, 1No. two bedroom, 5 No. three bedroom, and 3 No. four bedroom dwellings; ecological corridors and landscape buffer, open space and landscaping. Approved by Committee 24.04.2020
- 2.3 The following planning history relates to the adjacent rural exception site at Strawberry Villas:
- DC/08/0847 Erection of 4 x 1 bed, 4 x 2 bed and 4 x 3 bed (total 12) affordable homes and apartments. Approved 11.06.2008.
- 3. Proposal**
- 3.1 The proposal initially sought the provision of 'up to nine' dwellings, with indicative layout and elevations demonstrating how this could be achieved, which were the same plans submitted under the previously refused application SDNP/19/02698/OUT.
- 3.2 Following concerns raised by officers in regard to the quantum of development proposed, the proposal wording was revised during the course of the application to reduce the number of proposed dwellings to 'up to seven.' The submitted layout and elevations are indicative only. Although the final number of units would be determined at reserved matters stage, a s106 agreement has been drafted to secure two affordable units of an affordable rented tenure, based on a maximum of seven units being achieved.
- 4. Consultations**
- Initially submitted proposal (for 'up to nine units')
- 4.1 The following comments were received in response to the initial consultation on the proposal for 'up to nine dwellings:'
- 4.2 **Amberley Parish Council:** Objection. Comments:
- The site is not allocated for housing by the Amberley Neighbourhood Development Plan (NDP) and has not been assessed as a development site;
 - Taking into account the recently approved development at Strawberry Villa and new dwelling at Drewitt's Farm, the requirement for new dwellings has already been met;
 - The scale of development proposed disqualifies it from meeting the criteria for a windfall site under Policy HD6 of the NDP;
 - Would constitute arbitrary subdivision of land contrary to criterion 4 of HD6;
 - Constitutes major development by the main road at the entrance to the village when approaching from Storrington and will figure prominently in views from the Downs;
 - There is no direct access to the Millennium Green, or to the village without walking along the main road;
 - The Parish Council reserves comments on the style and mix of housing proposed, the access on to the B2139 and for emergency vehicles, and additional drainage required.
- 4.3 **Archaeology:** No objection, subject to conditions. Comments:
- An archaeological presence should be secured on site when groundworks are undertaken in areas located outside of the footprints of currently existing buildings.
- 4.4 **Design:** Objection. Comments:
- The submitted landscape assessment makes no attempt to inform the amount of development, or the siting and scale of buildings;

- The use of outline planning applications within a nationally designated landscape, especially where all matters are reserved, does not allow for evidenced-based quantum calculations which are an integral part of good design;
 - Appropriate development in a National Park requires a very high standard of assessment and a design process that meets criteria set out in National Guidance and Local Plan Policy SD5;
 - Further appraisal work and a design code to should be required to inform any subsequent Reserved Matters applications.
- 4.5 **Drainage:** No objection, subject to conditions.
- 4.6 **Ecology:** Objection. Comments:
- The preliminary ecological report states that the site has high/moderate potential for roosting bats. Emergence surveys are required, however have not been submitted;
 - Information provided in relation to other protected species (e.g. reptiles) is sufficient;
 - Support provision of a 5m wide wildlife meadow along the eastern boundary of the site and a 2m wide wildlife corridor along the northern, southern and western boundaries.
- 4.7 **Highway Authority:** No objection, subject to conditions. Comments:
- Access information has been previously requested at outline stage however has not been forth coming
 - The proposed access is supported in principle support the access, however would be subject to meeting required standards at Reserved Matters stage, and provision of:
 - Seven-day speed survey to show 85th percentile speeds in both directions
 - Scaled visibility plan in line with the 85th percentile speeds from a 2.4m setback within land under the control of the applicant;
 - access drawing detailing the access layout and width suitable for two cars to pass;
 - Refuse tracking diagrams
 - A suitable footway link to join the existing network at Newland Gardens with dropped kerbs and tactile paving and to link with the football field;
 - Stage I Road Safety Audit
- 4.8 **Landscape:** Objection. Comments:
- The capacity of the site needs improved landscape-evidence from which to base an achievable number, and unlikely the site has capacity for 9 units based upon the submitted layout;
 - It is clear the proposal has not been landscape-led and there insufficient understanding of the site and its context to generate a scheme which will conserve and enhance the National Park at this location.
 - The evidence presented in the LVIA has not been used to influence design choices made.
- 4.9 **Natural England:** No objection.
- 4.10 **Southern Water:** No objection, subject to condition.
- 4.11 **Tree Officer:** No objection.
- All four boundaries are screened with conifer hedging which is heavily overgrown and of no special merit;
 - The garden trees within the site have landscape value but are of low merit and in poor condition;
 - A semi-mature ash tree along the northern boundary is showing signs of ash dieback;
 - The large cider gum tree to the east of the site entrance has public amenity value. However, it is in close proximity to the public highway, nearing over-maturity and in poor structural condition, so unlikely it could be retained as part of the development.

Revised proposal (for 'up to seven units') and following submission of Bat Emergence Survey

- 4.12 Following revision of the proposal wording to reduce the number of dwellings to 'up to seven,' the following additional representations were received:
- 4.13 **Amberley Parish Council:** Objection (same comments/concerns raised as previously).
- 4.14 **Design:** No objection. Comments:
- If we are minded to accept the principle of developing the proposed developable area and up to seven dwellings is acceptable;
 - The design and amount of development would still need to be founded upon a proper understanding of the landscape;
 - Any reserved matters application should be accompanied by an appropriate landscape appraisal setting out how good design has been achieved using the ten characteristics set out in the National Design Guide;
 - The design principles (parameters) set out in any supporting information at Reserved Matters will be critical to the acceptability of any scheme.
- 4.15 **Ecology:** No objection, subject to conditions.
- The bat activity survey confirmed the main building is used by an individual common pipistrelle bat for roosting;
 - The development will result in the loss of roosts used by individual non-breeding bats;
 - Mitigation proposals has been provided to ensure bats would not be disturbed, killed or injured, together with new roosting opportunities
 - Provided these are implemented alongside a minimum 5m green corridor along the eastern boundary and a minimum 2m green corridor along the western, southern and northern boundaries (located outside the private garden curtilage) is provided, no concerns are raised.
- 4.16 **Highway Authority:** No objection. Comments:
- The reduction in the amount of units to up to 7 does not alter the LHA's comments issued on 5 March 2020.
- 5. Representations**
- 5.1 One letter of objection has been received (to both submitted and revised proposal), raising the following concerns:
- Removal of the conifers along the boundary would result in increased noise and visual impacts and have a significant adverse effect upon the occupant's quiet enjoyment of Downsland;
 - The trees provide carbon sequestration which is important given the proximity of the main road;
 - Removal of the trees appears to be for cosmetic reasons;
 - Lack of details of surface water drainage other than stating the existing water course will be used to dispose of surface water;
 - The field immediately to the north and the northwest corner of the development site has standing water after rainfall that does not readily drain away to the existing water course;
 - Any rise in [water] level would flood the garden and storage sheds of Downsland.
- 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) and the Amberley Neighbourhood Development Plan (NDP) (2017). 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 (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 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.

The South Downs National Park Partnership Management Plan

- 6.6 The South Downs National Park Partnership Management Plan 2020-25 is a material consideration in the determination of the application. The following policies are of particular relevance:
- 1: Conserve and enhance natural beauty and special qualities of the landscape;
 - 3: Protect and enhance tranquillity and dark night skies;
 - 5: Conserve and enhance populations of priority species
 - 50: Housing and other development.

Statutory Requirements

- 6.7 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 Amberley Neighbourhood Development Plan (2017)

- 7.1 The Amberley Neighbourhood Development Plan (NDP) was adopted by the SDNPA on 15 June 2017 and also forms part of the Development Plan. The following policies are of particular relevance:
- EN1 Natural Environment
 - EN2 Landscape Character and Open Views

- EN3 Protection of Trees and Hedgerows
- EN4 Renewable and Low Carbon Energy
- EN6 Dark Night Skies
- EN7 Local Green Space
- FI4 Surface Water Management
- HD1 Settlement Boundary
- HD2 Quality of Design
- HD3 Housing Types, Sizes and Tenures
- HD4 Housing Density
- HD5 Housing Site Allocation
- HD6 Windfall Sites
- HD7 Outdoor Space
- HD8 Attention to Detail
- GA1 Footpath and Cycle Path Network
- GA2 Cycle ways and Pedestrian Footways
- GA3 Car Parking

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

7.2 The following policies of the South Downs Local Plan are of particular relevance:

- SD1: Sustainable Development
- SD2: Ecosystems Services
- SD4: Landscape Character
- SD5: Design
- SD6: Safeguarding Views
- SD8: Dark Night Skies
- SD9: Biodiversity and Geodiversity
- SD10: International Sites
- SD11: Trees, Woodland and Hedgerows
- SD16: Archaeology
- SD17: Protection of the Water Environment
- SD19: Transport and Accessibility
- SD21: Public Realm, Highway Design and Public Art
- SD22: Parking Provision
- SD25: Development Strategy
- SD26: Supply of Homes
- SD27: Mix of Homes
- SD28: Affordable Homes
- SD44: Telecommunications and Utilities Infrastructure
- SD50: Sustainable Drainage Systems
- SD51: Renewable Energy.

8. **Planning Assessment**

Principle of development

8.1 Outline planning applications seek to establish whether the general principles of a proposal would be acceptable before a fully detailed proposal is brought forward. Outline proposals may defer the determination of one or more 'reserved matters,' which may include access; appearance; landscaping; layout; and scale of development. In this instance, all matters are

reserved for later determination, however to approve the outline application the Authority must be satisfied in regard to the in-principle acceptability of the amount and type of development proposed; the ability to mitigate any ecological impacts; and whether safe access is achievable in principle.

- 8.2 The site falls within the settlement policy boundary of Amberley, which was adopted through the Amberley Neighbourhood Development Plan (2017) and carried through to the South Downs Local Plan (2019). Policies HD1 and SD25 support development proposals within settlement boundaries where these accord with other development plan policies; and providing they are of a scale and nature appropriate to the character and function of the settlement in its landscape context; make best use of suitable and available previously developed land in the settlement; and make efficient and appropriate use of land.
- 8.3 Policy SD26 requires a total of six dwellings to be provided in Amberley village, which has been met through allocation policy HD5 for a 'minimum of six dwellings.' Policy HD6 states that the scale of development must be appropriate to the size, character and role of the settlement and that land must be used 'effectively and comprehensively.'
- 8.4 The Parish Council has objected to the amount and scale of development due to the number of dwellings allocated to Amberley through SD26 having already been exceeded through permission SDNP/19/04886/FUL. Mention is also made of the development at Drewitts Farm, which has had a number of permissions for six dwellings since 2014.
- 8.5 Policy SD26 makes provision for the supply of 4,750 homes across the National Park for the Local Plan period (2014-33) through site allocation; the implementation of existing planning permissions; and the development of windfall sites. Under SD26, Amberley is required to allocate land for approximately six dwellings, which is secured through policy HD5 of the Amberley NDP (for a minimum of six), and permission for 14No dwellings on the site has now been granted under SDNP/19/04886/FUL. The permission at Drewitts Farm will have contributed to the calculation of the overall windfall allowance for the National Park. Although the amount of development provided in Amberley during the Local Plan period will be higher than that allocated to the settlement under SD26, it is important to note that settlement housing numbers are not capped. Paragraph 7.32 of the supporting text for policy SD26 makes it clear that windfall allowance is not attributable to particular settlements, and does not count towards settlement-specific housing provision figures. Policy HD6 does not set a limit on the amount of development that would be acceptable for a windfall site, however the supporting text refers to 'small residential developments on infill and brownfield sites.'
- 8.6 The Parish Council also raises concerns in regard to the subdivision of the site to provide smaller dwellings which is felt to be contrary to criterion 4 of HD6 which states that 'arbitrary subdivision of land or piecemeal development' is unacceptable.
- 8.7 There is no explanatory text setting out the reasoning behind criterion 4 of HD6; however, the usual purpose of such policy wording is to prevent circumvention of affordable housing thresholds, as set out in criterion 5 of Policy SD28. In this instance the replacement of the existing large dwelling would allow the provision of a mix of smaller dwellings better suited to meeting the projected future household needs for the National Park and local area, in line with policies HD3 and SD27 which seek the provision of smaller, predominantly 1-2 and 3 bedroom dwellings to address the identified local and wider National Park housing need. This is in line with the NPPF, which promotes an effective use of land especially if this would help to meet identified needs for housing where land supply is constrained, and supports the optimal use of each site's potential.
- 8.8 It is acknowledged that up to seven units would be a relatively significant number of new dwellings for a settlement the size of Amberley (identified in the Neighbourhood Development Plan as having a population of approximately 600, with 300 households.) However, the SDNPA Settlement Facilities Assessment scores Amberley as the 14th most sustainable settlement in the SDNP out of the 212 assessed. The village has a shop/post office and primary school, is within 16-30 minutes' walk from bus routes and less than 2km from Amberley Train Station. As such, the proposed development would be located in a

relatively sustainable location. However, it would need to be demonstrated at Reserved Matters stage that the final number of units would be sustainable in environmental and landscape terms i.e. it the scheme would need to be informed by appropriate landscape analysis of the site's unique constraints and opportunities (see paragraphs 8.13-8.16 below).

- 8.9 In summary, the provision of up to seven dwellings on the site is acceptable in principle, subject to a s106 to secure a policy-compliant amount and tenure of onsite affordable housing provision. Following negotiations with the applicant, the provision of one social rented unit and one affordable rented unit has been secured through the advancement of a s106 agreement, based on the scenario that seven units are approved at reserved matters, which would accord with policy SD28. Should a lesser amount of units be approved at reserved matters, the applicant could seek to modify the s106 agreement via a Deed of Modification.

Quantum of development and Landscape Capacity of the Site

- 8.10 Although appearance, layout, and scale are not matters for consideration at this outline stage, it is important to understand whether the site is capable in principle of supporting 'up to seven' dwellings.
- 8.11 Policies EN1, EN2, HD4 and HD6 of the Amberley NDP (2017) seek to ensure that new development does not detract from the National Park's visual qualities and essential characteristics or adversely impact on significant views; and is of a scale, design and density appropriate to its location to avoid harm to the established character and appearance of the local area. Policy HD2 states that Proposals for new development will be assessed against the established standards laid down in the Amberley Village Design Statement (2005). Planning guideline 11 of the Amberley VDS states that further development on the boundaries of the built up area should be restricted to smaller buildings to soften the transition to open ground and retain the 'soft edge' and uneven character of the existing settlement pattern.
- 8.12 Proposals must also comply with policies SD4, SD5 and SD25, which require the design of development to adopt a landscape-led approach in order to conserve and enhance existing landscape character features; and be of a scale and nature appropriate to the character and function of the settlement in its landscape context. Policy SD6 requires new development to preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views and views of key landmarks within the National Park. Policy HD4 requires the density of new developments to be appropriate to its location by virtue of size, siting and relationship to existing properties.
- 8.13 Concerns are raised by the Parish Council that the proposal (of seven units) would be a prominent major development at the gateway to the village when approaching from Storrington and will feature prominently in views from the Downs.
- 8.14 Similar concerns are also raised by the Design and Landscape officers. The site is likely to have a relatively low capacity to receive development, being located in a sensitive, edge of settlement location, and is immediately visible from Turnpike Road on the approach to the village from Storrington, and other publically accessible sites and key viewpoints including from the South Downs Way. Although the application is supported by a retrospective Landscape and Visual Impact Assessment (LVIA), this document attempts to justify the nine units originally proposed without any analysis of landscape evidence to assess the site's capacity for development.
- 8.15 Notwithstanding, the Design officer is of the view that seven units could potentially be achieved on the site, although this would be entirely dependent on the size, scale and design of development brought forward at Reserved Matters. The consideration of housing density generally is not sufficiently refined to be useful for determining the landscape capacity of development sites in a National Park; however, it does provide an approximate indication of the amount of housing that could be delivered for example on allocation sites, subject to detailed landscape work being undertaken. In this instance, the site, together with the rural exception and allocation sites, would form a separate, edge-of-settlement development away from the main, denser village area, where lower densities would allow a more sensitive

transition from the open countryside. The red line area is 0.3ha, however with the required ecological buffers (see Ecology below), the developable area is approximately 0.25ha. The provision of seven dwellings on the site would therefore result in a development of approximately 29 dwellings per hectare (dph), which is a reasonably low figure. Until an appropriate level of landscape evidence analysis has been undertaken, the optimum quantum, form, layout, scale and appearance of development remain unknown.

- 8.16 It will therefore be critical to the acceptability of any Reserved Matters application for the final amount, design, scale and form of development proposed to be clearly and demonstrably supported by detailed landscape evidence and analysis, and appropriate understanding of the site's landscape constraints and opportunities.
- 8.17 In summary, the proposal for outline permission for 'up to seven' units is considered to be acceptable and allows sufficient flexibility for a policy-compliant amount of development to be brought forward at Reserved Matters. However, it would need to be clearly demonstrated at Reserved Matters, through an appropriate analysis of landscape evidence, that the final amount of development proposed in this sensitive, edge-of-settlement site would not result in unacceptable harm to the character of the area and wider landscape.

Ecology and Trees

- 8.18 Policies HD6, SD2, SD9 and SD11 support proposals that conserve and enhance biodiversity, trees and hedgerows; retain, protect and enhance features of biodiversity and supporting habitat, and identify and incorporate net gains for biodiversity. As the site falls within the 5km buffer of the Arun Valley Special Protection Area (SPA) and the 12km buffer of The Mens Special Area of Conservation (SAC) the application is also required under SD10 to be 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. For the Arun Valley SPA, this requires the site to be assessed for its suitability for wintering Bewick Swan; and for The Mens SAC, this requires the development to be assessed for its ability to impact on bats.
- 8.19 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. The site is not suitable habitat for Bewick Swan, and no Barbastelle or Bechstein bats were found on site, and likely significant effects are therefore ruled out. The development would result in the loss of a day roost used by an individual non-breeding bat, however acceptable mitigation proposals for this protected species are proposed including the provision of new roosting opportunities, and 2m green corridors along the site boundaries (outside private garden curtilage) to retain suitable foraging habitat. The County Ecologist has no objection to the proposals subject to conditions securing the proposed mitigation measures, and a scheme of biodiversity enhancements.
- 8.20 The Tree officer has advised that there are no trees on site that are worthy of retention, and that the large gum tree next to the access and public highway should not be retained due to its age and structural defects. Although the conifer hedging provides a screening function which is important in terms of breaking up views of the site from publically accessible viewpoints, it is of limited ecological value and its removal and replacement with native species would be positive in both landscape character and ecological terms. The enhancements recommended by the submitted Ecological appraisal include the planting of species-rich native hedging to the boundary of the site, and the enhancement of habitat corridor areas along the boundaries with scattered native trees.
- 8.21 The minimum 5m buffer alongside the watercourse is required for both ecological and flood risk/drainage reasons. As this and the 2m ecological buffers along the remaining boundaries would be outside private curtilage, it is considered appropriate to secure the ongoing landscape and ecological management of these areas via a suitably worded condition.

Access and parking

- 8.22 Policy GA4 of the Amberley NDP states that Proposals for development which would enable or assist with traffic calming/improved safety along the B2139 (Turnpike Road) will be

supported. Policy SD21 states that proposals will be permitted provided that they protect and enhance highway safety.

- 8.23 The submitted plans indicate that the existing access from Turnpike Road would be used to access the site. This is currently just within the 40mph speed zone, although the applicant understands that the Parish Council are seeking to extend the 40mph zone some 100m westwards.
- 8.24 The WSCC Highway Authority has advised, as on the previous application, that given the access point; the context of the road network and traffic speeds in this location, further information including traffic and speed surveys would be required to justify the proposed visibility splays of 12m in both directions. A road safety audit would also be required to assess the provision of a footway along Turnpike Road, and a footway to link the site to the playing field to the west. Subject to this information being provided at Reserved Matters stage, and it being demonstrated that safe and suitable access can be achieved, the Highway Authority has no objection in principle to the use of this access.
- 8.25 It is likely that the access would need to be widened to provide an appropriate visibility splay and to allow two vehicles to exit and enter the site at the same time, which could have impacts on the mature trees either side of the existing access, and associated habitat. Officers also have concerns that retaining a single access on to Turnpike Road would effectively isolate the development from the rest of the settlement, including the allocation site to the north. The resultant scheme would function as a disconnected pocket of development, cut off from the village and neighbouring sites. It would therefore be preferable to connect vehicular access for the site with the allocation site to the north, thereby sharing the existing Newland Gardens road, the junction of which with Turnpike Road has good visibility further into the 40mph zone. However, this is more an issue of amenity and landscape character impact, depending on the extent of the visibility splay required for the currently proposed option onto Turnpike Road, and not a matter of highway safety. As access is a reserved matter, sufficient information to overcome the above highways and amenity concerns would need to be provided at Reserved Matters stage.

Other Matters

- 8.26 The site is currently disconnected from the settlement, and there are clear opportunities for improving permeability. The access as proposed currently fails to indicate any pedestrian links with the adjacent playing field or the Millennium Green; the public footpath leading to the village school; or nearby existing and proposed development. As such any scheme would be effectively disconnected from the rest of the settlement, and occupants would predominantly rely on the use of private vehicles for even short journeys. To address this, WSCC Highway Authority require a pedestrian access scheme to be brought forward at Reserved Matters.
- 8.27 The site is considered to be at low risk from surface and groundwater flooding. The submitted details indicate that surface water drainage would be dealt with using permeable surfaces, soakaways and the adjoining water course. It is unclear whether the topography of the site or direction of water flow would allow surface water drainage to drain to the water course, in which alternative means for achieving sustainable drainage on the site will need to be addressed at Reserved Matters.
- 8.28 The County Archaeologist has advised that the site is located in an area of good archaeological potential and an archaeological presence should be secured on site when groundworks are undertaken on areas of the site outside the footprints of existing buildings.
- 8.29 There would be an increase in traffic levels, and temporary noise and disturbance during the construction phase, however this is not considered to significantly impact neighbour amenity. The location of the dwellings would be unlikely to cause significant harm from overlooking towards neighbouring properties, and any replacement planting of the coniferous borders could include larger tree and hedge specimens. No concerns have been raised in regard to noise or disturbance as a result of development.

- 8.30 It is considered that the above matters could be dealt with by means of suitably worded planning conditions to secure satisfactory details at reserved matters stage under consideration of access, layout and landscaping.

Community Infrastructure Levy

- 8.31 The market housing element of the development would be liable for a CIL contribution of £200 (plus indexation from 2017) per sqm. Affordable housing is exempted from CIL.

9. Conclusion

- 9.1 Given the above it is considered that the proposal is broadly in accordance with the Development Plan and there are no overriding material considerations to otherwise indicate that outline permission should not be granted. It is therefore recommended that planning permission is granted subject to conditions and a legal agreement to secure two affordable dwellings of a policy compliant tenure.

10. Reason for Recommendation

- 10.1 The application is recommended for approval subject to the following conditions and a legal agreement to secure two affordable dwellings of a policy compliant tenure. If the legal agreement is not completed or sufficient progress been made within 6 months of the Planning Committee meeting of 13 August 2020, it is recommended that authority be delegated to the Director of Planning to refuse the application.

1. The permission hereby granted is an outline permission under s92 of the Town and Country Planning Act 1990 (as amended) and an application to the Local Planning Authority for the approval of the following matters shall be made not later than the expiration of 2 years from the date of this permission:

- i) Access;
- ii) Layout;
- iii) Scale;
- iv) Appearance; and
- v) Landscaping.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

2. The development permitted shall be begun either before the expiration of five years from the date of this permission, or before expiration of 2 years from the date of approval of the last of the reserved matters to be approved, whichever is the later.
Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).
3. 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.
4. From the date of this permission, notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) or any Order amending or revoking and re-enacting this Order, no further buildings, structures or means of enclosure shall be erected or installed at the site without prior planning permission from the Local Planning Authority.
Reason: In the interests of amenity, and to prevent unsustainable development that would not comply with planning policy.

Construction

5. No works pursuant to this permission shall commence until plans and cross sections of the existing and proposed ground levels of the development, site boundaries and

finished floor levels in relation to a nearby datum point (above Ordnance datum) have been submitted to and approved by the Local Planning Authority in writing. The development shall be completed in full accordance with the approved details.

Reason: To ensure a satisfactory relationship between the new development and adjacent buildings, amenity areas and trees.

6. No works pursuant to this permission, including any works of demolition, shall commence 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 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.

7. No works pursuant to this permission shall commence until details of earthworks shall be submitted to and approved in writing by the Local Planning Authority. These details shall include the proposed grading and mounding of land areas including levels (or contours) to be formed, and the nature of material, showing the relationship of proposed mounding to existing vegetation and surrounding landform. 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.

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

Reason: To safeguard the landscape character of the site.

Design and Materials

9. The appearance particulars to be submitted in accordance with Condition I shall include a Design Code demonstrably informed by an assessment of local landscape character, to be submitted to, and approved in writing, by the Local Planning Authority. The design code shall provide further details on matters such as character areas, street hierarchy, building typologies and heights, key buildings, the approach to car parking, structural planting, street furniture, lighting and treatment of the public realm. Thereafter the development shall be carried out in full accordance with the approved design code.

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.

10. The appearance particulars to be submitted in accordance with Condition I shall include a schedule of architectural details, materials and finishes and, where so required, samples of such materials and finishes, to be submitted to and approved in writing by the Local Planning Authority. The schedule shall include, but not be limited to:

- i) Treatment of external walls, roofs, eaves;
- ii) Windows and doors (which shall be of timber construction) including glazing, head, sill, lintel and depth of reveal; and
- iii) Rainwater goods and fascias.

Thereafter the development shall be carried out in full accordance with the approved schedule and samples.

Reason: To achieve an appropriate form of development in the interests of the character and appearance of the area, and the quality of the development.

11. The landscaping and layout particulars to be submitted in accordance with Condition I shall include a detailed scheme of hard and soft landscaping works, which 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 replacement tree establishment; schedules of plants and trees (achieving where possible closed canopies along the green corridor through the site) noting species, sizes; and proposed numbers/densities where appropriate;
- ii) Tree guards, staking and tree-pit construction;
- iii) Climbers for northern building elevations (to improve thermal efficiency and provide habitat);
- iv) The provision of a 5m buffer on the western boundary alongside the watercourse, and 2m ecological buffers along the northern, eastern and southern boundaries;
- v) Location, height and materials/construction technique for all boundary treatments and other built means of enclosure (including gates and setbacks) to property frontages, the 5m watercourse buffer along the eastern boundary and the 2m site boundary buffers on the northern, western and southern boundaries);
- vi) Retained areas of grassland cover, scrub, hedgerow, and trees;
- vii) Treatment of surfaces, paths, access ways, courtyards, seating areas, patio areas and parking spaces, including their appearance, depth and permeability, kerbs, edges, steps and ramps, spot levels, finished floor levels, upstands and demarcation;
- viii) Above ground rainwater harvesting solutions and rain gardens;
- ix) Ancillary structures (including cycle and refuse storage to the rear of dwellings);
- x) Electric vehicle charging points;
- xi) A timetable for implementation of the soft and hard landscaping works.

- xii) 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 to integrate the development into the landscape and mitigate any impact upon the amenities of neighbouring properties.

12. The landscaping and layout particulars to be submitted in accordance with Condition 1 shall include a Landscape Management Plan covering areas outside of private ownership including shared public space, access roads, pathways and landscaping, which shall be submitted to and approved in writing by the Local Planning Authority. The management plan shall include long term objectives, management responsibilities and maintenance schedules for all landscape areas, other than small privately owned domestic gardens. The landscape management plan shall thereafter be implemented in full prior to the first occupation of the development hereby permitted, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To secure the long term maintenance of the landscaping scheme, which will contribute to the setting of the development and the surrounding character and appearance of the area.

13. No works pursuant to this permission 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 dwelling 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) Sustainable, locally sourced materials (including plastic-free windows and doors).

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 occupation of the dwellings hereby permitted, a refuse storage and management strategy, incorporating collection for recyclables and private garden compost, 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.

Archaeology

15. No works pursuant to this permission shall commence until a Written Scheme of Investigation to secure the implementation of a programme of archaeological assessment has been submitted to and approved in writing by the Local Planning

Authority. The assessment should take the form of trial trenches located across the proposed area of housing, access roads and service trenches to ensure that any archaeological remains encountered within the site are recognised, characterised and recorded.

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.

16. No works pursuant to this permission shall commence until a programme of archaeological mitigation of impact, based on the results of the trial trenching, in accordance with the approved Written Scheme of Investigation required under Condition 15, has been submitted to and approved in writing by the Local Planning Authority.

Thereafter the mitigation provisions shall be carried out in full accordance with the approved programme.

Reason: To mitigate the effect of the works associated with the development upon any heritage assets and to ensure that information regarding these heritage assets is preserved by record for future generations.

17. On completion of all archaeological fieldwork as set out in the approved Written Scheme of Investigation and mitigation programme under Conditions 15 and 16 a report setting out and securing any post-excavation assessment, specialist analysis and reports, publication and public engagement as appropriate shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the post-excavation assessment shall be carried out in full accordance with the approved report.

Reason: To contribute to our knowledge and understanding of the past by ensuring that opportunities are taken to capture evidence from the historic environment and to make this publicly available.

Drainage

18. No works pursuant to this permission shall commence until details of the proposed foul drainage and means of disposal, including on and/or off site works, have been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in full accordance with the approved designs.

Reason: To ensure satisfactory provision of foul water drainage.

19. Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate waste water network capacity is available to adequately drain the development

Reason: To ensure satisfactory provision of foul water drainage.

20. No works pursuant to this permission shall commence until details of the proposed surface water drainage and means of disposal, including on and/or off site works, have been submitted to and approved in writing by the Local Planning Authority.

All works shall be undertaken in full accordance with the LPA agreed detailed surface water drainage designs and calculations for the site, based on sustainable drainage (SuDS) principles. The drainage designs should demonstrate that the surface water runoff generated up to and including the 1 in 100-year, plus climate change, critical storm will not exceed the run-off from the current site following the corresponding rainfall event.

The maintenance and management of the SuDS system should be set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority.

Reason: To ensure satisfactory provision of surface water drainage.

21. Prior to development above slab level, details of vegetative and capture-at-source solutions for the management of surface water shall be submitted to and approved by the Local Planning Authority.

These shall include, but not be limited to provision of:

- i) Rainwater gardens (to include any planted areas in front of buildings);
- ii) Water butts.

The details shall be implemented and maintained as approved in full accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To manage and mitigate surface water run-off and the risk of flooding.

Ecology and Trees

22. Development shall proceed in accordance with the measures set out in Sections 5.0 'Assessment of Effects and Mitigation of the Ecological Impact Assessment by Lizard Landscape Design and Ecology (July 2020), unless varied by a European Protected Species (EPS) license issued by Natural England and agreed in writing by the Local Planning Authority. Thereafter, the replacement bat roost features and enhancements shall be permanently maintained and retained in accordance with the approved details.

Reason: to ensure the favourable conservation status of bats.

23. No works pursuant to this permission shall commence until a detailed scheme of biodiversity enhancements to be incorporated into the development and the green corridors along the boundaries, in line with measures in Section 6.0 of the Ecological Assessment (Lizard, July 2020) shall be submitted to, and approved in writing by the Local Planning Authority, and thereafter implemented in full as approved. The details shall include the locations and specifications of such features, a timescale for their provision, and details of any future management responsibilities. The details shall be implemented and maintained as approved in full accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

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

24. Prior to development above slab level, a Landscape and Ecological Management Plan (LEMP) covering the watercourse and ecological boundary buffer zones, 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 watercourse, banks, 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) Detailed working methodologies for installation and maintenance of pathways and boundary treatments within/adjacent to the watercourse buffer area;
 - d) Ecological trends and constraints on site that might influence management;
 - e) Details of future management of both areas for habitats and species, including details of management responsibility;

- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
- g) A scheme of ongoing monitoring, and remedial measures where appropriate;
- h) 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 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.

Lighting and Dark Night Skies

25. 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, particularly along the ecological buffers on the southern, eastern and northern boundaries.

The lighting shall be installed, maintained and operated in full accordance with the approved details, and no other external lighting shall be installed anywhere within the site, unless otherwise approved in writing by the Local Planning Authority.

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

26. Prior to first occupation of the development hereby permitted, details of timed black-out blinds to be affixed to any rooflight(s) 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.

Highways and parking

27. No works pursuant to this permission shall commence until appropriate visibility splays have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in full accordance with the approved details.

Reason: In the interests of road safety.

28. No works pursuant to this permission shall commence until the access has been constructed in accordance with plans and details to be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of road safety.

29. No works pursuant to this permission shall commence until a scheme of pedestrian access works has been submitted to agreed and agreed in writing by the Local Planning Authority. Thereafter the development shall be carried out in full accordance with the approved details.

Reason: In the interests of road safety.

30. Prior to the first occupation of the development hereby permitted, details of car parking and electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. The spaces shall thereafter be retained at all times for their designated purpose.

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

31. Prior to the first occupation of the development hereby permitted, details of covered and secure cycle parking spaces 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 details.

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

Telecommunications

32. Prior to the first occupation of the development hereby permitted, details of how superfast broadband connection will be provided (or an equivalent alternative technology) and installed on an open access basis, 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 details.

Reason: To provide satisfactory broadband connection for new dwellings.

Informatives

1. A formal application for connection to the public sewerage system is required in order to service this development. Please read our New Connections Services Charging Arrangements documents which has now been published and is available to read on our website via the following link: www.southernwater.co.uk/developing-building/connection-charging-arrangements Building Control officers should be asked to comment on the adequacy of soakaways to dispose of surface water from the proposed development. It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.
2. 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.
3. If the development site includes a watercourse or water-dependent habitat, such as wet woodland or floodplain marsh, you must always seek to conserve and enhance these habitats and where possible provide new similar habitats.

Watercourses should be left with an appropriately sized, development-free buffer zone on both sides of the channel. Usually, a minimum of 5 metres on both sides of the watercourse will be required.

Riparian owners should seek to protect and enhance the watercourses on their land and carry out any Water Framework Directive actions in line with the South East River Basin District Management Plan.

11. Crime and Disorder Implication

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

12. Human Rights Implications

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

13. Equality Act 2010

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

14. Proactive Working

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

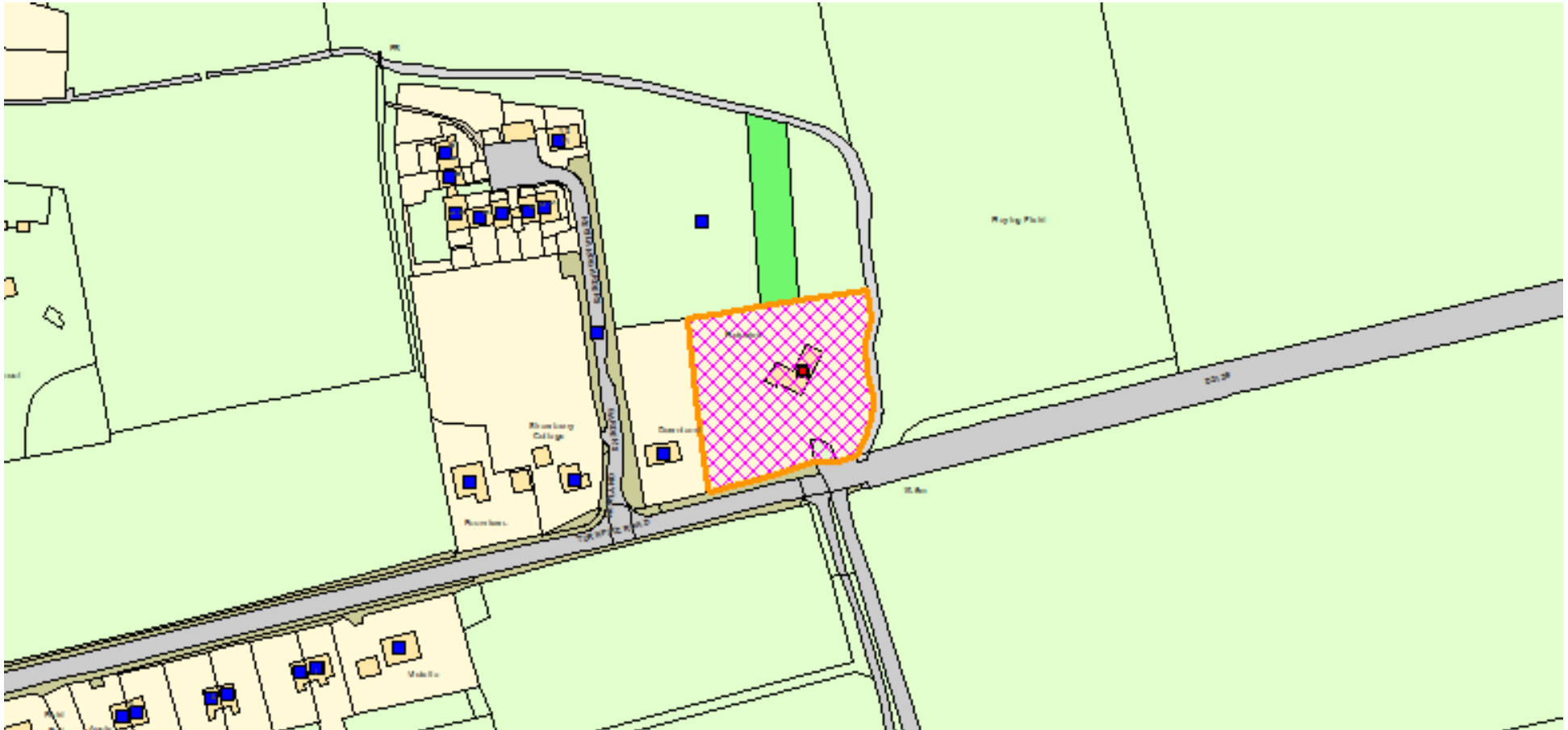
TIM SLANEY

Director of Planning

South Downs National Park Authority

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Appendices I. Site Location Map
SDNPA Consultees Legal Services, Development Manager
Background [All planning application plans, supporting documents, consultation and third party responses](#)
Documents [Amberley Neighbourhood Plan \(2017\)](#)
[Amberley Village Design Statement \(2005\)](#)
[National Planning Policy Framework \(2019\)](#)
[Planning Portal \(Outline Permission\)](#)
[SDNPA Settlement Facilities Assessment \(2015\)](#)
[South Downs Local Plan \(2014-33\)](#)
[South Downs National Park Partnership Management Plan 2014](#)
[South Downs Integrated Landscape Character Assessment 2005 and 2011](#)

Agenda Item 08 Report PC20/21-07 Appendix I
Site Location Map



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Agenda Item 09
Report PC20/21-08

Report to	Planning Committee
Date	13 August 2020
By	Director of Planning
Local Authority	Lewes District Council
Application Number	SDNP/20/01676/FUL
Applicant	Mr Justin Wallden
Application	To retain the use of the land on a permanent basis for one rugby pitch for Ditchling Rugby Club, with associated use of the Cricket Club Car Park and Clubhouse, following temporary permission granted under reference SDNP/16/05154/FUL
Address	Land at Keymer Road, Ditchling, East Sussex

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

Executive Summary

The application proposes the permanent change of use of part of an agricultural field at the edge of Ditchling village to provide a single grassed rugby pitch following the earlier granting of a temporary permission. Parking and facilities would continue to be provided by shared use of the Cricket Club's car park and club house building.

The site is in a sensitive, rural location between the historic settlements of Ditchling and Keymer, to the east of the existing Cricket Club, and associated grounds and club house. The site is visible from the adjoining public footpath, and from key viewpoints on Ditchling Beacon and the Downs.

The site was previously granted the temporary four-year permission by the Planning Committee for the proposed use in February 2017 to allow assessment of landscape impacts over a period of time, in particular for the use of the car park and its condition during winter months to be reviewed. The four-year period was deemed sufficient time to allow for levelling works to establish a pitch and a number of playing seasons. Officers consider on balance that although there would be some visual impacts as a result of permanent use of the site for the playing of rugby, the proposal is acceptable in landscape terms, and would conserve the open landscape character of the strategic gap between Ditchling and Keymer.

The application is placed before the Committee given its previous consideration of the original application and to allow Members the opportunity to consider whether permanent use of the site would be appropriate.

1. Site Description

- 1.1 The site lies within the area of the Adur to Ouse Scarp Footslope South Downs Integrated Landscape Character Assessment (SDILCA), and forms a transition between the steep chalk scarp to the south and the Low Weald to the north.
- 1.2 The site comprises three areas which include the rugby pitch itself, a 2ha rectangular area within a grassed field to the east of the existing cricket fields; the existing St James Cricket Club pavilion building 150m to the west of the rugby pitch; and the Cricket Club's car park which is 120m further west. The car park surface has been laid with a geocell membrane infilled with coarse gravel to provide a stable surface during winter months.
- 1.3 The pitch part of the site currently comprises semi-improved grassland bounded by

hedgerows with scattered trees. To the south of the pitch is a sheep grazed field. There are some mature oaks on site and ephemeral (temporarily filled) ditches along the boundaries.

- 1.4 The cricket club car park is accessed directly from Keymer Road, and bounded by deciduous hedges and trees, with allotments beyond its western boundary. The car park can accommodate up to 120 vehicles, with rugby matches generating a parking demand of approximately 19 cars.

- 1.5 A Public Right of Way (PRoW) 'The Drove' runs from Keymer Road along the eastern boundary of the rugby pitch, with the remaining boundaries of the wider field being bordered by deciduous hedgerow and trees.

2. Relevant Planning History

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

- SDNP/14/03217/PRE Creation of 2 no. rugby pitches and car park. Advice provided 17.07.2014

The advice stated that the site forms part of a sensitive landscape in which new development has the potential to detract from its landscape character and to impact on the setting of the village. The resulting change to the landscape would unlikely to be deemed acceptable, particularly in combination with the existing cricket club immediately adjacent. The cumulative result would be the creation of a substantial area of formalised land on the rural edge of the village prominent in views, particularly from higher land, which would not be mitigated by existing landscaping and landform.

- SDNP/15/01682/FUL Change of use of land to provide two rugby pitches and associated car parking for Ditchling Rugby Club. This proposal sought to provide a second playing field in the field to the south, a new access from Keymer Road and new car park in the field to the north. Refused 10.09.2015 for the following reasons:

- 1) The proposal, by virtue of its nature, extent, resultant parking area and associated human/vehicular activity would have an adverse impact on the landscape character area and the adjoining Conservation Area which could not be mitigated by additional landscaping, due to the location of the site and surrounding topography. The proposal is therefore considered to be contrary to Paragraph 115 of the NPPF which affords National Parks the highest status of protection in relation to scenic beauty, Saved Policies ST3, CT1, CT2 and H5 of the Lewes District Local Plan (2003) and Core Policies 8 & 10 of the Emerging Lewes District Local Plan Core Strategy.
- 2) The proposal does not provide for adequate turning facilities within the site and reversing vehicles to or from the site onto the public highway would cause hazards to be introduced by the interference with the free flow of safety and traffic on the B2116 (Keymer Road). The Proposals would therefore be contrary to Saved Policies T13 & T14 of the Lewes District Local Plan (2003), Core Policy 13 of the emerging Lewes District Local Plan Joint Core Strategy and the National Planning Policy Framework.

- SDNP/16/05154/FUL Change of use of land to provide one rugby pitch for Ditchling Rugby Club, with associated use of Cricket Club Car Park and Clubhouse. Temporary 4 year permission granted 16.02.2017. The development was recommended for approval on a temporary basis *"to allow for the use of the car park and its wintertime condition to be reviewed. A maximum of four years would allow for the land levelling works and establishment of a pitch followed by two playing seasons."*
- SDNP/17/04484/DCOND Discharge of Conditions 4, 5, 10, 11, 13 and 14 on planning consent SDNP/16/05154/FUL. Approved 20.10.2017

- 2.2 Applications relating to the land to the cricket club land to the west of the proposed rugby pitch are also relevant:

- LW/01/0424 Retrospective application for groundworks within copse to form overspill parking spaces. Approved 26.04.2001

- LW/03/1958 Change of use of agricultural field to additional cricket pitch including re-alignment of hedgerow/ditches and new access to serve overflow car park. Refused 17.11.2003
- LW/04/0450 Change of use of agricultural field to additional cricket pitch including re-alignment of hedgerow/ditches and new access to serve overflow car park. Refused 26.04.2004 Appeal withdrawn
- LW/06/0249 Change of use of land from youth area to agricultural and change of use of land from agricultural to youth area cricket pitch. Approved 02.05.2006

3. Proposal

- 3.1 The proposal seeks the permanent change of use of the site as a rugby pitch, and associated use of the cricket club house and car park. The conditions attached to the previous permission required the assessment of the pitch and car park ground conditions, and details of any levelling, seeding, surfacing and drainage works that would be carried out. The approved details included cleaning of field drains and verti-draining (aeration) of the pitch to provide an acceptable playing surface, but no seeding, levelling or engineered drainage works were proposed.
- 3.2 No operational development, including excavations, drainage, groundworks or change in ground levels, is currently proposed. The rugby pitch is used for one adult team playing home games only. There are 11 home games during a typical season which runs from September to April. A two-week extension of the playing season is sought to allow matches to be played from 1 September (rather than 15 September as previously permitted) given the trend for wetter winters and need for cancellation of matches as a result. The proposed rugby playing season does not overlap with the cricket season.
- 3.3 Matches would be played during daylight hours on an unlit pitch. White painted rugby posts would be left out during the playing season, and stored during the remainder of the year. A number of biodiversity enhancements are recommended by the submitted preliminary ecological appraisal including the provision of bat boxes and suitable reptile habitat.

4. Consultations

4.1 **Archaeology:** No objection.

4.2 **Ditchling Parish Council:** Objection. Comments:

- Would be contrary to policy SD4 criteria 1) and 3) and CONS7 of the Ditchling, Streat & Westmeston Neighbourhood Plan;
- Does not maintain the strategic gap between Ditchling and Keymer villages;
- At the 9 February 2017 committee meeting mention was made of a sink hole at the Ditchling Recreation Ground indicating that the previous rugby pitch was unsafe; and that the pitch was prone to flooding;
- This sink hole was a collapsed drain that had been repaired four years previously, and matches had continued to be played at the Recreation Ground for two following seasons.

4.3 **Ecology:** No objection, subject to condition.

4.4 **Environmental Health:** No objection. Comments:

- No statutory nuisance associated with temporary use of the land and no complaints made to Lewes District Council.

4.5 **Flood Authority:** No objection. Comments:

- No changes are proposed to the site arrangement, drainage or levels.

4.6 **Highways:** No objection, subject to conditions.

4.7 **Landscape:** Objection. Comments:

- The 'gap' is a vital rural setting to both Hassocks and Ditchling and a key Gateway into the National Park;
- This area is under significant pressure for change and soon cumulative changes will result in a permanent change of character which cannot be mitigated for;

- The site does not have the capacity for a permanent non-rural change of use given the likely infrastructure (car parking, pitches, lighting, access ways) required for the rugby club to be viable [*Officer Comment: any future application for infrastructure would be considered on its own merits*];
- Engineered drainage works could alter the site's character and that of the nearby semi-improved grassland [*Officer Comment: no drainage works are proposed*];
- Concerns in regard to permanent impacts to the landscape setting of the Conservation Area;
- Should permission be granted the following should be secured:
 - Meaningful habitat management and grazing regime through a Landscape and Ecological Management Plan;
 - Reinstatement of the lost field boundary to improve green infrastructure;
 - Gapping up of one of the gateways onto B2112 if both are not needed;
 - Sustainable drainage solutions; for example, wetland habitat creation;
 - Sensitive removal of Himalayan balsam (avoiding chemicals close to ditches).

4.8 **Sport England: Support.** Comments:

- Supports removal of any conditions that would improve the sustainability of Ditchling RFC and the benefits that would accrue from permanent permission including securing investment and ensuring long term sustainability;
- The draft Playing Pitch Strategy (PPS) for Lewes District identifies a significant deficit of rugby pitches up to 2030. The pitch should therefore be retained permanently.

4.9 **Tree officer:** No objection.

5. **Representations**

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

Principle

- Contrary to the Ditchling Neighbourhood Plan;
- Outside settlement boundary and should only be used for non-agricultural and non-rural purposes where absolute need can be proved and there is no alternative;
- Rugby is not an agricultural or rural pursuit;
- No offsetting community-wide gain and no significant economic or employment benefits
- Further development of the site would be necessary to ensure the club's financial sustainability;
- The pitch at the Ditchling Recreation Ground where the club played previously is still available and suitable;
- The Recreation Ground already has parking facilities, toilets, storage and clubhouse and there has been considerable community investment in draining the ground;
- In supporting the application, Sports England are risking the future of the Recreation Ground which serves many local sports and needs clubs to support it;
- Will require more facilities on site and further applications will follow if permission is granted;

Heritage and Landscape Impacts

- Close to Ditchling Conservation Area, a Grade 2* building and within 300 yards of the village's only two Grade I buildings;
- Will destroy archaeological evidence and interest in a site with known Mesolithic sites;
- Future drainage works would urbanise the visual appearance of the area from the Downs and for walkers;

Drainage and Ecology

- The site is wet and unsuitable for a winter sports pitch; drainage works will cause flooding problems elsewhere;
- Will require extensive drainage works including removal of topsoil, extensive drainage and laying of sports turf which will impact the water table and block subterranean chalk streams;
- Site and Keymer Road, the Beacon Road, Clayton Road and South Street are all prone to groundwater/surface water off the Downs, with water incursion into houses at the northern end of Beacon Road;
- Impacts on the The Drove Way area; wet meadowland flora and established oak trees, insect life, and habitat.

5.2 A letter of objection was also received from Hassocks Parish Council raising the following:

- Hassocks Parish Council supports the comments made by Ditchling Parish Council;
- The application should be rejected as it is contrary to Policy CONS 7 of the Ditchling, Streat & Westmeston Neighbourhood Plan and Policy SD4 of the South Downs Local Plan.

5.3 Five neutral representations were received, including from the Ditchling Society, raising the following:

- Following grant of temporary permission, the Rugby Club has adhered to and carried out the conditions imposed;
- The Club has been co-operative with and considerate towards immediate neighbours;
- The field now has a decent playing surface; although prone to water logging which limits games;
- Concerns that future drainage works could affect existing water courses and drainage and have archaeological and landscape impacts;
- The impact has been manageable and the club is beginning to provide some community benefit including mini-rugby training for local children;
- Concerns about future expansion of facilities such as lighting, alternative car parking, access and built storage would not be acceptable;
- The access, car parking and pavilion facilities should continue to be shared with the Cricket Club; and all maintenance vehicles accessing the site via Keymer Road. Only pedestrians should access the pitch using the public footpath in the Drove;
- Flora and fauna, and ecological protection should be ensured;
- Cost and impacts to works at the Recreation Ground would be lower;
- The ground size and condition of the old pitch at the Recreation Ground does not comply with standards, and unsuitable for playing rugby.

5.4 One letter in support of the application was received, raising the following:

- Provides recreational involvement for a wide range of age groups in the village community;
- Development and coaching of young players is educational and provides useful skills and possible involvement in a sport on a lifetime basis.
- Activities and pastimes promoting physical fitness and mental wellbeing for the youth of the community should be promoted;
- The fields are well maintained and presented.

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) and the Ditchling, Streat & Westmeston Neighbourhood Development Plan (Ditchling Cluster NDP) (2018). 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.

6.4 The following sections of the NPPF are of particular relevance to the application:

- Section 2: Achieving sustainable development
- Section 8: Promoting healthy and safe communities;
- Section 12: Achieving well designed places;
- Section 15: Conserving and enhancing the natural environment
- Section 16: Conserving and enhancing the historic environment.

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, and the accompanying footnote 55 advising that 'major development' in designated landscapes is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

The South Downs National Park Partnership Management Plan

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 of particular relevance:

- 1: conserve and enhance natural beauty and special qualities of the landscape;
- 3: Protect and enhance tranquillity and dark night skies;
- 9: Protect the significance of the historic environment;
- 29: Enhance the health and wellbeing of residents;
- 49: Maintain and improve access to a range of essential community services and facilities.

Statutory Requirements

6.8 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, Conservation Areas 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. Section 72 relates to conservation areas specifically, and states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

7. Planning Policy

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

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

- SD1 – Sustainable Development
- SD2 – Ecosystems Services
- SD4 – Landscape Character
- SD5 – Design
- SD6 – Safeguarding Views
- SD7 – Relative Tranquillity
- SD8 – Dark Night Skies
- SD9 – Biodiversity and Geodiversity
- SD11 – Trees, Woodland and Hedgerows
- SD12 – Historic Environment
- SD16 – Archaeology
- SD17 – Protection of the Water Environment
- SD19 – Transport and Accessibility
- SD21 – Public Realm, Highway Design and Public Art
- SD22 – Parking Provision
- SD25 – Development Strategy
- SD43 – New and Existing Community Facilities
- SD45 – Green Infrastructure
- SD46 – Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries
- SD48 – Climate Change and Sustainable Use of Resources
- SD49 – Flood Risk Management
- SD50 – Sustainable Drainage Systems.

The Ditchling, Streat & Westmeston Neighbourhood Plan (Ditchling Cluster NDP) (2018)

7.2 The following policies of the Ditchling Cluster NDP are of particular relevance:

- DSI Development Strategy
- CONS 2 Set standards for design of new development
- CONS 3 Protect heritage assets
- CONS 4 Protect character of conservation areas
- CONS 6 Conserve landscape and important views
- CONS 7: Protect important gaps between settlements
- CONS 8: Preserve dark night skies
- CONS 9: Protect and enhance habitats and biodiversity
- CONS 11: Protect community open spaces
- CONS 12: Safeguard and enhance green infrastructure
- CONS 15: Enhance ecological networks
- COM 1: Increase and protect our community assets
- COM 2: Improve Ditchling Recreation Ground

7.3 The Hassocks Neighbourhood Plan has undergone examination and is awaiting referendum. Whilst the designated neighbourhood area does not include the application site, it does include part of the strategic gap between Keymer and Ditchling. Policy I Local Gap therefore has some relevance.

8. Planning Assessment

8.1 The committee report associated with the previous application SDNP/16/05154/FUL (see **Appendix 2**) acknowledges that the landscape impacts of the proposal are finely balanced. Temporary permission was recommended and granted so that landscape impacts, including the use of the car park and its condition during wintertime use, could be monitored and reviewed.

8.2 As with the previous application, the main considerations relevant to the application are:

- The principle of development;
- Impacts on landscape and the setting of the adjacent Conservation Area;
- Highways and parking;
- Drainage and the water environment;
- Ecology; and
- Amenity.

Principle of development

8.3 The site is located outside of the Ditchling settlement boundary, which was adopted through the Ditchling Westmeston and Streat Neighbourhood Development Plan (Ditchling Cluster NDP) (2018), and carried through to the South Downs Local Plan (2019). Policies SD25 and DSI exceptionally support development outside of settlement boundaries if there is an essential need for a countryside location, and it responds to the context of the relevant broad area. Supporting paragraph 7.10 of SD25 states that the exceptional circumstances whereby development outside settlements may be acceptable include land uses relating to countryside recreation and community uses. Policies SD43 and SD46 support the provision of community facilities such as sport pitches where it can be demonstrated that there is a local need; that the scale of the proposal is proportionate to the local area, and would not result in the loss of open space.

8.4 Policy CONS 7 seeks to preserve the strategic gap between the settlements of Ditchling and Hassocks. Part of the site (the Cricket Club car park and pavilion) falls within a protected area of Community Open Space under policy CONS 11 of the Ditchling Cluster NDP (2018) known as the Keymer Road Recreation Ground. Policy CONS 11 states that proposals will be expected to 'enhance the existing use and community value of [the site], while safeguarding and where possible enhancing their landscape and biodiversity value.' The rugby pitch itself is in an area identified under policy CONS 12 as 'natural/semi-natural accessible space,' and part of the green infrastructure network which should be safeguarded from adverse effects of new development. Policies COM 1 and COM 2 seek to protect and improve the existing Ditchling Recreation Ground which is located to the east of the settlement.

8.5 Concerns have been raised that the proposal would erode the physical gap between Ditchling and Hassocks; that there is no need for the rugby pitch to be located here given the existing pitch at Ditchling Recreation Ground; and that in granting permanent permission future development on the site is inevitable. Concerns are also raised by the Parish Council in regard to the nature and timing of alleged sink holes being one of the reasons for moving the Ditchling Rugby Club (the Club) away from the Ditchling Recreation Ground.

8.6 Erosion of the strategic settlement gap is considered in more detail under landscape impacts, however it is not considered that the use of the land as a sports pitch would result in a loss of open space or green infrastructure. Formerly in agricultural use, the site has been maintained as a grassed field and continues to be used as informal open space when not in use for the playing of rugby. The permanent use of the pitch, and associated use of the existing Cricket Pitch pavilion and car park do not involve new development. Whilst drainage and levelling works may be applied for in future to improve the pitch, such works do not form part of the current application and no information has been put forward to suggest that the permanent use of the site for playing rugby is incumbent on these works taking place or that the club's viability is dependent on them.

8.7 In terms of local need, Sports England refer to the Playing Pitch Strategy (PPS) for Lewes District which includes the area of Ditchling, and identifies a significant deficit of rugby

pitches up to 2030. However, this document is in draft form and can only be afforded limited weight. There is a playing field at the Ditchling Recreation Ground, which is protected under policies COM 1 and COM 2, and was used by the Club up until 2016. It is acknowledged that continued use of the Ditchling Recreation Ground by sports clubs would assist its ongoing viability; however, the playing field slopes downwards almost by almost a full 5m contour line east to west, and is only 55m wide rather than the full playing width of 70m. These constraints limit the Club's ability to attract new players, and was the primary reason for re-locating to the new site. Both the Ditchling Recreation Ground and the application site pitches have drainage issues. The grant of permanent permission would allow the Club to apply for funding to carry out appropriate drainage and levelling works to allow matches to be played in wet weather. However, such works would be the subject of a future planning permission and do not form part of the current application.

- 8.8 In summary, the scheme would provide a permanent community sports facility and would retain an area of open space when not in use for the playing of rugby. The use of the Cricket Club would be extended through the winter season, which would enhance the existing community use of the site. The proposal would meet a local need for a full sized rugby pitch, and is proportionate in scale to the local area. The proposal is therefore considered to be acceptable in principle, subject to considerations of landscape impacts and other issues. Seasonal restriction of the use of the site may be secured via a suitably worded condition.

Landscape and Heritage Impacts

- 8.9 The first statutory purpose of the National Park is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and development within it must accord with this purpose. Accordingly, policies SD4, SD5 and SD25 require development proposals outside settlement boundaries to respond to the context of the relevant broad area, and integrate with, respect and sympathetically complement the landscape character and appearance of the area.
- 8.10 Policies CONS 6 and CONS 7 seek to preserve the landscape setting of Ditchling, and conserve and enhance the open landscape character of the strategic gap. Erosion of the gap would impact on its open, rural character and the setting, historic character and identity of the village. Policy SD4 also seeks to protect the integrity of predominantly open and undeveloped land between settlements and 'real or perceived, visual separation' (supporting paragraph 5.17).
- 8.11 The land at the edge of settlements often forms part of their historic setting, in this case the site forms part of the rural setting of the Ditchling Conservation Area and a number of listed buildings including the war memorial. Policies SD12 and SD15 seek to safeguard heritage assets and their setting, and proposals within the setting of a conservation area are required to have regard to the overall settlement layout; the relationship to the established landscape setting; and existing views into and out of the conservation area.
- 8.12 Concerns have been raised by Ditchling and Hassocks Parish Councils that the proposal would be contrary to the policies protecting the strategic gap between both settlements, and would negatively impact on the setting of Ditchling Village and the Conservation Area.
- 8.13 The strategic gap is acknowledged to have an important role as part of the village's historic rural setting and in terms of preventing the conurbation of Hassocks and Ditchling. The South Downs Integrated Landscape Character Assessment (SDILCA) (2011) for the area (Scarp Footslopes) identifies that 'recent suburban development and urban fringe land uses on the edges of Ditchling...have encroached into its rural setting.' Development considerations include the avoidance of 'urban fringe land uses, such as garden centres, nurseries and sewage farms, [that]... erode the rural character of the landscape' and 'use of excessive lighting, signage and 'suburban' features on the edge of Ditchling [should be minimised.]' Proposals involving harmful land uses that would intensify development by introducing new built form or would have a harmful urbanising effect on this part of the National Park should be resisted.
- 8.14 During the course of the previous application, concerns were raised in regard to potential impacts from use of the car park during winter months, and Members granted temporary permission subject to an additional landscaping condition to secure the ongoing management

of the pitch and car park areas, and reinforcement of the car park surface. The subsequent discharge of conditions application approved details of a suitably porous geocell membrane infilled with coarse gravel, which has since been implemented.

- 8.15 It is acknowledged that the appearance of the rugby pitch is discernibly different to that of an agricultural field, and has a somewhat more urban appearance when operational. The grass is periodically cut and rolled, and if seeded would appear greener than a typically grazed field. The white rugby posts would also be visible throughout the playing season. Whilst there are no formal pathways between the car park, club house and rugby pitch, the grass could become eroded with use; however, this would not appear dissimilar to a rural path established over time through informal use. The seasonal use of the site during winter months would also introduce an additional level of human activity in a rural location. However, all of these elements would be seen in the context of the existing cricket club pitch, club house and car park. The development would not introduce new urban fringe development in the way that 'garden centres, nurseries and sewage farms' would, and because the site would retain its green and open appearance, the extent of visual landscape impacts would be limited. The existing cricket club and proposed rugby club are also land uses commonly associated with countryside open space found close to villages and towns.
- 8.16 The site is visible from Ditchling Beacon, however it appears within a patchwork of different field colours and field boundaries. The posts would be more visible from closer views including from Keymer Road and Clayton Road, and from the public footpath, which follows the western boundary of the Ditchling Conservation Area. There are a number of listed buildings within the Conservation Area on West Street, including the war memorial, and the proposal has the potential to impact on the setting of these heritage assets. However, views into the site from the Conservation Area itself are largely screened by intervening trees and hedgerows, and it is not considered that either the rugby posts or playing field would have a significant visual impact on the setting of heritage assets or the Conservation Area, or publically accessible areas.
- 8.17 Concerns are raised that the necessary drainage and levelling works associated with permanent use of the site would cause landscape harm. Although no levelling or drainage works are proposed; however, the amount of levelling that would likely be required was considered during the previous application. This would be minimal, varying between +0.5m and -0.3m, and could be blended with the gradients of the wider field so as to not form a sharply discernible contrast. It is acknowledged that more engineered forms of drainage could result in unacceptable landscape impacts; however more sustainable drainage solutions such as the creation of wetland habitat could be acceptable in landscape terms.
- 8.18 In summary, although there would be some visual impacts as a result of permanent use of the site for the playing of rugby, the proposal is considered on balance to be acceptable in landscape terms, and would conserve the open landscape character of the strategic gap. Enhancement of the site could be secured via a Landscape and Ecological Management Plan (LEMP) to achieve a number of landscape and biodiversity benefits including reinforced hedgerow and other habitat; reinstatement of the lost field boundary to the south of the playing field; a grazing regime; removal of invasive species and sustainable drainage solutions. Given the site already benefits from temporary permission, it is considered appropriate to secure the provision of a LEMP within a period of six months of the date of any grant of permission by means of a suitably worded condition.

Highways and Parking

- 8.19 The Highway Authority has no objection to the proposal, subject to conditions limiting use of the land for the purposes of playing rugby from September to April to ensure no conflict with the cricket club operation and use of the car park.
- 8.20 A parking management plan was secured under the previous permission for the duration of the temporary planning permission. It is considered appropriate to secure an amended parking management plan to reflect permanent permission, should this be granted.

Drainage and the Water Environment

- 8.21 Policy SD50 supports sustainable drainage solutions to avoid increase of surface water run-off, taking account of climate change.

- 8.22 Concerns have been raised in regard to the poor drainage of the rugby pitch, and the need for permanent/engineered drainage solutions which could cause flooding elsewhere. The Parish Council has also raised a concern in regard to the nature and timing of alleged sink holes being one of the original reasons for moving the Ditchling Rugby Club (the Club) away from the Ditchling Recreation Ground.
- 8.23 The northern part of the rugby pitch is at risk of surface and ground water flooding, and the pitch is currently unable to support matches during wet weather. The submission of drainage details was required as a condition of the previous temporary permission, and to date only verti-draining has been carried out to aerate the soil as an interim measure.
- 8.24 In the case that permanent permission is granted, it is understood that the applicant would likely seek funding for a long-term sustainable drainage scheme. The nature and extent of these works would be the subject of a future planning application, and would need to comply with relevant development plan policies. The applicant is encouraged to investigate sustainable drainage solutions that could provide landscape and ecological enhancements, such as the creation of wetland habitat.
- 8.25 The sink hole referred to by the Parish Council relates to the Ditchling Recreation Ground pitch, which has not been used by the Rugby Club in some years. Both the Ditchling Recreation Ground and the current application site pitches have drainage issues; however drainage issues at the Ditchling Recreation Ground are not relevant to the continued use of the existing site on a permanent basis.

Ecology and Trees

- 8.26 Policies SD2, SD9 and SD11 supports proposals that conserve and enhance biodiversity, trees, hedgerows; retain, protect and enhance features of biodiversity and supporting habitat; and ensure appropriate and long-term management of those features. The mature trees along the southern boundary of the pitch are protected under CONS 12 as 'notable trees.'
- 8.27 The County Ecologist has advised that given the nature, scale and location of the proposal there are unlikely to be any adverse effects on any sites designated for their nature conservation interest. The habitats of greatest ecological importance are the boundary hedges, ephemeral ditches and scattered trees, which should be retained and protected.
- 8.28 The mitigation measures proposed include two bat boxes on trees, three log/rubble piles, an area of rough grassland, and wildlife corridors to the north and south. However, for these enhancements to provide a net gain in biodiversity, the boundary habitats would need to be enhanced through supplementary planting and their long-term management secured via a Landscape and Ecological Management Plan (LEMP).
- 8.29 When determining the previous application Members requested that officers investigate further whether a tree preservation order would be appropriate to ensure the protection of the mature oaks on the site. The Tree Officer has advised that whilst the trees merit protection they were not directly threatened by development at that time, which is also currently the case. The trees also now have a level of protection under CONS 12.
- 8.30 In summary, it is considered that the proposal is acceptable in terms of both ecology and trees, subject to suitably worded conditions securing the long-term ecological management of the site via a LEMP.

Amenity

- 8.31 The nearest neighbours at 1 & 2 Drove Cottages immediately to the east are approximately 30-50 metres away. The permanent use of the site as a rugby pitch would result in periods of concentrated activity and the playing of rugby and sound of spectators would be audible. The Drove is a public footpath, and some spectators and players may choose to access the site via this route.
- 8.32 However, these impacts would be for short periods when games are being played, and are not considered to be significant. The Environmental Health Officer has confirmed that no complaints of noise or disturbance have been made in the interim period, and has no objection.

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:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with the provisions of Section 91 (1) of the Town and Country Planning Act 1990 (as amended)/ To comply with Section 51 of the Planning and Compulsory Purchase Act 2004.

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

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

3. The pitch hereby approved shall only be used as a rugby pitch and for no other purpose (including any other purpose in Class D2 Use Classes Order 1987, as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

Reason: In the interests of amenity, and to prevent unsustainable development that would not comply with planning policy.

4. The pitch shall only be used during the season between 1 September and 1 April and at no other times. At no time shall it be used for matches or training at the same time as cricket matches are being played at the adjoining cricket club.

Reason: To ensure that shared parking arrangements with the cricket club are not over-used and to control the intensity of use and activity in the area in the interests of landscape character and amenity.

5. From the date of this permission, notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) or any Order amending or revoking and re-enacting this Order, no further buildings, surfacing, drainage measures, structures or means of enclosure shall be erected or installed at the site without prior planning permission from the Local Planning Authority.

Reason: In the interests of amenity, and to prevent unsustainable development that would not comply with planning policy.

6. Goal posts shall be removed from the site for the period 1 April to 1 September.

Reason: To minimise the visual impact of the development in this important pastoral landscape

7. Within three months of the date of this permission, a parking management plan shall be submitted to and approved in writing by the Local Planning Authority to include, among other matters; details of parking management of traffic by marshals for the duration of rugby match days; measures to manage the internal circulation and flow of traffic within the car park and measures to minimise deterioration in the natural surface of the car parking area.

Reason: To ensure both the efficient use of the car park and safeguard the condition and appearance of the field in which parking is to take place, which is within a sensitive rural landscape.

8. No external lighting shall be installed anywhere within the site.

Reason: To enable the Local Planning Authority to control the development in the interests of amenity and protect the South Downs International Dark Night Skies Reserve.

9. Within six months of the date of this permission, a Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP shall incorporate the measures detailed within the submitted Preliminary Ecological Appraisal (SJM Environmental, 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; to include but not be limited to:
 - Habitat management (including the car park area) and grazing regime;
 - Gapping up of one of the gateways onto B2112 (if both are not needed);
 - Sustainable drainage solutions; for example, wetland habitat creation;
 - Sensitive removal of Himalayan balsam (avoiding chemicals close to ditches).
- 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 five-year period);
- vii) Details of the persons, body or organisation responsible for implementation of the plan;
- viii) A scheme of ongoing monitoring over a five-year period, to ensure management is generating the desired outcomes and remedial measures (within the five 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 LEMP 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 LEMP 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.

10. Within three months of the date of this permission, details of covered and secure cycle parking spaces 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 details.

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

Informative

- I. The site is sensitive and any further infrastructure may be unlikely to be supported in this location.

11. Crime and Disorder Implication

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

12. Human Rights Implications

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

13. Equality Act 2010

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

14. Proactive Working

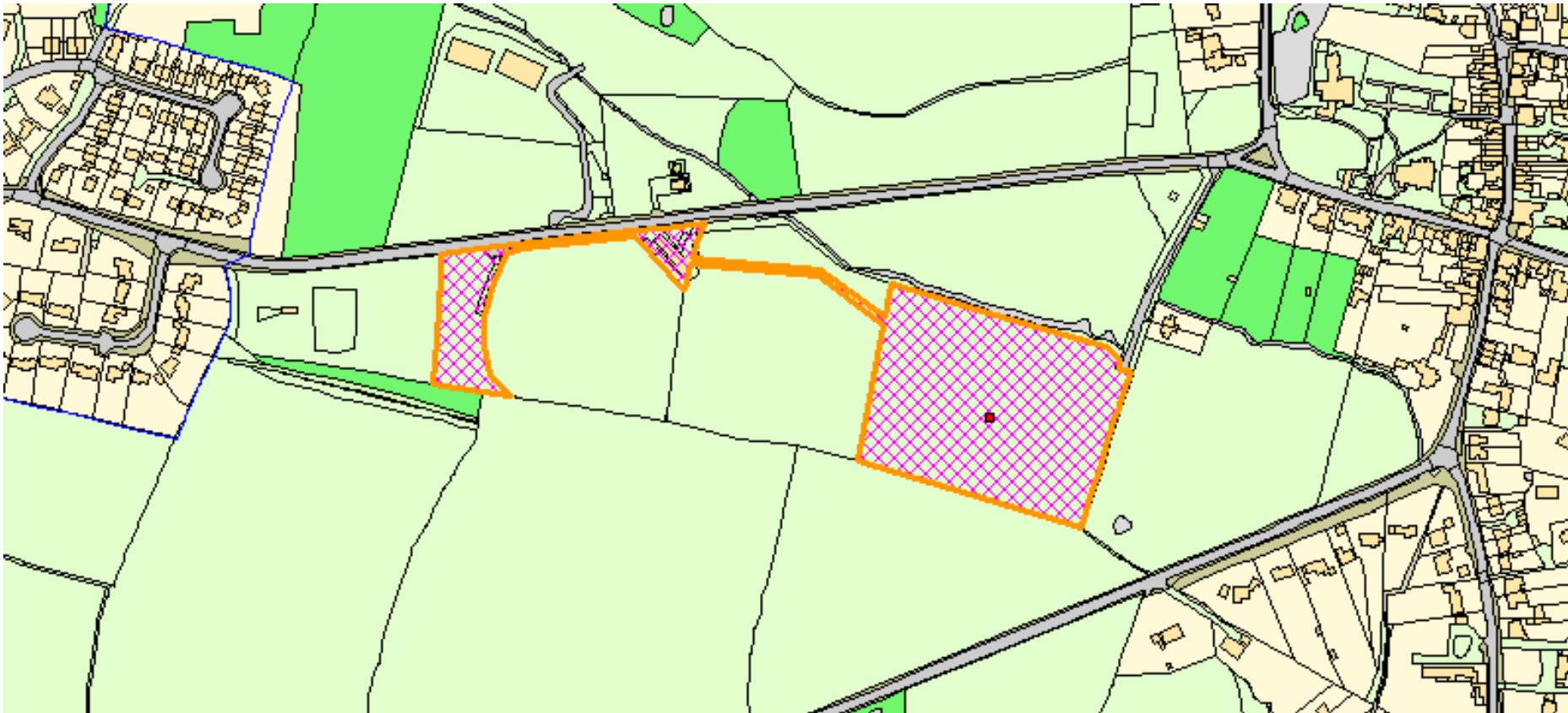
- 14.1 In reaching this decision the South Downs National Park Authority has worked with the applicant in a positive and proactive way, in line with the NPPF. This has included the provision of pre-application advice and seeking amendments during the determination of the application to ensure that the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

TIM SLANEY

Director of Planning

South Downs National Park Authority

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Appendices	<ol style="list-style-type: none">1. Site Location Map2. Committee Report for SDNP/16/05154/FUL3. Minutes of 9 February 2017 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) Ditchling Cluster Neighbourhood Development Plan (2017-32) South Downs Local Plan (2014-33) South Downs National Park Partnership Management Plan (2020-25) South Downs Integrated Landscape Character Assessment (2011)



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**Agenda Item 11
Report PC10/17**

Report to	Planning Committee
Date	9 February 2017
By	Director of Planning
Local Authority	Lewes District Council
Application Number	SDNP/16/05154/FUL
Applicant	Mr J Wallden – Ditchling Rugby Club
Application	Change of use of land to provide one rugby pitch for Ditchling Rugby Club
Address	Land at Keymer Road, Ditchling East Sussex

Recommendation: That planning permission be granted on a temporary basis to allow for use not exceeding four years and in accordance with the conditions set out in Paragraph 10.1 of this report.

Executive Summary

This application proposes the change of use of part of an agricultural field at the edge of Ditchling village, to provide a single rugby pitch. Parking would be provided by shared use of the Cricket Club car park, which lies on the western side of the cricket ground. This differs from an earlier planning application (SDNP/15/01682/FUL) for two pitches and a new car park, which was refused by Committee in September 2015.

The site is within a sensitive location between settlements historic Ditchling and Keymer. On its own merits the current application is for minor levelling works and creation of a level grass pitch with goal posts. Grading this into the natural contours and sensitive management thereafter are necessary to minimise the risk of changes in the character and appearance of the land which can be seen at close quarters from the adjoining public footpath and roads and from Ditchling Beacon and the Downs.

There are concerns that pressure for other development may follow; a further pitch, fencing, lighting, hard-surfacing, paths and buildings. Restrictive conditions and an informative can advise against further development affecting the landscape.

The adjoining cricket pavilion and car park are now available for use by rugby players and spectators. The rugby and cricket seasons do not overlap and this can be reflected in a planning condition. This would ensure that adequate car parking is available on match days. However, a wintertime use of the unsurfaced car park over winter is currently untested; marshalling is needed to ensure parking is used efficiently and to safeguard the land during wet conditions.

A temporary permission is recommended to allow for the use of the car park and its wintertime condition to be reviewed. A maximum of four years would allow for the land levelling works and establishment of a pitch followed by two playing seasons. All physical works are reversible.

The application is placed before the Committee due to the significant number of representations received.

I. Site Description

- I.1 The application site comprises three physically separate elements which are shown at **Appendix I**. These are: a 2ha part of a pasture field in which the rugby pitch would be located; the existing St James Cricket Club pavilion 150m to the west of this and lastly the existing cricket club car park which is 120m further west (270m from the proposed rugby pitch). These all lie outside the western edge of Ditchling village and conservation area.
- I.2 The first and largest element is the 2ha part of a pasture field in which it is proposed to locate the rugby pitch. This area is roughly rectangular in shape and is located approximately 100 metres to the south of the B2116 Keymer Road and 100m north of the B2112 New Road. This land is separated from Keymer Road by an intervening smaller field and a brook. To the south the remainder of the field outside the application site continues southward to New Road.
- I.3 A Public Right of Way (PRoW) runs along the field's eastern edge from the B2112 passing 1 & 2 Drove Cottage via an access track 'The Drove' to the B2116. From this right of way there are views across the land towards the Ditchling and Keymer church spires and to Oldland windmill to the north.
- I.4 The land is bounded on three sides by a mixture of deciduous hedgerows, some with ditches with occasional tree clusters and sporadic trees. The small trees and vegetation in the field to the north provide a strong hedgerow boundary with Keymer Road, and there is relatively strong hedge screening to the west and along New Road to the south. The eastern boundary with the Drove also has a relatively strong screening, but does provide gaps for access through to the Drove.
- I.5 The southern boundary of the land is unmarked but roughly bisects the existing field along an invisible line running north-west / south east. This line passes close to three large oak trees, growing in the open field.
- I.6 The land appears quite level but is not totally flat and any development to provide a sports pitch would require an element of cut and fill (though not to a significant level).
- I.7 To the west of this land are the grounds of St James Cricket Club, which contains the other two elements of the application site.
- I.8 The second element is the cricket pavilion, 150m from the edge of the land. This was built within the past twenty years and houses four changing rooms.
- I.9 The third element is the cricket club car park, 270m west of the field edge. This is a grassed area accessed from Keymer Road. It is also largely bounded by deciduous hedges and some trees, with allotments beyond its western boundary.
- I.10 The application plans show these three elements connected together by red lines which represent notional pathways between them, although there are no defined pathways through these grassed fields. There is a minor wooden bridge between the western boundary of the first field and the cricket ground.

Surrounding Landscape.

- I.11 The site lies within the South Downs Integrated Landscape Character Assessment (SDILCA) Type: Scarp Footslopes Area: 12 Adur to Ouse Scarp Footslope. The relevant key characteristics for this type and area include a complex geology comprising bands of lower chalk, mudstones and sandstones giving rise to a locally undulating landform. The area forms a transition between the steep chalk scarp to the south and the Low Weald to the north. Large straight sided arable fields are close to the scarp foot which have encroached up on to the scarp in places.
- I.12 There is a mosaic of farmland and woodland comprising irregular fields of arable and pasture bounded by an intact network of thick hedgerows, with hedgerow oaks and woodland. Streams arising from the springs at the foot of the chalk flow northward in narrow hidden stream valleys, some enshrouded in woodland. Villages, located on the spring-line are often associated with springs, ponds and mills. The steep chalk scarp provides a dramatic backdrop. Impressive panoramic views onto the footslopes from the adjacent scarp and

downs reveal a balanced woodland and farmland mosaic.

- 1.13 From within the site the Downs to the south are clearly visible beyond New Road.

2. Relevant Planning History

- 2.1 SDNP/15/01682/FUL. Change of use of land to provide two rugby pitches and associated car parking for Ditchling Rugby Club. This was refused on 10th September 2015 for the following reasons (a third reason referred to the list of plans considered but is not repeated below):

[1] The proposal, by virtue of its nature, extent, resultant parking area and associated human/vehicular activity would have an adverse impact on the landscape character area and the adjoining Conservation Area which could not be mitigated by additional landscaping, due to the location of the site and surrounding topography. The proposal is therefore considered to be contrary to Paragraph 115 of the NPPF which affords National Parks the highest status of protection in relation to scenic beauty, Saved Policies ST3, CT1, CT2 and H5 of the Lewes District Local Plan (2003) and Core Policies 8 & 10 of the Emerging Lewes District Local Plan Core Strategy.

[2] The proposal does not provide for adequate turning facilities within the site and reversing vehicles to or from the site onto the public highway would cause hazards to be introduced by the interference with the free flow of safety and traffic on the B2116 (Keymer Road). The Proposals would therefore be contrary to Saved Policies T13 & T14 of the Lewes District Local Plan (2003), Core Policy 13 of the emerging Lewes District Local Plan Joint Core Strategy and the National Planning Policy Framework.

- 2.2 Applications relating to the land to the cricket club land to the west of the proposed rugby pitch are also relevant. LW/03/1958 for an additional cricket pitch and LW/04/0450 for a new access to serve an overflow car park were both refused permission in 2003 and 2004 respectively.
- 2.3 LW/04/0450 was appealed but was withdrawn. An additional application in 2006 (LW/06/0249) secured permission for the additional cricket pitch which now currently exists on the neighbouring field immediately west of the site for the proposed rugby pitch.

3. Proposal

- 3.1 The applicant seeks permission for the change of use of land to provide one rugby pitch measuring 70m x 112m. This involves excavation at the northern edge by 0.5m and raising at the southern edge of 0.3m to create a near level surface with slight cross-fall for drainage. This would be rolled and cultivated to create a grassed playing surface. Rugby posts would be erected but can be removed at the end of season. No other land drainage is proposed.
- 3.2 Currently the rugby club has eleven home matches in the season between 17th September and 1st April. The club no longer plays for much of this period at its previous home ground of over fifty years, Ditchling Recreation Ground to the east of the village, but has shared use of Brighton Rugby Club grounds (see explanation in 'Principle of Development' at 8.3 – 8.7 below). These matches are played on Saturday afternoons. Use of the application site would also allow for the establishment of a junior team, which would probably play on Sunday mornings.
- 3.3 Parking would be provided by shared use of the adjoining cricket club car park outside the cricket season, which runs from 23rd April – 3rd September. This area is located 270m from the boundary of the proposed rugby pitch land and is grass surfaced with sufficient space for approximately 120 vehicles and turning, subject to marshalling of vehicles. Players would use the cricket club pavilion which has four changing rooms providing for home and away teams.
- 3.4 Players and spectators arriving by car would reach the pitch on foot across the fringes of the cricket ground, crossing the boundary ditch via the existing wooden pedestrian bridge. Those arriving on foot from Ditchling Village may use the roadside footpath in Keymer Road and the public right of way which reaches a field gate at the north east boundary of the land.
- 3.5 The previously refused proposal (SDNP/15/01682/FUL) was for two pitches on the land, and new 40-space car park on the field to the north served by a new vehicular access which was proposed from Keymer Road.

4. Consultations

4.1 Highways – No objection

- The proposal would use the existing vehicular access and parking already used by the Cricket Club. An additional plan shows car parking for 126 cars.
- Some concern is expressed at any conflict in the two uses being utilised at the same time due to insufficient parking areas. However, the applicant has confirmed that the proposed rugby season runs from 17th September to 1st April and the cricket use from 23rd April to 3rd September. Therefore due to the different seasons a rugby game and a cricket game would not be played at the site at the same time. Bearing this in mind it would be difficult to justify a highway recommendation for refusal in principle for the use of this existing access.
- Recommends conditions: Parking and turning space to be retained for use. Wheel-washing equipment to be provided during any earthworks.

4.2 Landscape – Objection

- The site forms a transition between the steep chalk scarp to the south and Low Weald to the north. There are panoramic views of a mosaic of farmland and woodland comprising irregular fields of arable and pasture, a network of thick hedgerows, with hedgerow oaks, and woodland. Recent suburban development and urban fringe land uses on the edges of Ditchling have encroached into its rural setting.
- It also forms part of a wider patchwork of gently undulating pasture fields contributing to the rural setting of Ditchling and Keymer and is visible in views from surrounding roads and public footpaths including the South Downs Way. It contributes to the rural setting of the villages and Ditchling Conservation Area. It also provides separation between the formalised cricket pitches on the edge of Keymer and the built form of Ditchling.
- South Downs Integrated Landscape Character Assessment (SDILCA) Objectives and Guidelines are to ensure that urban fringe land uses, such as garden centres, nurseries and sewage farms, do not erode the rural character of the landscape. Seek to minimise use of excessive lighting, signage and 'suburban' features on the edge of Ditchling.
- The pitch can be regarded as 'green space' but the formalisation of the land and the associated activities resulting from the nature of the land use change will alter and the existing rural character with an adverse impact on the rural setting of the village and surrounding area.
- The pitch would be visible at reasonably close range from both approach roads (B2116 and B2112) to Ditchling from the west.
- Close range views from footpath immediately to the east would be from open pasture field to formalised pitch and associated activities.
- The SDILCA above identifies that urban fringe land uses have encroached into the village's rural setting. The proposal will further encroach into this setting.
- Overall intensification of the use and resulting adverse effects on landscape and users of footpaths not in accordance with National Park's purpose to conserve and enhance the area's natural beauty.
- The landscape assessment submitted with the application somewhat underestimates the landscape / visual effects. These cannot be dealt with by additional mitigation.
- If approved, conditions should cover:
 - Details of tree protection measures
 - A landscape and ecological enhancements scheme – there is opportunity for providing successional tree planting.
 - A detailed landscape plan including management/maintenance plan to ensure any proposed planting and seeding will establish and thrive.

4.3 Rights of Way – No objection

The public footpath running to the east of the site appears to be unaffected.

4.4 Sport England – Support

The Rugby Football Union has also provided their support to the application, and has confirmed that the rugby club currently experiences poor pitch quality at their existing ground. Careful attention is needed to ground conditions and site preparation, which will benefit from specialist consideration by sports turf consultants/agronomists due to the need to understand the implications of topography, soils, drainage, and to ensure the pitch is fit for purpose (including soils, seeding and water supply). Without this there is a risk that the playing pitch will not meet needs because it will suffer from problems such as waterlogging and uneven surfaces.

Conditions recommended:

- i) Detailed assessment of ground conditions and submission of a detailed scheme for approval in consultation with Sport England to ensure that the playing field will be provided to an acceptable quality.
- ii) Construction of pitch in accordance with Sport England methodologies.
- iii) Use as playing field only. No other Class D2 use.

4.5 Ditchling Parish Council – Objection

Site is outside any defined planning boundary and within the National Park countryside where development other than that related to agriculture, forestry or another rural enterprise would be resisted. Also contrary to National Park purpose to the 'protect, conserve and enhance natural beauty, including biodiversity and cultural heritage'.

It is essential to retain and protect the strategic gap between Ditchling and Keymer villages, the sports field would have an adverse impact. It is contrary to policies CT1 and RE4 of the Lewes District Local Plan. The Parish Council supports the letters of objections from neighbours and residents.

4.6 Hassocks Parish Council – Objection

Contrary to policies in the Hassocks and the Ditchling, Streat and Westmeston Neighbourhood Plans which aim to preserve the Ditchling-Hassocks Gap.

4.7 County Archaeologist – No objection

Site is within an Archaeological Notification Area (prehistoric, Roman and medieval). Due to proposed groundworks conditions are recommended i.e. a written scheme of investigation and ensuing report.

4.8 Environmental Health – No objection**4.9 County Drainage Officer – No objection.**

It does not increase impermeable area, although it would raise levels to create a fall. The application indicates that there is high groundwater. Improvement of drainage is therefore likely to increase surface water run-off with some displacement of surface water and increased flood risk. Therefore recommend a condition that details are submitted for the safe management of surface water.

4.10 Ecologist – No objection subject to mitigation measures**4.11 South Downs Society - object**

Objections as for previous refused application for two rugby pitches and car parking

- Adverse impact on landscape character and adjoining conservation area.
- Site holds unique and special quality, as the last undeveloped land on southern side of the B2116. A rugby pitch will still appear green, but it will no longer be the green field so typical of the area around Ditchling. It will be a developed green, in effect closing the strategic gap between Ditchling and Keymer.
- Land is surrounded by hedges which makes it less visible but would still be noticed from the South Downs and the footpaths along the eastern boundary, along the old roman road to the north, and roadside footpath in Keymer Road.

5. Representations

5.1 64 Letters of objection and 59 letters of support:

Objections

- Loss of strategic gap between Ditchling and Keymer.
- Need: There is no need for the rugby pitch - the club already has access to a pitch and facilities. The existing pitch is prone to flooding and is uneven, but so is this natural piece of land. For a fraction of the cost these problems could be fixed. The club recently rejected an offer of a financial contribution from the Council to do this.
- Statistics in the neighbourhood plan suggest there is not a significant need for the new pitch, and a general support for conservation of the landscape.
- Adverse impact on habitat for natural fauna and flora.
- Will adversely impact views from the South Downs and lodge hill.
- National Park Purposes: Inappropriate use of land within SDNP, leading to urbanisation of the urban fringe and gap.
- Highways, Parking and Transport: The existing access is poor and lacking in safety. Traffic would be increased with an inadequate number of parking spaces provided and there is no on street parking nearby and limited in the village. Suggested use of cycles and public transport unrealistic due to lack of busses, distance from station and the cold dark weather in the rugby season, plus carrying of sports kit which makes cycling unlikely. Questions the accuracy and relevance of the submitted provided transport statement.
- Future development: Fears that proposal may lead to future land development, such as housing).
- Landscape impact: loss of natural field which contributes to rural setting of villages.
- Unsuitable location: The land is boggy, natural field and floods.
- Loss of amenity and tranquillity for local residents, walkers and local people. Residents can cricket matches/socials. The new pitch is closer so disturbance will be greater.
- Heritage: Encroachment and impact upon the historic and natural character of the landscape, including the rural edge of the conservation area and the historic field pattern.
- Associated development may follow: Likely future need for extended car park, floodlighting, hard standing and clubhouse.
- Planning permission has been recently refused.
- Drainage and flood-risk: levelling and draining will increase run off into the nearby stream.
- Local relevance: Few club members are from Ditchling and therefore has limited contribution to community.
- Oak Trees: No confidence that mature oaks will be maintained.
- Light pollution: being a winter sport, floodlight will need to be provided.
- Construction: Works to undertake the levelling and landscaping would be disruptive.

Support

- Provision and improvement of essential sport facilities: This will benefit future generations of the village and players of sport.
- Need: The current pitch is inadequate; boggy, dangerous, too small, and uneven.
- Village attraction: It will attract more players & people to the village.
- Protection against further development: The pitch would prevent future development such as housing.
- Strategic gap: The site is not close to Keymer, there is no development other than goal posts.
- Views: These would not be spoilt - minimal development, goal posts only

- Improvements to the existing pitch failed, spending further money on more drainage is not a economically viable and due to existing sewer pipe.
- Future intentions: the applicant has no intention of using the land for anything but Rugby.
- Traffic: Any disruption would be minor due to infrequent use and sharing existing cricket club facilities which are unused during winter.
- Limited use: noise would be limited and infrequent. No lighting therefore no light pollution.
- Scale: Due to small scale and no built development the impact on green space and landscape is minimal.
- Agriculture: The land has not been productive for 10 years.
- Good quality management would be employed for proposed pitch.

5.2 **Letter of Objection from Ditchling, Streat and Westmeston Neighbourhood Plan Project Management Team – Object**

Contrary to a principal emerging policy of the neighbourhood plan (Pre-submission version published March 2016, with final submission anticipated January 2017. This is to preserve the strategic gap Ditchling/Keymer. Previous objections as for 2015 application apply as follows:

- Resident's questionnaire response showed a desire to conserve the rural identities of the settlements within the area and to protect valuable open spaces and particularly the countryside that separates the settlements from adjoining urban development, with particular reference to the strategic greenfield gap down the Keymer Road between Ditchling village and Keymer/Hassocks.
- In 2004 the cricket club sought permission for an additional cricket pitch and car park. The car park element was never approved, but a subsequent scheme for just the additional pitch was approved. The Rugby club is now proposing exactly what the cricket club proposed to do unsuccessfully 11 years ago.
- The proposals would entail the loss of ancient hedgerow, and both car park and pitches would entail re-alignment of ancient ditches and water courses.
- Proposals would directly abut the Ditchling Village Conservation Area. It is considered that this is an unacceptable encroachment on the boundary and listed buildings.
- Ditchling Parish Council is in negotiations to purchase a field on the north side of Keymer Road for parking which would not involve the same landscape damage as the proposals. It is not considered that the proposed car park would be an appropriate Community Car Park.
- Concern that works to improve drainage/flooding of the site may lead to run off elsewhere.
- An extensive archaeological survey should be conducted before consideration should be given to this application.
- Concerns about practicalities of sharing facilities with Cricket Club and potential further applications for facilities that the site currently lacks.
- Concerns about the impact on the amenity currently enjoyed by properties in The Drove, in relation to noise and privacy.

5.3 **Letter of Support from England Rugby Football Union (RFU)**

This is an opportunity to improve the facility offer from Ditchling RFC the current pitch is below that of a Model Venue 1 as defined in RFU National Facilities Strategy 2013- 2017.

RFU and Sussex RFU have been working with Ditchling RFC since 2006 to resolve issues of pitch capacity and quality at their current location; sewer pipes preclude drainage improvement. The existing pitch is poor quality and was unplayable from late October until March last season. Lack of sustainable access is hampering the recruitment and retention of players.

5.5 Letter of Support from Sussex Rugby Football Union

Comments as RFU above, also:

- Existing pitch undersized, which inhibits a modern free-flowing game style.
- The existing also leads to [unspecified] health and safety issues.
- Consequent loss of senior players, now only one team
- Cancelled games last season due to ground conditions

6. Planning Policy Context

- 6.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory development plan in this area comprises the Lewes District Local Plan Joint Core Strategy 2016 and saved policies of the Lewes District Local Plan 2003. The policies of relevance are listed below.
- 6.2 Policies of the Emerging South Downs National Park Local Plan, Preferred Options 2015 are of limited weight. These are also set out below.
- 6.3 The emerging Ditchling, Streat and Westmeston Neighbourhood Plan was published in pre-submission draft in March 2016. Whilst this has very limited weight, an emerging policy is to preserve the strategic gap between Ditchling and Keymer. A final submission version is due imminently and an update will be given to the Committee.

National Park Purposes

- 6.4 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.
- 6.5 If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social well-being of the local community in pursuit of these purposes.

National Planning Policy Framework and Circular 2010

- 6.6 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was issued and came into effect on 27 March 2012. The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 115 that great weight should be given to conserving landscape and scenic beauty in the national parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight in National Parks.
- 6.7 The development plan policies listed below have been assessed for their compliance with the NPPF and are considered to be compliant with the NPPF.
- 6.8 The South Downs Partnership Management Plan (SDPMP) was adopted on 3 December 2013. It sets out a Vision and long term Outcomes for the National Park, as well as 5 year Policies and a continually updated Delivery Framework. The SDPMP is a material consideration in planning applications and has some weight pending adoption of the SDNP Local Plan. Relevant policies are 1, 3, 9, 28, 29, 37, 39, 48 and 49
- 6.9 Policy 1 seeks to conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.
- 6.10 Policy 3 seeks to protect and enhance tranquility and dark night skies.
- 6.11 Policy 9 relates to the historic environment.
- 6.12 Policy 28 seeks to improve rights of way
- 6.13 Policy 29 seeks to enhance the health and wellbeing of residents and visitors by encouraging, supporting and developing the use of the Park as a place for healthy outdoor activity and relaxation.

- 6.14 Policies 37 and 39 seek to encourage cycling and manage vehicle parking.
- 6.15 Policy 48 seeks to support the towns and villages in and around the National Park to enhance their vital role as social and economic hubs.
- 6.16 Policy 49 seeks to maintain and improve access to a range of essential community services and facilities for communities in the National Park.

7. Planning Policy

- 7.1 The relevant policies of the Lewes District Local Plan Joint Core Strategy 2016 are:
 CP7 – Infrastructure
 CP8 – Green Infrastructure
 CP10 – Natural Environment and Landscape Character
 CP11 – Built and Historic Environment and High Quality Design
 CP12 – Flood Risk, Coastal Erosion, sustainable Drainage and Slope Stability
 CP13 – Sustainable Travel.
- 7.2 The saved policies of the Lewes District Local Plan 2003 which are also relevant are:
 ST3 – Design, Form and Setting of Development
 ST11 & ST12 – Landscaping of Development
 CT1 – Planning Boundary and Key Countryside policies
 CT2 – Landscaping, Conservation and Enhancement
 H5 – Development within or affecting Conservation Areas.
 RE1 – Provision of Sport, Recreation and Play
 T8-T10 – Pedestrian Routes and Traffic Calming
 T13-T14 – Vehicle Parking
- 7.3 The emerging policies of the South Downs National Park Local Plan Preferred options 2015 include:
 SD1 – Sustainable Development
 SD5 – Landscape Character
 SD11 – Historic Environment
 SD14 – Green Infrastructure
 SD21 - Recreation
 SD22 – Development Strategy
 SD35 – Provision and Protection of Open Space

8. Planning Assessment

- 8.1 Proposals are required to accord with Policies contained within the Development Plan (the Lewes District Local Plan Joint Core Strategy 2016 and saved policies of the Lewes District Local Plan 2003), unless material considerations indicate otherwise, having regard to the NPPF.
- 8.2 Given the location of the development in relation to the surrounding landscape, the villages of Ditchling and Keymer, the B2116 Keymer Road to the north and B2112 New Road to the south, and the adjacent Conservation Area to the east, the key issues in this case are:-
 - The principle of development
 - Impact on landscape and the adjacent Conservation Area
 - Highways and parking.
 - Drainage and flood risk
 - Neighbouring Amenities.
 - Biodiversity

Principle of Development

- 8.3 Core Policy 8 of the Joint Core Strategy supports development that maintains green infrastructure, a term which includes outdoor sports facilities, natural and semi natural greenspace such as grassland and accessible countryside. It also resists development which would undermine the functional integrity of these spaces or the wider green infrastructure of which they form part.

- 8.4 Saved Policy RE1 of the 2003 Local Plan support principle of outdoor sport facilities to meet a ratio of 1.7ha per 1000 population. The most recent study by the District Council was in 2004, this concluded that Ditchling was deficient by 2.7 pitches according to this ratio. However, this comprised as shortfall in cricket pitches.
- 8.5 The District Council's 2004 study is over twelve years old and is due to be updated by another survey of sports pitches, although this is likely to be around eighteen months' hence. In the meantime, the comments from the RFU (see 5.3 above), supported by Sport England indicate the difficulties of the existing pitch in terms of drainage and pitch size, to which the Rugby Club attribute the cancellation of matches and reduced attraction of the club to players, despite its fifty year existence. In the short term, the club shares the Brighton Rugby Club ground which is some 6km to the south west of Ditchling.
- 8.6 Therefore the evidence of need at this time is based on a qualitative assessment. In the absence of up to date empirical data, the support by national sport organisations, particularly that of RFU, which refers to their involvement in the questions of existing drainage and pitch size since 2006, can be afforded weight and to this extent there is a degree of in principle support
- 8.7 However, the question of whether the proposal maintains the functional integrity of the countryside under Core Policy 8, and is compatible with its landscape character under other policies including CP10 and the Saved policies ST3 and CT1; the last of these states that retention of the character of the countryside will be of heightened importance where it separates settlements and prevents coalescence. Whether the purposes of the National Park which seek to conserve and enhance the natural beauty of the area, are met is also important. The following considers the landscape and character impacts.
Impact on Landscape and the Adjacent Conservation Area
- 8.8 As can be appreciated from Ditchling Beacon, the land on which the rugby pitch is proposed forms part of a wider patchwork of gently undulating pasture fields, with woodland towards Keymer village in the west. In its present condition and from this distance it is indistinguishable from other pasture; its shape, the yellow-green colour and visual texture of its winter vegetation appear the same.
- 8.9 Immediately to the west is the cricket club land, which is also open and part of this undeveloped patchwork. However, its colour and texture is (in winter) greener and more even, reflecting its husbandry of closer cut, rolled and perhaps improved and fertilised grass. Also visible on that land is the white outline of the cricket screen against the hedgerow and further to the west the two storey pavilion. Further west again the cricket club car park is set among the pockets of woodland close to Keymer village, which filters its view from the Beacon.
- 8.10 There is a discernible difference between the appearance of the cricket pitch and pasture fields but in their current proportions they contribute to the pastoral patchwork setting of the village and its conservation area, ensuring a clear visual separation between Ditchling and Keymer.
- 8.11 The proposal would introduce quite subtle levelling of the land (between +0.5m and -0.3m). If this were carefully blended with the gentle gradients of the wider field (rather than the formation of a distinct terrace with cut edge and bank) it could prove hard to discern both from distant and close-to vantages.
- 8.12 However the proposal by reason of its husbandry of cut, rolled and likely improved grass is likely to appear more akin to the colour and texture of the cricket ground to the west, a point which is alluded to in the South Downs Society response at 4.11 above. Furthermore the presence of white-painted rugby posts would be visible from the Beacon, and from close-to views such as the footpath along the eastern boundary and above the boundary hedges in most directions, such as from Keymer Road and New Road. Although the posts could be removed during summertime, the combined effect of these and changes in the appearance of the land would change the appearance of this particular parcel of land during most of the autumn, winter and spring months.

- 8.13 These factors and the risk of other attendant changes, such as line markings, fencing, pathways, perhaps lighting and signage lead to some concerns from the National Park landscape consultant. Further west there is concern that the winter use of the car parking field will lead to pressure for a more formal surface to be laid.
- 8.14 In consideration of these points, it is agreed that if the use were to lead to the formation of a distinct green rectangle among the pasture, this would be eye-catching, particularly when viewed from above at Ditchling Beacon and along the Downs. However if planting and maintenance were carried out in such a way so as to create a less distinctive difference between the pitch and surrounding field, then the effect may be less stark. The precise outcome is difficult to predict and would rely on well-judged management.
- 8.15 The rugby posts could not be concealed. They would be visible from the Beacon and Downs and closer-to vantages, especially the public footpath at the eastern boundary and edge of the conservation area, and probably from vantages along Keymer Road and Clayton Road, albeit partly screened by boundary hedging and partly mitigated by distance (over 100m from both of these roads).
- 8.16 The presence of these posts and the white-line pitch markings would signify that the land is no longer in agricultural use. In combination with the existing cricket club and pavilion to the west (which was created within the past twenty years), together with the recently constructed farmhouse to the north of Keymer Road, they would add to recent changes in the rural gap between the villages and the concerns which the landscape consultant mentions, concerning the creation of an urban fringe.
- 8.17 The question of whether the presence of these posts and markings are or are not compatible with this part of the National Park landscape is a difficult judgement. They occupy little space and although the posts are tall they are slender. They are also associated with a use of land which by its nature is an open-space use; one which is often found in the countryside close to villages and towns. Their contribution to an urban fringe effect may be considered quite slight.
- 8.18 In this particular location, the separation between Ditchling and Keymer as identified in the consultant's reference to the SDILCA is a sensitivity which should be given weight. The posts are a degree more urban in appearance than the existing pastoral character and their presence would intensify development between the two villages. However in themselves they do not create a more built up appearance, such as garden centres, nurseries and sewage farms mentioned in the SDILCA would do.
- 8.19 The Ditchling conservation area follows the line of the footpath at the eastern boundary of the land. Eastward of this along Keymer Road into West Street are listed buildings, including the war memorial. The setting of these designated heritage assets, their setting and views between these and the development site is an important matter, which is affirmed by paragraphs 128 – 136 of the NPPF. They are vital components of the character of the village.
- 8.20 In consideration of this, views of the land from the westernmost part of the conservation area in Keymer Road/West Street and from the war memorial are largely concealed by well established trees and hedges. It is unlikely that the rugby posts would have any significant impact on views from within the conservation area or its setting or that of listed buildings here.
- 8.21 Further south, where the public footpath crosses the eastern side of the application field, the posts would be seen visible, along with the difference in field maintenance, line-markings and appearance of the grassland. From Ditchling Beacon at least the posts would be visible, and would be viewed in the same landscape as that of the conservation area. However, the openness of the land would be maintained along with the hedgerows and trees and overall irregular (and probably historic) shape of the field within which the pitch would be located. It is concluded that the impact on heritage assets is not significant.
- 8.22 Other attendant future development such as lighting and ball-strike fencing is not proposed here. However, as indicated in the consultant's response they are unlikely to be compatible with this landscape. Planning conditions could be used to remove any permitted

development rights for fencing and lighting and informatives might also be used to indicate that future applications for lighting or tall or urbanising fencing or buildings would be unlikely to be supported by this Authority.

- 8.23 A modest addition to the cricket club sign and perhaps a small sign to direct spectators to the field could be sensitively sited, under a separate application for signage.
- 8.24 Trees and hedges are stated in this application to be retained. The county ecologist has highlighted the importance of adherence to relevant British Standards for works near trees and for this purpose a working method statement would be needed. The roadside hedge close to the access to the cricket club car park requires no reduction; its existing alignment is acceptable to the highway officer.
- 8.25 The car park is discussed in the following section and although it is considered to be well screened, its greater use will increase the occasions when cars are parked and therefore have an impact on close-to views during winter. However, winter views from the Beacon and Downs are less easily predicted although the intervening vegetation is likely to provide a filter.
- 8.26 In summary of this section, it is considered unlikely that the limited earthworks here will have a significant impact, provided that careful grading is carried out. Sport England recommends further assessment of ground conditions and submission of a detailed scheme for approval in consultation with them before commencement of works, which could be achieved by a suitably scoped planning condition to require the level changes to remain within the range stated in this application.
- 8.27 The landscape effect of the cultivation of grass, rolling and maintenance is less easily predicted. It relies on sensitive management both during the playing season and in the summer to ensure that the change is not a stark one but is well blended with the pastoral patchwork. Such details could also be included in a detailed scheme under planning condition for approval before commencement of works.
- 8.28 The rugby goal posts would not be required between 1st April and mid September, and could be removed during this time, for storage in a discreet location, perhaps close to the cricket pavilion. Conditions restricting fencing, lighting and other building work might also be used.
- 8.29 With this approach it is possible that the impacts of the proposal could be limited to an extent that is compatible with the landscape, conservation area and listed buildings in accordance with policies CP8, CP10, and saved policies ST3, CT1, the NPPF and the first purpose of the National Park, furthermore that the integrity of the countryside is maintained under Core Policy 8.

Highways and Parking

- 8.30 Unlike the previously refused application which proposed a new car park, the current proposal is to use the existing car parking space to the west of the cricket ground which is illustrated to have a capacity of 98 vehicles. The highway officer is satisfied subject to assurance that rugby and cricket games do not take place at the same time. The applicant has confirmed that their seasons do not overlap; the rugby season runs from 17th September to 1st April and for cricket it is 23rd April to 3rd September.
- 8.31 It would be possible to reflect this arrangement by planning condition for example, that the pitch could not be used during the cricket season above. What remains unclear is the extent to which pre-season training might occur and further information has been sought, however a condition might perhaps also include that pre-season training is for a limited period and that no such sessions should take place at the same time as cricket matches. An update will be given on this point.
- 8.32 As the car park is grassed area with no defined arrangement of spaces, marshalling of cars would be important for three reasons. Firstly to ensure that space for cars is used efficiently, secondly to preserve circulation aisles so that cars leave the field in a forward gear.
- 8.33 The third reason relates to ground conditions. The effect of car parking on this field during

the autumn, winter and spring is currently untested. How it might function and appear during the wetter months will depend on the frequency and amount of use and how this is managed. The eleven adult team matches may be added to by the formation of a new junior team, as mentioned in the application. It is also reasonable to expect that training sessions would take place, although without spectators these are likely to generate less parking.

- 8.34 This third reason presents an area of uncertainty. One risk is that poorly managed parking may lead to pressure for new surfacing and/or drainage, with consequent effects on the appearance and character of this field.
- 8.35 Whilst marshalling on match days could be required by planning condition, a prudent approach would also be the setting of a trial period during which this aspect of the proposal and its consequences could be tested.
- 8.36 One final point is the recommendation by the highway officer of a wheel cleaning condition during any period of earthworks to create the level pitch. It is arguable that the works are unlikely to yield greater risks of mud leaving the site than might be caused by agricultural activities such as ploughing and therefore the justification for such a condition is marginal but it could be imposed.

Drainage and Flood-risk

- 8.37 The site lies within an area of low flood-risk according to Environment Agency records, where this form of development raises no flood-based objection under national policy.
- 8.38 In relation to local drainage, the site of the proposed pitch is bounded by ditches and there is a brook which runs through the adjoining field to the north. The county drainage officer infers from the application that there is high groundwater in the locale and that the proposed level changes, albeit minor in scale, should be accompanied by details which confirm that surface water will be safely managed.
- 8.39 The applicant has been asked to provide further information regarding field ditches, their capacity and management. An update will be given.

Neighbouring Amenities

- 8.40 It is clear that the formation and use of a rugby pitch would result in periods of concentrated activity. The closest neighbours at 1 & 2 Drove Cottages immediately to the east are around 30-50 metres away. As such the playing of rugby and sound of spectators would be audible, in contrast to the very tranquil character of the area. Although the car park is almost 400m away, some spectators and players may choose to access the site via the access track, The Drove, which passes in front of the cottages to the north eastern field gate. This would increase activity and to an extent, additional noise.
- 8.41 In the previous application the view was taken that because these impacts would be for short periods when games are being played. The impacts would not be so adverse as to justify refusal. The current application, which is for a single pitch and no additional car park, is likely to have a proportionately lower risk. The environmental health officer has confirmed no objection.
- 8.42 In terms of visual amenities, the degree of visual change for these residents is considered slight, due to screen afforded by hedging and trees along the drove and the eastern boundary of the site.

Biodiversity

- 8.43 The application includes an updated ecological survey and appraisal completed in Summer 2016. The county ecologist agrees with its conclusions, that the site is semi improved grassland of low ecological value but that hedgerows and trees provide habitat for birds, which should be safeguarded. Earthworks should also employ a watching brief to check for any residual risk of reptiles and weed species, Himalayan Balsam, should be properly removed where it occurs on the land and disposed of. Trees should be protected during earthworks according to British Standards. Planning conditions can be used to this effect.
- 8.44 In accordance with policies and National Park purposes, carefully placed log piles at field edges can improve habitat, particularly for invertebrates. Advice has been sought from

National Park rangers as to the suitability of bird and bat boxes recommended here, which would need to be both functionally and visually appropriate. Subject to their advice, these could also be required by planning condition. An update will be given to the Committee.

9. Conclusion

- 9.1 The site is within a sensitive location between settlements and is at the fringe of historic Ditchling, its conservation area and listed buildings. The current proposal is for lesser development than in the previously refused scheme, it amounts to modest levelling work to create a single grass pitch and the erection of rugby goal posts. The level changes may be blended into the wider field. Subject to sensitive details and maintenance by planning condition, in association with Sport England, it is considered possible to avoid a stark contrast between the colour and texture of the resulting vegetation and the adjoining rural patchwork.
- 9.2 Whilst the application must be considered on its own merits, concern for future development pressures which would have greater impacts may be addressed by planning conditions, including limiting fencing, lighting, hard-surfacing and other building works.
- 9.3 The success of the proposed shared car parking with the cricket club depends on ensuring that they each use it at different times. This is consistent with the mutually exclusive seasons for the playing of these sports. Although information has been sought regarding pre-season training a planning condition could specify that this and matches during the season do not coincide with cricket matches.
- 9.4 Marshalling of car parking during rugby matches is important to ensure efficient use and layout. However, parking on this field in wetter conditions is untested, a trial period would allow for this.
- 9.5 The proposal is for 11 matches per season of the existing adult team but with the prospect of a junior team in the future. The precise intensity of this use and associated spectators and parking would also become clearer during a trial period. The success with which maintenance of the pitch prevents a stark contrast with the landscape could also be reviewed.
- 9.6 The current proposals; land levelling, goal posts, shared use of existing parking and pavilion are all reversible. Whilst landscape impacts here are finely balanced, a trial period by means of a temporary planning permission would allow for a future review based on actual experience of impacts and the degree of successful management under planning conditions. A period of four years, sufficiently long to allow for two full playing seasons once the earthworks and re-planting is complete and established is considered reasonable.

10. Reason for Recommendation and Conditions

- 10.1 Application SDNP/15/01682/FUL is recommended for approval on a temporary basis, of four years subject to the following conditions:
 - 1) The development hereby permitted shall be begun before the expiration of two years from the date of this permission.

Reason: To comply with the provisions of Section 91 (1) of the Town and Country Planning Act 1990 (as amended)./ To comply with Section 51 of the Planning and Compulsory Purchase Act 2004.
 - 2) The development hereby permitted shall only be carried out in accordance with the following plans:
BAC-DIT-LV-001. Site location
BAC-DIT-LV-004. Layout and Section.

Reason: For the avoidance of doubt and in the interests of proper planning.
 - 3) The permission hereby granted shall be for a limited period expiring either upon four years from the date of this notice of permission or after a period of two years from the first use of the site as a sports pitch, whichever occurs sooner. The land shall then be restored to its former condition, levels and appearance and goal posts shall be removed.

Reason. The development is approved on a temporary basis only in order to allow for detailed impacts to be considered again.

- 4) No development shall take place unless and until:
- A detailed assessment of ground conditions of the land proposed for the new playing field land as shown on drawing number BAC-DIT-LV-004 has been undertaken (including drainage and topography) to identify constraints which could affect playing field quality; and
 - Based on the results of the assessment pursuant to (a) above, a detailed scheme and timetable for its implementation, to ensure that the playing field would be provided to an acceptable quality (including adequate drainage conditions and capacity), and proposed arrangements for its establishment and subsequent maintenance (including drainage maintenance), shall be submitted to and approved in writing by the Local Planning Authority in consultation with Sport England. The development shall only be carried out in accordance with the approved scheme and timetable and shall be maintained in accordance with the approved maintenance details for the duration of this temporary planning permission.

Furthermore, level changes for the creation of the pitch hereby approved shall not exceed +0.5m and -0.3m height unless the Local Planning Authority gives prior written approval for any minor variation, and shall be blended with the adjoining natural contours.

Reason: To ensure that further survey work is undertaken and that detailed design, methods of establishment and drainage are provided and implemented in the development and its maintenance, to minimise its visual impact in this important pastoral landscape, and that drainage is maintained.

- 5) The pitch shall only be used during the season between 15th Sept and 1st April and not at the other times (with the exception of pre-season rugby training during September). At no time shall it be used for matches or training at the same time as cricket matches are being played at the adjoining cricket club.

Reason: To ensure that shared parking arrangements with the cricket club are not over-used and to control the intensity of use and activity in the area in the interests of surrounding amenities, including rural tranquillity.

- 6) The pitch hereby approved shall only be used as a rugby pitch and for no other purpose (including any other purpose in Class D2 Use Classes Order 1987, as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

Reason: To safeguard the character of the area and because the pitch has only been approved in this location to serve a specific local use as part of the green infrastructure of the area..

- 7) Notwithstanding section 55 of the Town and Country Planning Act, (as amended), or the Town and Country Planning (General Permitted Development) Order 2015, or any in any statutory instrument revoking and re-enacting that Order with or without modification), no fences, lighting, surfacing, including any surfaced path or any other building shall be erected or carried out without the prior written approval of the Local Planning Authority.

Reason: Further works and development may adversely affect the character and appearance of this important pastoral landscape, which also includes the Designated International Night Skies reserve and is close to the Ditchling Conservation Area.

- 8) Goal posts shall be removed from the site for the period 1st April to 1st September.
Reason: To minimise the visual impact of the development in this important pastoral landscape

- 9) No development shall take place unless and until a parking management plan has been

submitted to and approved in writing by the Local Planning Authority to include, among other matters; details of parking management of traffic by marshals for the duration of rugby match days; measures to manage the internal circulation and flow of traffic within the car park and measures to minimise deterioration in the natural surface of the car parking area. This management plan shall be fully adhered to for the duration of this temporary planning permission.

Reason: to ensure both the efficient use of the car park, with provision for manoeuvring of cars to leave the site in a forward gear, also to safeguard the condition and appearance of the field in which parking is to take place, which is within a sensitive rural landscape

- 10) No development shall take place unless and until details of tree protection to be implemented for the duration of development works and aftercare, in accordance with BS5837: 2012 Trees in relation to design, demolition and construction.

Recommendations, have been submitted to and approved in writing by the Local Planning Authority, and shall be adhered to during the course of development and aftercare.

Reason: to safeguard trees which are an integral part of the character of this important pastoral landscape.

- 11) The development hereby approved shall only be implemented in accordance with the recommendations and conclusions of the Preliminary Ecological Appraisal document, July 2016, submitted with this application, in particular the retention and maintenance of hedges and trees, a watching brief during works; removal of Himalayan Balsam and the provision bird and bat boxes (no lighting is permitted by reason of condition 7 above) . In addition loggery for invertebrates shall be introduced onto the site and maintained for the duration of this temporary permission.

Reason: In the interests of biodiversity, to manage any residual risk and to enhance the ecological value of parts of the site.

- 12) Wheel-cleaning of plant leaving the site during the ground levelling works shall be carried out at the site entrance to ensure that mud is not deposited on the public highway as a consequence of these works.

Reason: In the interests of highway safety.

- 13) No development shall take place until the developer has secured the implementation of a programme of archaeological work, in accordance with a Written Scheme of Archaeological Investigation which has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the archaeological and historical interest of the site is safeguarded and recorded to comply with the National Planning Policy Framework.

- 14) The development hereby permitted shall not be brought into use until the archaeological site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition 13 and that provision for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: To ensure that the archaeological and historical interest of the site is safeguarded and recorded to comply with the National Planning Policy Framework.

Informative: Permission relates to a creation of a single pitch and goal posts only, with associated shared use of cricket pavilion and parking. Additional development which affects landscape character is unlikely to be supported.

11. Crime and Disorder Implications

- 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. This has included the updating of the agent and discussion of issues during the course of the application.

TIM SLANEY

Director of Planning

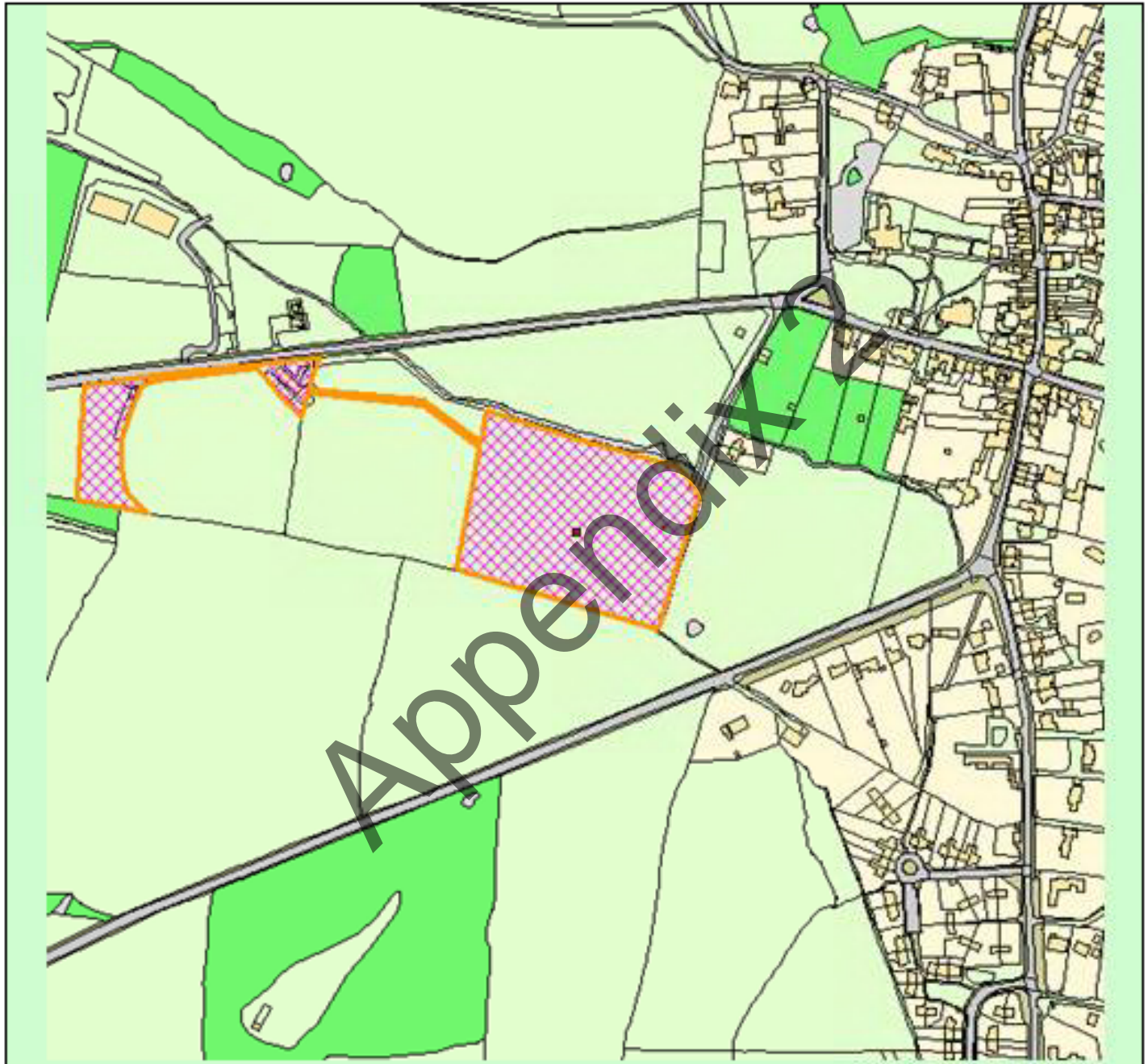
South Downs National Park Authority

Contact Officer	Stephen Cantwell
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Email:	stephen.cantwell@southdowns.gov.uk
Appendices	I. Site Location Map
SDNPA Consultees:	Legal Services & Development Manager
Background Documents	All planning application plans, supporting documents, consultation and third party responses National Planning Policy Framework National Planning Practice Guidance SDNP Partnership Management Plan Lewes District Local Plan Joint Core Strategy 2016 Lewes District Local Plan (2003) Ditchling, Westmeston & Streat Neighbourhood Plan

Agenda Item 11 Report PC10/17 Appendix 1 Site Location Map

Appendix 1

Site Location Map



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SOUTH DOWNS NATIONAL PARK AUTHORITY PLANNING COMMITTEE 9 FEBRUARY 2017

Held at The Memorial Hall, South Downs Centre, North Street, Midhurst at 10:00am.

Present:

Alun Alesbury	Heather Baker	Barbara Holyome	Neville Harrison (Chair)
Doug Jones	Tom Jones	Ian Phillips	Robert Mocatta

Ex Officio Members for Planning Policy items only (may participate on Policy Items but not vote, no participation on Development Management Items)

Norman Dingemans Margaret Paren.

SDNPA Officers: Tim Slaney (Director of Planning), Becky Moutrey (Senior Solicitor) and Rebecca Haynes (Governance Officer).

Also attended by: Rob Ainslie (Development Manager), Richard Ferguson (Development Management Lead West), Vincent Haines (Development Control Officer), Michael Scammell (Conservation Officer), Stephen Cantwell (Development Management Lead East), Robert Thain (Minerals & Waste Lead), Sarah Nelson (Strategic Planning Lead), Lucy Howard (Planning Policy Manager) Chris Patterson (Communities Lead), Matthew Bates (Local Plan Lead) and Dan Ashe (Planning Policy Officer).

OPENING REMARKS

270. The Chair informed those present that:

- SDNPA Members have a primary responsibility for ensuring that the Authority furthers the National Park Purposes and Duty. Members regard themselves first and foremost as Members of the Authority, and will act in the best interests of the Authority and of the Park, rather than as representatives of their appointing authority or any interest groups.
- The meeting was being webcast by the Authority and would be available for subsequent on-line viewing. Anyone entering the meeting was considered to have given consent to be filmed or recorded, and for the possible use of images and sound recordings for webcasting and/or training purposes.
- Items 11 onwards on the agenda would not be considered before 1pm

ITEM 1: APOLOGIES FOR ABSENCE

271. Apologies were received from, David Coldwell, Gary Marsh and Amber Thacker.

ITEM 2: DISCLOSURE OF INTERESTS

Robert Mocatta declared a public service interest in Items 7 & 8 as a member of East Hampshire District Council.

Tom Jones declared a public service interest in Item 11 as a member of Lewes District Council (Lead Member for Planning) and Ditchling Parish Council. As a resident of Ditchling he knew all of the public speakers and had kept an open mind in regard to the application and had not taken part in any discussions at Parish Council meetings on the item.

Doug Jones declared a public service interest in Item 10 as the applicant was a member of the SDNPA Sustainable Communities Fund Panel to which Doug was the Chair.

272. Neville Harrison declared a public service interest in Items 10 & 11 as a member of the South Downs Society

273. Doug Jones declared a public service interest during item 10 as detailed in minute 302.

274. Barbara Holyome declared a public service interest during item 10 as detailed in minute 302.

275. Margaret Paren declared a public service interest in item 15 as detailed in minute 324

ITEM 3: MINUTES OF PREVIOUS MEETING HELD ON 19 JANUARY 2017

276. The minutes of the meeting held on 19 January 2017 as amended in the [February update sheet](#) were agreed as a correct record and signed by the Chair.

ITEM 4: MATTERS ARISING

277. There were none.

ITEM 5: UPDATES ON PREVIOUS COMMITTEE DECISIONS

278. There were none

ITEM 6: URGENT ITEMS

279. There were none.

DEVELOPMENT MANAGEMENT

ITEM 7: SDNP/16/03835/FUL. BROAD VIEW FARM, BLACKNEST ROAD, BINSTED, ALTON, HAMPSHIRE GU34 4PX

280. The Case Officer [presented](#) the application and referred to the [February update sheet](#) which detailed a revised recommendation to include a S106 agreement and amendment to condition 14 and removal of condition 18.

281. The following public speakers addressed the Committee:

- Nigel Barrow spoke against the application on behalf of himself and his neighbours.
- Karen Clark of Hedley Clark Ltd spoke against the application on behalf of Mr. & Mrs. Anderson
- Sue Hodder spoke against the application representing Binsted Parish Council
- Stephen Andrews spoke in support of the application as the Agent
- Karen Cullen spoke in support of the application as the wife of the applicant.

282. The Committee considered the report by the Director of Planning (Report PC06/17), the [February update sheet](#), the public speaker comments, and commented:

- The scheme was a modest development and an encouraging farm diversification plan. There had been few objections to the farm shop
- The re wilding was not necessary but was encouraging
- The conditions covered the outstanding issues
- A management plan had been provided
- The applicant had worked to mitigate previous objections
- It was pleasing to see more parking provision near to the farm shop
- A 3 metre wide landscape sympathetic access route with the ability to park on the edges would be preferable
- Farm vehicles can use access tracks that were not finished in tarmac
- The areas around the cabins were likely to be boggy during the winter months
- Their concerns regarding:
 - There were too many outstanding issues being controlled by conditions
 - Lack of clarity regarding external lighting which could have a detrimental effect on the area
 - External hard and soft landscaping which was extensive and left to be dealt with by conditions
 - The lack of clarity regarding the extensive engineering works that needed to be carried out in regard to the access route and the levels which would also impact on trees
 - The plans did not show a scheme for root protection of trees
 - The visual impact, scale, materials and levels of the access route. A tarmac 5metre wide road was unsatisfactory in rural surroundings and would adversely affect the landscape
 - Additional works such as hardstanding might be required around the cabins in the winter months and permitted development rights should be removed. Any track or hardstanding between the cabins would have an adverse impact on the landscape

- That dogs would be allowed to stay in the cabins near the sheep farming.

283. In response to questions, officers clarified:

- There were no indications of finished levels for the access route at this stage. The access route would be 5 metres wide
- The Highways response was received on 5 December 2016 there were no concerns regarding safety, however a response in regard to parking provision was provided
- The application did not include lighting for the cabins, however a condition was in place to cover lighting on the farm shop and cafe.
- The emerging South Downs Local Plan contained policies to safeguard disused routes such as disused railway lines for future cycling routes. The application scheme did not impinge on the nearby disused railway line.
- The application did not require an analysis on the effect on nearby small businesses
- The application detailed the use of tarmac for the bell mouth of the access route and porous scalpings for the remainder of the access route and car park
- There were no designated recreational areas. Areas around the cabins were grassed and each cabin had a covered seating area
- The re wilding activities were supplementary to farming and were in the gift of the applicant
- The existing definitive footpath runs through the farm where the cabins were proposed
- Informal access to cabins was commonplace
- The Committee have previously granted permissions with a number of conditions to resolve outstanding issues such as hard and soft landscaping.

284. SDNP/1603835/FUL: It was proposed and seconded to delegate the grant of permission to the Director of Planning in consultation with the Planning Committee Chair in order to:

- Negotiate a variation to the access route to achieve a less negative visual impact on the landscape
- Ensure the deed of variation was completed to amend the site location plan contained in the S106 agreement
- The conditions set out in the report and update sheet, the removal of permitted development rights and removal of the words 'above slab level' in conditions 3 & 4

Following a vote the proposal was carried.

285. **RESOLVED:** SDNP/1603835/FUL: That the grant of planning permission be delegated to the Director of Planning in consultation with the Planning Committee Chair subject to:

1. Negotiation of a variation to the access route to reduce the negative landscape impact in regard to scale, materials and levels
2. A deed of variation to be completed to amend the site location plan contained in the S106 agreement
3. Conditions:
 - (i) As set out in paragraph 11.1 of report PC06/17 and February update sheet
 - (ii) Modifications to conditions 3 & 4 to remove 'above slab level' and
 - (iii) Additional condition to remove permitted development rights in regard to hardstanding.

ITEM 8: SDNP/16/05343/FTP BROAD VIEW FARM, BLACKNEST ROAD, BINSTED, ALTON, HAMPSHIRE GU34 4PX.

286. The Case Officer [presented](#) the application.

287. The following public speakers addressed the Committee:

- Ian Salisbury spoke against the application on behalf of himself
- Geoff Woollen spoke against the application on behalf of himself.

288. The Committee considered the report by the Director of Planning (Report PC07/17), the [January update sheet](#) and the public speaker comments.
289. In response to questions, officers clarified that the new proposed footpath did not contain any styles but a new gate and confirmed that the section of the path relevant to the order was correctly shown.
290. It was proposed and seconded to vote on the officer's recommendation. Following a vote the proposal was carried.
291. **RESOLVED:** SDNP/16/05343/FTP: That
1. An order shall be made providing for the diversion of part of public footpath no.55. If no objections received to confirm the order. As shown on the plan at Appendix 2 of report PC07/17.
 2. If after making the order objections are received that cannot be resolved, it shall be submitted to the Secretary of State for a decision.
292. The Chair adjourned the meeting for a comfort break at 11:55am
293. The meeting re convened at 12:04pm

ITEM 9: SDNP/16/04263/FUL & SDNP/16/04264/LIS STANMER HOUSE STABLE BLOCK STANMER VILLAGE STANMER PARK BRIGHTON BN1 9QA

294. The Case Officer [presented](#) the application and referred to the [February update sheet](#).
295. The following public speakers addressed the Committee:
- Rosie Harrison spoke against the application on behalf of Stanmer Preservation Society.
 - Bill Fairhall spoke against the application representing himself.
 - Phil Purvis spoke in support of the application as the Agent.
296. The Committee considered the report by the Director of Planning (Report PC08/17), the [February update sheet](#), the public speaker comments, and commented:
- There was a need to be satisfied that a thorough investigation had taken place to establish the facts in regard to the loss of historical fixtures and fittings. There was also a need to establish if any historical photos existed
 - The public speakers had indicated that additional information and historical photos might exist; therefore the decision should be deferred to investigate.
 - Any additional historical information would be highly desirable
 - It would be appropriate to defer any decision in order to investigate restoration or recreation options
 - Some Planning Committee members had seen the stables in their original state prior to the previous permission for conversion being granted
 - There was a need to have the cycle store on site and other options needed to be explored. The proposed arrangements were not appropriate or practical
 - The current internal finish of the studio flat was unsympathetic to the surroundings of the historic building
297. In response to questions, officers clarified:
- Any prosecution case would not require the owner to restore the building. The application before the Committee was to be determined on its merits.
 - There was a significant loss of the stable stalls with the original fabric gone. Any attempt at a restoration could only be a recreation.
 - Listed Building enforcement could seek to recreate the feature. As there was no evidence of the existence of working drawings, photos would need to be used which could be open to challenge as their interpretation might not be entirely correct
 - The agent had confirmed that the historical fixtures and fittings had been destroyed during the conversion works.

298. It was proposed and seconded to defer the consideration of the planning and listed building consent application for no more than 6 months from the date of the meeting in order to obtain further information relating to: Details on the historical fixture and fittings and the appropriateness of the proposed cycle store location
299. **RESOLVED:** SDNP/16/04263/FUL & SDNP/16/04264/LIS: To defer the consideration of planning application reference SDNP/16/04263/FUL and listed building consent application reference SDNP/16/04264/LIS for not more than 6 months from the 9 February Planning committee meeting in order to obtain further information relating to:
1. Details on the historical fixtures and fittings and
 2. The appropriateness of the proposed cycle store location
300. The Chair adjourned the meeting for lunch at 12:46pm
301. The meeting re convened at 1:18pm

**ITEM 10: SDNP/16/03499/FUL LAUNDRY COTTAGE EAST DANGSTEIN
DANGSTEIN ROAD ROGATE GU31 5BZ**

302. Barbara Holyome and Doug Jones declared a Public Service interest in this item as one of the public speakers was known to them as an ex SDNPA employee.
303. The Senior Solicitor informed the Committee that the Applicant for the application (Paddy Cox) was known to some members of the Authority as being a member of the SCF Panel and involved in the Heathlands Reunited Project. His involvement in the business of the SDNPA did not in any way influence the determination of the application which must be considered on its merits.
304. The Case Officer [presented](#) the application and referred to the [February update sheet](#) which included an additional reason for refusal. The Committee were reminded that whilst the applicant may have suggested changes to the application they were not to be considered in determining the current application before the Committee.
305. The following public speakers addressed the Committee:
- Dr Mairi Rennie spoke against the application on behalf of the Parish Council and the South Downs Society.
 - Paddy Walker spoke against the application representing himself and his family as longtime residents and 31 other households.
 - Nick Jacobs spoke against the application representing himself, his wife and his children.
 - Nina Williams spoke in support of the application on behalf of Dangstein Conservancy.
 - Nicola Peel spoke in support of the application on behalf of Dangstein Conservancy.
 - Paddy Cox spoke in support of the application on behalf of Dangstein Conservancy
306. The Committee considered the report by the Director of Planning (Report PC09/17), the February update sheet, the public speaker comments, and commented:
- It was only the additional uses in addition to forestry that required permission
 - Their support in principle for the proposed activities, however the concerns of the community were understandable
 - The aspirations of the applicant were commended. The proposed activities addressed many of the National Park's Purposes and Duty which the Authority would generally encourage
 - All impact assessments had been received from the applicant. The applicant should not be discouraged with his aspirations, but a more detailed application would be required for any future applications
 - Their concerns regarding:
 - The impact of additional vehicle movements
 - The site had the capacity to hold a large number of vehicles and there was a need to set a limit for this

- There was a lack of clarity on the levels of activity which needed to be managed and controlled at a more appropriate level for the local community
- The levels of activity were too high, the parking needed to be reduced and the access issues resolved
- There was a need to provide a clear plan, with assurances and detailed information regarding the level of activities, vehicle access and parking.

307. In response to questions, officers clarified:

- The current use of the land is for forestry (the growing and harvesting of trees which would include the planting for commercial use)
- The applicant does not own, but has rights of access on the Dangstein road access route. The appropriate notices were served with the submission of the application. Any restrictions on access would be a private law matter.
- The applicant had use of the Dangstein Road and Fynings Lane access routes to the site; there were also additional grassed access routes
- There were no public footpaths or bridleways passing through the application site
- There was a hamlet community adjacent to the application site
- Camping would be available for 365 days per year subject to usual limits of tourist accommodation of up to 28 days for one period of stay
- The Highways Authority had requested more robust figures in regard to vehicle numbers

308. The committee concluded that:

- Reason for refusal 1 needed to be clarified. As the level of activities had not been demonstrated the Committee did not have enough information to reach a conclusion therefore the first reason should be prefixed with the words 'it has not been demonstrated that'
- Reason for refusal 2 the word 'inadequate' should be changed to 'unacceptable'

309. It was proposed and seconded to vote on the officer's recommendation as amended and detailed in minute 308. Following a vote the proposal was carried.

310. **RESOLVED:** SDNP/16/03499/FUL: That Planning permission be refused for the reasons set out in paragraph 11.1 of report PC09/17 as amended in minute 308 and the update sheet.

ITEM 11: SDNP/16/05154/FUL LAND AT KEYMER ROAD, DITCHLING, EAST SUSSEX

311. The Case Officer [presented](#) the application and referred to the [February update sheet](#) which included amended conditions 4 & 7.

312. The following public speakers addressed the Committee:

- Shirley Crowther spoke against the application on behalf of the Ditchling Society.
- Crispin Mair spoke against the application on behalf of himself and other residents
- Cllr Phillip Smith spoke against the application on behalf of Ditchling Parish Council
- David Campion spoke in support of the application as the Agent
- Justin Wallden spoke in support of the application as the Applicant and Club President
- Rob Becvar spoke in support of the application as the Club Chairman

313. The Committee considered the report by the Director of Planning (Report PC10/17), the [February update sheet](#) the public speaker comments, and commented:

- The trees should be subject to TPO
- 11 Matches per year were not excessive
- The proposals did not encroach on to the strategic green gap
- The Neighbourhood Plan specifically referenced the strategic green gap
- The Landscape Officer had a number of objections

- A 4 year temporary permission would provide the opportunity to monitor any landscape impact
- The proposal was a scaled down development from the previous application
- The Authority should be supporting activities in villages and encouraging sports bodies to be responsible for their own land
- Their concerns regarding:
 - The proposals could have a significant landscape impact
 - The proposed drainage solutions could affect trees and the large oak trees to the south should be protected by a TPO
 - Substantial physical works could be required
 - There were no details on the grass seed to be used or how it would be applied, how the ground would be managed and what reinforcement solutions would be used in the car park
 - There were landscape issues that needed to be addressed
 - Whilst temporary the level of investment required to make the surface usable might require longer than 4 years.

314. In response to questions, officers clarified:

- Officers had no information regarding any offers for the club to have further use of an alternative ground. The application before the committee was to be determined on its merits
- Change of use was required to alter agricultural green space to sports use
- There were a number of physical works to be carried out on site such as a change of levels
- The emerging Ditchling, Streat and Westmeston Neighbourhood Plan was in its pre submission stage and therefore had very little weight in determining the application
- A planning condition would require the ground to be returned to pre permission condition after 4 years if no further planning permission were granted
- In 4 years' time any future application would be considered in relation to future adopted development plan policies.

315. The committee concluded:

- That an additional landscape condition was required to cover:
 - The grass seed to be used
 - A feathering approach should be taken in the seeding
 - The length of the grass
 - The ongoing management of the pitch and car park areas
- To ensure the conditions covered
 - The reinforcement material to be used in the car park
 - drainage solutions

316. It was proposed and seconded to vote on the revised officer's recommendation, to include an additional landscape condition as detailed in minute 315 and for officers to explore the possibility for a conditional TPO. Following a vote the proposal was carried.

317. **RESOLVED:** SDNP/16/05154/FUL: That planning permission be granted on a temporary basis to allow for use not exceeding four years and in accordance with:

- i) The conditions set out in Paragraph 10.1 of report PC10/17 and the February update sheet.
- ii) Additional landscape condition to be drafted by the Director of Planning in consultation with the Planning Committee Chair to cover issues raised in minute 315

ITEM 12 REVIEW OF VALIDATION REQUIREMENTS FOR PLANNING APPLICATIONS AND RELATED CONSENTS

318. The Committee considered the report by the Director of Planning (Report PC11/17) and the [February update sheet](#).
319. In response to a question, officers clarified that appendix 2 to report PC11/17 detailed the minimum requirements for each application to be validated; however officers could ask for further information if required.
320. It was proposed and seconded to vote on the officer's recommendation. Following a vote the proposal was carried.
321. **RESOLVED:** The Committee approved the revised local list of requirements for validating planning applications and related consents for adoption
322. The Chair adjourned the meeting for a comfort break at 3:45pm
323. The meeting re convened at 4:01pm

STRATEGY & POLICY

324. Margaret Paren declared a personal interest in item 15 as she had participated in the Landscape Character Assessment and Village Design Statement, but had not participated in the production of the Plan.

ITEM 14: SDNPA RESPONSE TO SUBMISSION (REG 16) CONSULTATION ON THE LAVANT NEIGHBOURHOOD DEVELOPMENT PLAN (LNDP).

325. Robert Newman spoke in support of the LNDP as the Parish Councillor and in particular highlighted the support and assistance given to the Neighbourhood Planning group by officers of the National Park especially Nat Belderson
326. The Committee considered report PC13/17, and commented:
 - Lavant Parish Council were congratulated for their balanced approach to the Plan
 - Their support for the Plan and Welcomed Cllr. Newman's statement expressing appreciation of Officers assistance
 - Some concern was raised over the loss of the Eastmead Industrial site and it was questioned whether the existing occupants would be able to remain as part of any mixed use scheme.
327. In response to questions, officers clarified:
 - Some communities were raising levels of parking provision through their Neighbourhood Development Plans, Lavant's wish to do so arises from a recently constructed scheme which is felt to have resulted in local parking problems.
 - Lavant had evidenced a housing need and that the employment site was potentially the only option available. A mixed use development on the site was a local solution that had been assessed by the District Valuer and officer. It should not be seen as setting a precedent elsewhere.
328. It was proposed and seconded to vote on the officer's recommendation. Following a vote, the proposal was carried.
329. **RESOLVED:** That the Committee agreed the table of comments as set out in Appendix 3 of report PC13/17 which would form The SDNPAs representation to the Independent Examiner of the Lavant NDP.

ITEM 15 SDNPA RESPONSE TO SUBMISSION (REG 16) CONSULTATION ON THE LISS NEIGHBOURHOOD DEVELOPMENT PLAN (LNDP)

330. The Committee considered report PC14/17 and commented:
- Liss Parish Council were congratulated on the development of their Plan and for demonstrating collaborative working
 - SDNPA officers were congratulated for their work with the community to reach the submission stage.
 - Amendments to the introduction may be required to ensure it accurately represents how the Parish is made up of individual settlements, with important gaps separating these individual parts of the Parish. It was hoped this could be resolved through discussion during the examination of the LNDP
331. In response to questions, officers clarified:
- The Authority had previously made significant representations at the Pre Submission stage. The focus of these representations was in relation to the allocation of land at Brows Farm, officers reported that the neighbourhood Planning Group had prepared a development brief to deal with these concerns
 - Some policies would duplicate policies in the South Downs Local Plan or East Hampshire Joint Core Strategy. Whilst this duplication was a concern officers and Members appreciated that some policies were included to demonstrate that the community's aspirations were reflected in the LNDP. However if a wording of a Neighbourhood Plan were different to that in the Local Plan; that duplication could cause issues.
332. It was proposed and seconded to vote on the revised officer's recommendation. Following a vote, the proposal was carried.
333. **RESOLVED:** The Committee agreed the table of comments as set out in Appendix 2 of the report which will form SDNPAs representation to the Independent Examiner of the Liss NDP.

ITEM 13 REVISED POLICIES FOR THE PRE-SUBMISSION SOUTH DOWNS LOCAL PLAN

334. The Chair informed the Committee that the chapters had been seen and commented on by the Local Plan Member Working Group and issues raised had been addressed in the version the committee were being asked to consider and that only strategic comments should be made at this stage
335. The Committee considered report PC12/17 the [January update sheet](#); and were taken through each of the policies in regard to:
- Development Strategy
 - Homes (strategic)
 - Gypsies, Travellers and Travelling Showpeople
 - Employment
 - Town Centres and Retail
 - Infrastructure
 - Implementation and Monitoring Chapter
336. Norman Dingemans left the meeting at 16:51pm
337. Concern was raised around the approach that was being taken to wording policies. The Director of Planning confirmed that when the whole plan was produced further consideration would be given to the positive nature of policies.
338. Following Committee discussion the proposed changes to be taken forward by officers were agreed as follows:
- Development Strategy: There were still amendments to be made to the text on settlements outside the National Park'

Homes: an alternative word was needed to replace housing 'requirement'

Gypsies, Travellers and Travelling Showpeople: an explanation was needed to explain why the numbers didn't match those in the supporting text

Town Centres and Retail: Policy SD31: 5, 6, 7 & 8 needed to be reorganised and clarified.

The introduction for Town and Villages showed some inconsistencies which required amendments. Members were asked to send their views to the Officer responsible for the text.

Infrastructure: Green Infrastructure needed to be cross referenced in more sections than the introduction

It was to be clarified why Public Houses were not included in the list of community facilities in policy SD43

339. Margaret Paren and Alun Alesbury left the meeting at 5:28pm

340. **RESOLVED:** The Committee:

- 1) Endorsed the direction of the policies as detailed in Appendices 1 to 7 of report PC12/17 for inclusion in the Pre-Submission Local Plan document, subject to the comments made by the Planning Committee being addressed as detailed in minute 338.
- 2) Noted that the Pre-Submission Local Plan will be reported to Planning Committee for consideration prior to publication for public consultation, and
- 3) Note that the Pre-Submission Local Plan document will be subject to final approval by the National Park Authority

ITEM 16: TO NOTE THE DATE AND VENUE OF THE NEXT MEETING

341. Thursday 9 March 2017 at 10am at the South Downs Centre, Midhurst.

CHAIR

The meeting closed at 5:46 pm.

Report to	Planning Committee
Date	13 August 2020
By	Director of Planning
Local Authority	Arun District Council
Application Number	SDNP/19/06071/FUL
Applicant	Mr & Mrs C Fuente
Application	Planning Application for Two Semi-Detached 1.5 Storey 2 Bedroom Cottages, Open and Covered Car Parking and Cycle Stores, including Re-provided Car Parking and Cycle Stores for Lea Cottage and The Old Stable, Hard and Soft Landscaping and Boundary Treatments, and Other Works.
Address	The Old Pub Car Park, School Hill, Slindon, Arundel, West Sussex, BN18 0RS

Recommendation:

- 1) That planning permission be granted subject to the conditions set out in paragraph 10.1 of the report.**
-

Executive Summary

The application site is located within the settlement policy boundary of Slindon, where the principle of development is generally acceptable, however it is also in a sensitive edge-of-settlement location in the Slindon Conservation Area with a number of listed buildings in close proximity.

Concerns have been raised by the Historic Buildings and Landscape officers in regard to the lack of landscape evidence and analysis submitted to support the proposed design, and the resultant impacts on the Conservation Area, setting of listed buildings and important views of the site from publically accessible areas including from within the Conservation Area. However, there is some difference in opinion in regard to the extent and nature of harmful landscape and heritage impacts as a result of this omission in the design process.

The applicant has sought to address the concerns raised by officers, and the Design officer has no objection to the final proposal. Having assessed the scheme on its own merits, officers consider that, on balance the proposal is acceptable from design, landscape and heritage perspectives and permission is therefore recommended.

The application is placed before Members due to the sensitivity of the site location and heritage/landscape considerations.

I. Site Description

- I.1** The site relates to a 0.05ha area within the settlement boundary of Slindon forming the car park of the former Newburgh Arms public house, to the west of School Hill, Slindon. The site is on the eastern edge of the settlement within the Conservation Area, and is in close proximity to a number of Grade II listed buildings including Lea Cottage, the Old Stable and the former pub immediately to the west of the site, and 32 and 33 Top Road and Vine Cottage to the north, which are owned by the National Trust. The village recreation ground and playground, also within the Conservation Area, is located immediately to the east of the site.

- 1.2 The site is mainly tarmacked, with a small gravelled area to the south and is currently used to accommodate private parking for Lea Cottage and the Old Stable (which are within the ownership of the applicant). The northern half of the site falls within an Area Tree Preservation Order (TPO) TPO/SL/2/75, which covers a single Walnut tree outside the application site. There are two mature multi-stemmed sycamore trees outside the TPO area on the eastern boundary adjoining the recreation ground.
- 1.3 The site is accessed from Top Road via an existing private road, which currently serves Nos 32 and 33 Top Road, Vine Cottage, Lea Cottage and The Old Stable. The access road is also used to access Slindon's recreation ground, and is shared with a public footpath (No 386_1) which leads away eastwards to the A29.

2. Relevant Planning History

- 2.1 The following planning history is relevant to the application site:

- SL/10/76 Proposed new car park. Approved 15.09.1976
- SL/14/86 Extension of car parking facilities at rear. Approved 26.08.1986
- SDNP/15/06423/PRE Redevelopment of site with three 2 no. bedroom starter homes, new hard and soft landscaping, car parking, including re-provided car parking for Lea Cottage and The Old Stable, new boundary treatments and other works. Withdrawn 20.07.2017 to await outcome of the proposed settlement policy boundary for Slindon, which would affect whether market or affordable dwellings would be acceptable.
- SDNP/18/02249/PRE Redevelopment of site with a pair of semi-detached 3 bedroom cottages with rear gardens; covered and open car parking, including re-provided car parking for Lea Cottage and The Old Stable; secure cycle parking and bin storage, including for Lea Cottage and The Old Stable; new hard and soft landscaping and boundary treatments; and other works. Advice provided 20.06.2018.

The advice provided (appended at **Appendix 2**) supported the principle of development and the general layout of the proposal, including facing the primary elevation towards the recreation ground. The advice also stated that any scheme would need to give careful consideration to the site's sensitive heritage context, and the final design would need to be informed by a thorough analysis of contextual landscape evidence to best reflect the landscape character of the area, and local vernacular of the Conservation Area.

3. Proposal

- 3.1 The application as originally submitted proposed 2No 2 storey, three-bedroom semi-detached dwellings with a large central gable that projected on both eastern and western elevations. In response to concerns raised by officers in regard to harmful impacts on the character and appearance of the Conservation Area and setting of listed buildings, the proposal was amended during the course of the application and now seeks to provide 2No 1.5 storey two-bedroom, semi-detached dwellings of a traditional style and symmetrical appearance.
- 3.2 The principle (eastern) elevation would front onto the Recreation Ground, and the height to the ridge line would be 7.3m. Each dwelling would have two gable windows on both east and west elevations, with the rear (west) elevation incorporating a shared central 0.8m extension with a small cat-slide roof. Each dwelling would also have two small roof-lights between each set of gable windows.
- 3.3 The materials would incorporate flint block panelling and brick quoins, clay roof tiles and traditional casement timber windows. A total of six new trees are proposed to be planted around the site to replace the loss of the two sycamore trees along the southern boundary. The eastern boundary would be delineated with a post and wire fence with native hedgerow, and a pedestrian gate allowing access from the site to the recreation ground. The existing eastern boundary to the garden of The Old Stable (which is in the ownership of the applicant) would be moved westwards to allow provision of garden space to the new dwellings.

- 3.4 The existing private access from Top Road would be used to access the development.

Following comments from the Historic Buildings and Design officers throughout the course of the application, the originally proposed car barn has been removed. A total of eight parking spaces would be provided for the new dwellings and for Lea Cottage and The Old Stable, and one visitor parking space. Covered cycle storage is proposed in the rear gardens of each dwelling, including Lea Cottage and The Old Stable.

4. Consultations

Initially submitted proposal

4.1 The following comments were received in response to the originally submitted proposal for 2 No three bedroom, 2-storey units with a large shared central gable facing on the eastern (principle) elevation:

4.2 **Design:** Objection. Comments:

- The design should be informed by an appropriate assessment of settlement pattern, building scale, height and density and detailed analysis of building character and traditions;
- The amount and scale of development is inappropriate; the addition of a large central gable feature presents an incongruous architectural feature that would impact the architectural integrity of nearby listed buildings and an important area of open space within the village;
- The proposal would cause significant harm to the character and appearance of the Slindon Conservation Area, and be contrary to national design advice and policy SD5.

4.3 **Drainage:** No objection, subject to conditions.

4.4 **Ecology:** No objection, subject to conditions. Comments:

- The site is of low ecological value;
- A sensitive lighting strategy should be required due to the presence of rare barbastelle bats in the area.

4.5 **Environmental Health:** No comments.

4.6 **Highway Authority:** No objection, subject to conditions. Comments:

- Use of the existing car parking would no longer be an option for residents. Overspill parking would not result in a severe highways safety concern, but rather an amenity issue from a small rise in on-street parking demand.

4.7 **Historic Buildings:** Objection. Comments:

- Whilst the principle of development with two dwellings on the site is acceptable, there is only a limited design rationale to explain how the design responds to its sensitive context;
- The heritage statement is perfunctory and does not meet the requirements of s72 in terms of proper analysis to inform a design that reflects the character or appearance of the Conservation Area.

4.8 **Public Rights of Way:** No objection.

4.9 **Slindon Parish Council:** Objection. Comments:

- The height of the building and central chimney is detrimental, affecting views from the lane and road, impacting the houses opposite and overlooking Bowlers Green House;
- The scale of the development is out of proportion to the two existing/original properties, Lea Cottage and The Old Stable;
- Will exacerbate parking on the adjacent highways, which continues to be an issue in the village;
- The access route to the development also leads to the Top Field recreation ground and will impact on the safety of those using the facilities;

- Whilst no requirement for affordable housing, it is disappointing that the development does not reflect the demand for affordable homes as evidenced by the housing needs survey.
- 4.10 **Southern Water:** No objection, subject to conditions.
- 4.11 **Tree Officer:** No objection.
- Two sycamore trees would be removed, both of which are poorly formed with multiple structural features, limiting their viability as long-term landscape features, regardless of any development proposal;
 - The loss of these trees would be noticeable when viewed from the open space to the east however they have limited visibility in the wider landscape;
 - This can be adequately mitigated by new tree planting, indicative details of which are contained in the arboricultural report and may be secured through a planning condition.
- Revised Proposal
- 4.12 The following comments were received in response to amended drawings submitted between March and July 2020 following the design and heritage concerns raised:
- 4.13 **Design Officer (9 June):** Holding objection, pending further information. Comments:
- The approach does not follow the SDNPA landscape-led methodology or demonstrate how local character has informed the design;
 - The application is now supported by a photographic analysis of local buildings identifying good examples of local architectural details;
 - The height of the building has been reduced to an appropriate scale and the central gable feature removed thereby offering some form of response to the site and its immediate setting;
 - Confirmation of materials and refinement and sophistication in the replication of local architectural details will be central to the acceptability of the scheme;
 - The proposed parking arrangement needs revising to be workable.
- 4.14 **Design Officer (9 July):** Holding objection, pending further information. Comments:
- The site section appears to be accurate and illustrates [an acceptable] change in level and extent of tree planting between Bowlers Green and the proposed development;
 - The architectural details do not reflect those found in the photographic analysis. The detailing, proportion and arrangement of these features will determine how successful the scheme is, and they should be revised accordingly.
- 4.15 **Design Officer (16 July):** No objection. Comments:
- There is now a link between the photographic analysis and the final design, which is better as a result.
- 4.16 **Flood Risk:** No comments.
- 4.17 **Highway Authority:** No objection, subject to conditions. Comments:
- Turning may require a multi-point manoeuvre for parking bay no. 1. This is not anticipated to result in a highway safety concern, but rather an amenity issue;
 - Arun Parking Standards require visitor parking to be provided at a ratio of 20%. As such, at least one visitor parking space should be provided for this proposal.
- 4.18 **Historic Buildings (16 March):** Objection. Comments:
- The proposed development is alien in scale and form to Slindon Conservation Area and would cause harm to the Conservation Area and the setting of the nearby listed buildings;
 - There is still little evidence to support the proposed design; this process should be started from scratch rather than being an exercise in justifying the current proposal;

- Any development should recognise the backland location and take outbuildings as a model; this should result in something smaller and simpler in form than any of the designs shown to us so far;
- Any garage block should sit on the boundary wall and be built of brick.

4.19 Historic Buildings (2 June): Objection. Comments:

- The design process has failed to properly consider the site's particular history and physical relationship with its wider context in the Conservation Area, and the setting of a number of listed buildings to inform a bespoke design;
- It is not enough to present an 'analysis' showing a number of photographs of existing properties within the village that look like those proposed. That seems to assume that it is acceptable to simply copy anything that can be found within the village without any regard to the specific issues relating to the site;
- In its current form, the development would neither preserve nor enhance the character or appearance of this part of the Conservation Area (and therefore the Conservation Area as a whole);
- The scale of the proposed development has been reduced, and is therefore closer to being acceptable.

4.20 Landscape: Objection. Comments:

- The scheme has undergone a number of iterations to both the layout and design to minimise its negative effects, some of which contribute to an overall reduction in harm;
- The alterations have been undertaken without appropriate evidence and understanding to steer them, which is not as effective as avoiding the harm in the first place, through sensitive landscape-led design;
- The application does not provide the quality evidence base critical for achieving the landscape-led aims of the Local Plan Policies and demonstrating the conservation and enhancement of this part of Slindon;
- Landscape includes buildings, roads and open spaces which together contribute to the character and sense of the place. These elements have not been fully understood in either the Landscape Baseline of the LVIA or the D&A;
- The buildings bear no relationship to the access route which generates an alien form of back land development that fails to integrate with the existing settlement and undermines the character of Slindon;
- Loss of mature trees, whilst not of significant arboricultural value but nonetheless characterise the settlement edge of Slindon;
- Pre-grown green screens of ivy are an urban solution and inappropriate in this location.

4.21 Slindon Parish Council. Objection. Comments:

- Whilst the effort to reduce the height of the proposed is appreciated, the Parish Council is not convinced of the necessity for two more properties on what is essentially, a car park in a Conservation Area.

5. Representations

Initially submitted proposal

- 5.1** Four letters of objection were received in response to the originally submitted proposal, including from the National Trust (who own and manage part of Slindon Village including the two Grade II cottages to the north), raising the following concerns:

Principle

- Proposes 'backland' development which would be inappropriate and alien to the settlement character of Slindon and contrary to SD5 criterion (c) as it conflicts with the existing historic settlement pattern;

- The dominant character of Slindon is one of dwellings fronting the roads and lanes around the village with varying setbacks from them, but with very little development to the rear other than historic structures with a functional link with the frontage building;
- This is the case on this site where the existing cottages (Lea Cottage and The Old Stable) were stables and stores for the former pub fronting onto School Hill;

Design and Heritage/Landscape Impacts

- Has not adequately considered the distinctive pattern of development found in Slindon and the overall character and appearance of the Slindon Conservation Area;
- Has not considered impact on the setting of the listed buildings to the north of the application site owned by the National Trust (Vine Cottage, 32 and 33 Top Road) including their strong visual relationship with the eastern part of the village and landscape towards the coastal plain, given their position at one of the highest points in the village;
- Would be cramped and have a negative impact on the character of the village;
- Would be out of proportion to the original pub and outbuilding conversions and would impact on important views;
- Would dominate single storey Bowlers Green due to proximity and siting on higher ground, with the only screening provided by the tree proposed for removal;

Access and Parking

- No provision for visitor parking and increased parking on the narrow village roads;
- The private access road is the access to the recreation ground and parked vehicles backing out onto School Hill would endanger pedestrians.

5.2 Following submission of the revised drawings, a further four letters of objection were received raising the following:

- Urbanising over-development in a picturesque and historic conservation area;
- The view of the settlement boundary would be urbanised and impact on the existing rural character and setting of the conservation area that the NT has carefully preserved;
- The reduction in height does not mitigate the negative impact it would have on Slindon's Conservation Area;
- The landscape impact has been downplayed by the submitted LVIA given the high sensitivity of the site as an edge of village location with adjoining PROW;
- No evidence has been provided to demonstrate how the proposal meets the statutory duties required under s66 and s72;
- Improvements made to the design and photographs of properties around Slindon provided; however, no justification is supplied to demonstrate a positive response to local context or baseline landscape and visual assessment;
- Will a set a precedent for similar in-fill development in the village;
- Requires the felling of mature native trees;
- The character of Slindon is being eroded by large new dwellings with little consistency in the final construction outcome;
- The village forms part of the National Trust estate and had until recently an eclectic mix of architectural and social strata;
- Would still dominate the single story property to the south (Bowlers Green);
- The view onto the recreation ground from The Old Stable will be obstructed resulting in loss of amenity;
- Will affect amenity of users of the Recreation Ground who will feel overlooked;
- Lack of provision for visitor parking and danger from extra traffic on the path and vehicles reversing onto School Hill;
- Noise and disruption during construction will prevent home working due to COVID-19;
- Construction vehicles will damage adjacent listed buildings;

- The tenant of The Old Stable, School Hill as of 11 May 2020 was not informed of the radical shortening of the garden where a home office has been located.

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 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.

The South Downs National Park Partnership Management Plan

- 6.5 The South Downs National Park Partnership Management Plan 2020-25 is a material consideration in the determination of the application. The following policies are of particular relevance:
- 1: Conserve and enhance natural beauty and special qualities of the landscape;
 - 3: Protect and enhance tranquillity and dark night skies;
 - 5: Conserve and enhance populations of priority species
 - 50: Housing and other development.

Statutory Requirements

- 6.6 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, Conservation Areas 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. Section 72 relates to conservation areas specifically, and states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

7. Planning Policy

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

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

- SD1: Sustainable Development
- SD2: Ecosystems Services
- SD4: Landscape Character
- SD5: Design
- SD6: Safeguarding Views
- SD8: Dark Night Skies
- SD9: Biodiversity and Geodiversity
- SD11: Trees, Woodland and Hedgerows
- SD17: Protection of the Water Environment
- SD19: Transport and Accessibility
- SD21: Public Realm, Highway Design and Public Art
- SD22: Parking Provision
- SD25: Development Strategy
- SD26: Supply of Homes
- SD27: Mix of Homes
- SD28: Affordable Homes
- SD44: Telecommunications and Utilities Infrastructure
- SD50: Sustainable Drainage Systems
- SD51: Renewable Energy

8. Planning Assessment

8.1 The main issues for consideration with regard to the applications are:

- Principle of Development;
- Design, Landscape and Heritage Impacts;
- Dark Night Skies;
- Ecology and Trees;
- Highways and Access;
- Drainage and the Water Environment; and
- Neighbour Amenity.

Principle of development

8.2 The site falls within the settlement policy boundary of Slindon, as adopted through the South Downs Local Plan (2019-33), where the principle of development is generally accepted. Policy SD25 supports development within settlement boundaries providing that this is of a scale and nature appropriate to the character and function of the settlement in its landscape context; makes best use of suitable and available previously developed land in the settlement; and makes efficient and appropriate use of land.

8.3 As a former car park, the application site is considered to be previously developed land and, as set out in the pre-application advice provided in 2017, a development comprising two small dwellings on the site is acceptable in principle. However, the site is in a sensitive location, being within the Slindon Conservation Area and close to a number of Grade II listed buildings, as well as being visible from a number of publically accessible areas including a public right of way, and Slindon Recreation Ground which is also in the Conservation Area. The overall acceptability of any scheme is therefore dependent on a design that demonstrates an appropriate response to the site's sensitive heritage landscape context.

8.4 In terms of housing provision, 2No two-bedroom dwellings would make a modest contribution towards meeting the identified market housing need in the National Park for small 2 and 3 bedroom properties, as reflected by policy SD27. Concerns are raised by the Parish Council in regard to the lack of any affordable housing provision, following a recent housing needs survey by Action in Rural Sussex (AiRS) commissioned on behalf of the

Slindon Community Land Trust which indicated strong community support for affordable housing. However, the quantum of development falls under the minimum threshold for affordable housing under SD28.

- 8.5 Concerns have been raised in regard to the impact of development on on-street parking which is an issue locally; however, the site is not a public car park, and is not currently available for public use. The adjoining recreation ground is accessed via a public right of way, and it is considered that the majority of users would be village residents arriving by foot. As such, the loss of parking space is not an overriding material consideration. It will however be important to ensure that there would be minimal impacts as a result of development in terms of parking pressures, and that sufficient parking provision, including for visitors, is provided (see Access and Parking paras 8.26-8.29 below).
- 8.6 In summary, the principle of providing 2 No two bedroom dwellings is acceptable, however, the overall acceptability of any scheme is dependent on a design response that is appropriate to the site's sensitive edge-of-settlement context, in particular the character and appearance of the Conservation Area, and the setting of the nearby Grade II listed buildings. This and other matters are considered in more detail below.

Design, Landscape and Heritage Impacts

- 8.7 In accordance with sections 66 and 72 of the Town and Country Planning (Listed Buildings and Conservation Area) Act (1990), Local Planning Authorities must have special regard to the desirability of preserving listed buildings and their setting, and pay attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas. Any proposal would therefore need to demonstrate an acceptable heritage and landscape character impact in terms of the nearby listed buildings and their setting, and the character and appearance of the Slindon Conservation area.
- 8.8 Accordingly, there a range of policies in the South Downs Local Plan, including SD12, SD13 and SD15, which require development to conserve and enhance the historic environment; preserve and enhance the significance of listed buildings and their setting; and preserve or enhance the special architectural or historic interest, character or appearance of conservation areas.
- 8.9 The updated Slindon Conservation Area Appraisal (CAA) was formally adopted by the SDNPA in August 2018. Paragraph 5.23 of the CAA acknowledges the design challenge involved in incorporating new buildings into a historic village, and any contemporary design approach must be of the highest quality and informed by, and rooted in, the wider context. This is equally true of traditional design approaches such as is proposed.
- 8.10 Proposals must also comply with policies SD4 and SD5, which require the design of development to adopt a landscape-led approach in order to conserve and enhance existing landscape character features. SD6 requires new development to preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views and views of key landmarks within the National Park.
- 8.11 As set out in supporting paragraph 5.21, the purpose of SD5 is to 'ensure that development is of the highest possible design quality' through a landscape-led approach 'informed by contextual analysis of the local landscape character and built character... [including] landscape features, historic landscape features... biodiversity and other ecosystem services, key routes and street patterns, landmarks, views and vistas, the scale, proportions, pattern, and vernacular architecture and materials.'
- 8.12 Concerns are raised that the proposal has failed to provide sufficient baseline landscape and heritage evidence to inform an appropriate design or adequately assess negative impacts on the Conservation Area and the setting of nearby listed buildings; and would have a harmful urbanising impact on heritage assets and important views.
- 8.13 The Landscape and Historic Buildings officers have also objected to the application due to the lack of any contextual evidence or analysis provided to support the design and explain how it responds to its sensitive heritage and landscape context. Both officers are of the view that whilst the principle of providing 2 No dwellings on the site is acceptable, insufficient

consideration has been given to the site's individual history and physical relationship with its wider context, which should be properly assessed and analysed to inform a bespoke design rather than the standard domestic form that has been presented. As a result, the application does not achieve the landscape-led aims of the Local Plan policies, or succeed in demonstrating that it conserves and enhances the character and appearance of the Conservation Area.

- 8.14 The SDNPA Design officer also objected to the originally submitted design and lack of landscape-led methodology, and the resultant harmful impact on the Conservation Area and setting of the Grade II listed buildings. In particular, the height of the building and central chimney would be out of proportion to the two existing/original properties, Lea Cottage and The Old Stable and detrimentally affect views into the site from the Conservation Area.
- 8.15 During the course of the application the applicant submitted a number of revised plans in an attempt to address concerns raised about the scale, form and design of the development, and overcome the perceived lack of landscape and heritage evidence. The applicant was advised of the need to provide an appropriate assessment of heritage assets, landscape character settlement pattern, building scale, height and density and a detailed analysis of building character and building traditions to ensure any revised design would provide a sensitive response to the historic character of this part of Slindon. Following negotiations over a period of time, the applicant provided an amended Landscape Visual Assessment (LVA); photographic analysis of locally distinctive architectural details; drawings of typical architectural features; and detailed elevational drawings incorporating these features.
- 8.16 The Historic Buildings, Landscape and Design officers agree that the final scheme is an improvement on the initially submitted proposal. The development is not a bespoke response to the site's unique history as part of the original public house, or its edge of settlement location; however, it is now of a simpler, scaled back traditional domestic form and appearance. Due to a reduction in the scale, height and size (approximately 9sqm per dwelling) of the building; removal of the large, uncharacteristic central gable feature and car barn; and incorporation of local architectural features, the scheme now offers a response to the site and its sensitive heritage setting. Following submission of the detailed elevational drawings, the Design officer considers the scheme to reflect statutory requirements and design guidance set out in SD5 and National Design Guidance, and has no objection to the proposal.
- 8.17 The remaining concern, which forms the basis of the retained Heritage and Landscape officer objections (as well as that of the National Trust), is that the application has lacked from the outset any detailed assessment of the site's unique heritage and landscape character context. The LVA (and application as a whole) relies on an assumption that any change at this location would be positive given its existing low character value. However, the site has not always been a tarmacked car park, and its historic context and development over time within the wider landscape context has not been fully explored or understood. As a result, it could be argued that the application has failed to demonstrate understanding of what a true enhancement of the settlement edge would entail. However, there is some difference in opinion as to the nature of the resultant harm, and what a fully landscape-led scheme would look like. The Historic Buildings officer has expressed a view that a smaller, simpler outbuilding form would be more acceptable, with a flint garage building sitting on the northern boundary wall. The Landscape officer has expressed a view that the dwellings should be turned to face onto the access route along the northern boundary rather than eastwards towards the Recreation Ground. The extent and nature of harmful landscape and heritage impacts as a result of this omission in the design process is therefore considered to be a matter of judgement.
- 8.18 It is acknowledged that the submitted landscape evidence and analysis work is somewhat limited. This missing part of the design process has been problematic for both sides, and has resulted in the need for the applicant to submit a number of design iterations resulting in considerable delays to the determination process, and the need for officers to provide ongoing commentary and advice throughout. However, officers have assessed the final proposal on its own merits, and following the improvements made to the design, and the

retrospective analysis and inclusion of detailed local architectural features, it is considered that the proposal would, on balance, preserve the character and appearance of the Conservation Area and setting of the listed buildings, and views into the site from the Recreation Ground and public right of way. Enhancement of the site and its setting would be dependent on the ability to secure a landscaping scheme that reflects the site's sensitive, edge of settlement location, without urban features such as picket fences, tarmac surfaces and non-native planting, and appropriate surfacing and boundary treatments.

- 8.19 In summary, the scheme is considered, on balance, to be acceptable in terms of design, landscape and heritage considerations, subject to suitably worded conditions to secure details of sustainable construction, quality local and sustainably sourced materials, joinery and sample panels, and hard and soft landscaping. It is considered appropriate to secure such details via pre-commencement conditions as such details need to be taken into account in the construction of the development and are pivotal to the ability of the development to enhance the Conservation Area, and preserve the setting of listed buildings and important views from publically accessible locations.

Dark Night Skies

- 8.20 Policy SD8 requires proposals to demonstrate that all opportunities to reduce light pollution and ensure that the measured and observed sky quality in the surrounding area is not affected. The site is located within the Dark Skies Intrinsic Zone of Darkness (EIa), which is a buffer zone classified as 'dark sky' and includes isolated areas that may not be connected to the main core. In these areas, glazing and roof-lights should be minimised, and light spill mitigated through the use of low-transmittance glazing and timed blackout blinds.
- 8.21 It is considered that harmful light spill could be adequately mitigated through the use of automated blackout blinds and low transmittance glass. Details of these could be secured via an appropriately worded condition.

Ecology and Trees

- 8.22 Policies SD2, SD9 and SD11 require proposals to identify and incorporate opportunities for net gains in biodiversity; conserve and enhance trees and hedgerows; and have a positive impact on the ability of the natural environment to contribute goods and services.
- 8.23 The County Ecologist has advised that the site is considered to be of low ecological value, and no concerns are raised. Whilst the submitted arboricultural report confirms that two sycamore trees would be felled to facilitate the development, a native hedge would be planted along the eastern boundary, along with new tree planting throughout the application site, which would provide suitable mitigation.
- 8.24 The sycamore trees on the eastern boundary proposed for removal are located outside the 1976 Area Tree Preservation Order which covers only the northern part of the site (which also only relates to a single walnut tree outside the application site). The Tree Officer has advised that the sycamore trees are poorly-formed and multi-stemmed, which limits their viability as long-term landscape features, regardless of any development proposal. The loss of the trees would be noticeable when viewed from the recreation ground however they have limited visibility in the wider landscape. It is acknowledged that due to the size of the development, there is limited ability to replace the trees with specimens of a large size, however a total of six replacement trees are proposed throughout the site. Native hedgerow planting is proposed along the eastern boundary.
- 8.25 In summary, the application is acceptable from an ecological and arboricultural perspective, and tree protection measures, replacement planting and a sensitive external lighting strategy to ensure that bats are not affected could be secured via appropriately worded conditions. A scheme of biodiversity enhancements and features such as rainwater harvesting could also be secured in order to ensure the scheme complies with SD2.

Highways and access

- 8.26 Policies SD19 and SD21 seek the continued safe and efficient operation of the strategic and local road network, and the promotion of sustainable modes of transport to minimise the need to travel.
- 8.27 Concerns are raised in regard to lack of visitor parking, and that the proposal could impact the safety of users of the recreation ground.
- 8.28 WSCC Highway Authority has no objection to the proposal following provision of a visitor parking space. The published parking standards for both WSCC and Arun district state that 0.2 visitor spaces should be provided per dwelling. Although only two new dwellings are proposed, the site also needs to provide parking for Lea Cottage and The Old Stable i.e. a total of four dwellings, and a visitor parking space has therefore been provided. The proposal is for a small development, with a minor associated increase in vehicular movements via a private access road that is already shared by a number of different users, including vehicles used to access neighbouring properties. Users of the public footpath will already be aware of vehicular traffic and the need to exercise necessary caution, and as such the proposal is unlikely to significantly impact the safety of pedestrians. The Highway Authority have suggested there may be an impact on amenity from increased on-street parking as a result of development. However as previously discussed at para 8.5 the site is not a public car park and there would be no loss of public parking space as a result of development. Sufficient parking provision would be provided for the existing and proposed dwellings, including for visitors.
- 8.29 Concerns were raised by both the Historic Buildings and Design officers in regard to the design of the originally proposed car port, which did not reflect the character of the conservation area or the site's edge of settlement character. Suggestions were made as to how the structure's design could be improved however these were not incorporated in the amended proposal and officers therefore requested its removal. It is considered appropriate to secure final details of vehicle and cycle parking, and provision of electrical charging points by way of an appropriately worded condition.

Drainage and the Water Environment

- 8.30 Policies SD2 and SD50 support proposals that ensure against increase of surface water run-off, taking account of climate change, and deliver sustainable drainage solutions such as porous surfaces, rain gardens/balancing ditches and tree planting where feasible.
- 8.31 The Arun Drainage officer has advised that the site lies within the Lidsey Treatment catchment which is prone to sewer infiltration when groundwater levels are high. Care must therefore be taken to ensure development is adequately drained and does not increase flood risk elsewhere. Southern Water have advised that any SuDS scheme must ensure a management and maintenance plan for the lifetime of the development. It is therefore appropriate to secure details of sustainable surface water drainage (SuDS) scheme. The provision of further on-site solutions such as rainwater harvesting and rain gardens may be secured through a suitably worded landscaping condition.

Neighbour Amenity

- 8.32 Concerns have been raised that the building would dominate and overlook the single storey dwelling to the south known as Bowlers Green due to its proximity and siting on higher ground, with the only screening provided by the trees proposed for removal.
- 8.33 The applicant was asked to provide a section plan detailing existing and proposed ground levels across the site, including the adjacent property to the south, existing vegetation and boundary treatments.
- 8.34 From the submitted plans the new dwellings would be located approximately 10m away from the single storey dwelling to the south known as Bowlers Green. There is also a drop in ground height of approximately 2m on the boundary between Bowlers Green and the proposal site. A single small (secondary) window is proposed on the upper floor of the southern elevation, which would serve the principal bedroom. The window would face out onto a newly extended part of Bowlers Green, which comprises a utility room, and part of

the pedestrian access up to the front door of the dwelling.

- 8.35 Neither bedrooms nor utility rooms fall into the category of principle habitable rooms i.e. rooms that are frequently used for general daytime living purposes, and the area of the neighbouring property that would be overlooked would be an area of front garden (in terms of the orientation of the principle elevation) where the expectation of privacy would reasonably be less than in rear gardens, and not a private area where the occupants would spend any length of time. Given the height difference and existing intervening vegetation along the majority of the fence line within the boundary of the neighbouring dwelling it is also considered unlikely that views into the utility room could be achieved. Impacts from direct overlooking and loss of privacy are therefore considered to be minor. However, strengthening of the southern boundary with, for example, a trellis and soft native planting, could be secured via a suitably worded condition.

- 8.36 Concerns are also raised that the amenity of users of the recreation ground would be affected from overlooking, however this area is a public open space.

Community Infrastructure Levy

- 8.37 The development would be liable for a CIL contribution of £200 (plus indexation from 2017) per sqm.

9. Conclusion

- 9.1 It is acknowledged that the proposal has not followed a landscape-led approach, which is the most appropriate method of achieving the highest possible quality of design. Nonetheless, the applicant has sought to address the landscape and heritage concerns raised during the process of the application by an iterative approach, and on its own merits the scheme is considered, now, to be on balance acceptable.

- 9.2 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 the application should not be approved. It is therefore recommended that planning permission be granted.

10. Reason for Recommendation

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

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with the provisions of Section 91 (1) of the Town and Country Planning Act 1990 (as amended) 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. Notwithstanding the provisions of Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order amending or revoking and re-enacting that Order with or without modification) no development falling within Classes A B C D E F G and H of Part 1 of Schedule 2 to the order shall be erected constructed or placed within the curtilage(s) of the dwelling(s) hereby permitted so as to enlarge improve or otherwise alter the appearance or setting of the dwelling(s) unless permission is granted by the Local Planning Authority pursuant to an application for the purpose.

Reason: In the interest of visual amenity and to ensure the development conserves the landscape character of the South Downs National Park.

4. Notwithstanding the provisions of Schedule 2 Part 2 Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order

amending or revoking and re-enacting that Order with or without modification) no new fences, gates, walls or other means of enclosure shall be erected without the prior written approval of the Local Planning Authority.

Reason: In the interest of visual amenity and to ensure the development conserves the landscape character of the South Downs National Park.

Construction

5. Prior to the commencement of the development hereby permitted, plans and cross sections of the existing and proposed ground levels of the development, site boundaries and finished floor levels in relation to a nearby datum point (above Ordnance datum) shall be submitted to and approved by the Local Planning Authority in writing. The development shall be completed in full accordance with the approved details.

Reason: To ensure a satisfactory relationship between the new development and adjacent buildings, amenity areas and trees.

6. 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) Protection of roadside verges in particular along School Hill and the private access road into the site;
- x) Adequate signage and protection of the amenity of users of the public right of way;
- xi) Protection of the public sewer along the access road;
- xii) Loading and unloading of plant and materials to avoid congestion in School Hill at peak times;
- xiii) 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);
- xiv) 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;
- xv) 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;
- xvi) Details of any flood lighting, including location, height, type and direction;
- xvii) Measures to control the emission of dust and dirt during demolition/construction;
- xviii) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- xix) A method to record the quantity of recovered material (re-used on site or off site);
- xx) 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.

7. All new electricity and telephone lines shall be laid underground unless otherwise agreed, in writing, by the Local Planning Authority.
Reason: To safeguard the landscape character of the site.
8. Prior to the commencement of the development hereby permitted, a plan showing the location of all existing and proposed utility services shall be submitted to and approved in writing by the Local Planning Authority. This shall include gas, electricity, communications, water and drainage. No development or other operations shall take place other than in complete accordance with the approved services plan.
Reason: To safeguard landscape character and amenity and ensure utility services provision will not impact on trees.

Design and Materials

9. Prior to the commencement of the development hereby permitted, details of the following materials shall be submitted to and approved in writing by the Local Planning Authority:
- i) Full details and samples of external materials of all facing and roofing materials, including bricks, plain clay tiles and to include sample panels of brickwork in a traditional bond available for inspection on site;
 - ii) Details of external flues, background and mechanical ventilation, soil/vent pipes and their exits to the open air;
 - iii) Full details of external decoration or any other finish to external walls, joinery and metalwork.
- Thereafter the works shall be carried out in full accordance with the approved details and shall be retained permanently as such, unless prior written consent is obtained from the Local Planning Authority to any variation.
- Reason: In the interests of preserving the character and appearance of the Conservation Area and the setting of nearby listed buildings.
10. Prior to the commencement of the development hereby approved, the following shall be submitted to and agreed in writing by the Local Planning Authority:
- i) Samples and/or technical details of the proposed rainwater goods, which shall be of cast iron or cast aluminium;
 - ii) Details of the proposed method of fixing the rainwater goods to the building;
 - iii) The position of the downpipes.
- Thereafter the works shall be carried out in full accordance with the approved details and shall be retained permanently as such, unless prior written consent is obtained from the Local Planning Authority to any variation.
- Reason: In the interests of preserving the character and appearance of the Conservation Area and the setting of nearby listed buildings.
11. Prior to the commencement of the development hereby permitted, details of all new external window and door joinery shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include drawings and sections at a scale of 1:10 (including sections through glazing bars and meeting bars), to clearly show the construction of the joinery and the finished relationship to the jambs, cills and heads of the wall, method of opening, and details of final finish (including colour).
Thereafter the works shall be carried out in full accordance with the approved details and shall be retained permanently as such, unless prior written consent is obtained from the Local Planning Authority to any variation.
- Reason: In the interests of preserving the character and appearance of the Conservation Area and the setting of nearby listed buildings.
12. Prior to the commencement of the development hereby permitted, detailed specifications of low transmittance, non-reflective glazing, which shall be applied to all

openings including the roof-lights, windows and glazed elements, shall be submitted to and approved in writing by the Local Planning Authority. The approved glazing shall be installed and operated in accordance with the approved details prior to first occupation of the dwellings and shall remain in perpetuity.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of night time amenity, tranquillity and protect and conserve the International Dark Night Skies reserve.

13. Prior to the commencement of the development hereby permitted, and notwithstanding previously submitted landscaping details; a detailed scheme of hard and 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 replacement tree establishment; schedules of plants and trees (achieving where possible closed canopies along the green corridor through the site) noting species, sizes; and proposed numbers/densities where appropriate;
- ii) Tree guards, staking and tree-pit construction;
- iii) Location, height and materials/construction technique for all boundary treatments and other built means of enclosure (including gates and setbacks) to property frontages (to include post and wire fence and hedging along eastern boundary and re-enforced screening along southern boundary; gate to the recreation ground and main gate into the site);
- iv) Retained areas of grassland cover, scrub, hedgerow, and trees;
- v) Treatment of surfaces, paths, access ways, courtyards, seating areas, patio areas and parking spaces, including their appearance, depth and permeability, kerbs, edges, steps and ramps, spot levels, finished floor levels, upstands and demarcation;
- vi) Above ground rainwater harvesting solutions and rain gardens;
- vii) Ancillary structures (including refuse storage to the rear of dwellings);
- 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 to integrate the development into the landscape and mitigate any impact upon the amenities of neighbouring properties.

14. Prior to the first occupation of the development hereby permitted, a Landscape Management Plan covering areas outside of private ownership including access roads, parking areas, pathways and landscaping, shall be submitted to and approved in writing by the Local Planning Authority. The management plan shall include long term objectives, management responsibilities and maintenance schedules for all landscape areas, other than small privately owned domestic gardens. The landscape management plan shall thereafter be implemented in full as approved unless otherwise agreed in writing by the Local Planning Authority.

Reason: To secure the long term maintenance of the landscaping scheme, which will contribute to the setting of the development and the surrounding character and appearance of the area.

15. 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 dwelling 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) Sustainable, locally sourced materials (including plastic-free windows and doors).

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.

16. Prior to the first use of the dwellings, hereby permitted, a bin storage and management strategy, incorporating collection for recyclables and private garden compost, 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.

Drainage

17. Prior to the commencement of development hereby permitted, details of the proposed surface water drainage and means of disposal, including on and/or off site works, 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 recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage.

All works shall be undertaken in full accordance with the approved detailed surface water drainage designs and calculations for the site, based on sustainable drainage (SuDS) principles. The drainage designs should demonstrate that the surface water runoff generated up to and including the 1 in 100-year, plus climate change, critical storm will not exceed the run-off from the current site following the corresponding rainfall event.

The maintenance and management of the SuDS system should be set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority.

Reason: To ensure satisfactory provision of surface water drainage.

18. No part of the building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.

Reason: To ensure that the proposed development is satisfactorily drained.

19. Prior to development above slab level, details of vegetative and/or capture-at-source solutions for the management of surface water shall be submitted to and approved by the Local Planning Authority.

The details shall be implemented and maintained as approved in full accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To manage and mitigate surface water run-off and the risk of flooding.

Ecology and Trees

20. Prior to development above slab level, a scheme of biodiversity enhancements including bird and bat habitat features shall be submitted to, and approved in writing by the Local Planning Authority, and thereafter implemented in full as approved. The details shall include the locations and specifications of such features, a timescale for their provision, and details of any future management responsibilities. The details shall be implemented and maintained as approved in full accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

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

21. Tree protection measures, including fencing, ground protection, supervision, working procedures and special engineering solutions shall be carried out in accordance with the approved Arboricultural report (ref 15734 - AIA 2 ecourban Ltd, May 2020).

Reason: In the interests of amenity and to ensure that reasonable measures are taken to protect and establish trees.

22. No development including ground preparation, temporary access construction or construction work shall commence on site until details of new tree planting have been submitted to and approved in writing by the Local Planning Authority. Details of protection of young trees, weed control and formative pruning shall also be provided. The approved details shall be implemented in full unless otherwise agreed in writing with the Local Planning Authority.

Reason: In the interests of amenity and to ensure that reasonable measures are taken to protect and establish trees.

Lighting and Dark Night Skies

23. 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.

The lighting shall thereafter 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.

24. Prior to the commencement of the development hereby permitted, detailed specifications and plans of the roof lights, which shall be low profile, and incorporate automated/timed black-out blinds, shall be submitted to and approved in writing by the Local Planning Authority. The approved roof lights and blinds shall be installed and operated in accordance with the approved details prior to first occupation of the dwellings and shall remain in perpetuity.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of night time amenity, tranquillity and protect and conserve the International Dark Night Skies reserve.

Highways and Parking

25. Prior to the commencement of the development hereby permitted, details of the car parking and electric vehicle charging points 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 details prior to first occupation of the development, unless otherwise agreed in writing by the Local Planning Authority.

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

26. Prior to the first occupation of the development hereby permitted, details of covered and secure cycle parking spaces shall be provided. 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.

Informatives

1. The applicant is advised that the erection of temporary directional signage should be agreed with the Local Traffic Engineer prior to any signage being installed. The applicant should be aware that a charge will be applied for this service.
2. 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.
3. A formal application for connection to the public sewerage system is required in order to service this development. The 150 mm diameter gravity foul sewer requires a clearance of 3 metres on either side of the gravity sewers to protect it from construction works and to allow for future access for maintenance. No development or tree planting should be carried out within 3 metres of the external edge of the public gravity sewer without consent from Southern Water. No soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of a public sewers. All existing infrastructure should be protected during the course of construction works.
4. Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method and cater for the 1 in 10-year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100-year event plus 40% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers.
5. Supplementary guidance notes regarding surface water drainage are located here <https://www.arun.gov.uk/surfacewater> on Arun District Councils website. A surface water drainage checklist is available here <https://www.arun.gov.uk/drainagechecklist> on Arun District Councils website, this should be submitted with a Discharge of Conditions Application."
6. No new structures, such as gates and stiles, are to be installed within the width of the PROW without the prior consent of the WSCC PROW Team. These will constitute an offence of obstruction under the Highways Act 1980. It is an offence to damage the surface of a PROW without the prior consent of the WSCC. PROW Team. Where a PROW surface is damaged and there was no prior consent, the applicant will be liable

and required to make good the surface to a standard satisfactory to the WSCC PROW Team.

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

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Appendices 1. Site Location Map
2. Pre application advice SDNP/18/02249/PRE

SDNPA Consultees Legal Services, Development Manager

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

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

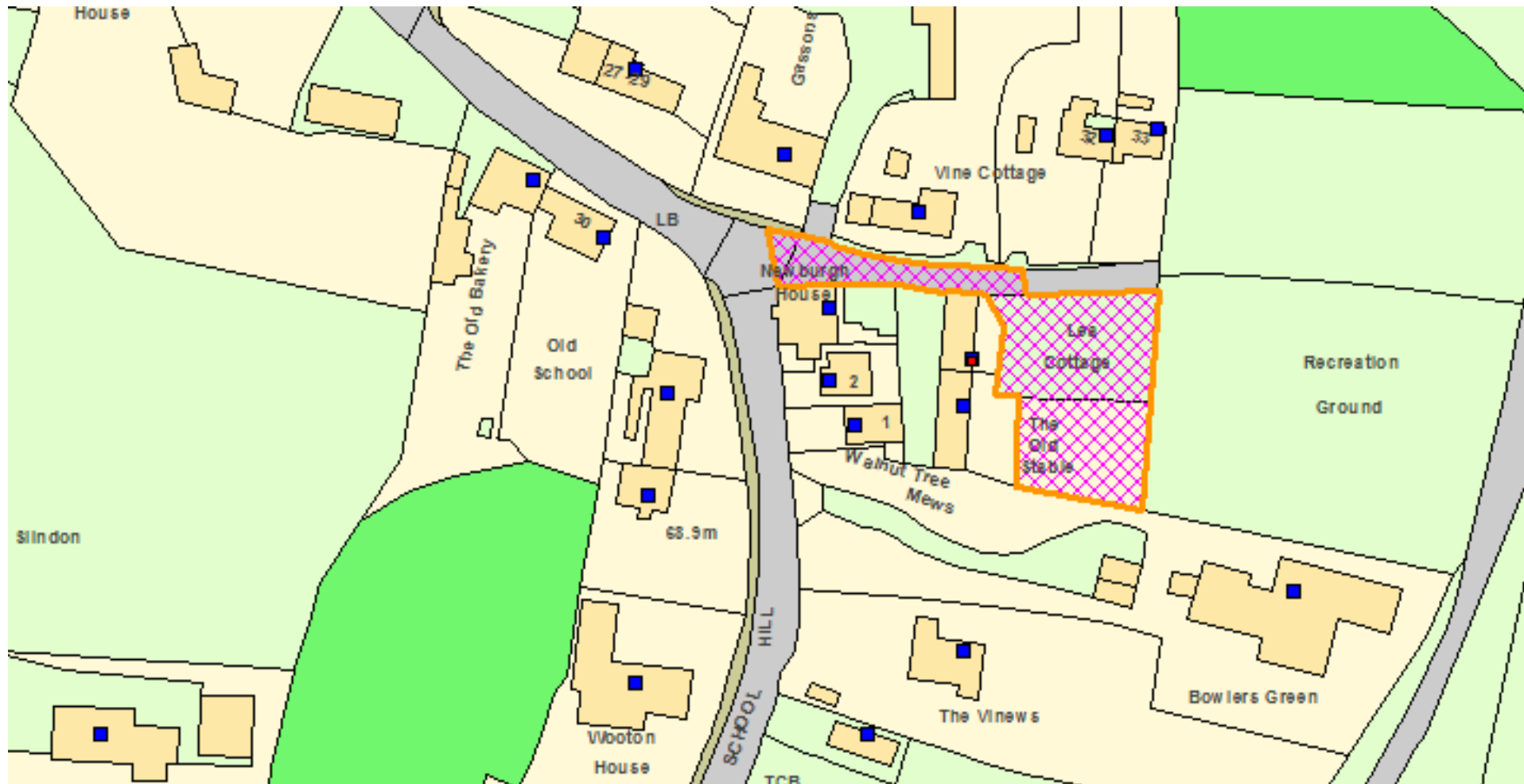
[Slindon Conservation Area Appraisal \(2018\)](#)

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

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

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

Agenda Item 10 Report PC20/21-09 Appendix I
Site Location Map



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Matthew Utting
MatPlan Limited
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Bracknell
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RG12 8BF

Our Ref: SDNP/18/02249/PRE
Contact Officer: Stella New
Tel. No.: 01730 819216

20 June 2018

Dear Matthew Utting

PRE-APPLICATION ADVICE

Proposal: Redevelopment of site with a pair of semi-detached 3 bedroom cottages with rear gardens; covered and open car parking, including re-provided car parking for Lea Cottage and The Old Stable; secure cycle parking and bin storage, including for Lea Cottage and The Old Stable; new hard and soft landscaping and boundary treatments; and other works.

Site Address: Former Pub Car Park, Off School Hill, Slindon, West Sussex, BN18 0RS

Thank you for your correspondence received 23 April 2018 seeking pre-application advice.

Executive Summary

New development within settlement policy boundaries is generally acceptable in principle. Currently, given the level of objection to policy SD25, very limited weight can be given to the proposed settlement policy boundary for Slindon, and you are therefore recommended to wait until the South Downs Local Plan has been adopted before submitting an application.

Providing that the settlement policy boundary is retained in the final version of the Plan, and whilst the outcome of any formal application cannot be pre-judged, it is considered that, based on the information provided, the proposal is likely to be acceptable. However you would need to demonstrate that the design and layout is consistent with the landscape character of the area, and reflects the local vernacular of the Conservation Area.

Any proposal should also seek to:

- o Meet the policy requirements for housing mix, including an appropriate provision of affordable units
- o Demonstrate a landscape led approach to the design and layout of the resultant proposal
- o Incorporate the value of the natural environment to mitigate climate change and deliver biodiversity and wellbeing gains

Please note that the advice contained within this letter constitutes an informal Officer's opinion and does not prejudice, nor is binding upon, any future decision taken by the South Downs National Park Authority.

Planning Policy

Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory development plan, currently, in this area is the Chichester District Council Local Plan (1999). The Chichester District Local Plan is now more than 18 years old and since its publication the South Downs National Park has been formed (as of 1 of April 2011) and the National Planning Policy Framework (NPPF) was published on 27 March 2012.

The Pre-Submission version of the South Downs Local Plan (2017) was published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for public consultation from 26 September to 21 November 2017, and the responses considered by the Authority. The Plan was submitted to the Secretary of State for independent examination in April 2018. The Submission version of the Local Plan consists of the Pre-Submission Plan and the Schedule of Proposed Changes. It is a material consideration in the assessment of this planning application in accordance with paragraph 216 of the NPPF, which confirms that weight may be given to policies in emerging plans following publication. Based on the current stage of preparation, and given the relative age of the saved policies within the Arun District Local Plan (2003), the policies within the Submission South Downs Local Plan (2018) are currently afforded considerable weight, depending on the level of objection received on individual policies. Depending on the timing of a formal application, you are advised to give strong consideration to the South Downs Local Plan, which may be adopted by the time you come forward.

The relevant policies within the Pre-Submission Local Plan are:

SD1: Sustainable Development
 SD2: Ecosystems Services
 SD4: Landscape Character
 SD5: Design
 SD8: Dark Night Skies
 SD9: Biodiversity and Geodiversity
 SD11: Trees, Woodland and Hedgerows
 SD12: Historic Environment
 SD13: Listed Buildings
 SD15: Conservation Areas
 SD19: Transport and Accessibility
 SD21: Public Realm, Highway Design and Public Art
 SD22: Parking Provision
 SD25: Development Strategy
 SD26: Supply of Homes
 SD27: Mix of Homes
 SD28: Affordable Homes
 SD45: Green Infrastructure
 SD50: Sustainable Drainage Systems
 SD55: Contaminated Land

The outcomes and associated policies of the SDNP Partnership Management Plan are also a material consideration. Relevant policies are as follows:

1 - Conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.

3 - Protect and enhance tranquillity and dark night skies.

50 - Housing and other development in the National Park should be closely matched to the social and economic needs of local people and should be of high design and energy efficiency standards to support balanced communities so people can live and work in the area.

Planning Assessment

The site relates to the car park and grounds of the former Newburgh Arms public house, to the west of School Hill, Slindon. The site falls within the Conservation Area, and the proposed settlement policy boundary for Slindon as set out in policy SD25 of the Submission South Downs Local Plan (2018). The site is in close proximity to a number of Grade II listed buildings, and the village recreation ground and playground, also within the Conservation Area, is sited immediately adjacent to the new dwellings.

Pre-application advice was sought in 2017 for the provision of 3 affordable units, which was subsequently withdrawn.

The main issues for consideration with regard to the proposal are listed below:

- o Principle of development
- o Housing provision
- o Design and layout
- o Dark night skies
- o Highways
- o Trees
- o Amenity
- o Contamination and drainage

Principle of Development

The site falls within the proposed settlement policy boundary for Slindon, as set out in policy SD25 of the Submission South Downs Local Plan 2018.

Policy SD25 'Development Strategy' supports development within settlement boundaries providing that this is of a scale and nature appropriate to the character and function of the settlement in its landscape context, and makes efficient and appropriate use of land. However, it must be emphasised that this policy has received a significant level of objection to the methodology used to assess settlement policy boundaries, including for Slindon, such that means very limited weight may currently be given to it. You are therefore recommended to await the adoption of the South Downs Local Plan before submitting a formal application in order to have a level of certainty in regard to the acceptability of the proposal in principle. As there is currently no formal settlement boundary for Slindon, rural development policies would need to be applied to any application, which are considerably more restrictive.

The provision of two semi-detached market dwellings is likely to be acceptable in principle, providing that the settlement policy boundary for Slindon is not amended through the adoption process. Any formal proposal would also need to demonstrate consideration of local housing needs, and accord with other policy considerations, including design, heritage, highways, and residential amenity. These are dealt with in more detail below.

Housing Provision

It would be important for any scheme to reflect the identified local housing need. Slindon has not prepared a Neighbourhood Development Plan, and there is limited information in regard to any locally identified housing need. However, as part of the evidence base for the South Downs Local Plan, the SDNPA carried out a Housing and Economic Development Needs Assessment in 2017, which identified the need for the following broad mix of market housing:

- 1 bedroom dwellings: at least 10%
- 2 bedroom dwellings: at least 40%
- 3 bedroom dwellings: at least 40%
- 4+ bedroom dwellings: up to 10%

The provision of 2x 3 bedroom dwellings is considered preferable to a single, large dwelling and would contribute towards the element of windfall housing.

Policy SD28 'Affordable Homes' currently requires a contribution towards affordable housing from new developments of 3 units and over. As only 2 units would be provided, there would be no requirement for the development to provide any affordable housing contribution.

Design, Layout and Heritage Impact

The site itself has a number of constraints that need to be considered. The site falls within the Slindon Conservation Area, including a number of adjacent Grade II listed building. Given these constraints, we would recommend first carrying out a landscape appraisal before considering the design and layout of the development

In terms of relevant policy, the NPPF (2012) attaches great importance to the design of the built environment as a key part of sustainable development. Although planning policies and decisions should not attempt to impose architectural styles or particular tastes, they should seek to promote or reinforce local distinctiveness. Saved Policy GEN7 of the Arun District Local Plan (2003) states that new development should improve the visual amenities of the local area and make a positive contribution to the quality of the environment, especially in sensitive areas.

Policy SD4 Landscape Character of the Submission South Downs Local Plan (2018) supports development that conserves and enhances landscape character reflecting the context and type of landscape in which the development is located and the individual identity of settlements. Policy SD5 Design supports a landscape-led approach, where proposals respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area. Proposals should also:

- o Contribute to local distinctiveness and sense of place
- o Utilise architectural design which is appropriate and sympathetic to its setting in terms of height, massing, density, roof form, materials, night and day visibility, elevational and, where relevant, vernacular detailing
- o Provide high quality, secure, accessible, and where possible, integrated storage for general and recycling waste, heating fuel, and transport related equipment;
- o Provide high quality outdoor amenity space appropriate to the needs of its occupiers and
- o Provide sufficient internal space to meet the needs of a range of users.

Policy SD15 'Conservation Areas' of the Submission South Downs Local Plan (2018) states that Development proposals within a conservation area, or within its setting, will only be permitted where they preserve or enhance the special architectural or historic interest, character or appearance of the conservation area. The Slindon Conservation Area Appraisal is likely to be adopted in August 2018, and it will be important for you to reference this in any application.

Finally, Policy SD2 Ecosystem Services of the Submission South Downs Local Plan (2018) supports development that seeks to have an overall positive impact on the ability of the natural environment to contribute goods and services, through the use of high quality design to provide more, better and joined up natural habitats, conserve water resources, improve the National Park's resilience to, and mitigation of, climate change, increase the ability to store carbon through new planting or other, reduce levels of pollution and improve opportunities for peoples' health and wellbeing. Please refer to the online technical advice note for more information <https://www.southdowns.gov.uk/wp-content/uploads/2018/04/Core-07-Ecosystem-Services-Technical-Advice-Note-non-householder.pdf>

In terms of the details that have been submitted, the general layout is considered positive, in particular the principal elevation facing onto the recreation ground, and treatment of the 'rear' elevation as a secondary, facing elevation to the adjacent listed Lea Cottage and The Stable. The provision of a single storey car port is also welcomed, and will avoid an expanse of parked cars which would detract from the setting of the Conservation Area and adjacent listed buildings. The siting of the two dwellings follows the line of development, and given the compact nature of the site, a semi-detached approach is considered to be acceptable. However, when you do come forward with an application, it will be important to include a thorough contextual analysis of the site, and development pattern of the surrounding area. This would provide your design rationale, and overall vision for the development, and inform the most appropriate layout for the site. The analysis should also consider the local built form of the village, picking out positive design elements and local materials that could be incorporated to achieve a locally distinctive scheme.

The Historic Buildings officer has considered the submitted information, and in addition to the above general advice has advised the analysis would need to provide the following details:

- o Why has a semi-detached form been chosen for this site, and is this typical of Slindon?
- o More specifically, where dwellings are semi-detached, do they have a large central element which breaks forward of the flanking wings? Are they symmetrical? Are porches typical?
- o Is the combination of flint and brick reflected elsewhere in the village, and examples of this
- o Specific material details, including flint (real or blocks?), roofing and fenestration.

Dark Night Skies

Policy SD8 of the emerging South Downs Local Plan states that development proposals must demonstrate that all opportunities to reduce light pollution have been taken, and must ensure that the measured and observed sky quality in the surrounding area is not affected.

The site is located within the Dark Skies Transition Zone (EIb), which lies between dark zones and the urban environment. Whilst the skies are relatively bright given the existing built environment in this area, it is still important to reduce light pollution as these areas have the potential to become dark zones in the future. The current extent of rooflights (4 large rooflights per unit) is considered excessive, and the size and number of these should be reduced. The use of low-transmittance or tinted glass that reduces light pollution, or timed black out blinds could also assist in reducing reduce harmful light spill.

Highways, Parking and Access

The proposal would include 4 parking spaces for Lea Cottage and The Stable, and consideration would need to be given as to how this arrangement could be satisfactorily provided. Consideration would also need to be given to the access and surfacing, which is visible from the adjoining street and presents an opportunity for improvement in terms of both surfacing and boundary treatment.

The access road, which also serves a number of other properties, is privately owned, and shared with public footpath No 386_I, which links with the wider footpath network.

The Highways Authority have reviewed the submitted documentation and have provided standing advice. Visibility on to School Hill is restricted to the south due to the building line and road geometry, however it is considered that an additional two dwellings utilising this access point would not give rise to a 'severe' increase in vehicular trips. The LHA would assess any impact on capacity at the junction and take into account any accident data at full application stage. A parking strategy, including provision of parking for all modes of transport, should be submitted. Detailed highways and transport pre application advice is available via a paid service <http://www.westsussex.gov.uk/default.aspx?page=10056>.

Trees and Ecology

The site falls within a Tree Preservation Order area TPO/SL/2/75. Whilst a TPO is a statutory level of protection, the presence of a TPO is not necessarily a block to development. Saved Policy GEN28 of the Arun District Local Plan (2003) states that development that would damage or destroy a TPO protected tree will only be permitted where it may be demonstrated that the public benefits of the development outweigh the tree's amenity value. Policy SD11 of the emerging South Downs Local Plan states that the felling of protected trees will only be permitted in exceptional circumstances. Where a TPO tree is proposed to be lost due to development, a condition is normally applied securing the planting of a suitable replacement.

In this instance, there is a single tree that would be affected by the development, which is considered to provide a degree of amenity to this part of the Conservation Area. If the tree is not proposed to be retained in the proposal, you would need to demonstrate that the amenity value of the tree could be offset through a carefully considered landscaping scheme that incorporates suitable replacement planting. Full arboricultural information would be required with any formal application. If permission is granted, you would also need to apply for any works to the tree, including removal and replacement, under a separate TPO application.

Although the site is unlikely to provide much in the way of habitat, the tree and other planting could support wildlife, including bats, and you would need to provide a preliminary ecological assessment with any formal application.

Amenity

Given the existing settlement pattern, and relative distance from existing dwellings, it is considered unlikely that the proposal would raise any material concerns in regard to neighbour amenity from noise or overlooking. Any formal application would be subject to public consultation, including neighbouring properties.

Contamination and Drainage

As the site is a former carpark, there may be contamination on site that will require remediation. You may wish to contact Arun Environmental Health for further advice in regard to the level of detail that would be required prior to determination of an application.

The site is wholly within flood zone 1 (low risk) and there are no records or knowledge of the site flooding. Policy SD50: Sustainable Drainage Systems supports development proposals that ensure against the increase of surface water run-off, taking account of climate change. Given the topology of the site, which slopes north to south, it would be important to incorporate a sustainable drainage system (SuDS), which might include porous surfaces, rain gardens/balancing ditches and tree planting where feasible. Such features would have the added bonus of providing a degree of public amenity as well as biodiversity benefits.

Financial Contributions

The proposed development would trigger the requirement for a Community Infrastructure Levy contribution to help deliver infrastructure to support development in the area, however given the existing floor space you would be entitled to a level of exemption. The site falls within Zone 2, which is charged at a levy of £200 per sqm. A factsheet for developers is provided via the link below.

<https://www.southdowns.gov.uk/planning/community-infrastructure-levy/cil-householder-developer-factsheet/>

Information to accompany a full application

In the event that a formal application is to be submitted, the following documents would need to be submitted:

- o Landscape informed rationale for the design and layout of the final proposal
- o Ecosystem Services statement (see <https://www.southdowns.gov.uk/wp-content/uploads/2018/04/Core-07-Ecosystem-Services-Technical-Advice-Note-non-householder.pdf>)
- o Detailed arboricultural information, and preliminary ecology survey
- o Details of hard and soft landscaping including fencing, surfacing, and planting plans
- o Colour and finishes of all external building materials
- o External lighting details (if any), to include mitigation measures to minimise light spill.
- o Parking strategy, including provision of parking for all modes of transport

Please also consult the SDNPA's Local Validation List through the link below:
<http://www.southdowns.gov.uk/planning/making-an-application/local-validation-list>

Consultations

The following consultation responses have been provided and should be read alongside this response: Historic Buildings and Highways. The full comments are available online here
<http://planningpublicaccess.southdowns.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=P7SJ05TU0GK00>

If you pursue a formal planning application please note that the requirements of the South Downs National Park Authority Local Validation List will apply with regard to the information required to be submitted. Further information is available at <https://www.southdowns.gov.uk/planning/making-an-application/local-validation-list/>.

It would be advisable to contact the Building Control department at your Local Authority to check if building regulation approval is required.

Please note that the advice contained within this letter constitutes an informal Officer's opinion and does not prejudice, nor is binding upon, any future decision taken by the South Downs National Park Authority.

Yours sincerely,

Stella New
 Senior Development Management Officer
 For and on behalf of South Downs National Park

Appendix 2

Appendix

National Park Purposes

The two statutory purposes of the SDNP designation are:

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

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

Partnership Management Plan

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

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

National Planning Policy Framework (NPPF) and Circular 2010

Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was issued and came into effect on 27 March 2012. The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 115 that great weight should be given to conserving landscape and scenic beauty in the National Parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight in National Parks.

Development Plan

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

The following policies of the are relevant to this application:

The following policies of the **Arun District Local Plan (2003)** are relevant to this application:

- GEN7 - The Form of New Development
- AREA2 - Conservation Areas
- GEN12 - Parking in New Development
- GEN9 - Foul and Surface Water Drainage

Other plans considered

-

The Draft South Downs National Park Local Plan

The Pre-Submission version of the South Downs Local Plan (2017) was published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for public consultation from 26 September to 21 November 2017, and the responses considered by the Authority. The Plan was submitted to the Secretary of State for independent examination in April 2018. The Submission version of the Local Plan consists of the Pre-Submission Plan and the Schedule of Proposed Changes. It is a material consideration in the assessment of this planning application in accordance with paragraph 216 of the NPPF, which confirms that weight may be given to policies in emerging plans following publication. Based on the current stage of preparation, and given the relative age of the **saved policies within the** , the policies within the **Submission South Downs Local Plan (2018)** are currently afforded **considerable** weight, depending on the level of objection received on individual policies.

The following policies are of particular relevance to this case:

End of Document

Appendix 2

Report to	Planning Committee
Date	13 August 2020
By	Director of Planning
Title of Report	Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD) – draft for consultation
Purpose of Report	Approve for consultation the draft Guidance on Parking for Residential and Non-Residential Development SPD

Recommendation: The Committee is recommended to

- 1) Approve the draft Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document for public consultation**
- 2) Delegate to the Director of Planning, in consultation with the Planning Committee Chair, authority to make further minor changes to the SPD prior to public consultation.**

I. Summary

- I.1 The South Downs Local Plan (SDLP) was adopted on 2 July 2019 and includes Development Management Policy SD22: Parking Provision. Along with compliance with all other relevant policies, this Policy permits development that provides an appropriate level of cycle and vehicle parking in accordance with the relevant adopted parking standards for the locality. This Supplementary Planning Document (SPD) is one of a number of SPDs and technical advice notes that are being prepared by the Authority following the adoption of the Local Plan, which aim to assist with its implementation.
- I.2 The Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD), referred to hereafter as the “Parking SPD”, provides parking standards for the South Downs National Park (SDNP). Therefore, the Parking SPD supports the implementation of the SDLP. The purpose of the Parking SPD is to give clear direction to all those involved in the planning decision making process regarding the provision of cycle and vehicle parking for new development in the SDNP. The Parking SPD applies to both residential and non-residential development and, along with some locally specific Neighbourhood Development Plan policies, replaces all previous standards provided by the county councils in the SDNP. The draft SPD forms **Appendix I** of this report.
- I.3 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) require local planning authorities to consult the public for a minimum of six weeks. The SDNPA’s Statement of Community Involvement (SCI) (Version 3, Aug 2017) states that consultation will be carried out on all development plan documents for a minimum of eight weeks. Officers have checked the SCI to ensure that this consultation complies with its requirements in full taking into account any current restrictions arising as a result of the pandemic.

- 1.4 Planning Committee Members are therefore asked to approve for public consultation the draft Parking SPD.

2. Structure and Key Requirements

- 2.1 The Parking SPD has two overarching principles: landscape led and sustainable location.
- 2.2 For residential schemes, these two principles will be applied to a development proposal, plus a parking calculator and together these will form the standard for determining parking provision.
- 2.3 The parking calculator uses data on expected levels of car ownership to give figures for the number of spaces to be provided by a residential scheme. The results from the parking calculator are a guide and may need to be varied as the principles of landscape led and sustainable location are applied to a residential scheme. The calculator forms appendix 2 of this report.
- 2.4 For non-residential schemes the two principles will be applied along with the parking numbers in table 2 on page 11 of the SPD (**Appendix 1**). The figures in table 2 are initial guidance and developers will need to carry out site specific parking assessment for a proposed scheme.
- 2.5 The two principles being applied to proposed schemes is to allow flexibility in decision making rather than rigidly applying parking numbers. This is to avoid harm to the landscape through visually intrusive parking provision in sensitive locations where the negative impact cannot be overcome through the design and arrangement of the proposed scheme. Also some locations may allow for a variation in parking provision due to the availability of alternative means of travel other than the private car.
- 2.6 Disability parking provision is explicitly covered in the guidance reflecting the importance of making development accessible for all users.
- 2.7 Cycle parking guidance is provided with separate standards for both residential and non-residential development.

3. Next stages

- 3.1 Planning Committee is recommended to approve the draft version of the Parking SPD and its parking calculator presented as **Appendices 1 and 2** respectively for public consultation for a period of eight weeks. The anticipated timetable for the Parking SPD is therefore as follows:

13 August 2020	Planning Committee authorises the draft SPD for consultation
Sep – Oct 2020	Statutory public consultation undertaken for an eight week period
Nov 2019	Produce consultation statement giving summary of main issues raised and how these have been addressed
Dec 2019 – Jan 2020	Consultation statement along with amended draft SPD made publically available for comment
Feb 2020	Planning Committee formally adopt the SPD

- 3.2 Statutory public consultation is anticipated to take place in September and October 2020 for eight weeks. The requirements of our SCI that documents be available at the South Downs Centre and notifications sent out can be safely met from the beginning of August 2020. However, if restrictions related to Covid-19 were to be increased, for example, places such as the South Downs Centre had to be closed to the public then there may be an unavoidable failure to meet the requirements of the SCI. In that case we would review the situation and take all necessary actions to meet both national and local guidance.

- 3.3 When the consultation is carried out the main issues raised will be summarised in a consultation statement, which will be made publically available along with the amended draft SPD for a further five weeks for comment. This is in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004. As a result of consultation changes may be made to the SPD and a revised version will be presented to Planning Committee for formal adoption.
- 3.4 When adopted the Parking SPD will be a material consideration in the determination of planning applications. The SPD will guide decision making to ensure the appropriate level of cycle and vehicle parking provision for new development whilst making the landscape led approach and sustainability considerations core to the process.
- 4. Sustainability Appraisal and Habitats Regulations Assessment screening**
- 4.1 The European Union Directive 2001/42/EC sets out legislation on the assessment of the effects of certain plans and programmes on the environment (known as 'Strategic Environmental Assessment' or 'SEA'). Where the Authority determines that SEA is not required then under Regulation 9(3) the Authority must prepare a statement setting out the reasons for this determination.
- 4.2 The SDNPA has therefore produced a draft SEA Screening Statement. Full determination cannot be made as to whether or not an SEA is required until three statutory bodies have been consulted: The Environment Agency, Natural England and Historic England. Nevertheless, and subject to the outcome of this consultation, it is not considered that the Parking SPD is likely to have any significant environmental effects, and therefore does not require an SEA.
- 4.3 As required by Habitats Regulations Assessment (HRA), the SDNPA has also assessed whether the policies and proposals set out in the Parking SPD will have any significant impacts on Natura 2000 sites, thereby necessitating an Appropriate Assessment to consider the impact on the integrity of any such sites. The HRA Screening Statement concludes that the SPD does not set the principle of development nor does it direct development to a specific location. Therefore, there are no linking impact pathways present and there are no HRA implications. Subject to the outcome of consulting the three statutory bodies listed in paragraph 4.2 above, it is considered that a full appropriate assessment is not required.
- 4.4 The combined SEA Screening Statement and HRA Screening Statement is presented as **Appendix 3** to this report.

5. Other Implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	Yes. The final version of the SPD will need to be adopted by Planning Committee. It is anticipated that the revised SPD will be presented to Planning Committee for adoption in February 2021.
Does the proposal raise any Resource implications?	The SPD has been produced using internal resources, with the exception of the work on the Parking Calculator which was carried out by a specialist external consultant. The remaining stages of the SPD will be completed using internal resources.
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	The Parking SPD will guide decision making to ensure appropriate levels of cycle and vehicle parking in new development. Appropriate parking levels will benefit all persons including those with a protected characteristic. The SPD provides specific guidance to ensure that appropriate levels of vehicle parking are included in new development for those with a disability.

Are there any Human Rights implications arising from the proposal?	None.
Are there any Crime & Disorder implications arising from the proposal?	The guidance in the SPD will contribute to well designed, safer parking areas for all types of new development.
Are there any Health & Safety implications arising from the proposal?	None.
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy?	<p>1.Living within environmental limits</p> <p>The SPD supports policy SD22 and the expectation that parking areas in new development will contribute to ecosystem services, while protecting the landscape and contributing to the spatial strategy for the National Park.</p> <p>3.Achieving a sustainable economy</p> <p>Provision of appropriate levels of parking will support the movement of people and goods to ensure effective functioning of a sustainable local economy.</p>

6. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
Consultation on the SPD attracts significant objection, thereby damaging the reputation of SDNPA and/or undermining the adopted South Downs Local Plan.	3	2	<p>The SPD clearly links to adopted Local Plan policies that have been subject to independent examination.</p> <p>Where objections are made, they will be considered and where appropriate the SPD will be revised to take into account concerns that have been raised.</p>
Increase in Covid-19 restrictions results in the South Downs Centre being closed during the consultation with failure to meet the Statement of Community Involvement (SCI) requirement to make copies available. Consultation postponed as a result.	3	5	<p>If local restrictions were to be increased, we would review the situation and take all necessary actions to meet both national and local guidance.</p> <p>The SCI is due to be updated this year. When this happens it could be amended to require making copies available on the SDNPA website rather than hard copies. This amendment to the SCI would still comply with the legal requirements for planning consultation as the law was recently changed to allow copies to be made available online only.</p>

TIM SLANEY

Director of Planning

South Downs National Park Authority

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Appendices	<ol style="list-style-type: none"> 1. Draft Guidance on Parking for Residential and Non-Residential Development SPD 2. Draft Parking Calculator 3. Draft SEA Screening Statement and draft HRA Screening Statement
SDNPA Consultees	Legal Services; Chief Finance Officer; Monitoring Officer; Director of Planning
External Consultees	None
Background Documents	<p>South Downs Local Plan 2014-33</p> <p>https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf</p> <p>Local Development Scheme</p> <p>https://www.southdowns.gov.uk/wp-content/uploads/2015/02/Statement-of-Community-Involvement-August-2017.pdf</p>

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Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document

South Downs Local Plan

CONSULTATION DRAFT

July 2020

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I. Introduction

I.1 The purpose of this guidance is to give clear direction to all those involved in the planning decision making process regarding the provision of cycle and vehicle parking for new development in the South Downs National Park (SDNP). The guidance applies to both residential and non-residential development and, along with some locally specific Neighbourhood Development Plan policies, replaces all previous standards provided by the county councils in the SDNP.

I.2 This guidance is structured as follows:

- National context – National Park legislation and guidance plus the National Planning Policy Framework (NPPF)
- Local context, South Downs Local Plan (SDLP) – approach taken by the Local Plan
- Local context, Neighbourhood Development Plans (NDP) – relationship between this guidance and NDPs
- Principles – outline of the two overarching principles
- (i) Landscape led principle
- (ii) Sustainable location principle
- Parking calculator – explanation of how to use the parking calculator. The parking calculator for residential development forms Appendix I
- Cycle parking – requirements for residential development
- Garages – explanation of how garages will be counted in residential development
- Parking for non-residential development - use of the two principles along with table setting out provision for vehicle and cycle parking

I.3 This Supplementary Planning Document (SPD) requires a landscape led approach to parking provision for new development. As explained in the following sections this approach reflects the purposes and duty of the National Park in the management of development and follows the South Downs Local Plan (SDLP). The guidance when applied to new development should be read within the context of the whole SDLP.

2. Context

National context

2.1 The SDNP is a nationally protected landscape covering an area from Winchester in the west to Eastbourne on the coast. This area includes a variety of landscapes including chalk downland, ancient heathland and spectacular coastline with historic market towns and scenic villages.

2.2 The purposes of the South Downs National Park are statutory and take precedence in decision making on development within the National Park. The purposes and duty are set

out in the National Parks and Access to the Countryside Act 1949 as amended by the Environment Act 1995. The National Park purposes are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area (purpose 1)
- To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public (purpose 2)

The National Park Authority has a duty when carrying out the purposes: To seek to foster the economic and social well-being of the local communities within the National Park.

- 2.3** In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including those required to act on certain matters by statute and other public bodies, to have regard to these purposes. Section 62 also states that if it appears there is a conflict between the two purposes, greater weight shall be attached to conserving and enhancing the natural beauty, wildlife and cultural heritage of the area (purpose 1).
- 2.4** The National Planning Policy Framework (NPPF) states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. The NPPF in section 9 states that transport issues in general must be taken into account in the earliest stages of development proposals. More specifically parking is integral to the design of development and contributes to making high quality places.
- 2.5** Paragraph 105 of the NPPF sets out the approach to be taken where a planning authority sets out local parking standards for residential and non-residential development. Policies should take into account the following:
- the accessibility of the development;
 - the type, mix and use of development;
 - the availability of and opportunities for public transport;
 - local car ownership levels; and
 - the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Local context - South Downs Local Plan (SDLP)

- 2.6** The SDLP is landscape led and seeks to deliver multiple ecosystem services. This reflects the purposes of national parks to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of the special qualities.
- 2.7** This SPD gives guidance on addressing the requirements of Local Plan policy SD22: Parking Provision, criteria 2: "Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that

development in accordance with the relevant adopted parking standards for the locality. Wherever feasible, electric vehicle charging facilities must also be provided.”

- 2.8** The supporting text at paragraph 6.44 reiterates that the level of parking provision needs to be appropriate in accordance with the relevant adopted parking standards for the locality.
- 2.9** It is worth highlighting the relevance of particular Local Plan policies in relation to this SPD aside from SD22. Policies SD4: Landscape Character and SD5: Design are key in outlining the landscape led approach taken in this guidance. Policy SD21 Public Realm, Highway Design and Public Art protects and enhances the public realm and street scene and this space invariably includes vehicle parking. The requirements of policy SD21 criteria 3 and 4 relating to site layout and context are important in relation to parking arrangements. Core policy SD2: Ecosystem Services is also relevant as new parking areas provide an opportunity to contribute to a range of ecosystem services. Paragraph 6.39 of the supporting text to policy SD22 reiterates the expectation that parking areas will contribute to a range of ecosystem services.

Local context - Neighbourhood Development Plans

- 2.10** There are over fifty made or emerging neighbourhood development plans (NDP) in the National Park. Some NDPs have a parking policy that sets a local standard for parking provision while others have a more general policy. There is a widespread concern that development will add to existing on street congestion caused by parking in some settlements. NDP policies on parking commonly seek to address this issue by requiring off street parking in new development.
- 2.11** This SPD provides the detail of parking standards for policy SD22 of the SDLP. Where relevant, in decision making, all parking policies in NDPs will be taken into account along with the guidance provided in this SPD. Where there is conflict between different sets of standards then those set out in the last policy document to become part of the development plan will be taken into account.

3. Principles

- 3.1** The overarching principles that form this guidance are landscape led and sustainable location. For residential schemes, these two principles will be applied to a development proposal, plus the parking calculator, and together these will form the guidance for determining parking provision. For non-residential schemes, the two principles will be applied along with the parking numbers in table 2 below to determine provision. In decision making a flexible approach will be taken in using the two principles along with the numbers generated by the parking calculator or table 2 as appropriate to the scheme. Each principle, including the flexible approach to be taken, is explained further below.

(i) Landscape led - principle

- 3.2** The National Park Authority takes a landscape led approach and this is carried forward to the guidance provided in this Parking SPD. Landscape led is a design process which, at any scale, uses landscape as a framework for evidence of a site and its context, and is used to create a complete understanding of a place, its character and function. Design evolves using this understanding, maximising the site's potential to generate development which successfully conserves and enhances the natural beauty, wildlife and cultural heritage of the area and creates sustainable and successful places for people. Strategic policies SD4, and SD5 of the Local Plan are particularly relevant in setting out the landscape led approach. Detailed guidance on the landscape led approach is also provided in the Design Guide SPD, which is due to be published for consultation in winter 2020/21.
- 3.3** For determining parking provision for residential development this SPD uses a parking calculator in addition to applying the two principles. The parking calculator forms Appendix I of this guidance and is further explained in a separate section below at paragraph 4.1. This parking calculator provides a starting point in determining the number of parking spaces that may be suitable for a specific residential development proposal. The results from the parking calculator are a guide and may need to be varied due to the need to put landscape considerations first in determining parking provision.
- 3.4** Concerns about the impact on landscape of parking provision within a proposed residential development is a situation that may require alteration to the intended scheme and flexibility in the application of the number from the parking calculator. For example, in some locations attempting to incorporate the number of spaces suggested by the parking calculator in the proposed scheme could have an unacceptable adverse impact on the landscape. Again in some locations the option of lower parking provision may be unacceptable as alternative means of travel such as public transport may be very limited. A lower parking provision could also likely result in greater on street parking in adjacent parts of the settlement causing congestion or unacceptable visual impact on the street scene. In this type of situation SDNPA may seek a smaller quantum of development on the site due to resultant adverse landscape impacts. This in turn would generate a lower level of parking provision than originally suggested by the parking calculator for the original scheme. Hence the need for an iterative, landscape led approach at the start of the design process.
- 3.5** The SDNPA takes this flexible approach to the application of the result from the parking calculator in specific circumstances with landscape considerations justifying the alteration of residential schemes where appropriate. This is to avoid harm to the landscape through visually intrusive parking provision in sensitive locations where the negative impact cannot be overcome through the design and arrangement of the proposed scheme.
- 3.6** It is expected that development proposals will integrate parking provision as part of the overall landscape led approach. Parking provision is to be considered from the start of working up development proposals and is not to be treated in isolation separate from the rest of the scheme. This approach is consistent with Local Plan policy SD5: Design.

3.7 The following are points that need to be considered when designing a scheme to meet the requirements of SDLP policy SD5:

- All parking design to be landscape led with layouts and materials responding to the landscape character of the place.
- Car parking should be well integrated and the result must not be a public realm dominated by cars, hard standing and associated clutter.
- Car parking areas and cycle parking should maximise opportunities for enhancing green infrastructure and sustainable drainage.
- Development layouts and detailed design should minimise the opportunities for anti-social car parking on pavements and green spaces.
- All residential parking should be safe, overlooked and accessible for all.
- Cycle storage for residents and users of non-residential buildings should be safe and convenient to use, secure and sheltered from the elements.
- Car parking should not obscure clear and direct routes between the front door and the street.

3.8 In addition, from the beginning of the process the design needs to include consideration of policy SD2 and how the parking areas will contribute to ecosystem services.

(ii) Sustainable location - principle

3.9 The National Park Authority supports and encourages more sustainable forms of travel¹ whilst recognising that outside the larger settlements public transport coverage can be poor with a heavy reliance on private vehicles to get around. The five main settlements identified in the SDLP are Petersfield, Lewes, Liss, all of which have a railway station, Midhurst and Petworth. All five settlements are more sustainable relative to the rest of the National Park in offering a higher level of services and access to public transport options, either bus or bus and rail.

3.10 In some situations, conditions may exist that allow a flexible approach to applying the number from the parking calculator to a residential development proposal. For example, sustainable locations that have access to public transport options and/or connections to local facilities and amenities using active modes of transport such as cycling and walking. In these locations it is likely to expect a lower level of parking provision because of the travel options that are easily accessible and offer an alternative to the private vehicle. These more sustainable locations are likely to be in the larger settlements in the National Park.

3.11 Whether conditions exist in a location to justify a lower parking provision than suggested by the parking calculator would need to be determined on a case by case basis. The applicant would need to provide robust evidence to justify a lower parking provision. This evidence could include a study of existing travel options within the immediate locality of the

¹ South Downs National Park Authority, Partnership Management Plan, Outcome 5.3 Encouraging Sustainable Transport

proposed development. Alternatively, the proposed development may be creating new active travel routes linking to the existing network offering better connectivity and options other than using the private car. In that case the evidence provided would need to robustly show how the creation of new routes and connectivity justifies a lower parking provision.

- 3.12** Applicants seeking a lower parking provision for a residential scheme are advised to enter into discussions with officers of the SDNPA at the earliest opportunity through the pre-application enquiry process.

4. Residential Parking

Parking calculator

- 4.1** This section explains how the parking calculator is to be used for residential development. The parking calculator forms Appendix I of this guidance. In practical terms it is a separate document in the form of an Excel spreadsheet. Further instructions on how it is used can be found in the Excel spreadsheet. Firstly, using the drop down menu enter the ward area. The ward is the primary electoral unit in England and is also the geographical area for the Census data which forms the basis of the parking calculator. If you are unsure which ward and have a postcode for the address, follow the link in the parking calculator to the online look up. Follow the instructions on that website, enter the postcode and the ward details will be provided. The ward can then be entered. The parking calculator uses varying average car ownership figures depending in which ward the proposed development is located. It is critical that the correct ward is entered as average car ownership varies within the National Park and the parking calculator factors in these differences.
- 4.2** The number and tenure² of each dwelling type needs to be entered in to the parking calculator, for example the numbers of each one bedroom house, and whether it is owner occupied or other. The parking calculator notes this difference as car ownership data is significantly different for owner occupied compared to other types of tenure. The parking calculator will automatically provide a figure for the number of habitable³ rooms. The numbers of allocated parking spaces need to be entered. Once all this information has been entered the parking calculator will provide a figure for the number of spaces to be provided for each dwelling type along with a total figure for the whole scheme. It should be noted that paragraph 7.38 of the SDLP states that any room in a proposed dwelling that is not a main reception room, kitchen, bathroom or WC, and has dimensions that allow for a single bed, will be counted as a bedroom. This will include studies and additional reception rooms.

Garages

- 4.3** Garages are often put to other uses than parking. Research carried out nationally has shown that between 19%-45% of garages are used for other purposes than parking a vehicle. This is reflected in local research. In East Sussex, 33% of garages were used for

² Tenure being defined as the legal basis on which the property will be occupied for example, owner-occupied or rented.

³ Habitable room includes living rooms, kitchens, bedrooms but not bathrooms, WCs, circulation space.

parking based on surveys carried out in 2011⁴. The research shows that common reasons for using the garage for other purposes were to provide storage, cars were too large to fit the dimensions or conversion to habitable accommodation. Due to garages being frequently used for other purposes, parking at new developments is best provided through driveways, car ports or allocated parking bays.

- 4.4** Where garages are provided they will need to meet the minimum dimensions below. Due to research both nationally and locally showing limited usage for parking, garages will be counted as a third of a space. Therefore, every three garages provided will be counted as one parking space towards the overall parking requirement. As a minimum, garages must be 6 metres x 3 metres in size or 7 metres x 3 metres if to be used for cycle parking as well i.e. one cycle parking space in addition to the vehicle.

Cycle parking

- 4.5** Cycling as an active form of sustainable transport can bring benefits in different contexts including climate change, and health and wellbeing. Nationally the Government's long term ambition "is to make cycling (and walking) the natural choice for shorter journeys, or as part of a longer journey, by 2040."⁵ By 2025 Government has set a target of doubling cycle journeys from a 2013 baseline⁶. In the National Park, cycling contributes to objectives and outcomes⁷ on climate change, including encouraging sustainable transport, and improving health and wellbeing. Higher levels of cycling can reduce the number of short car journeys, and it is important that safe and secure cycle storage is provided.
- 4.6** Table 1 sets out the recommended levels of cycle parking provision for new residential development. The provision needs to take account of the location, size and type of dwelling.

Table 1 – Cycle space provision, new residential development

Dwelling Type	No. of Bedrooms	Spaces per Dwelling
Flat	1 & 2	0.5 spaces if communal 1 space if individual
Flat	3 or more	2 spaces
House	1 & 2	1 space
House	3 or more	2 spaces plus 1 space for houses with 5 or more bedrooms

5. Disabled parking

- 5.1** This section on disabled parking applies to the guidance on residential and non-residential development. Provision of disabled parking spaces needs to be considered from the start of

⁴ Guidance for Parking at New Residential Development, October 2017, East Sussex County Council

⁵ Department for Transport, Cycling and Walking Investment Strategy Report to Parliament, February 2020

⁶ Department for Transport, Cycling and Walking Investment Strategy, 2017

⁷ South Downs Local Plan objective 6; South Downs Partnership Management Plan outcome 5.3 & 7.1

the design process. As a minimum disabled parking spaces should be provided at 5% of the overall total of parking spaces for the development.

- 5.2** For residential schemes, the majority of larger dwellings are likely to have adequate parking on the plot although for developments of flats it may be necessary to include unallocated disabled parking bays. For non-residential schemes, disabled parking is to be part of the overall provision rather than in addition. Where specific developments are likely to create more demand for disabled parking spaces, this should be identified in the application process and detailed in transport assessments or access statements. Disabled parking provision should be designed and located to meet the specific needs of disabled persons. The location of suitable drop off points should also be indicated in transport assessments or access statements to demonstrate how the needs of disabled people have been addressed and to inform planning decisions.

6. Non-Residential Development

Parking provision for non-residential development

- 6.1** Provision for parking for non-residential development is shown in table 2 for vehicles and cycles. Table 2 must be used in conjunction with the principles in this guidance of i) landscape led and ii) sustainable location as described above to determine an appropriate level of parking provision. The numbers in the table can be applied flexibly where it is appropriate for reasons of landscape or sustainability in the same manner as described for residential development.
- 6.2** The NPPF is clear that where local planning authorities are setting parking standards the local circumstances must be taken into account. The numbers in Table 2 provide initial guidance to developers for suitable parking provision at a specific site depending on the type of development. Developers will need to carry out a site specific assessment of parking for the proposed development. Parking provision for different types of development may vary greatly from site to site. The assessment will need to consider the land use of the proposed development, trip rates associated with the development and the user groups of staff/visitors to the site. The following characteristics are also to be taken into account: survey or business data to ascertain the peak parking periods and demand; the location of the site as well as accessibility for travel via alternatives to the private car; local information such as Census travel to work data about mode share and detail in supporting travel plans.
- 6.3** Applicants for employment uses such as office, light industrial or storage and warehousing are encouraged to provide suitable changing and showering facilities for employees along with the required level of cycle parking.

Table 2 – Parking provision for non-residential development

Type of Development	Vehicle	Cycle
Shops	1 space per 14m ²	1 space per 100m ² for staff and 1 space per 100m ² for customers
Financial and Professional Services (including Banks, Building Societies, Estate Agents & other agencies)	1 space per 30m ²	1 space per 100m ² for staff and 1 space per 200m ² for customers
Restaurant and Café Drinking Establishments Hot Food Takeaways	1 space per 5m ² of public area and 2 spaces per bar (or 5m length of bar for large bars) and for staff parking to be clearly designated	1 space per 4 staff and 1 space per 25m ² for customers
Business – Offices, Light industrial, Research and Development	1 space per 30m ² , up to threshold of 500m ² in less accessible areas	1 space per 150m ² for staff and 1 space per 500m ² for visitors
General Industrial	1 space per 40m ²	1 space per 200m ² for staff and 1 space per 500m ² for visitors
Storage and Distribution	1 space per 100m ²	1 space per 500m ² for staff and 1 space per 1000m ² for visitors
Residential Institutions Sheltered Housing, Nursing and Rest Homes	Site specific assessment based on travel plan and needs	Site specific assessment based on travel plan and needs
Non-Residential Institutions (including Crèches, Day nurseries, Clinics, Health Centres, Schools, Non-residential education and training centres, Museums, Public libraries, Public halls, Exhibition Halls, Places of worships, Law courts)	Site specific assessment based on travel plan and needs	Site specific assessment based on travel plan and needs
Assembly & Leisure (including Cinemas, Concert Halls, Bingo Halls, Dance Halls, Swimming Pools, Skating rinks, Indoor and Outdoor areas for Sport and Recreation)	1 space per 22m ² . For large scale places of assembly serving more than a local catchment, 1 space per 15m ² .	1 space per 4 staff plus visitor / customer cycle parking

7. Parking Capacity Surveys

- 7.1** For both residential and non-residential schemes advice should be sought from the local highways authority at the earliest stage of the development process as to whether a parking capacity survey is appropriate. The extent and form of the survey is to be agreed with the local highways authority and in liaison with the South Downs National Park Authority. Where parking provision is to be determined by a site specific assessment it is expected a parking capacity survey will be carried out.
- 7.2** The geographical area which should be surveyed (survey area) should be proportionate to the impact of the development – determined as the number of vehicles that are expected to park on-street in the surrounding area. The survey area should include sufficient available space to accommodate the number of vehicles expected to be owned by residents of the site and their visitors. This can be determined using the Parking Calculator.
- 7.3** The survey area is expected to centre on the development site and should include the area's most likely to be used for parking by those living in, or visiting the site, and will therefore need to have regard for site access arrangements.
- 7.4** Surveys should be carried out when usage of available parking space is at its greatest (i.e. peak time) in the survey area. This may include early morning surveys to assess the amount of overnight parking in the area. The duration of the survey will be dependent on the likely impact of the development and whether or not there are existing pressures on parking space in the area. A development which is likely to have a large impact on on-street parking in an area where available space is already well used or insufficient to meet existing demands, would be expected to carry out an extensive survey throughout the day.
- 7.5** A parking capacity survey should take the form of a beat survey (or similar alternative) where an enumerator walks a planned route at regular intervals recording registration plate details of the parked vehicles. The enumerator should record sufficient information to provide the following information in a summary report:
- The rate of turnover of vehicles on each street expressed as a number of vehicles leaving/arriving per hour
 - The number of vehicles parked on each street
 - An estimate of the parking capacity of each street and a brief explanation of how this was calculated
- 7.6** If the development is located within a Controlled Parking Zone, the summary report should also provide details of the existing resident permit take-up and/or any waiting lists. This information can be obtained from the local highway authority. A summary report of parking capacity surveys should be accompanied by:
- A map displaying the geographical area surveyed at a suitable scale for interpretation
 - Details of the dates and times of day when survey(s) were undertaken
 - Details of parking restrictions (Traffic Regulation Orders) which apply in the survey area.

8. Public Parking

Policy SD22 and the supporting text in the SDLP provide guidance for the development of new, extended or relocated public parking. The principles of landscape led and sustainable location in this guidance are consistent with, and can be applied to, the policy requirements for public parking in SD22. Similarly, to the guidance in this SPD a successful scheme will use an iterative landscape led process to make a positive contribution to the overall character and appearance of the area whilst improving safety, and being inclusive and accessible for all users.

DRAFT

Appendix I Parking Calculator

PLEASE SEE SEPARATE PARKING CALCULATOR EXCEL SPREADSHEET DOCUMENT

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Appendix 2 South Down Local Plan Policies SD2, SD4, SD5, SD21 & SD22

DRAFT

ECOSYSTEM SERVICES

Introduction

4.12 Ecosystem services are the benefits that people and society get from the natural environment. An ecosystems approach helps us to identify the benefits we get from nature, value them and build them into planning, decision making and management. In Chapter 1, Figure 1.3 – The Four Aspects of Ecosystem Services illustrates how the landscapes of the South Downs provide a multitude of ecosystem services. Figure 4.1 illustrates the inter-relationships between ecosystem services and people’s enjoyment and understanding of the National Park. Figure 4.2 provides further detail on ecosystem services within the National Park.

4.13 The National Park Authority adopted an ecosystems approach to the *PMP*²³, and this is embedded into the Local Plan. This has been achieved in three main ways:

- Firstly, there is a core policy on ecosystems services (SD2)
- Secondly, an assessment has been made of all the strategic and development management policies, to identify those that make a positive contribution to a significant number of ecosystem services; these are identified with the icon ☆
- Thirdly, consideration was given to the site allocations, the settlements within which they sit and the ability to deliver multiple ecosystem services. Symbols and site specific development requirements relating to specific ecosystem services indicate how these sites in particular are expected to contribute. These symbols are set out in Figure 9.1 and throughout Chapter 9: Sites and Settlements

4.14 A GIS based tool (EcoServ GIS) has been developed to provide supporting evidence for the Local Plan on ecosystem services. The EcoServ models and maps have been used to map and understand the delivery of ecosystem services within the National Park in spatial terms. EcoServ maps have been generated, which have informed the spatial portrait and all the allocations in the Local Plan. Further details are set out in the evidence based study *Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool*²⁴.

²³ Partnership Management Plan: Shaping the Future of Your South Downs National Park 2014 – 2019 (South Downs National Park Authority, 2013)

²⁴ Mapping of Ecosystem Services Within the South Downs National Park Using the EcoServ GIS Tool (South Downs National Park Authority, 2016)

FIGURE 4.1: 'PEOPLE SUPPORTING LANDSCAPE, LANDSCAPE SUPPORTING PEOPLE



FIGURE 4.2: THE FOUR ASPECTS OF ECOSYSTEM SERVICES IN THE SDNP

There are four main categories of ecosystems services, namely, supporting, provisioning, regulating and cultural services. The natural environment is a dynamic system and these four services cannot be viewed in isolation from one another. They are ecologically and functionally interdependent.

Supporting services offered by flora and fauna and micro-organisms are essential for healthy soils, habitats and nutrient cycling, which underpin the environment's natural goods and services which benefit people. The National Park has a rich variety of species, landscapes, rivers and coastline which support the other ecosystems services, such as soil and water quality.

Provisioning services relate to the products and productivity of the natural environment. Approximately 85 per cent of the National Park is farmed and its soils support it being a major producer of cereal crops, which are grown mainly on the dip slopes. These soils also support grazing and biodiversity of important native habitats and species like the Duke of Burgundy butterfly. Approximately 25 per cent of the National Park is wooded, which contributes renewable fuel like biomass. The chalk hills, which sweep across the National Park, filter and store fresh water, providing us with high-quality drinking water.

Regulating services are the controls from the natural environment. For example, rivers which help to control water flow, drainage and flooding. Rivers such as the Meon, Ouse and Cuckmere support habitats and biodiversity. Enhancing species like bees and other pollinators are vital for food crops as well as other plants and wildflowers. Woodland also prevents soil erosion and is an important resource for carbon storage which helps to mitigate climate change. These services also regulate pollution in the air, water and on land. These include regulating carbon dioxide and air quality from cars and industry, chemicals from the treatment of agricultural fields or viticulture or surface water run-off and percolation from the urban environment into rivers and ground water.

Cultural services relate to people's enjoyment of the National Park and its special qualities. The distinctive landscape of the Western Weald, the chalk ridge, scarp and dip slopes and the dramatic Seven Sisters cliffs are of inspirational value through their sense of place and tranquillity, including dark night skies. Embedded in the landscape is important cultural heritage which is rich in arts and literature, archaeological remains, traditional historic towns and villages and architecture. These special qualities and an extensive network of bridleways and footpaths enhance people's health and wellbeing.

All of these ecosystem services can be utilised and enhanced to provide for sound growth within properly understood limits. The services described above are assets that should guide all growth, hence their thinking underpins this core policy. Through careful management of development, the various provisions of ecosystem services can be used to ensure that the multiple benefits they give to society are supported and protected.

Core Policy SD2: Ecosystem Services

- I. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:
 - a) Sustainably manage land and water environments;
 - b) Protect and provide more, better and joined up natural habitats;
 - c) Conserve water resources and improve water quality;
 - d) Manage and mitigate the risk of flooding;
 - e) Improve the National Park's resilience to, and mitigation of, climate change;
 - f) Increase the ability to store carbon through new planting or other means;
 - g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land;
 - h) Support the sustainable production and use of food, forestry and raw materials;
 - i) Reduce levels of pollution;
 - j) Improve opportunities for peoples' health and wellbeing; and
 - k) Provide opportunities for access to the natural and cultural resources which contribute to the special qualities.

Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services.

4.15 The purpose of this policy is to embed a holistic approach to managing our natural resources sustainably for the future. Its criteria encapsulates the ecosystem services that the natural environment contributes to people. This integrated approach is important because development can have multiple effects across these services. Development proposals should take a positive approach to the delivery of ecosystem services and take adequate account of the economic benefit of enhancing ecosystem services. There are many ways to deliver on these criteria. These should be delivered on a site by site basis with reference to the aspects of ecosystem services set out in Figure 4.2.

4.16 All planning applications should be accompanied by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services. The preparation of the statement should be proportionate to the impact. Use should be made of the EcoServe GIS maps, and other evidence that can be sourced from a variety of sources such as the *Habitat Connectivity Study* and the *Strategic Flood Risk Assessment (SFRA)*, when available.

Two technical advice notes²⁵ have been produced by the National Park Authority, which provide checklists and further guidance to help applicants meet the requirements of Policy SD2.

- 4.17** This core policy should not be read in isolation but instead linked to all other Local Plan policies. For example, Criterion (d) of Policy SD2 is about managing and mitigating the risk of flooding and is linked to the ecosystem services of water flow and flood. The relevant Local Plan Policies are SD45: Green Infrastructure, SD17: Protection of the Water Environment and SD48: Climate Change and Sustainable Use of Resources. It should be noted that where more detailed applicable criteria are contained in other policies within the Plan, SD2 should be read as supporting that detailed criteria. Site specific development requirements linked to ecosystem services are set out in allocation policies as appropriate.

²⁵ Ecosystem Services and Householder Planning Applications Technical Advice Note (South Downs National Park Authority, 2018) and Ecosystem Services Technical Advice Note (Non-householder) (South Downs National Park Authority, 2018)

★ Strategic Policy SD4: Landscape Character

1. Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:
 - a) They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
 - b) The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape;
 - c) They will safeguard the experiential and amenity qualities of the landscape; and
 - d) Where planting is considered appropriate, it is consistent with local character, enhances biodiversity, contributes to the delivery of GI and uses native species, unless there are appropriate and justified reasons to select non-native species.
2. Where development proposals are within designed landscapes, or the setting of designed landscapes, (including historic parkscapes and those on the *Historic England Register of Historic Parks and Gardens*) they should be based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.
3. The settlement pattern and individual identity of settlements and the integrity of predominantly open and undeveloped land between settlements will not be undermined.
4. Green and blue corridors will be safeguarded. Development proposals should identify and take opportunities to create and connect green and blue corridors.
5. The restoration of landscapes where features have been lost or degraded will be supported where it contributes positively to landscape character.

- 5.6** The purpose of Policy SD4 is to set out how development proposals will be expected to conserve and enhance landscape character in the National Park.
- 5.7** Landscape character is what make an area unique, resulting from the action and interaction of natural and/or human factors. Landscape character is the combination of distinct, recognisable and consistent pattern of elements and features as set out in Figure 5.1 including, for example, the landform, historic landscape or 'time depth', and a variety of perceptual and aesthetic qualities.

Understanding of landscape context and character

- 5.8** The ability of proposals to meet the requirements to enhance landscape character in Policy SD4 will be considered in proportion to the size, scale and likely impacts of the proposals.
- 5.9** It is important that proposals are based on a meaningful understanding of the context and character of an area and those positive characteristics which define local distinctiveness. The use of standard design solutions and features can erode local distinctiveness in urban and rural areas. Therefore, this policy is closely linked to Policy SD5: Design, and they need to be read together.

- 5.10** Proposals should be informed by the *SDILCA*, community-led/local landscape character assessments and appropriate site-based investigations. Local landscape character assessments may include Community, Parish or Village Design Statements and other community planning documents. However, references to these will not be a substitute for appropriate professional site based assessment and research.
- 5.11** Proposals should be accompanied by a Landscape Appraisal, which should be proportionate to the size and likely impacts of the scheme. Landscape Appraisals should be carried out in accordance with the *Guidelines for Landscape and Visual Impact Assessment*²⁹ and successor documents. If the proposals require a full Environmental Impact Assessment (EIA) then a Landscape and Visual Impact Assessment (LVIA) undertaken by a Chartered Landscape Architect will be required. Most applications will be likely to require a bespoke Landscape Appraisal. Applicants are advised to consult the Authority on the proposed scope for such a study at the earliest opportunity. Householder applications should be informed by the *Landscape and Biodiversity Baseline Checklist* which is available on the Authority's website in the first instance. Further study may be required following on from completion of the checklist which the Authority would advise on.
- 5.12** The cumulative impact of development or land-use change can detrimentally affect landscape character. There are many heritage features in the landscape and these contribute to local distinctiveness reflecting the time depth which is present in the landscape.

Design and layout

- 5.13** The design and layout of proposals should be consistent with local landscape character. Good design should avoid the need for screening which could appear incongruous in the landscape. Proposals should be designed to be complementary to their context and setting. Policy SD5: Design, includes further requirements and guidance on design and landscape matters. The introduction of undesirable exotic plant species into the wider countryside and at the settlement edge as part of scheme planting proposals will be strongly resisted. The use of non-native plant species may be justifiable in some cases where there are clear reasons for this, for example, based on biodiversity or other ecosystem services functions.

²⁹ Guidelines for Landscape and Visual Impact Assessment 3rd Edition (Landscape Institute & IEMA, 2013)

Designed landscapes

- 5.14** There are many locations where designed landscapes, gardens and parkscapes exist within the towns, settlements and wider countryside, often associated with land holdings. There are 30 parks and gardens on the *Historic England Register of Historic Parks and Gardens*³⁰, for example, Petworth Park, designed by Capability Brown. In addition, there are many other sites which are identified as being designed landscapes, but not included on the Historic England list. These are identified in the *Historic Landscape Character Assessments*³¹ for the National Park and are important cultural heritage assets.
- 5.15** Policy SD12: Historic Environment, sets relevant requirements for heritage assets. Detailed records of historic parks, gardens and designed landscapes are available from the County Garden Trusts, which are independent charities engaged in caring for gardens and designed landscapes.
- 5.16** Proposals which may affect designed landscapes, gardens and parkscapes should be informed by a design process which understands and identifies the key features within the designed landscape. This process should ensure that development will enhance the designed character of the landscape.

The individual identity of settlements

- 5.17** The gaps between settlements protect the individual character and identity of towns and villages. They retain the open nature and the physical and, either real or perceived, visual separation between settlements. The land at the edge of settlements often forms part of the historic setting of the settlement and can include areas which have cultural importance. Public RoV can often provide access to these areas and connections to the open landscape of the National Park beyond.

Green and blue corridors

- 5.18** Green and blue corridors are areas or linear features which connect habitat and wildlife populations and can provide opportunities for walking and cycling, and also facilitate the movement of wildlife. Green and blue corridors are an essential component of the National Park's GI, and can provide benefits for people and wildlife at both the landscape scale and more local scale. More information is provided under Policy SD45: Green Infrastructure.

Landscape features

- 5.19** Natural and historic features such as trees, woodlands, hedgerows, field boundaries, historical water systems, chalk pits and sandpits, should be conserved and enhanced through design. The restoration of degraded characteristic landscape features is supported.

³⁰ Link to the Historic England website to view/search the Historic Parks and Gardens Register:
<https://historicengland.org.uk/listing/the-list/>

³¹ Link to the Sussex Historic Landscape Characterisation study: <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/sussex-historic-landscape-characterisation/>; the Historic Landscape Assessment of Hampshire is underway

Strategic Policy SD5: Design

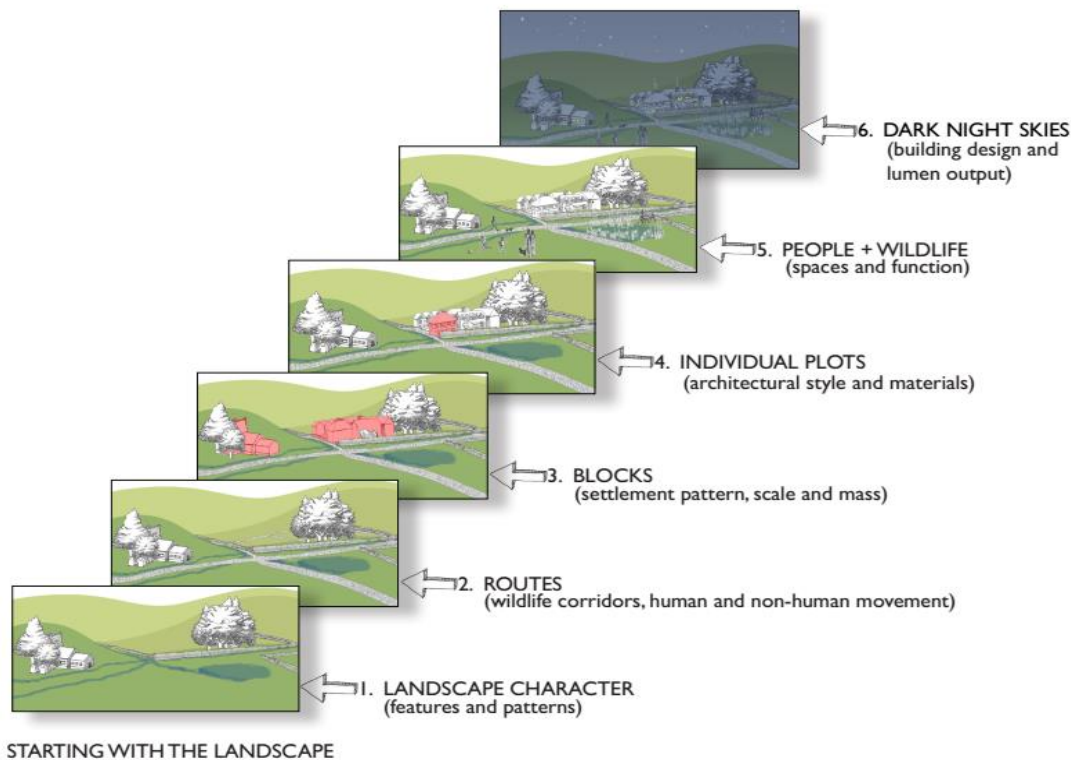
- I. Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area. The following design principles should be adopted as appropriate:
 - a) Integrate with, respect and sympathetically complement the landscape character by ensuring development proposals are demonstrably informed by an assessment of the landscape context;
 - b) Achieve effective and high quality routes for people and wildlife, taking opportunities to connect GI;
 - c) Contribute to local distinctiveness and sense of place through its relationship to adjoining buildings, spaces and landscape features, including historic settlement pattern;
 - d) Create high-quality, clearly defined public and private spaces within the public realm;
 - e) Incorporate hard and soft landscape treatment which takes opportunities to connect to the wider landscape, enhances GI, and is consistent with local character;
 - f) Utilise architectural design which is appropriate and sympathetic to its setting in terms of height, massing, density, roof form, materials, night and day visibility, elevational and, where relevant, vernacular detailing;
 - g) Provide high quality, secure, accessible, and where possible, integrated storage for general and recycling waste, heating fuel, and transport related equipment;
 - h) Provide high quality outdoor amenity space appropriate to the needs of its occupiers or users;
 - i) Ensure development proposals are durable, sustainable and adaptable over time, and provide sufficient internal space to meet the needs of a range of users;
 - j) Give regard to improving safety and perceptions of safety, and be inclusive and accessible for all; and
 - k) Have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.

5.20 Landscape features have a time depth and contribute to ecological richness and shared cultural heritage. Reference should be made to the *Pan Sussex Historic Landscape Characterisation*, the *Hampshire Historic Landscape Characterisation* and other appropriate research material to identify the relevant natural and historic key features that should be used to inform development proposals.

- 5.21** The purpose of Policy SD5 is to ensure that all development is of the highest possible design quality which reflects and respects the exceptional quality of the natural, agricultural and built environment of the National Park. Proposals should adopt a landscape-led design approach and seek to enhance local character and distinctiveness of the area as a place where people want to live and work now and in the future. The definition of landscape encompasses all types and forms, including the historic landscape character and also townscape. Townscape refers to areas of buildings and related infrastructure, and the relationships between buildings and different types of urban greenspace.

A landscape-led approach

- 5.22** Development should enhance, respect and reinforce the landscape through a landscape-led design approach, informed by contextual analysis of the local landscape character and built character, as set out in Figure 5.3. This contextual analysis should include considerations, as relevant, of topography, landscape features, historic landscape features, the water environment, biodiversity and other ecosystem services, key routes and street patterns, landmarks, views and vistas, the scale, proportions, pattern, and vernacular architecture and materials. The surrounding mix of uses should also inform proposals. Appropriate study areas and methodology would be determined in discussion with the Authority and will be dependent on the size, height and location of proposals.
- 5.23** Individual design elements, such as use of materials and detailing of elements such as windows, are critical to the success of the overall design and should be considered once the character of the area has been assessed.
- 5.24** Supporting information accompanying planning applications should be proportionate to sensitivity of the location and the scale of what is being proposed. The Authority will engage with applicants and agents to offer advice on what is required. It will need to demonstrate how the design has been informed through an analysis of the opportunities and constraints of the site, its context, and how it responds positively to these. Some schemes may be asked to go through the *National Park Authority's Design Review Panel Process*. Depending on the scale of development, a comprehensive masterplan outlining the principles for a site should address all of these elements and any other site-specific issues, to achieve an exemplary design.

FIGURE 5.3: A LANDSCAPE-LED APPROACH TO DESIGN

Connections for people and wildlife

5.25 Good design provides effective and high quality connections for people and wildlife, ensuring sustainable ease of movement. Opportunities should be identified and taken to connect GI assets and make a positive contribution to local character. The purpose of an open space, for example a playground or orchard, should be clear, otherwise it will most likely become a forgotten space which serves no purpose or benefit. Open spaces should be connected to the existing environment, for example by footpaths or cycleways. Where public open spaces are provided, there should be no restrictions, such as locked/keypad entry gates, to accessing these areas, and they should be accessible to all. Policies SD45 and SD46 set out criteria related to the provision of GI and open space, respectively.

High quality landscape and architectural design

5.26 The Authority will seek the highest quality design for development proposals in line with the first purpose of the National Park. This includes truly outstanding or innovative design and contemporary design which reinforce local distinctiveness, taking reference and visual cues from the landscape and local settlement identity and character. The Authority will encourage the use of locally sourced materials to support local character and distinctiveness, and to reduce the cost both financially and environmentally of transporting materials long distances. Reference should be made to the respective strategic stone studies for each of the three counties.

- 5.27** The design of streets has a significant influence on the layout and setting of development, and should respect local character, and respond to the historic form and layout of existing streets. Further criteria relating to the public realm and street design is set out in Policy SD21: Public Realm, Highway Design and Public Art.
- 5.28** The spaces around new buildings are integral to the success of new development and should be well designed to create a high quality built environment. This includes the gaps between houses, gardens, driveways, parking areas, waste and recycling storage, street composition and open space/amenity space. Careful consideration should be given to the siting, use/function and materials used. Spaces should be defined through use of suitable landscaping, such as boundary treatments, planting and varied use of materials, which differentiate between private and public areas. The use of hard and soft landscaping should be consistent with local character and enhance GI. Existing landscape features such as trees, hedges and walls which are characteristic of the streetscape and local area should be retained. The long term maintenance of landscape features should be addressed, for example through a legal agreement.
- 5.29** Development should comply with design policies set out in NDPs, and take into account village and town design statements.

Adaptable, durable, and sustainable design

- 5.30** New housing needs to be appropriate for the widest range of households and should therefore be adaptable, accessible and durable over time to accommodate people of all ages and abilities, without diminishing overall appearance and function.
- 5.31** Development should maximise sustainable technologies. The sourcing and performance of materials, and construction methods, should maximise energy and resource efficiency. The wood fuel economy is one example of this. Dwellings which utilise local sustainable wood fuel schemes support the local economy, repurpose what would otherwise be a waste product and can support reductions in fuel poverty. This should be undertaken in accordance with Policy SD48: Climate Change and Sustainable Use of Resources.
- 5.32** Development should be durable and adaptable to change. The ongoing management and long term maintenance of the scheme, including all design elements, should be addressed.

Amenity and functional needs

- 5.33** It is important that all types of development meet the day-to-day functional needs of its users, and of those responsible for its servicing. Internal space should have internal proportions that allow quality of experience for its occupiers and users. High quality, accessible, secure and where possible integrated on site storage should be available for the storage of transport equipment which includes bicycles, mobility scooters, push chairs and wheelchairs. Refuse and recycling storage should take account of the operational requirements of refuse collection services.
- 5.34** High quality garden, terrace or balcony space should be provided for residential occupiers, of a size and nature that befits future occupiers' needs, for example families with children. Other uses may need to provide outdoor space for staff and/or visitors depending on the use and context.

- 5.35** In addition, the privacy and amenity of existing neighbours and future occupiers should be respected. Proposals should ensure good natural light for new and, where relevant, existing buildings and their occupiers. Proposals affecting residential properties in particular should not be unduly overbearing, or compromise others' reasonable privacy, unless outweighed by innovative design solutions that mitigate these impacts.
- 5.36** Reference should also be made to Policies SD30 and SD31 on Replacement Dwellings and Extensions to Existing Dwellings and Provision of Annexes and Outbuildings.

Development Management Policy SD21: Public Realm, Highway Design and Public Art

1. Development proposals will be permitted provided that they protect and enhance highway safety and follow the principles set out in the document, *Roads in the South Downs*, or any future replacement.
2. Development will not be permitted where it would reduce the biodiversity, landscape and amenity value and character of historic rural roads. Particular attention will be given to new access points and other physical alterations to roads, and to the impacts of additional traffic.
3. Site layout must be designed to protect the safety and amenity of all road users. The design and layout of new development must give priority to the needs of pedestrians, users of mobility aids, cyclists and equestrians. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it.
4. Street design and management proposals must be context-sensitive, responding to the specific character, activities, heritage, built form and layout, materials and street furniture of the location. Highway design must pay particular attention to the role and location of buildings, doors and entry points.
5. Appropriately designed and located new public art will be supported, in particular within settlements. New public art should be site specific, reflecting and respecting the site and its context.

6.26 The purpose of Policy SD21 is to protect and enhance the public realm and street scene in the National Park, for the benefit of all users and in support of Purpose 2 of the National Park in particular.

Roads in the South Downs

6.27 The guidance document *Roads in the South Downs* developed by the local highways authorities and the National Park Authority, sets out broad principles and procedures which should be followed by all developments involving changes to the public realm and the creation of new public spaces and highways. Development proposals will not be permitted where they do not protect highway safety whilst following the principles of context-specific design set out in *Roads in the South Downs*. Development will be expected to contribute to the adaptation of existing highways so that standardised road infrastructure can be minimised in a way consistent with highway safety.

Historic rural roads

6.28 Historic rural roads are defined as those roads outside towns shown on the *second edition of the Ordnance Survey*⁵⁸, which have not undergone significant widening or straightening in the intervening period. 'Roads' in this context refer to the highway itself as well as any associated pavements or cycle paths, verges, banks, ditches and boundary features.

⁵⁸ Ordnance Survey 2nd edition, Six-inch to the mile, England and Wales, 1891 – 1914: accessible online through various providers including National Library of Scotland, <http://maps.nls.uk/os>

- 6.29** Both development proposals themselves, and their off-site traffic impacts, may impact on historic rural roads. Physical impacts may include the removal of portions of hedgerows and banks for new access points, or the construction of new kerbs and signage. Development proposals involving physical alterations to roads and their immediate setting should identify whether the roads in question are historic rural roads and if so, demonstrate that the historical significance, ecological, landscape and recreational value and character of those roads are conserved and enhanced. The integrity of banks, hedges, walls and roadside trees must be maintained.
- 6.30** A Design and Access Statement should demonstrate that Policy SD21 is complied with, covering both physical changes arising from the development and impacts on traffic levels. The level of detail required in the statement should be proportionate to the expected impact. As a guideline, any development proposal outside Lewes, Petersfield, Midhurst, Petworth and Liss which comprises at least one net additional dwelling, or the addition or change of use of 100m² or more of floorspace, will generally be required to specifically address the matters set out in Policy SD21.
- 6.31** Firstly, the statement must detail the expected traffic flows arising from the development and whether any routes leading to or from the site are likely to experience a traffic increase of approximately 10% or more on existing hourly vehicular traffic as a result. Where this applies, the assessment should check whether these routes meet the definition of historic rural roads given above. If that is the case it must be demonstrated that the changes to traffic levels and patterns arising from the development would conserve and enhance the ecological, landscape and recreational value of those roads. Cumulative impact must be taken into account.
- 6.32** Current levels of agriculture and forestry related traffic are part of the rural character of the National Park. Whilst this policy applies equally to agricultural and forestry developments where planning permission is required, there may be circumstances where benefits to the purposes of the National Park from specific agricultural or forestry operations outweigh a negative impact of traffic increases arising from those operations that would otherwise be unacceptable.

Street layout

- 6.33** This policy, specifically covering areas within the public realm, must be read in close conjunction with Policy SD5: Design, which discusses the design of new development more broadly.
- 6.34** *Roads in the South Downs* and the national guidance documents *Manual for Streets*⁵⁹, *Manual for Streets 2*⁶⁰ and the *Design Manual for Roads and Bridges*⁶¹ provide useful guidance in relation to site layout, design and the safety of all users. Street clutter should be minimised and removed where safe to do so. Formal traffic calming measures can be inappropriate; good design at the outset should limit the need for further physical measures. New and amended road layout and design in rural areas should take account of the movement of large vehicles and machinery associated with agriculture and forestry.

⁵⁹ Manual for Streets (Department for Transport, 2007)

⁶⁰ Manual for Streets 2: Wider Application of the Principles, (Chartered Institution of Highways and Transportation, 2010)

⁶¹ Design Manual for Roads and Bridges (Highways England, last updated 2017)

- 6.35** Given the ageing population of the local area and the importance of visitors from this demographic group to the National Park's economy, it is especially important that the needs of disabled users of the public realm be factored into the design of new development at an early stage. A locally distinctive and easily legible and navigable environment is particularly important for people with visual impairments and those with dementia.

Sensitivity to context

- 6.36** Context-specific design of the public realm is important for maintaining and enhancing the attractiveness and distinctiveness of towns and villages. *Roads in the South Downs* and the Historic England document, *Streets for All: South East*⁶² provide guidance on this.
- 6.37** New street lighting may be considered inappropriate in areas of the National Park due to the need to protect dark night skies. Detail on street lighting is contained in Policy SD8 (Dark Night Skies).

Public art

- 6.38** Public art is generally more characteristic of towns, villages and designed landscapes than of the broader countryside. The principle of new public art will be supported within settlement boundaries, especially when incorporated into the fabric of developments by the engagement of artists at an early stage in the design process. Proposals for new public art outside settlement boundaries, where it is subject to the planning process, will be assessed on a case by case basis according to the policies contained in this Local Plan.

⁶² Streets for All: South East (Historic England, last updated April 2018)

Development Management Policy SD22: Parking Provision

1. Development proposals for new, extended or re-located public parking will be permitted provided that they are located in or adjacent to the settlements listed in Policy SD25: Development Strategy, or have a strong functional link to an established cultural heritage, wildlife or landscape visitor attraction, provided that:
 - a) There is evidence that overriding traffic management or recreation management benefits can be achieved;
 - b) It is a component of a strategic traffic management scheme which gives precedence to sustainable transport; and
 - c) The site is close to and easily accessible from main roads by appropriate routes, and well connected to the PRow network.
2. Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the relevant adopted parking standards for the locality. Wherever feasible, electric vehicle charging facilities must also be provided.
3. All new private and public parking provision will:
 - a) Be of a location, scale and design that reflects its context; and
 - b) Incorporate appropriate sustainable drainage systems.
4. All new public parking provision will comply with the following:
 - a) Wherever feasible, electric vehicle charging facilities must be provided. Where located with potential for onward travel by mobility scooter, this should include charging facilities for such scooters; and
 - b) Where located with good accessibility to the bridleway network, include provision for horse box parking.

6.39 New parking areas will be expected to contribute to a range of ecosystem services while protecting the landscape, and their distribution will contribute to the spatial strategy for the National Park.

New public car parks

6.40 Roadside car parking is a problem at various locations, causing damage to verges and reducing road capacity. However, the ability of the National Park's road network and car parks to accommodate an increasing number of visitors' cars is limited. It is not practicable, nor would it be desirable in landscape terms, to cater for peak demand. The Authority will direct new public car parking provision to locations in or adjacent to the settlements listed in Policy SD25 (Development Strategy), where it will maximise benefits to the local economy and minimise harm to the landscape.

- 6.41** The construction of new public car parks should always be justified as part of an overall traffic management scheme whose primary focus is increasing access to the site by public and non-motorised transport. Large scale car parks with supporting infrastructure such as lighting can be particularly obtrusive in the landscape. Development proposals for significant new car parks may be classed as major development within the meaning set out in Policy SD3.
- 6.42** Traffic Regulation Orders (TROs) can be a means of improving access and preventing inconsiderate parking in towns and villages, and may be necessary in some cases to mitigate the impact of development. Associated street clutter should be avoided and additional signage kept to a minimum.
- 6.43** There are many existing visitor attractions in the countryside away from settlements related to the National Park purposes, which may wish to expand or relocate their parking facilities. Policy SD22: Criterion 1 only applies to parking areas whose primary purpose is to serve the visitor attraction in question.

Parking standards for residential and non-residential developments

- 6.44** The provision of vehicle and cycle parking for new development should be in accordance with the local parking guidance applicable to that area.

Design, location and layout of new vehicle parking

- 6.45** New vehicle parking areas, whether public or private, can negatively impact on landscape, the local environment, biodiversity and drainage when inappropriately sited and designed. The cumulative impact of changes on biodiversity and surface water run-off will be given particular consideration when deciding applications for the loss of existing garden space to car parking.
- 6.46** Permeable parking surfaces should be used in preference to impermeable surfaces unless there are overriding reasons that render their use unsuitable. Materials should be selected which are appropriate to the site context and predicted levels of use. Usage should be made of existing and proposed buildings, landscape features and planting to successfully integrate the parking area within its surrounding landscape context and avoid negative impacts on local character. Changes to existing parking areas to bring them into line with the principles of *Roads in the South Downs* will be supported.
- 6.47** The type of parking provided must be accessible to all and resilient to future changes. All new public car parks should therefore deliver a proportion of parking spaces for disabled people/blue badge holders, cyclists and motorcyclists which are compliant with the relevant national and local guidelines for the area. Public parking should address the needs of mobility scooter users, and accommodate horse boxes, in line with the National Park's Purpose 2 and duty. Electric vehicle charging facilities must be provided for in all new parking areas, including residential developments and public car and cycle parks, unless it can be demonstrated that this is not viable or that adequate connections to the electricity grid are not available.

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SOUTH DOWNS NATIONAL PARK AUTHORITY CAR OWNERSHIP PARKING DEMAND TOOL												
Ward 1						STAGE 1	Please input the ward name for your development location by double clicking in the box or click box and use the drop down menu to the right of the box. The spreadsheet will automatically show the District and Ward of this location. If the ward is not known please refer to https://www.nomisweb.co.uk/reports/lmp/ward2011/contents.aspx and input postcode. Where Census data contains small samples for certain sized dwellings this is highlighted in red if <20, and green if <50 in the Total Demand column. In such cases, other wards should be selected to achieve a higher sample size, the tool allows for 3 wards. If there is still a low sample then the tool will automatically choose district/borough data.					
District												
Ward 2												
District												
Ward 3												
District												
Ward Tempro Factor 2011-2033												
District Tempro Factor 2011-2033												
STAGE 2												
Please input the unit type, tenure, number of bedrooms, number of units of that type and number of allocated parking spaces												
DEVELOPMENT MIX						ALLOCATED PARKING	PARKING DEMAND					
Ref.	Unit Type	Tenure	Habitable Rooms (Per Unit)	Bedrooms (Per Unit)	No. of Units (Total)	Spaces (Per Unit)	Allocated No.	Unallocated for Residents		Unallocated for Visitors		Total Demand
								per unit	Total	per unit	Total	
A												
B												
C												
D												
E												
F												
G												
H												
I												
J												
K												
L												
M												
N												
O												
P												
Q												
R												
S												
Total												

GUIDANCE NOTE

The Parking Demand Tool should be used in reference to South Downs National Park Authority Guidance on Parking for Residential and Non-Residential Development SPD. The tool uses 2011 Car Ownership and Temprow predicted to 2033 to predict residential development demand. The tool is not a definitive standard guide to the expected level of car ownership. For more information please refer to the guidance document or contact planningpolicy@southdowns.gov.uk.



South Downs
National Park Authority

Spreadsheet tool developed by:

PELHAM TRANSPORT CONSULTING

www.pelhamtransportconsulting.co.uk

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Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD)

**Strategic Environmental Assessment (SEA) –
Screening Statement**

**Habitats Regulations Assessment (HRA) –
Screening Statement**

Draft Determination Statement

I. INTRODUCTION

- I.1** This statement sets out the Authority's determination under Regulation 9 (1) of the Environmental Assessment of Plans and Programmes Regulations 2004 on whether or not a Strategic Environmental Assessment is required for the consultation draft Guidance on Parking for Residential and Non-Residential Development Supplementary Planning Document (SPD) hereafter referred to as the Parking SPD.
- I.2** This statement also sets out the Authority's determination as to whether Appropriate Assessment is required under the Conservation of Habitats & Species Regulations 2017 (as amended).

Strategic Environmental Assessment

- I.3** Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive) and Environmental Assessment of Plans and Programmes Regulations (2004) specific types of plans that set out the framework for future development consent of projects must be subject to an environmental assessment.
- I.4** There are exceptions to this requirement for plans that determine the use of a small area at a local level and for minor modifications if it has been determined that the plan is unlikely to have significant environmental effects.
- I.5** In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9(1)), the Authority must determine if a plan requires an environmental assessment. Where the Authority determines that SEA is not required then under Regulation 9(3) the Authority must prepare a statement setting out the reasons for this determination. The need for SEA is considered under Section 3 of this report.

Sustainability Appraisal

- I.6** Under separate legislation (the Planning and Compulsory Purchase Act 2004 and associated Regulations), the Authority is required to carry out a Sustainability Appraisal (SA) for all Development Plan Documents. This considers the social and economic impacts of a plan as well as the environmental impacts.
- I.7** In accordance with current Regulations (Town & Country Planning (Local Development) (England) (Amendment) Regulations 2012) SA is not required to be carried out for SPD. However, despite this, it is still necessary to determine the need for SEA.

Habitats Regulations Assessment

- I.8** Habitats Regulations Assessment is required to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or Natura 2000 sites. The need for HRA is set out within the EC Habitats Directive 92/43/EC and transposed into British Law by the Conservation of Habitats and Species Regulations 2017 (as amended). Section 4 of this report deals with the need for Habitats Regulation Assessment.

2. SCOPE OF THE PARKING SPD

2.1 The scope of the SPD is to provide further guidance to support the implementation of the parking policy of the South Downs Local Plan (SDLP). The SPD will elaborate upon policy SD22: Parking Provision of the SDLP (adopted July 2019) and applies to the whole of the South Downs National Park. The SPD provides further detail on the following matters:

- Sets out a standard for parking at residential development based on principles and a calculator tool
- Sets out a standard for parking at non-residential development based on principles and a table showing provision of spaces by type of development
- Provides examples of how the principles will be used to determine parking provision
- Explains how the calculator tool is used as part of the standard for parking

3. STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

The SEA Screening Process

- 3.1** The process for determining whether or not an SEA is required is called screening. In order to screen, it is necessary to determine if a plan will have significant environmental effects using the criteria set out in Annex II of the Directive and Schedule I of the Regulations. Table I sets out the Authority's screening for the Parking SPD using the criteria set out in Annex II of the Directive and Schedule I of the Regulations. A determination cannot be made until the three statutory consultation bodies have been consulted: The Environment Agency, Natural England and Historic England.
- 3.2** Within 28 days of making its determination the authority must publish a statement such as this one, setting out its decision. If it determines that an SEA is not required, the statement must include the reasons for this.

SEA Determination and Reasons for Determination

Table I – SEA Screening for the Parking SPD

Criteria (from Annex II) of the SEA Directive and Schedule I of the Regulations	SDNPA Comments
Characteristics of the plan or programme	
a) The degree to which the plan or programme sets a framework for projects and other activities, either with regards to the location, nature, size and operating conditions or by allocating resources.	The Parking SPD sits at the lowest tier of the development plan system. It offers specific guidance to implement policy SD22: Parking Provision of the South Downs Local Plan (SDLP).
b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The SPD is an implementation tool for delivering the already adopted development plan policies at a higher tier (the SDLP) which have already been subject to SA/SEA. It is influenced by other higher tier plans rather than influencing other plans itself.
c) The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.	The SPD provides further guidance to support the implementation of the parking policy in the context of the other policies of the adopted SDLP which have already been subject to SA/SEA and therefore does not have a significant environmental impact on environmental considerations. As the SPD is

	an implementation tool for the SDLP parking policy it does have social economic and environmental considerations in respect to sustainable development by providing clear and consistent guidance on the provision of parking within new development.
d) Environmental problems relevant to the plan or programme.	The SPD is an implementation tool for delivering already adopted development plan policies at a higher tier which have already been subject to SA/SEA. The SPD expands on higher level policy requirements (SD22) that parking for vehicles and cycles is appropriately provided within new development to minimise landscape impact and maximise ecosystem services.
e) The relevance of the plan or programme for the implementation of Community (EU) legislation on the environment (for example plans and programmes linked to waste management or water protection).	The nature of the Parking SPD has no direct impact on the implementation of Community legislation. The principle of development is considered through the SDLP which has been subject to SA/SEA and HRA.
Characteristics of the effects and of the area likely to be affected	
a) The probability, duration, frequency and reversibility of the effects.	<p>The SPD will not in itself set out or bring forward development plans or projects. It sets out a standard for parking in accordance with policy SD22 of the SDLP and guidance for how the Authority will use the standard and interpret the policy.</p> <p>The SPD should provide positive effects in regards to social, economic and environmental considerations.</p>
b) The cumulative nature of the effects	The SPD is not anticipated to have any significant cumulative effects. Cumulative effects are addressed in the SDLP SA/SEA and HRA.
c) The transboundary nature of the effects	The SPD applies within the South Downs National Park area only. It is not expected to have any negative effects outside of the SDNP. Transboundary effects have been addressed in the SDLP SA/SEA and HRA.
d) The risks to human health or the environment (for example, due to accidents)	The SPD presents no direct risks to human health or the environment. It is considered there may be improvements to human health and environment due to parking being

	provided to meet local needs, including being of the appropriate location, scale and design. This could indirectly support improved health outcomes and reduced health inequalities
e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The SPD will cover the whole of the South Downs National Park area.
f) The value and vulnerability of the area likely to be affected due to: i) Special natural characteristics or cultural heritage; ii) Exceeding environmental quality standards or limit values; ii) Intensive land-use	The South Downs National Park covers an area with a wide variety of characteristics. The SPD itself does not direct or establish the principle of development. This is covered by higher tier policies in the SDLP which have been subject to SA/SEA. In any case, development proposals will need to be consistent with SDLP policies SD4 to SD18 and where appropriate tested through the Habitats Regulations.
g) The effects on areas or landscapes which have recognised national, community or international protection status.	The SPD will cover the whole of the South Downs National Park which has been designated for its special landscape, wildlife and cultural value. The SPD should provide positive effects by guiding the provision of appropriate levels of vehicle and cycle parking in the National Park. In line with SDLP policies SD4 to SD18, development proposals will need to be tested through the Habitats Regulations where appropriate.

Other Considerations

2.1 In reviewing these criteria and coming to a conclusion, the Authority has also had regard to the following:

- The SPD does not present new policies but seeks to clarify the Authority's approach to implementing the SDLP parking policy.

SEA Conclusion

2.2 Having regard to the considerations above, the Authority considers that the Parking SPD is unlikely to have any significant environmental effects and therefore does not require a Strategic Environmental Assessment.

4. HABITATS REGULATIONS ASSESSMENT SCREENING STATEMENT

- 2.3** This part of the report seeks to determine whether the Authority's policies and proposals set out in the Parking SPD will have any significant impacts on Natura 2000 sites.
- 2.4** This SPD will support policy SD22: Parking Provision in the adopted South Downs Local Plan (SDLP). The SDLP was subject to a Habitats Regulation Assessment which was prepared in consultation with Natural England. The purpose of HRA is to assess the impacts of plans and/or projects against the conservation objectives of a European protected site. The assessment must determine whether the plan and/ or project would adversely affect the integrity of the site in terms of its conservation objectives. Where adverse effects are identified these effects should be avoided or mitigated.
- 2.5** The Appropriate Assessment stage of HRA is only required should the preliminary screening assessment not be able to rule out likely significant effects.
- 2.6** The Directive states that any plan or project not connected to or necessary for a sites management, but likely to have significant effect thereon shall be subject to appropriate assessment. There are 4 distinct stages in HRA namely:
- Step 1: Screening - Identification of likely impacts on a European site either alone or in combination with other plans/projects and consideration of whether these are significant.
 - Step 2: Appropriate Assessment - consideration of the impact on the integrity of the European Site whether alone or in combination with other plans or projects with respect to the sites structure, function and conservation objectives. Where there are significant effects, step 2 should consider potential mitigation measures.
 - Step 3: Assessment of Alternative Solutions - Assessing alternative ways of achieving the objectives of the plan/project which avoid impacts; and
 - Step 4: Assessment of Compensatory Measures - Identification of compensatory measures should impact not be avoided and no alternative solutions exist and an assessment of imperative reasons of overriding public interest (IROPI) deems that a project should proceed.
- 2.7** Should screening (step 1) reveal that significant effects are likely or effect cannot be discounted because of uncertainty, then it is necessary to move onto step 2: Appropriate Assessment. If step 2 cannot rule out significant effect even with mitigation, then the process moves onto step 3 and finally step 4 if no alternative solutions arise.

Step 1 - Screening

- 2.8** There are four stages to consider in a screening exercise:
- Stage 1: Determining whether the plan/project is directly connected with or necessary to the management of the site;

- Stage 2: Describing the plan/project and description of other plan/projects that have the potential for in-combination impacts;
- Stage 3: Identifying potential effects on the European site(s); and
- Stage 4: Assessing the significance of any effects

Stage 1

- 2.9** It can be determined that the Parking SPD is not directly connected with, or necessary to the management of a site.

Stage 2 to 4

- 2.10** Information about the scope of the SPD can be found in Section 2 of this document. The SPD supports SDLP policies, which are already subject to a full HRA, including of any in-combination effects with other plans and / or projects. The SDLP HRA considered the potential effects on the following European sites:

- Calcareous grassland sites: Lewes Downs SAC, Castle Hill SAC and Butser Hill SAC
- Woodland sites: Duncton to Bignor Escarpment SAC, Kingley Vale SAC, East Hampshire Hangers SAC and Rook Cliff SAC
- Heathland bog sites: Thursley, Ash, Pirbright and Chobham SAC, Woolmer Forest SAC, Ashdown Forest and Shortheath Common SAC
- Bat sites: The Mens SAC, Singleton and Cocking Tunnels SAC, and Ebernoe Common SAC
- Heathland bird sites: Wealden Heaths Phase II SPA, Ashdown Forest SPA and Woolmer Forest SAC
- Riverine sites: River Itchen SAC, Arun Valley SAC/SPA/Ramsar
- Estuarine sites: Chichester and Langstone Harbours SPA / Ramsar, Solent Maritime SAC, Dorset and Solent potential SPA
- Wetland sites: Pevensey Levels SAC/ Ramsar site

- 2.11** The following impact pathways were identified as relevant to the SDLP HRA:

- Recreation pressure
- Air Quality
- Water quantity and changes in hydrological cycles
- Water quality
- Loss of supporting habitat
- Urbanisation

- 2.12** The SDLP HRA undertook a test of likely significant effects for policies and site allocations contained in the Local Plan. Policies / allocations assessed as having no potential impact pathways linking to European Designated Sites were screened out from further consideration. The following assessment was made of SDLP policy SD22:

Policy	Description	HRA Implications
	SD22 sets out the requirements for new public and private parking. The policy permits development proposals where they provide an appropriate level of parking to serve the needs of the development in accordance with the relevant adopted parking standards for the locality.	<p>“No HRA implications.</p> <p>This is a development management policy relating to parking provision. It is a positive policy as it provides for connections to allow vehicle charging, thus encouraging the use of electric vehicles which has the potential to reduce atmospheric pollution contributions.</p> <p>There are no linking impact pathways present.”</p>

HRA screening conclusion

2.13 The Parking SPD provides further guidance to support the implementation of Policy SD22. The SPD does not set the principle of development nor does it direct development to a specific location. Therefore, as with the assessment of Policy SD22 there are no linking impact pathways present and there are no HRA implications. A full appropriate assessment is not required.

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Report to	Planning Committee
Date	13 August 2020
By	Director of Planning
Title of Report	Adoption of the Sustainable Construction Supplementary Planning Document (SPD)
Purpose of Report	To present the revised Sustainable Construction SPD for adoption

Recommendation: The Committee is recommended to:

- 1) Note the content of the Consultation Statement (Appendix 1 of this report); and**
- 2) Adopt the revised Sustainable Construction SPD (Appendix 2 of this report).**

I. Introduction

- I.1 In 2018 the United Nations' Intergovernmental Panel on Climate Change released a report describing what it would take to keep global temperatures from rising more than 1.5 degrees Celsius, a goal of the Paris climate agreement. The consensus among climate change scientists is that global heating beyond 1.5 degrees is likely to lead to harmful climate change. The report explained that countries would have to cut their anthropogenic carbon dioxide emissions, such as from power plants and vehicles, to net zero by around 2050. To reach that goal, it said, CO₂ emissions would have to start dropping "well before 2030" and be on a path to fall by about 45 percent by around 2030 (12 years away at that time).
- I.2 The UK Government Committee on Climate Change (CCC) set a UK target in 2019 for net-zero greenhouse gas emissions by 2050. To achieve the 2050 zero carbon target the CCC calculates that annual emission reductions will need to be 30% higher than the rate since 1990.
- I.3 Greenhouse gas emissions from buildings represent approximately 25% of all UK emissions. The SDNPA as a local planning authority has a key role in ensuring that emissions relating to the construction and operation of new development are minimised and that new buildings in the National Park do not subsequently have to implement relatively expensive retrofitted improvements to make them fit for a zero carbon future. The Vision & Circular for National Parks and the Broads states that National Parks have a role as exemplars of sustainability and renewable energy.
- I.4 While reducing emissions (mitigation of Climate Change) is a critical goal there has already been global heating of approximately 1 degree Celsius which the Government's 2018 UK Climate Projection document predicts will bring hotter, drier summers and milder and wetter winters together with more extreme weather events such as floods, storms and droughts. These changes are expected to bring negative impacts to both human health and wildlife. Adaptation to predicted climate change is therefore an important policy objective.
- I.5 The Sustainable Construction Supplementary Planning Document (SPD) (**Appendix 2**) is intended to interpret the South Downs Local Plan (SDLP) sustainable construction policies,

providing guidance to applicants seeking planning permission, to development management officers and to Members on what is expected from new development in terms of both mitigation and adaptation to climate change. The SPD will not apply to residential extensions but will apply to development of one new home and above. The SPD will also apply to non-residential extensions greater than 250 square metres in size.

- 1.6 The draft SPD was presented to Planning Committee in January 2020 where it was approved for public consultation subject to one principal amendment, namely that all development types in the draft SPD should be set the same target figure of 19% for CO₂ emissions reductions through increased energy efficiency. Officers had proposed a lower target of 10% for CO₂ emissions reductions for minor, non-residential development. This change was made prior to public consultation.

- 1.7 This SPD is one of a number of SPDs and technical advice notes that are being prepared by the Authority following the adoption of the Local Plan, which aim to assist with its implementation. The two rounds of consultation on this SPD have been carried out in line with the Authority's Statement of Community Involvement (Version 3, August 2017).

2. Policy Context

- 2.1 The National Park Authority (NPA) adopted the South Downs Local Plan (SDLP) on 02 July 2019. This includes a number of policies which set out the Authority's requirements for new development to mitigate and adapt to predicted climate change, including:

- 2.2 **Core Policy SD2 Ecosystems Services** encapsulates the ecosystem services that the natural environment contributes to people. It seeks to deliver all opportunities to improve the National Park's resilience to, and mitigation of, climate change.

- 2.3 **Policy SD48 Climate Change and Sustainable Use of Resources** sets out a requirement for all new development to incorporate proportionate sustainable construction measures for both Climate Change mitigation and adaptation. Residential development is required to meet minimum standards of energy efficiency and mains water consumption. Major non-residential development is required to meet BREEAM New Construction standards. New development is also required to reduce CO₂ emissions through the use of on-site zero/low carbon energy and through sustainable design, construction and the use of low carbon materials.

- 2.4 **Policy SD22 Parking Provision** requires new development to provide electric vehicle charging facilities where feasible.

- 2.5 **Policies SD4 Landscape Character, SD5 Design, SD9 Biodiversity and Geodiversity, SD45 Green Infrastructure, SD49 Flood Risk Management and SD50 Sustainable Drainage Systems** require green and blue infrastructure enhancements and Sustainable Drainage systems, all of which assist in adapting to predicted climate change.

- 2.6 **Policy SD3 Major Development** requires all major development (solely that defined as major development for the purposes of paragraph 172 of the National Planning Policy Framework) to meet 'One Planet Living' standards of sustainable performance which include:

- Zero Carbon
- Zero Waste
- Sustainable Transport
- Sustainable Materials
- Sustainable Water
- Land Use and Wildlife
- Culture and Community
- Health and Wellbeing

- 2.7 The Sustainable Construction SPD has been prepared to provide further guidance to support the implementation of the Local Plan policies. It covers:

Reducing CO₂ emissions

- through the energy efficiency of buildings

- through on-site low or zero carbon energy
- through passive house principles
- by encouraging the use of electric vehicles
- through more sustainable management of waste
- through the use of more sustainable building materials

Adapting to climate change through

- more sustainable water consumption
- multifunctional green infrastructure and sustainable drainage systems

2.8 In addition to supporting the implementation of the Local Plan the SPD supports the wider objectives of the SDNPA, including the following outcomes and policies from the [Partnership Management Plan](#):

- Outcome 1 (Landscape and Natural Beauty) in relation to creating green infrastructure
- Outcome 2 (Increasing Resilience) in relation to adapting to climate change
- Outcome 5 (Outstanding Experiences) in relation to encouraging sustainable transport
- Policy 23, improving the sustainability of water resources
- Policy 50, housing and other development should be to high energy efficiency standards
- Policy 56, supporting appropriate renewable energy schemes, sustainable resource management and energy efficiency in communities and businesses to meet Government climate change targets

3. Public Consultation

3.1 Public consultation on the draft SPD took place from 11 February to 24 March 2020. During the consultation period 25 responses were received, from a range of individuals and organisations including parish councils, district councils, statutory agencies, community groups and developers and agents. The Consultation Statement, forming **Appendix I** of this report, summarises and responds to the representations received during the consultation.

3.2 Of the 25 responses received on the draft SPD:

- 3 were negative and thought the requirements went too far in some aspects
- 5 were neutral
- 6 were positive
- 11 were positive but would like still more ambitious measures than those set out in the draft SPD

3.3 The key points made during the consultation can be summarised as follows:

Where respondents would like more ambitious targets

- Rain water and grey water re-use should be mandatory
- Passive house standard should be required for at least half of all new dwellings
- More sustainable transport measures including more EV charge points for non-residential are required
- Should go further in tackling climate change
- There should be a presumption in favour of solar panels and the use of ground source heat pumps
- Charging of Electric bikes should be covered
- There should be more stress on the embodied energy of materials and the use of local and recycled materials
- Should include retrofitting buildings

Where respondents would like less onerous targets

- Exclude the use of log burners
- Document should not require prescriptive BREEAM credits
- Many of the targets go too far as not contained in the Local Plan

- iv) Occasional EV charging on street may attract crime
 - v) Should spell out that measures are subject to viability
- 3.4 In response to this public consultation a revised SPD was prepared. A summary of the changes made is as follows:
- i) New reference to pragmatic approach to applying measures where there are demonstrated technical reasons or significant viability consequences.
 - ii) New reference to underfloor heating and advice that individual and programmable thermostats should be used.
 - iii) New reference to retrofitting of existing buildings where possible within the scope of the document (significant refurbishments or extensions which require planning permission)
 - iv) Additional text explains that solar collection is less feasible where there is overshadowing and that biomass is less feasible where access and storage are constrained.
 - v) Text amended to clarify that on street EV charging least favoured option after on plot and communal car parking locations.
 - vi) Additional reference to encouraging use of locally-sourced materials, including local timber.
 - vii) Some additional text on the need for good ventilation when air tightness levels are improved and advice on the CO2 cost of running mechanical ventilation and heat recovery systems
 - viii) Some amendments made to clarify the requirement for a minimum quantity of construction waste to be diverted from landfill.
- 3.5 The Town and Country Planning (Local Planning) (England) Regulations 2012 (As Amended) legally require local planning authorities, prior to adopting a SPD, to publish the Consultation Statement and revised SPD for comment for a minimum four week period. This consultation took place for six weeks from 19 May to 30 June 2020. A further twelve representations were received during this period and these are also detailed in the Consultation Statement, which forms **Appendix 1** of this report. The representations largely concerned matters of detail and some minor changes to the SPD are set out in response to these in the Consultation Statement and included in the revised SPD, which forms **Appendix 2** of this report.
- 4. Next steps**
- 4.1 The recommendation is that Members note the content of the Consultation Statement and adopt the revised Sustainable Construction SPD.
- 4.2 Once adopted, the SPD will be a material consideration in the determination of planning applications. As such, it will help to improve the sustainability credentials of new development in relation to both mitigation of, and adaptation to, predicted climate change.
- 4.3 The SDNPA is preparing a suite of SPDs on Parking, Trees, Design and Biodiversity Net Gain, which will be presented to Planning Committee over the coming months before they go out to consultation; they all support the implementation of the South Downs Local Plan. It is proposed all new SPDs will be formatted and designed into a common style. As this will not change the content of the Sustainable Construction SPD, the formatting and design work can occur following adoption of the SPD.
- 5. Sustainability Appraisal and Habitats Regulations Assessment screening**
- 5.1 There is no legal requirement for Supplementary Planning Documents to be accompanied by a Sustainability Appraisal, and this is reinforced in National Planning Practice Guidance (reference 11-008-20140306). However, as per this guidance there may be, in exceptional circumstances, a requirement for SPDs to undertake Strategic Environmental Assessment (SEA) where it is felt they may have a likely significant effect on the environment that has not already been assessed during the preparation of the Local Plan. The requirements of the draft SPD build directly on the local plan policies which have already been subject to recent sustainability appraisal and officers therefore do not consider that a further such appraisal is required here.

- 5.2 However, where the Authority determines that an SEA is not required the Authority must prepare a statement setting out reasons for this determination. The Authority therefore produced a draft Screening Statement for consultation with the three applicable statutory bodies; the Environment Agency, Natural England and Historic England which took place in January and February 2020. The Environment Agency stated that as the SPD is expanding on Local Plan policy that has already been subject to SEA they considered that no SEA is required for the SPD. Historic England also stated that a SEA is not required in this instance. No response was received from Natural England. The determination therefore concludes that the Sustainable Construction SPD is not likely to have any significant environmental effects, and therefore does not require an SEA. Where environmental effects are identified they will be positive.
- 5.3 As required by Habitats Regulations Assessment (HRA), the SDNPA has also assessed whether the SPD will have any significant impacts on Natura 2000 sites, thereby necessitating an Appropriate Assessment to consider the impact on the integrity of any such sites. The HRA Screening Statement concludes that the SPD does not set the principle of development, nor does it direct development to a specific location. Therefore, there are no linking impact pathways present and there are no HRA implications.
- 5.4 The combined SEA Screening Statement and HRA Screening Statement is presented as **Appendix 3** to this report.

6. Other Implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	No.
Does the proposal raise any Resource implications?	The SPD has been produced using existing internal resources. Some specialist consultant advice on energy and sustainability matters will be required to support decision making on relevant planning applications by both the Authority's planning team and that of the host authorities. This cost will be met within existing budgets. The costs of further formatting and design production of the SPD will also be met within existing budgets.
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	The Sustainable Construction SPD will lead to more energy and water efficient new dwellings with corresponding lower utility bills. This will have a particularly beneficial effect for those occupants on low incomes. The need for mitigating and adapting to predicted climate change is of particular relevance to low income residents as these groups are likely to be disproportionately affected by the extreme weather effects of climate change.
Are there any Human Rights implications arising from the proposal?	None.
Are there any Crime & Disorder implications arising from the proposal?	None.
Are there any Health & Safety implications arising from the proposal?	None.

Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy?	The whole rationale of the Sustainable Construction SPD supports the principles of the SDNPA Sustainability Strategy.
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7. Risks Associated with the Proposed Decision

7.1 A risk assessment is provided in the table below.

Risk	Likelihood	Impact	Mitigation
If adopted: Third party challenge to the principle of the SPD or the guidance contained within. A challenge can be made within a six week period following adoption.	Possible	Moderate	The SPD has been prepared in compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (As Amended).
If not adopted: limited guidance is provided by the Authority in respect of sustainable construction.	Possible	Moderate	Adopt the SPD.

TIM SLANEY

Director of Planning

South Downs National Park Authority

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Appendices

1. Consultation Statement
2. Revised Sustainable Construction Supplementary Planning Document
3. SEA Screening Statement and HRA Screening Statement Determination Statement

SDNPA Consultees Legal Services; Chief Finance Officer; Monitoring Officer; Director of Planning

External Consultees None



Sustainable Construction Supplementary Planning Document Consultation Statement

July 2020

- I.1. The Sustainable Construction Supplementary Planning Document (SPD) provides further guidance to support the implementation of Local Plan policies, in particular Policy SD2: Ecosystem Services; Policy SD3: Major Development; and Policy SD48: Climate Change and Sustainable Use of Resources. Once adopted, the SPD will be a material consideration in the determination of relevant planning applications.
- I.2. This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town and Country (Local Development) (England) Regulations 2004 which states:

“Before a local planning authority adopt a supplementary planning document it must—

 - (a) prepare a statement setting out—*
 - (i) the persons the local planning authority consulted when preparing the supplementary planning document;*
 - (ii) a summary of the main issues raised by those persons; and*
 - (iii) how those issues have been addressed in the supplementary planning document; and*
 - (b) for the purpose of seeking representations under regulation 13, make copies of that statement and the supplementary planning document available in accordance with regulation 35 together with details of—*
 - (i) the date by which representations must be made (being not less than 4 weeks from the date the local planning authority complies with this paragraph), and*
 - (ii) the address to which they must be sent.”*
- I.3. This statement sets out details of the consultation that has taken place to date which has informed and refined the SPD. It sets out details of how, when and with whom the initial consultations with interested parties and organisations took place and how this has informed the SPD.
- I.4. Following the preparation of the draft SPD, the Authority resolved to undertake a six week consultation on the Sustainable Construction SPD between 11th February 2020 and 24th March 2020. As part of the consultation, the Authority:
 - Published the draft Sustainable Construction SPD on the SDNPA website;
 - Made the draft SPD available for inspection at the South Downs Centre during opening hours;
 - Sent emails and letters to persons and organisations on the SDNPA Local Plan mailing list inviting them to examine the consultation documents and make any representations on them during the consultation period;
 - Sent emails to consultation bodies identified below, which the Authority considers to be affected by the SPD;
 - Released details of the consultation to the local press via a press release;
- I.5. The Authority considered it appropriate to consult the following consultation bodies on the draft Sustainable Construction SPD:
 - Homes and Communities Agency
 - Relevant district and county councils
 - Adur District Council
 - Arun District Council
 - Brighton & Hove City Council
 - Chichester District Council
 - East Hampshire District Council
 - East Sussex County Council
 - Hampshire County Council

- Horsham District Council
- Lewes & Eastbourne District Councils
- Mid Sussex District Council
- Waverley District Council
- Wealden District Council
- West Sussex County Council
- Winchester City Council
- Worthing Borough Council
- Parish Councils within the National Park
- CPRE Hampshire
- Action in Rural Sussex
- Local developers and Registered Providers
- Estates within the National Park that have developed Whole Estate Plans

In total this consisted of 1029 stakeholders, including individuals, statutory bodies, developers, 176 agents and other organisations.

- I.6. Consultation responses were received from 25 individuals and organisations. The comments received are summarised in **Appendix I**. Officer comments relating to the responses received and how the SPD has been amended in response to these comments is also set out in Appendix I.
- I.7. Following the amendment of the Sustainable Construction SPD, incorporating the changes highlighted in Appendix I, the revised draft and the Consultation Statement were published for a further period of public consultation between May 19th and June 30th 2020. Further comments received during this consultation have been added to **Appendix I** in a second table.

Appendix I

Draft Sustainable Construction SPD – Summary of comments received and officer comments

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
Alan Redpath	I thought it was an excellent document, forward looking and wholly sensible - providing a good balance of the issues/goals and proposed policies.	Grateful for the support	None required
Alan Redpath	Sustainable transport should be a key policy for 10 plus house developments	Sustainable Transport opportunities are always considered in development schemes of this size and are subject to the requirements in Local Plan Policy SD19 (amongst others). This includes making connections to existing non-motorised vehicle networks, such as PROWs and cycle ways. All new homes will require EV charge points.	None required
Arundel Town Council	No Comments	Noted	None required
Bepton Parish Council (John Beckett Councillor for Planning)	Much of the content of the SPD is excellent but on a number of proposed targets for Greenhouse Gas Emissions it lacks the ambition urgently required to control climate change. Passive house should be 50% of units not just 10%	It is considered that the Authority has gone as far as it can, given the policies in the local plan. Supplementary Planning Documents cannot make new policy.	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
Bepton Parish Council	Water Use.....Rain Water Harvesting and Grey Water Recycling should be mandated where feasible rather than "encouraged".	The Authority cannot be prescriptive about how the standard is achieved.	None required
Bramshott and Liphook Parish Council	Supports the draft Sustainable Construction Supplementary Planning Document and finds it to be aspirational.	Grateful for the support	None required
Brighton and Hove City Council	General point is that certain paragraphs read as policy rather than guidance	The SPD is intended to provide further guidance to aid and support the implementation of relevant South Downs Local Plan Policies which seek to address climate change and the sustainable use of resources.	None required
Brighton and Hove City Council	General point is that specific percentage CO2 reduction, green roof and passive house targets are not reflected in Local Plan policy directly.	Although not quantified, Policy SD48.3 clearly requires all development to 'demonstrate proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.'	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
Brighton and Hove City Council	The guidance specifies that developers have to reach a specific target for the energy component of BREEAM. BHCC have dropped a similar requirement, as developers have argued that you can't break down BREEAM into its various components. BHCC now just require that the overall target of 'excellent' is reached.	Point noted but again some prescriptive minimum requirements are thought necessary to proportionately interpret Local Plan Policy SD48.3 as without them it would be possible for major non-residential development to score very poorly in certain sustainable construction issues such as waste and sustainable pollution while still achieving BREEAM excellent overall.	None required at present although we will review this aspect when we review the SPD in the future, following experience of its application in practice.
Cheriton Parish Council	Document should exclude use of log burners	Excluding log burners from new homes would be, in the Authority's view, disproportionate. However all new biomass boilers proposed as part of the energy calculation for development would need to meet the 2022 EU stringent emission standards, i.e. be 'EcoDesign ready'. This is explained in para 2.46 of document.	None required
Cheriton Parish Council	Where underfloor heating is installed it must be accompanied by the use of individual digital room thermostats	This is good guidance advice although the Authority would not be able to insist on it.	New text added to the SPD: 2.41 <i>Heat pumps work well with underfloor heating as this requires</i>

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
	capable of operation from a single or central software application on a smart telephone or laptop machine.		<i>lower temperatures than traditional wet radiators. Where underfloor heating is installed it should be accompanied by the use of individual room digital and programmable thermostats, to minimise wasted heat in unused rooms.</i>
Cheriton Parish Council	A presumption in favour of solar panels and the use of ground source heat pumps as the means of providing heat and light to be included in all development planning applications, with backup systems provided by the traditional gas (incl. LPG) and electricity suppliers. The need for exceptions to be evidenced.	The Authority believe this is too prescriptive and prefer to emphasise the performance standard (maximum reduction in CO2 emissions) rather than requiring specific technologies.	None required
Cheriton Parish Council	Recommend use of low emissivity glass, energy efficient light bulbs and Cat 5 ethernet cabling and the installation of sockets including USB, which will facilitate the 'smart' control of digital and electronic devices to reduce heat loss, electricity use and encourage home working respectively	The Authority believe this is too prescriptive and prefer to emphasise the performance standard (reduction in CO2 emissions) rather than requiring specific technologies. The energy properties of building elements (such as windows) and the performance of lighting fixtures will all contribute to a CO2 calculation	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		and the performance target set in this document. A reference to high speed internet connection hardware for new homes will be considered in the forthcoming SDNPA Design Guide SPD.	
Cheriton Parish Council	No mdf in the use of skirtings or architrave should be mentioned.	The Authority believe this is too prescriptive and it would be impracticable to enforce.	None required
Cheriton Parish Council	Apply 'grey water', rain water harvesting and boiling water taps in all development.	The Authority believe this is too prescriptive and prefer to emphasise the performance standard (mains water consumption target) rather than requiring specific technologies.	None required
Cheriton Parish Council	EV charge points should be provided at a greater rate than only 1 in 5 spaces.	Note this rate is only for non-residential developments and all new dwellings (where the majority of charging is expected to occur) are expected to have a charge point. It is considered disproportionate at this stage to insist on more than 1 in 5 car parking spaces for non-residential development to receive charge points	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
Cheriton Parish Council	A much greater proportion than 10% of dwellings should be passive house standard	Although it is agreed that passive house standards will be popular with many occupants it is considered to be appropriate and proportionate to start with a 10% passive house figure for larger housing developments given that there is no specific figure in the Local Plan requiring passive house standards and as the passive house standard is not yet ubiquitous	None required
Christopher Hicks	Comments on some of the text in Local Plan policies SD2, SD3, SD22, SD48.	The policies are from the Local Plan adopted in July 2019 and this document is not able or seeking to amend them but rather they are quoted in the document because the document is interpreting those policies and providing more detailed guidance.	None required
Chris Jeffries	EV charge points should be provided at a greater rate than only 1 in 5 spaces.	Note this rate is only for non-residential developments and all new dwellings are expected to have a charge point. At present it is considered to be too onerous to expect more than 1 in 5 spaces in	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		non-residential development car parks to have charge points although the infrastructure still allows this rate to be increased as demand increases.	
Chris Jeffries	More reservoirs should be planned	This is beyond the scope of the SPD.	None required
Chris Sprules	Overall document looking really good	Grateful for support	None required
Chris Sprules	Sustainable transport: <ul style="list-style-type: none"> • Cycles or NMUs must be accessible to encourage use • Electric Bikes should have access to charging points 	Cycle and/or mobility scooter storage will be considered in forthcoming Parking SPD and/or Design SPD. The necessity of including separate charging for electric bikes in residential development is debatable as, compared with electric cars, bikes are more manoeuvrable and should be able to be charged from the house or garage.	None required
Chris Sprules	Grey water should be mandatory	The Authority cannot be that prescriptive and is limited by Government to a 110 litre/person/day standard for all development except for 'Major Development' (as defined by local plan policy SD3) where a lower	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		figure of 90 litres is considered appropriate. Both of these standards can be met without the use of grey water.	
Cove Construction	<p>General concern that the following requirements in the draft SPD go too far and represent attempts to create new policy:</p> <ul style="list-style-type: none"> • 20% CO2 reduction via low/zero carbon on-site energy. • 10% passive house homes for larger developments. • EV charge points for all new dwellings • Domestic and construction waste requirements • 10% green roofs for larger developments 	<p>The Authority acknowledges that the measures listed were not explicitly quantified in the local plan but it takes the view that the SPD provides further appropriate guidance to help support the implementation of these local plan policies which seek to address climate change and the sustainable use of resources.. We would also note;</p> <ul style="list-style-type: none"> • The 20% figure is eminently achievable through technologies such as photovoltaics (PV, air source heat pumps (ASHPs) or biomass heating or a combination. • 10% Passive house homes require a modest extra build cost but can be sold at a 	<p>A paragraph in the Introduction chapter (para 1.11) has spelt out that: <i>'...although the measures will be expected in the vast majority of cases, where there are genuine and evidenced technical reasons or significant viability consequences, the Authority will consider these matters on a case by case basis and may waive certain requirements.'</i></p>

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		<p>premium and provide very significant fuel bill savings aiding the marketability of these dwellings. Passive house represents the likely direction of travel for all new homes in the near future.</p> <ul style="list-style-type: none"> • EV charge points for all new homes should nearly always be feasible on plot or in shared car parks. • Domestic waste measures (kitchen bins and compost bins) are financially insignificant. • The Authority's construction waste requirements only require what should be good practice to reduce waste to landfill. • The Green roof requirement set out in the SPD helps deliver many local plan policies including Ecosystem 	

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		services, green infrastructure, SuDS, adaptation to climate change as well as biodiversity net gain requirement. 10% of roofs being green roofs on larger developments is deemed proportionate and appropriate.	
CPRE Hampshire	This SPD implements SDNP Local Plan Policies SD2 (Ecosystem Services) and SD48 (Climate Change and Sustainable Use of Resources) which have already received the support of CPRE Hampshire within the Local Plan consultations. Accordingly, this SPD has our full support.	Grateful for support	None required
CPRE Hampshire	Believes that whole developments should be passive house standard rather than only 10% and will be very popular with occupants.	Although it is agreed that passive house standards will be popular with many occupants it is thought proportionate to start with a 10% figure for larger housing developments (10 and above homes). There is likely to be a modest extra	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		build cost at least in the short term until passive house standards become more widespread, which is likely.	
East Hampshire District Council	Have no comments to make on the proposed SPD.	Noted	None required
Eric Croft	<ul style="list-style-type: none"> • Too unambitious in mitigating climate change • Passive house should be a general rule, not just 10%. • Plastic windows, doors and other unnecessary details, such as barge boards should be avoided 	The Authority believes that the SPD is a proportionate interpretation of the existing local plan policies. The document cannot make new policy. Although plastic windows and doors etc. will be discouraged it is thought that an outright ban is too prescriptive.	None required
Ferring Parish Council	Interested to read the content of the consultation and will continue to support the work of South Downs National Park Authority.	Grateful for the support	None required
Fittleworth Parish Council	Members welcomed the aspirations of the guidance and agree with its aims.	Grateful for the support	None required
Fittleworth Parish Council	Would prefer the document to also address how existing housing stock could be retro-fitted to be more sustainable.	The document can only interpret the policies in the SDNP Local Plan. The planning system has significant influence over new development but	New text added to the SPD: 1.17 <i>The Authority strongly supports the need to retrofit existing building stock to make it more energy</i>

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		has little or no control over existing buildings and none over improving efficiency or encouraging renewables in existing buildings which are remaining in the same use class.	<i>and water efficient. However, unless there is a major refurbishment or an extension to a non-residential property is proposed, the planning authority has very limited influence over existing building stock and consequently this document does not address this specific issue.</i>
Fittleworth Parish Council	Would like more practical guidance on what renewable energy measures work in what circumstances	<p>The document does set out certain circumstances that favour specific technologies and this will be augmented with the proposed text in the right hand column.</p> <p>Detailed locally specific guidance is not possible as each location and each proposal will have its own sensitivities and considerations.</p>	<p>New text added to the SPD:</p> <p>2.35 <i>Where there is likely to be significant overshadowing from existing or proposed large trees or from neighbouring structures, PV may be much less feasible.</i></p> <p>2.39 <i>As with PV, where there is likely to be significant overshadowing from existing or proposed large trees or from neighbouring structures, solar water heating may be much less feasible.</i></p> <p>2.48 <i>For the reasons above, biomass heating systems are less appropriate where space on plot and access to plot is limited or constrained but</i></p>

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
			<i>conversely may be very appropriate on easily accessible and larger plots and in rural off-gas grid areas, subject to visual impact considerations.</i>
Forestry Commission	Supports the following in the draft document: <ul style="list-style-type: none"> • Retention and expansion (where possible) of existing trees and woodlands • Use of trees and woodlands to reduce 'heat island' effects within new developments • Use of trees to create shade • Encouragement to use FSC and Grown in Britain timber in construction projects 	Grateful for the support	None required
Forestry Commission	Also supports investigation into inclusion of 'honorary natives' into any permitted species list which may be drafted, and also consider suitable exotics which may	Noted, although these details will be considered in the forthcoming SDNPA Tree SPD	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
	both benefit wildlife and provide resilience against a changing climate.		
Forestry Commission	Provides standard advice on the importance and irreplaceable nature of ancient woodland	Noted, although this document will have no direct effect on ancient woodland	None required
Hampshire Constabulary Designing Out Crime Officer	Paragraph 2.56 of the SPD advises a suitable parking space “would include on-plot spaces, on-street spaces with sufficient space to allow good pedestrian access around a charge point and spaces within nearby car parking courts.” On street spaces problematic as will attract crime when charging.	Vast majority of new development car charging spaces will either be on plot or in dedicated and allocated car parking spaces. There may be rare situations where on-street spaces would be the only option.	The document has been amended to make it clear that on-street spaces should be the least favoured option after on-plot and allocated car parking spaces in a car park: 2.60 A ‘suitable car parking space’ would include on-plot spaces, spaces within nearby car parking courts, and then, only when the previous two locations prove unfeasible, on-street spaces with sufficient space to allow good pedestrian access around a charge point.
Luken Beck	Considers that the document should incorporate additional commentary on where exemptions can be applied to	Noted. Although all SPD guidance measures are inherently subject to technical feasibility and viability the	A paragraph in the Introduction chapter (para 1.11) has spelt out that: ‘...although the measures will be expected in the vast majority of

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
	developments that have their viability threatened by the standards set out within the document.	Authority is happy to spell this out at the front of the document	<i>cases, where there are genuine and evidenced technical reasons or significant viability consequences, the Authority will consider these matters on a case by case basis and may waive certain requirements.'</i>
Midhurst Society	We have considered your draft document and generally welcome the proposed procedures and support and look forward to its adoption and implementation.	Grateful for the support	None required
Cllr Mike Croker of Bramber Parish Council and Horsham District Council	Given the 'Climate Emergency' all development should be passive house standard	The document can only interpret existing national or local policy and cannot create its own policy. The Government has not provided a clear steer on energy standards for new development (although minimum national standards are set by building regulations) and the SDNP Local Plan policies are restricted by Government as far as energy efficiency is concerned.	None required
Cllr Mike Croker	Section 2 Energy Efficiency: fully support the 'fabric first' approach and welcome	Agreed and grateful for support	None required

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Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
	the recognition that use of a mechanical ventilation and heat recovery system is an essential element of a new dwelling fit for the 21st century.		
Cllr Mike Croker	Section 2 On-Site Low Carbon Energy: broadly agree with the approach in this section, although I have some concern over the use of biomass heating in all but large commercial installations, due to ongoing maintenance requirement to ensure that particulate emissions are kept within strict limits.	All new biomass heating will need to be 'Ecodesign ready' meeting the 2022 EU standard which imposes much stricter controls on all pollutants including particulates. This is explained in para 2.46 of document	None required
Cllr Mike Croker	Section 2 Water Consumption: would prefer rainwater harvesting storage as mandatory	Government restricts water consumption targets LPAs can impose and SDNPA policy SD48 requirements are the most stringent standard allowed. We cannot be prescriptive about rainwater harvesting.	None required
Cllr Mike Croker	Section 2 Adaption to Climate Change: fully support the 'landscape led approach' of the SDLP	Grateful for the support	None required
Cllr Mike Croker	Section 3 Zero Carbon: fully support 3.10	Grateful for the support	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
	and Section 3 Health and Wellbeing: fully support 3.26.		
Cllr Mike Croker	Section 3 Sustainable Transport: 3.15 should include a requirement for charging of electrically assisted pedal cycles, both in the storage locations of individual dwellings and for visitor parking. It should also require compliance with the relevant county cycle infrastructure design guide e.g. West Sussex Cycling Design Guide.	Cycle and/or mobility scooter storage will be considered in forthcoming Parking SPD and/or Design SPD.	None required
Paddy Cox	Generally applauds steps being proposed and has commented where SPD can be strengthened or clarified	Grateful for the support	None required
Paddy Cox	Wishes to promote behaviour change to promote energy conservation	Although acknowledge important role of behaviour, this is beyond the scope of the planning system alone.	None required
Paddy Cox	Would like more emphasis on embodied energy of construction	Although acknowledge importance of embodied energy this is very difficult for the Authority to measure and it is felt it would be disproportionate to be prescriptive about certain materials. The document does encourage re-use and use of recycle materials and does encourage the	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		use of alternatives to plastic windows, doors and other common building elements, partly because of the high embodied energy of plastic.	
Paddy Cox	Would like greater stress on local materials	Agreed.	Text in 2.86 includes extra paragraph encouraging applicants to: <ul style="list-style-type: none"> • <i>use locally-sourced materials where possible due to the need to reduce carbon miles inherent in transporting materials from afar.</i>
Paddy Cox	Would like SPD to encourage use of local timber fuel <20% moisture content	The standard of wood that can be used is already being tackled by Government. Agreed locally-sourced materials should be encouraged	See proposed extra paragraph in 2.86 in row above this one.
Paddy Cox	The SPD dismisses on-shore wind energy out of hand, on the grounds of visual amenity which is too categorical, given the importance of maximising green energy.	The document says that wind is likely to be unacceptable for visual reasons in most cases, so this has not been completely dismissed but will be subject to sensitivity of visual impacts.	None required
Paddy Cox	Questions the efficacy of promoting EVs	Research has shown that carbon impact of EVs would be better than petrol/diesel even from a fully fossil-	None required

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Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		fuel powered National Grid. In fact UK power is fuelled by approximately 50% low/zero carbon energy and rising, so EVs are a much more sustainable way of transporting people than the combustion engine, even taking into account resources needed for battery production.	
Paddy Cox	Notes requirement to use 'Grown in Britain' timber or FSC but would prefer greater emphasis on smaller suppliers	The Authority is keen to support the Grown in Britain (G in B) initiative, which at least reduces UK dependence on imports and the carbon miles associated with that. The Point that smaller companies are less likely to afford G in B certification is noted, although the Authority cannot recommend specific suppliers.	Text in 2.86 now includes an extra paragraph encouraging applicants to: <ul style="list-style-type: none"> • <i>use timber from a local source in lieu of Grown in Britain or FSC certified if provenance of this timber can be assured through written documentation.</i>
Selborne Parish Council	SPC fully supports the Sustainable Construction SPD	Grateful for the support	None required
Selborne Parish Council	SPC is concerned that only 10% of larger residential developments are to be Passive Design	Although it is agreed that passive house standards will be popular with many occupants it is thought proportionate to start with a 10%	None required

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Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
		figure for larger housing developments (10 and above homes). There is likely to be a modest extra build cost at least in the short term until passive house standards become more widespread, which is likely.	
Southern Water	Southern Water supports the Authority's requirement for all new dwellings to meet the higher water efficiency standards of 110 l/p/d and 90 l/p/d for major development within the SDNP (p32). Southern Water also supports the requirement for non-residential development to meet the minimum standards for BREEAM 'Excellent' within the water category, since a comprehensive approach to water efficiency standards across all types of new development should be adopted in order to help achieve meaningful savings.	Grateful for the support	None required
Storrington & Sullington Parish Council	Detailed comments, including: a) Within this document, 'carbon neutral' is taken to mean operationally neutral, not whole life.	a) Yes b) Correct as we are only referencing the CO2 emissions regulated by building regulations.	None required

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
	<ul style="list-style-type: none"> b) EV charging of EV not included in energy consumption target. c) Why isn't the failure to recycle plastics tackled? d) Document should take into account the extra maintenance required by timber windows over plastic and aluminium. e) Document does not address how solar panels etc. are to be recycled at end of life. 	<ul style="list-style-type: none"> This excludes all electrical appliances. c) Not within the scope of this document to solve this (difficult) problem. d) Properly treated hardwood should not need more maintenance. Even if painting and occasional repairs are taken into account, timber still will be a more sustainable material with a longer lifespan than plastic. e) True although as it happens the components of PV panels are highly recyclable (mostly glass, aluminium and silicon with a small amount of plastic). For the PV installed now this is a problem for 25-30 years from now, which this document cannot directly address. 	

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
Storrington & Sullington Parish Council	Promoting airtightness is problematic as living in an airtight environment is not healthy.	Airtightness is not the same as ventilation. E.g. passive houses are extremely airtight but have good standards of ventilation with fresh air warmed with expelled waste air in winter through mechanical means. This ventilation standard is controlled which is not the case for the majority of new homes.	New text (in italics) added to paragraph 2.10: When airtightness is at a good level (3 m ³ /m ² /hr or below) some further measures to ensure good ventilation in the home are usually necessary <i>to ensure that the quality of internal air is acceptable to human health.</i>
Storrington & Sullington Parish Council	Carbon cost of mechanical ventilation and heat recovery is not assessed.	Although not assessed, both measures are carbon positive as energy saved by good airtightness will more than make up for small carbon cost of mechanical ventilation and heat recovery is free energy from waste heat.	New text added to paragraph 2.10: <i>Although running a MVHR system uses some extra electricity, the net carbon saving (of pre-heating fresh air entering the building in winter) more than outweighs this.</i>
Waverley Borough Council	No comments	Noted	None required
The Wiggonholt Association	Page 6 Table: SD48.3 All categories: for “greener materials” substitute “secondary, recycled, and substituted materials as well as greener materials”. A glossary definition should be added for “greener materials”.	This is a summary table and so ‘greener materials’ is deemed an acceptable catch all term for all sustainable materials.	New text added in Glossary: ‘GREENER MATERIALS’ <i>This is a catch all term used in the summary table (Table 1) to describe materials that are re-used; recycled; have lower embodied carbon than</i>

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
			<i>standard products; are sourced locally; include timber from locally certified and well-managed sources; and where possible does not include plastic building elements such as windows, doors, barge boards etc.</i>
The Wiggonholt Association	Page 22: We note the Table at 2.76: The use of mobile crushing plant on larger building sites would ensure that demolition waste was accurately gauged and deployed. This is less likely to lead to wasted material within the SDNP, especially as there are not enough dedicated recycling sites in West Sussex. Contractors should be encouraged to exceed the volume and tonnage percentages. Under Volume and Tonnage of the table please substitute “Minimum Volume” and “Minimum Tonnage” for the categories stated. After the words “Site Waste Management Plan” add “which may include mobile recycling plant”.	Noted	In the table in para 2.80 (formerly 2.76) the words “Minimum Volume” and “Minimum Tonnage” for the categories stated have been used. After the words “Site Waste Management Plan” has been added “(which may include mobile recycling plant)”.

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
The Wiggonholt Association	Page 23: 2.83 Substitute these words: “use reclaimed, recycled and substituted materials in priority to primary aggregate. Use crushed bricks or concrete for hard core”. Small developments should be included in these requirements. There is no rationale for singling them out from larger developments.	Noted although the Authority believes that it would be disproportionate to require the smallest developments to meet these requirements but that it should nevertheless be encouraged.	Insert the term ‘ <i>substituted materials</i> ’ in para 2.86 (formerly 2.83)
The Wiggonholt Association	Page 30: para 3.13 and chart: the same comments apply as in para 2.76 (and chart)	noted	Substitute “ <i>Minimum Volume</i> ” and “ <i>Minimum Tonnage</i> ” for the categories stated in para 3.13.
The Wiggonholt Association	Page 31: 3.17 (Sustainable Materials) The Sustainable Materials report should include an account of alternative, recycled and substituted materials used on site.	noted	Text will be amended in para 3.17 to include: <i>a sustainable materials report which should include an account of alternative, recycled and substituted materials used on site</i>
The Wiggonholt Association	In all Appendices: Under category “Materials”: add to the definition, “substituted” before “re-used, recycled or other green materials”	noted	In all Appendices: Under category “Materials”: the term “substituted” has been added before “re-used, recycled or other green materials”

First Public Consultation February-March 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
The Wiggonholt Association	Appendix 2: Transfer category “Materials” to the blue band of requirement, as above.	For reasons of proportionality the Authority believes it more appropriate to encourage rather than require these measures for single dwellings.	None required
The Wiggonholt Association	All climate change policies of public bodies are now modified in the light of the recent decision (27 February 2020 on Heathrow) in the Court of Appeal which requires those bodies to take into account the Government’s policy commitments on climate change under the 2015 Paris Agreement (adopted November 2016). So sustainable construction targets should be much more ambitious	The SDNP local plan policies already take account of the Government’s policy commitments in this area and contribute to their implementation within the local plan period (which runs to 2033). A review of the local plan will take place within 5 years from adoption when these policies may be revised.	None required

Second Public Consultation May-June 2020			
Person or organisation who made representations	Issue raised	SDNPA response	Proposed action
Bohunt Manor Community Action Group	Support the document	noted	None required
CPRE	Welcome document but ideally would like it to go further	noted	None required
CPRE	Would like more precise requirements for 3.24 Health and Wellbeing to clarify expectations	Noted, although as this applies to Major Development (which is relatively rare in the National Park) and as the metrics may vary depending on the nature of the development, the SDNPA believes that it is appropriate to leave the discussion about exactly how to measure daylight/ventilation/thermal comfort/overheating risk/acoustics to negotiations on a case by case basis considering the applicable context.	None required
Forestry Commision	No further comments	noted	None required
Greatham Parish Council	Commends the document	noted	None required
Greatham Parish Council	Should be more ambitious with the amount of EV charging required in all new development	SDNPA understands this aspiration but considers there is a need to be proportionate. This will be reviewed	None required

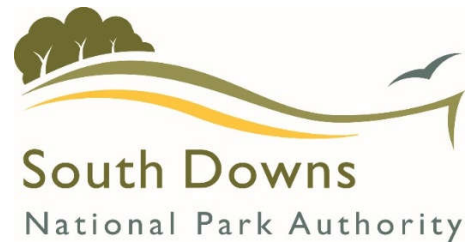
		in future revisions of policy and guidance.	
Greatham Parish Council	19% reduction in CO2 emissions refers to the 2013 Building Regulations baseline. But this should be 19% reduction even when building regulations get updated.	Government restricts Local Planning Authority's freedom to set targets beyond this specific one in relation to energy efficiency.	None required
Greatham Parish Council	Specific requirements for heating controls in rooms and waste recovery suggested.	SDNPA believes this to be too prescriptive	None required
Greatham Parish Council	Omit reference to technical, physical design reasons (in para 2.24) for Authority to consider being pragmatic in application of 20% reduction target	The Authority will have to be pragmatic when there are genuine physical constraints making implementation of targets difficult or impossible and so it is appropriate to say so.	None required
Greatham Parish Council	In para 2.29 the illustration of power typically generated from a certain size of PV panel may be an underestimate as the technology and efficiency is advancing quite rapidly.	noted	Text amended in para 2.29 to add: <i>This may be a conservative estimate of the power generated per square metre and the efficiency of PV is improving every year.</i>
Greatham Parish Council	All multi-residential development residents should have one EV charge point	Multi-residential development includes older people's accommodation and student flats etc. (not multiple home development in the more normal sense). It is not thought proportionate to provide an EV charge point for every resident at this stage for such development.	None required
Greatham Parish Council	Rainwater harvesting should be required	SDNPA considers this to be too prescriptive	None required

Greatham Parish Council	Para 2.94 add rain water harvesting to list of measures to reduce storm water runoff.	noted	Text amended in para 2.94
Greatham Parish Council	Para 3.15 requires 1 in 5 EV charge points per car space for non-residential development which conflicts with table 1 (1 in 10). Table 1 should be amended	Table 1 only relates to standard development in the National Park whereas Chapter 3 relates to 'Major Development' (as defined by policy SD3) and so there is no contradiction with the different standards.	None required
Greatham Parish Council	Suggests cycle storage requirements	This will be covered by the forthcoming Parking SPD	None required
Hampshire Constabulary	Concerned that EV parking still allowed on the highway in para 2.60	The draft SPD makes it clear that the preference is for on plot and communal car park solutions and that on street car parking for EV charge points would be a last resort and only when there is sufficient space.	None required
Lewes District Council	Broadly supportive with some detailed areas of concern	noted	None required
Lewes District Council	Document does not go far enough in requiring CO2 emissions	SDNPA believes it is setting targets which are as ambitious as possible within the limits of the adopted local plan policies.	None required
Lewes District Council	Prescriptive standards like Passive house should be avoided	Passive house has been used as an appropriate target (as a proportion of major development) because it is a nationally recognised standard, it is the apparent direction of travel for new homes in the near future and it is independently assessed.	None required

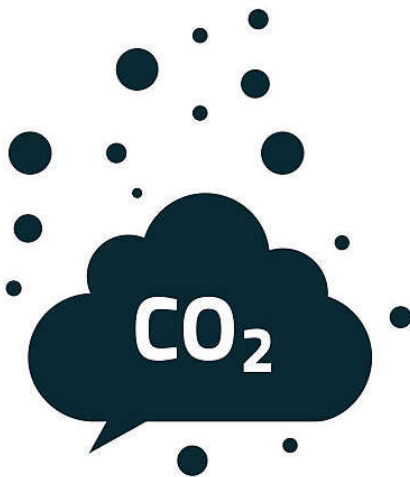
Lewes District Council	If passive house to be used then it should be for all development	A 10% figure for major residential development is thought proportionate, although this could be reviewed in future revisions of policy or guidance.	None required
Lewes District Council	EV charging should also consider vehicle to grid solutions to balance out the local energy grid	The scale of proposed development in the National Park compared with existing development is not significant enough to consider this likely to be a problem	None required
Lewes District Council	The table on page 22 shows Lewes District Council has alternate weekly collections – this is incorrect as our waste collection is weekly.	noted	Text amended
Lewes District Council	Should go further with water consumption targets for all development	SDNPA sympathise with this aspiration but central Government has restricted Local Planning Authority freedom in this area. The strictest standard Government allows has been adopted and only for the exceptional 'Major Development' schemes (as defined by policy SD3) can the Authority justify pushing for a stricter target still.	None required
Lewes District Council	Support Grown In Britain' promotion	noted	None required
Lewes District Council	For adaption to climate change should be promoting spaces to grow food.	noted	Text amended in para 3.25: <i>Opportunities for on-site or close local food growing opportunities should be provided.</i>

Selborne Parish Council	Support the document	noted	None required
Southern Water	No further comments following previous comments on earlier draft	noted	None required
Surrey County Council	No comments	noted	None required
Wealden District Council	No significant comments but Table at paragraph 2.78 should be updated as garden waste collection service in Wealden District Council area is now every 2 weeks	noted	Text amended in para 2.78
Winchester City Council	Table at paragraph 2.78 should be updated as WCC now offers a monthly glass collection service in addition to the other measures mentioned in the table.	noted	Text amended in para 2.78
Winchester City Council	Consideration could be given to enhancing the standards for EV charging for the 'minor non-residential and multi-residential' category to be consistent to those for the 'major non-residential and multi-residential' category.	The SDNPA does not believe that requiring small non-residential development to provide EV charging for staff or visitors would be proportionate at this time but this will be reviewed for future updates of the document	None required
Wiggonholt Association	Pleased that many of our earlier comments have been applied to current draft but would like requirements for use of greener materials to also apply to single dwellings	SDNPA believe that having the same requirements for single dwellings on this matter is disproportionate.	None required

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Sustainable Construction Supplementary Planning Document



ADOPTION VERSION AUGUST 2020

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INTRODUCTION

Policies covered:

- **Policy SD2:** Ecosystem Services
- **Policy SD48:** Climate Change and Sustainable Use of Resources
- **Policy SD22:** Parking Provision (as it relates to electric vehicle charging)
- **Policy SD3:** Major Development

Background

- I.1** The South Downs Local Plan (SDLP) was adopted on 02 July 2019. One of the nine Local Plan objectives is 'to adapt well to and mitigate against the impacts of climate change and other pressures'.

The need to mitigate climate change by reducing greenhouse gas emissions

- I.2** This accords with the overwhelming national and international consensus that radical measures are required across the whole of society to reduce man-made greenhouse gas emissions. In late 2018, the UN Intergovernmental Panel on Climate Change (IPCC) issued a stark warning. It established that achieving the ambitions of the Paris Climate Agreement, by limiting warming to 1.5°C to avoid the most catastrophic impacts of climate change, will require action at an unprecedented pace and scale.
- I.3** Deep cuts in greenhouse gas emissions from the global economy are required by 2030, with net zero emissions by 2050. This enormous challenge can only be tackled by governments, businesses and civil society working together to take ambitious action to radically reduce emissions.
- I.4** On 24 June 2019 the UK became the first major economy in the world to pass laws to end its contribution to global warming by 2050. The target will require the UK to bring all greenhouse gas emissions to net zero by 2050, compared with the previous target of at least 80% reduction from 1990 levels.
- I.5** Currently the built environment is responsible for approximately 25% of carbon dioxide emissions so it is imperative that this becomes an even greater focus for reducing emissions in that sector. While the planning system is not able to greatly influence the vast majority of buildings which have already been built, it is important to ensure that where the planning system has influence, such as with new development, that it is as sustainable as possible and avoids the need for future expensive retrofitting to make buildings more sustainable.

The need to adapt to predicted climate change impacts

- I.6** The climate is changing. Even if the world manages to limit greenhouse gas emissions sufficiently to cap global temperature rise to below 1.5°C, further climatic changes are still inevitable in the future as, according to the Met Office, approximately 1.0°C of global temperature rise has already occurred. The UK needs to manage the growing risks from climate change.

- I.7** The Government climate change predictions in the UK Climate Projections 2018 report predict hotter, drier summers; wetter winters and more extreme weather events such as storms with attendant localised heavy rainfall.
- I.8** Adaptation to predicted climate change therefore needs to encompass planning for higher risk of surface water flooding, more prolonged droughts, leading to water stress on people, environments and wildlife; and more frequent heatwaves leading to increased health impacts on the population, especially on the more vulnerable groups, such as the elderly.

Purpose of this SPD and document structure

- I.9** This document is designed to provide further guidance and to set out what the Authority's expectations are for different forms of development when applying the Local Plan policies SD48 and SD22, (See Chapter 2). Table 1, on page 6, provides a summary of the main sustainable construction requirements under both 'mitigation' to climate change (i.e. ways of reducing greenhouse gas emissions - mainly CO₂) and adaptation to predicted climate change. These requirements are set out for the 5 development types covered by this document.
- I.10** In Chapter 3, sustainable requirements for 'major development' as defined by strategic development policy SD3 are set out.
- I.11** Chapters 2 and 3 contain both guidance for the developer on each issue and some prescriptive expectations. These latter are set out in bold text and are preceded by the words 'The requirement is...'. Although the measures will be expected in the vast majority of cases, where there are genuine and evidenced technical reasons or significant viability consequences, the Authority will consider these matters on a case by case basis and may waive certain requirements.
- I.12** This document will be a 'material consideration' in the determination of planning applications where policies SD2 (criteria e), SD48, SD22 or SD3 apply. SD2 is a core policy in the Local Plan and criteria e of policy SD2 provides the overarching approach to climate change which other policies, such as SD48, carry through in a more specific way. Policies SD2, SD3, SD22 and SD48 can all be found in Appendix I of this document.
- I.13** A separate Technical Advice Note which provides guidance on how applicants should apply Local Plan policy SD2, relating to Ecosystem Services, is on the Authority website:
<https://www.southdowns.gov.uk/planning/supplementary-documents/>
- I.14** The document also provides guidance (in chapters 2 and 3) for applicants and their consultants in the form of the evidence needed to comply with Local Plan policies and some technical information on different methods of meeting those requirements.
- I.15** Appendices 2-6 provide sustainability checklists for the different development types which apply policy SD48 and policy SD22, where it relates to Electric Vehicle charging facilities. Appendix 7 provides a sustainability checklist for 'Major Development' where policy SD3 is applied.
- I.16** Acronyms and technical terms are explained in the Glossary at the end of the document. Words which feature in the glossary are indicated with a letter ^G the first time they appear.

Development types

- I.17** The Authority strongly supports the need to retrofit existing building stock to make it more energy and water efficient. However, unless there is a major refurbishment or an extension to

a non-residential property is proposed, the planning authority has very limited influence over existing building stock and consequently this document does not address this specific issue..

I.18 Policy SD48 needs to be applied proportionately which means that some development, including residential extensions will be exempt from the requirements of this SPD completely, whilst larger residential developments will be expected to achieve higher sustainable performance standards than single dwellings, minor non-residential development will not be expected to meet the BREEAM^G standards, whereas major non-residential development will need to meet BREEAM New Construction (NC) 'excellent' standards.

I.19 For the purposes of this Supplementary Planning Document the definition of 'dwellings' includes self-contained tourist accommodation.

I.20 **Single Dwelling** development includes:

All new single dwelling applications and applications for residential conversions (from a non-residential use to a single home).

I.21 **Small Residential** development includes:

All new developments and residential conversions of two or more homes (that are not defined as 'multi-residential development' below) and less than ten homes.

I.22 **Major Residential** development includes:

All new developments and residential conversions of ten homes or more (that are not defined as 'multi-residential development' below).

I.23 **Minor non-residential** development includes:

All new non-residential development which provides additional floor space above 250 sqm but below 1000 sqm of floor space and on a development site below 0.5ha.

I.24 **Major Non-Residential** development includes:

All new non-residential development which either provides additional floor space of at least 1000 sqm or is on a development site of at least 0.5ha.

I.25 **Major Multi-Residential** development includes:

All new non-residential development which either provides additional floor space of at least 1000 sqm or is on a development site of at least 0.5ha and is 'Multi-Residential' as defined by the Building Research Establishment (BRE)^G which can include: student halls of residence; care homes; sheltered housing; and other multi-residential buildings that have communal areas making up more than 10% of the total net internal floor area.

I.26 **Major development defined for Policy SD3** is set out in policy SD3 of the Local Plan https://www.southdowns.gov.uk/wp-content/uploads/2019/07/SD_LocalPlan_2019_17Wb.pdf

		Development type				
Local Plan Policy	Sustainability issue	Single Dwelling (1 unit)	Small Residential Development (2-9 units)	Large Residential Development (10 homes and above)	Minor Non-Residential Development (≥ 250m² ≤ 1000m² & < 0.5ha)	Major Non- & Multi-Residential Development (>1000m² or > 0.5ha)
Climate Change Mitigation						
SD48.2i SD48.2ii	Energy Efficiency CO ₂ reductions	19%	19%	19%	19%	BREEAM New Construction (NC) excellent
SD48.3	On-site Green Energy CO ₂ reductions	20%	20%	20%	20%	20%
SD48.3	Passive Design	Passive House principles encouraged	Passive House principles encouraged	10% of homes passive house certified.	Passive House principles encouraged	Passive House principles encouraged; BREEAM NC Ene 04 (passive design analysis) credit expected
SD22.2 SD48.3	EV Charge Points	Required	Required	Required	At least 1 required where at least 10 car spaces.	Required. At least 1 & cabling for 1 in 5 spaces
SD48.3	Waste	Recycling domestic waste kitchen bins; Compost bin	Recycling domestic waste kitchen bins; Compost bins	Recycling domestic waste kitchen bins; Compost bins; Site Waste Management Plan (SWMP) 50% waste diverted	Sustainable waste measures required	BREEAM NC Excellent; At least 2 of the BREEAM NC Wst 01 credits SWMP
SD48.3	Materials	Use of greener materials ^G	Use of greener materials. Grown in Britain ^G /FSC ^G timber	Use of greener materials. Grown in Britain/FSC timber	Use of greener materials. Grown in Britain/FSC timber	BREEAM NC excellent with at least half Material credits achieved. Grown in Britain/FSC timber
Adaptation to Climate Change						
SD48.2ii	Water Use	No more than 110 litres/p/day	No more than 110 litres/p/day	No more than 110 litres/p/day	Water efficient measures required	BREEAM NC excellent
SD48.3 SD2 SD4.1d SD4.4 SD5e SD9 SD45 SD49 SD50	Adaptation to Climate Change	Landscape Water use	Multi-functional SuDS ^G ; Green Roofs encouraged; Tree cover retained and enhanced; Low water Landscape Design.	Multi-functional SuDS; 10% Green Roofs; Tree cover retained and enhanced; Low water Landscape Design.	SuDS	Multi-functional SuDS; Tree cover retained and enhanced; Low water Landscape Design. 10% Green Roofs BREEAM NC: At least 1 flood resilience Pol 03 credit and 2 SuDS Pol 03 credits; and the Wst 05 credit

Table 1: Summary of Requirements for each development type

Technical Guidance: Policy SD48

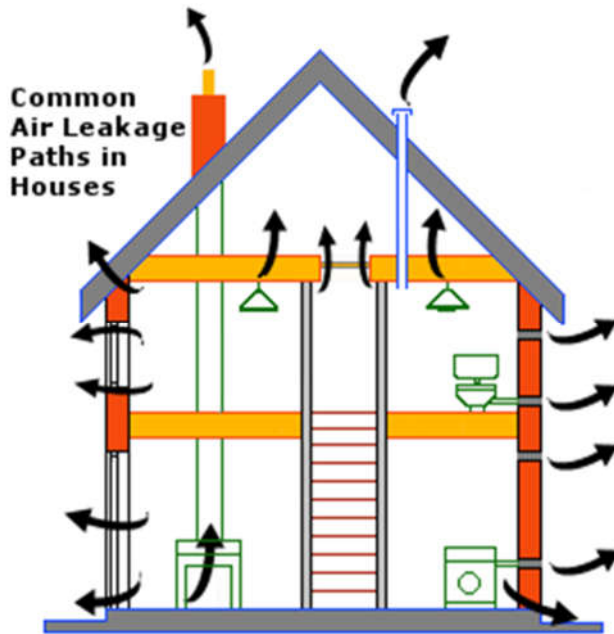
ENERGY EFFICIENCY

All Residential Development (Application of Policy SD48.2i)

- 2.1** The requirement is for the energy efficiency of each home to result in the predicted carbon dioxide emissions to be at least 19% lower than that allowed by the current (2013) building regulations standard.
- 2.2** The building regulations standard is calculated in a method called 'SAP'^G (Standard Assessment Procedure) which will already need to be carried out to comply with building regulations for energy. SAP will generate a 'target emission rate' (TER)^G for each new dwelling which is expressed in kilogrammes of CO₂ emissions for every square metre of the home for a year (kg/m²/yr). This is the maximum level of CO₂ emissions allowed by the building regulations.
- 2.3** When the home is designed, the predicted CO₂ emissions are calculated by SAP. This is the dwelling emission rate (DER)^G (also expressed in kilogrammes of CO₂ emissions for every square metre of the home for a year (kg/m²/yr)). The DER must be no greater than the TER to meet building regulations.
- 2.4** To meet the Local Plan Policy SD48 the DER in the SAP calculation needs to be at least 19% lower than the TER by improving the energy efficiency of the building. This would be secured by planning condition.
- 2.5** SAP assessments are carried out at both the design stage and the post construction stage and planning conditions (for large residential developments) may ask for compliance with the 19% CO₂ reduction through energy efficiency improvement to be demonstrated at both the design stage (before the commencement on site) and post construction stage (prior to occupation of each dwelling).

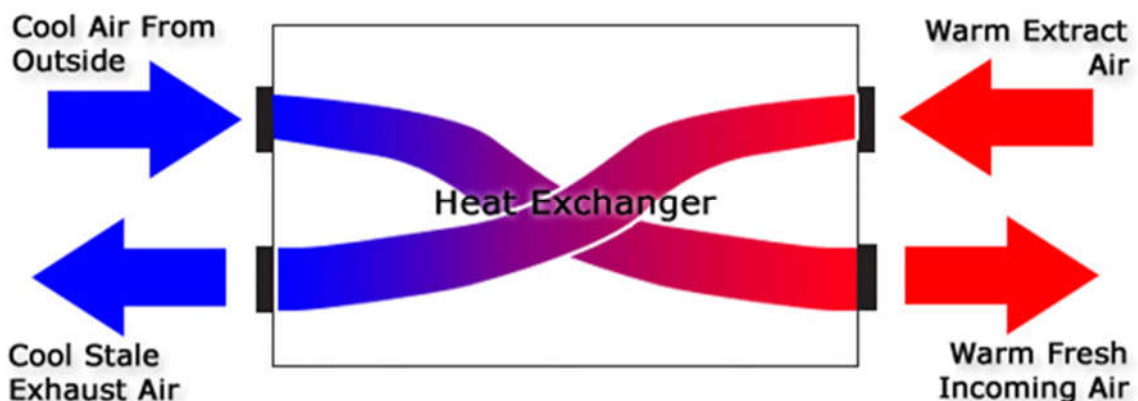
Energy efficiency measures for homes

- 2.6** The energy efficiency of buildings should start with the efficiency of the building elements to reduce energy demand and reduce heating bills. This includes the insulation levels of walls, floors, roofs, windows and doors. These can vary depending on the materials used and the thickness of those materials and the surface areas of those elements.
- 2.7** For instance, standard double glazed windows typically have an insulation standard (called a 'u-value') of 1.40 W/m²K, whereas the best practice (passive house standard) windows are triple glazed and can be as low as 0.70 W/m²K, which is effectively twice as efficient as the standard windows at preventing heat moving through the glass (and frames) to the outside of the house.
<https://www.self-build.co.uk/what-are-u-values/>
- 2.8** Another important consideration is the airtightness of the home. Old homes are relatively draughty and heat escapes through cracks and openings in the walls, floor and roof. New homes are built at much better airtightness levels, but the lower the airtightness measure the more energy efficient the home will be.



Air leakage in homes (Source: Energy Saving Trust)

- 2.9** Airtightness is measured in cubic metres (m³) of air that can escape per hour for every square metre (m²) of the surface area of the walls, floor and roof, assuming an internal air pressure of 50 Pascals. Typical new homes are built at around 4 to 5 m³/m²/hr. Best practice (passive house) airtightness standards are below 1 m³/m²/hr.
- 2.10** When airtightness is at a good level (3 m³/m²/hr or below) some further measures to ensure good ventilation in the home are usually necessary to ensure that the quality of internal air is acceptable to human health. In winter months the best way to do this is through the use of a mechanical ventilation and heat recovery system (MVHR). This expels stale air from the home and brings fresh air from outside but warms the fresh air with the warmth of the stale air leaving, so saving energy. Although running a MVHR system uses some extra electricity the net carbon saving (of pre-heating fresh air entering the building in winter) more than outweighs this.



The principles of a heat exchanger (Source: Energy Saving Trust)

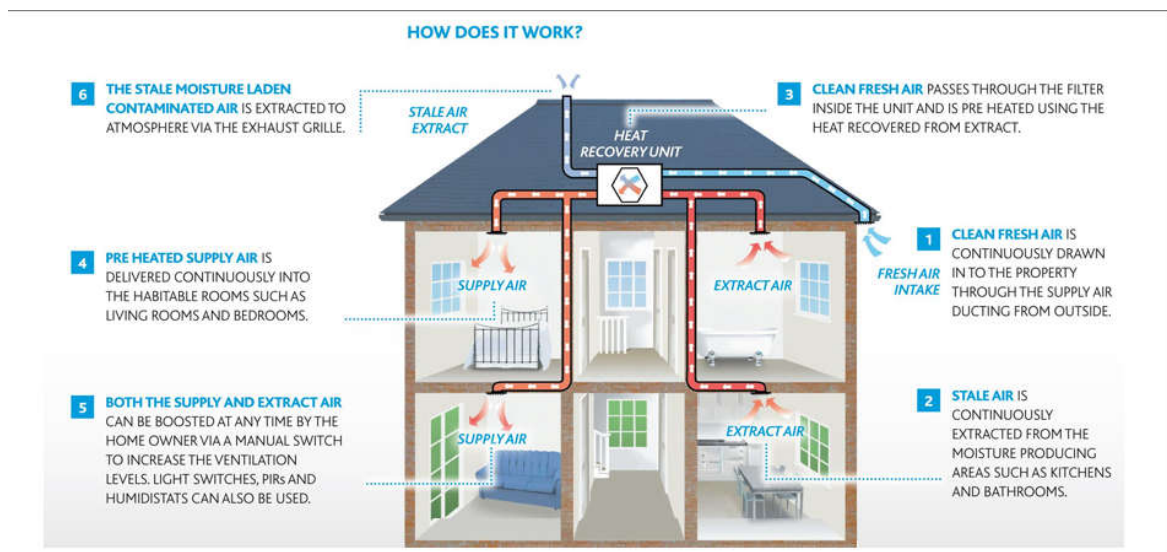
More information on airtightness in homes can be found here:

<https://www.homebuilding.co.uk/a-guide-to-airtightness/>

- 2.11** Reducing thermal bridging in the design of the home will also aid energy efficiency. Thermal bridges are essentially places in the home where insulation is not continuous and so heat loss is much higher in that specific spot. The architect or home designer needs to minimise these thermal bridge points as much as possible.

For more information: <https://www.bre.co.uk/certifiedthermalproducts/page.jsp?id=3073>

- 2.12** Recovering and recycling heat energy from warm parts of the house (especially unwanted moist air in bathrooms and kitchens) is a good way of increasing the energy efficiency of the space heating system in the home. This is achieved using mechanical ventilation with heat recovery (MVHR). This will use some electricity but the amount of heat energy saved more than makes up for this.



MVHR in a home with a heat exchanger (or recovery unit) (Source: AC Architects)

For more information on MVHR see: <https://www.homebuilding.co.uk/a-guide-to-ventilation/>

Minor Non-Residential Development (Application of Policy SD48.3)

- 2.13** The requirement is for the energy efficiency of the development to result in the predicted carbon dioxide emissions to be at least 19% lower than that allowed by the current (2013) building regulations standard.

- 2.14** A sustainability assessment at the design stage should set out what energy efficient measures are being proposed and provide a target for energy efficiency. This is best demonstrated using the SBEM^G (Simplified Building Energy Model) and which will be needed for building regulations. In SBEM the Building Emissions Rate (BER)^G will be calculated from the design proposals and can be compared with the maximum building regulations standard allowed (called the Target Emission Rate (TER)). A minimum improvement of 10% will be expected, so the BER should be at least 19% lower than the TER.

- 2.15** SBEM assessments are carried out at both the design stage and the post construction stage and planning conditions may ask for compliance with the 19% CO₂ reduction through energy efficiency improvement to be demonstrated at both design stage (before commencement on site) and post construction stage (prior to occupation).

2.16 Energy efficiency measures for non-residential buildings are the same in principle as those referred to for dwellings as set out in paragraphs 2.6-2.12 above. Insulation and air tightness levels are critical. The operational use of the building will influence how heat leakage can be minimised by design. For instance where there is likely to be frequent main door use, a buffer zone with a second exterior door or doors could be a good solution.

2.17 Larger scale MVHR systems than those suitable for homes may be appropriate for non-residential buildings but the principle is the same.

2.18 For more information on MVHR see

<https://www.carbontrust.com/resources/guides/energy-efficiency/heat-recovery/>

Major Non-Residential and Multi-Residential development (Application of Policy SD48.2.ii)

2.19 The requirement is that all Major development will need to meet the mandatory **Ene 01 (Reduction of energy use and carbon emissions) at BREEAM excellent standard through the energy efficiency of the buildings.**

2.20 BREEAM is the Building Research Establishment (BRE) Environmental Assessment Method and BREEAM NC is for New Construction. The latest version of this is BREEAM NC 2018. The BREEAM assessment covers the following nine sustainable topics:

- Management
- Health and Wellbeing
- Energy
- Transport
- Water
- Materials
- Waste
- Land Use and Ecology
- Pollution

BREEAM assessors are licenced by the BRE and design stage or 'interim' and post construction stage certificates are awarded by the BRE. Pre-assessment estimates can be generated by the BREEAM assessors at the early design stage to show how the targeted standard, such as BREEAM 'excellent', can be achieved. More information on BREEAM can be found here:

<https://www.breeam.com/>

2.21 Credits are awarded for each issue and these credits are converted into points, with a theoretical maximum of 100 points. To achieve the BREEAM 'excellent' standard, the scheme must achieve at least 70 points. Which particular credits are targeted is largely a matter of choice although at BREEAM 'excellent' standard certain credits are mandatory, such as the 4 credits out of 9 available required under Ene 01.

2.22 The Ene 01 issue awards credits according to how well the development design performs in the BRE Energy Performance Ratio which is a calculation which considers the following three metrics of modelled performance:

- The building's heating and cooling demand
- The building's primary energy consumption
- The total CO₂ equivalent emissions

ON-SITE LOW CARBON ENERGY (Application of Policy SD48.3)

All Development

- 2.23** The requirement is that all dwellings will need to demonstrate a 20% reduction in predicted carbon emissions through the use of on-site low or zero carbon energy generation.
- 2.24** If there are legitimate, fully evidenced and agreed technical or physical design reasons why the 20% reduction figure is not feasible in full in any particular case, this will be considered pragmatically by the Authority.
- 2.25** The way of assessing this will again be with reference to 'SAP' for residential development and 'SBEM' for non- and multi-residential development as with the energy efficiency requirements above (in paras 2.2-2.3 and paras 2.14-2.15 respectively). The dwelling emission rate (DER) improvement or Building Emission Rate (BER) (compared with the target emission rate (TER) set by building regulations), after applying reductions due to on-site low or zero carbon energy generation, will need to be at least 20% lower.
- 2.26** SAP and SBEM assessments are carried out at both the design stage and the post construction stage and planning conditions may ask for compliance with the CO₂ reduction through on-site low or zero carbon energy to be demonstrated at the design stage (before the commencement on site) for all development and also at the post construction stage (prior to occupation of each dwelling) for large residential and major non-residential development.
- 2.27** According to UK Power, a medium household gas use is around 12,000 kWh per year and medium household electricity use is around 3,100 kWh. With the recent decarbonisation of the national power grid the amount of carbon dioxide emitted by electricity and gas use per kWh is now nearly the same.

Solar Photovoltaic Panels

- 2.28** To reduce or off-set CO₂ emissions generated by the use of mains electricity the most cost efficient method of reducing CO₂ emissions is often by installing photovoltaic (PV) solar panels or tiles.
- 2.29** The installation of PV on the roof of most new houses should achieve the 20% CO₂ reduction figure in almost all cases. For non-residential buildings this will be more variable, according to available roof area and the predicted building use. PV systems are described in terms of the amount of power they generate (kWp). Domestic PV arrays typically range from 1 to 4kWp which might require a roof area of approximately 8- 28 sqm respectively. This may be a conservative estimate of the power generated per square metre and the efficiency of PV is improving every year.
- 2.30** As an illustration, an average detached house with 28.8 sqm of solar panels on a south facing roof will have a power rating of around 4.0kWp which will generate about 3400kWh of electricity a year. This compares with the average annual electricity use per household of 3100kWh and is likely to represent around 20-30% of total emissions for that house.
- 2.31** In the National Park, in some circumstances, there may be visual impact considerations that make solar panels inappropriate. This may be because of the sensitivity of the site and the potential visual impact on the landscape. Where PV is visible from the public realm, building integrated systems (for instance set within the roof or as rain screen cladding on walls) are

preferred to bolt on panels. Where visual impact is an issue (such as in conservation areas) PV tiles may be more acceptable than PV panels and panels on ancillary buildings such as garages, stores and sheds may be less prominent. For more innovative solar panels and tiles, e.g. see, for example:

<http://www.gb-sol.co.uk/default.htm>

- 2.32** The cost of PV has been dropping rapidly in recent years and the efficiency of the panels and tiles is increasing every year. For more information on solar panels see:

<https://www.which.co.uk/reviews/solar-panels/article/solar-panels/how-does-solar-pv-work>



PV glazing in a discreet location



Ground mounted PV on a large plot



Rain screen cladding PV on an office building



Low visual impact PV tiles on a slate roof

		WEST					SOUTH					EAST		
		90°	75°	60°	45°	30°	15°	0°	15°	30°	45°	60°	75°	90°
ROOF ANGLE	90°	56	60	64	67	69	71	71	71	71	69	65	62	58
	80°	63	68	72	75	77	70	80	80	79	77	74	69	65
	70°	69	74	78	82	85	86	87	87	86	84	80	76	70
	60°	74	79	84	87	90	91	93	93	92	89	86	81	76
	50°	78	84	88	92	95	96	97	97	96	93	89	85	80
	40°	82	86	90	95	97	99	100	99	98	96	92	88	84
	30°	86	89	93	96	98	99	100	100	98	96	94	90	86
	20°	87	90	93	96	97	98	98	98	97	96	94	91	88
	10°	89	91	92	94	95	95	96	95	95	94	93	91	90
	0°	90	90	90	90	90	90	90	90	90	90	90	90	90

Solar collection efficiency due to orientation and roof angle

2.33 As can be seen from the table above the ideal roof would be facing due south and would be at an angle of 30-40 degrees. Angles facing due east or west will have only approximately 85% of the solar collection efficiency which means that approximately 18% more solar panels are needed to generate the same amount of electricity.

2.34 The Energy Saving Trust gives a useful guide on approximate sizing for solar panels for different house types making a 20% allowance for unsuitable installation area (e.g. where there is overshadowing) and assumes only half of the available roof area is used.

https://www.pvfitcalculator.energysavingtrust.org.uk/Documents/150224_SolarEnergy

2.35 Where there is likely to be significant overshadowing from existing or proposed large trees or from neighbouring structures, PV may be much less feasible.

Solar thermal heating

2.36 While solar photovoltaic panels use the energy from the sun to generate electricity, solar thermal panels use the sun to heat up water and therefore usually offset carbon emissions due to mains gas water heating. Now that electricity and gas unit emissions are nearly equivalent, the emissions due to mains gas, typically used for space and water heating, are becoming more significant. Solar thermal panels are less effective in the winter months but can often provide all the hot water needed in the summer months.

2.37 The way a solar thermal panel works is quite simple. It absorbs the heat from the sun with panels that are called collectors. The heated water or heat-transfer fluid then runs from the collectors to the hot water cylinder.



Solar photovoltaic panels (left) and solar thermal panels (right)

Solar Photovoltaic - Thermal

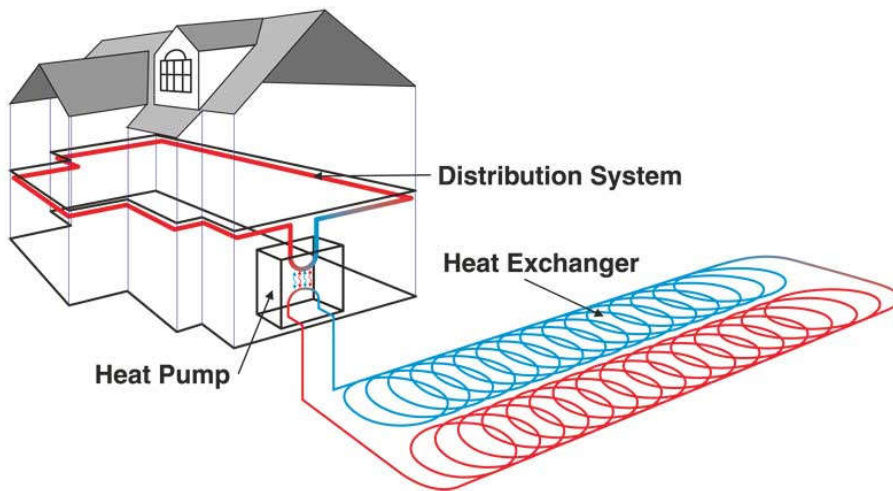
2.38 Solar Photovoltaic-Thermal (PV-T) is a hybrid solar panel combining the functionality of solar thermal collectors and solar PV in one panel. The panels create not only electricity but also produce hot water for use in the home.

2.39 As with PV, where there is likely to be significant overshadowing from existing or proposed large trees or from neighbouring structures, solar water heating may be much less feasible.

Heat Pumps

- 2.40** Heat pumps have some impact on the environment as they need electricity to run, but the heat they extract from the ground, air, or water is constantly being renewed naturally. The ratio of electrical energy needed to run the pump to the amount of heat energy produced for the building is called the Coefficient of Performance (CoP).
- 2.41** Heat pumps work well with underfloor heating as this requires lower temperatures than traditional wet radiators. Where underfloor heating is installed it should be accompanied by the use of individual digital and programmable room thermostats, to minimise wasted heat in unused rooms.

Ground Source Heat Pumps



The principles of a ground source heat pump

- 2.42** Ground source heat pumps (GSHPs) use pipes that are buried underground to extract heat from the ground, which is then used to heat radiators, underfloor or warm air heating systems and hot water in your home. A ground source heat pump circulates a mixture of water and antifreeze around a loop of pipe, called a ground loop, which is buried outside. Heat from the ground is absorbed into the fluid and then passes through a heat exchanger into the heat pump. As the ground stays at a fairly constant temperature under the surface, the heat pump can be used throughout the year.
- 2.43** The length of the ground loop depends on the size of the home or building and the amount of heat needed to heat it. Longer loops can draw more heat from the ground, but need more space to be buried in. The ground loop area needs to be free of trees and underground structures. If space is limited, a vertical borehole can be drilled instead but this is more expensive and usually requires a licence from the Environment Agency.
- 2.44** With a large water body close by a water source heat pump can operate in a similar way to a ground source heat pump, extracting heat energy from the water.

Air Source Heat Pumps

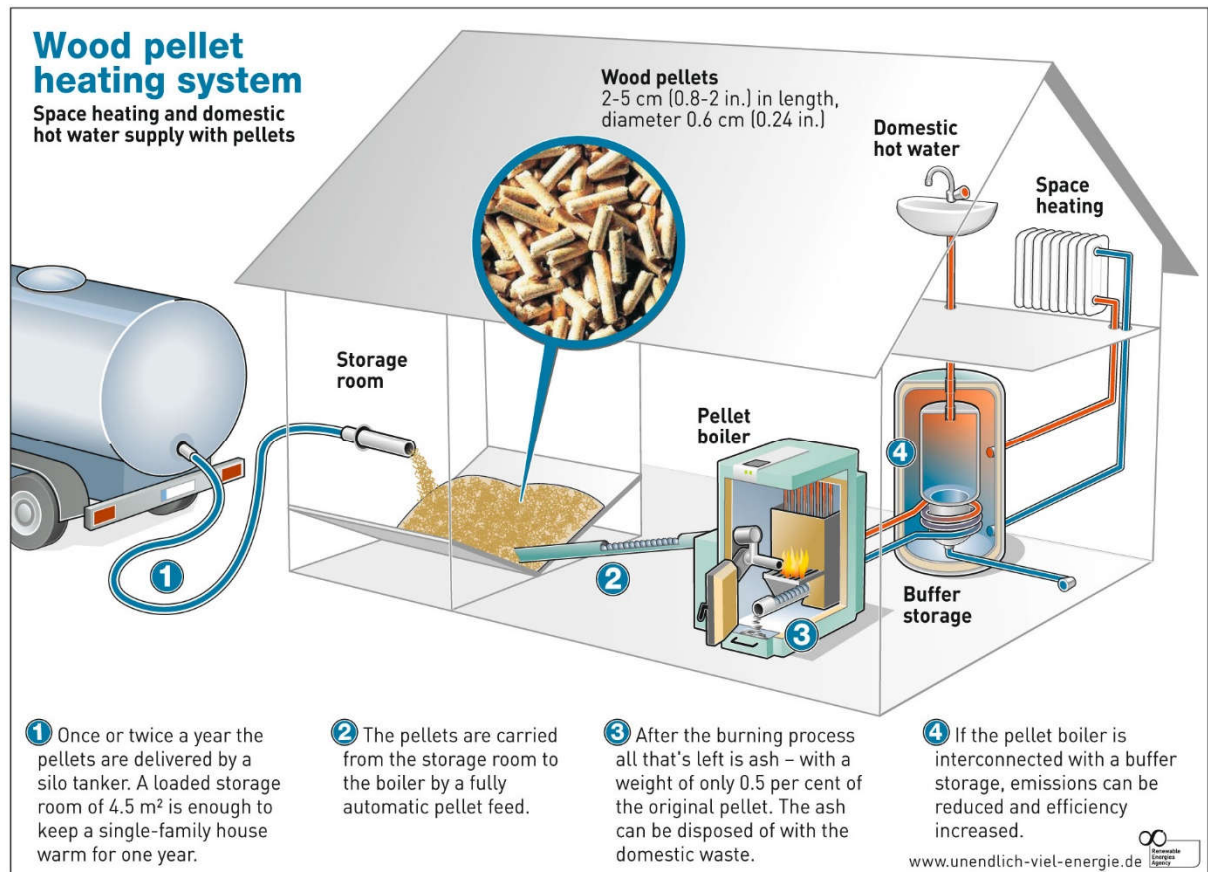


Air Source heat pump (Source: self-build.co.uk)

- 2.45** Air source heat pumps (ASHPs) absorb heat from the outside air in the same way that a fridge extracts heat from its inside. It can get heat from the air even when the temperature is as low as -15°C . This heat can then be used to heat radiators, underfloor heating systems, or warm air convectors and hot water in the home or non-residential building. In a well-insulated property, air-source heat pumps can provide all the heating needs by themselves. For non-residential buildings in particular, ASHPs can also provide cooling in summer. Air source heat pumps tend to displace gas energy in homes and either gas or electrical energy in other buildings.
- 2.46** Air source heat pumps need to be sited sensitively as they can have a negative visual impact and may have a modest noise impact.

Biomass

- 2.47** Timber pellets, chips or logs can be used to fuel boilers for water and space heating. A domestic unit with space for storing fuel may occupy the same space as a single garage and delivery implications will also need to be carefully considered. Large non-residential buildings would require larger scale units in proportion to the space heating demand of the building. A flue will also be needed which could be accommodated in a chimney or may need to be installed above the roof line which in more sensitive locations may have visual impact implications.
- 2.48** For the reasons above, biomass heating systems are less appropriate where space on plot and access to plot is limited or constrained but conversely may be very appropriate on easily accessible and larger plots and in rural off-gas grid areas, subject to visual impact considerations.



A wood pellet heating system (Source: Renewable Energy Vermont)

- 2.49** All biomass stoves in new development in the National Park will need to be 'Ecodesign Ready Stoves'. Ecodesign is the European-wide programme to lower particulate matter (PM) emissions. It is due to come into force for stoves in the UK in 2022. Stove Industry Alliance (SIA) Ecodesign Ready stoves will meet the Ecodesign requirements and are available now. The PM emissions limit for Ecodesign is 55% lower than for Department for Environment, Food and Rural Affairs (DEFRA) exempt stoves.

See <http://www.stoveindustryalliance.com/ecodesign-ready-stoves-and-air-quality/>

The EcoDesign mark is awarded to wood burning appliances that are verified by HETAS^G as meeting the five fundamental requirements of the Regulation (EU) 2015/1185 24/5/2015 for efficiency and emissions.

<https://www.hetas.co.uk/ecodesign-ready/>.

Hydro Electric Power

- 2.50** Water power requires a convenient source of running water and will usually require permission from the Environment Agency.

Wind Energy

- 2.51** Small scale wind generation attached to buildings is unlikely to be acceptable from a visual point of view in the National Park in most cases and is associated with potential structural damage risks to those buildings. Free standing wind turbines are also problematic due to their likely significant visual impact in the National Park and are unlikely to be supported for this reason.

- 2.52** Domestic scale wind energy is generally considered inappropriate in built up areas as the wind is either too weak or unpredictable.

Government Financial Incentives

- 2.53** For more information on Government financial incentives for generating electrical energy such as the 'Smart Export Guarantee' and for generating renewable heat, such as the 'Renewable Heat Incentive', contact the Energy Saving Trust.

<https://www.energysavingtrust.org.uk/>

PASSIVE DESIGN (Application of Policy SD48.3)

Passive design is an approach aimed at reducing the energy demand of a building significantly and is applicable to all types of building use (not just homes). Passive House (or 'Passivhaus') certification requires strict adherence to the design principles and standards laid down by the Passivhaus Trust:

<http://www.passivhaustrust.org.uk/>

All large residential development (10 dwellings and above)

2.54 The requirement is for at least 10% of all dwellings to be passive house certified.

2.55 Passive house homes are built and certified to a very high energy efficiency standard and typically will use 75% less energy than standard newly built homes. Very high insulation rates, very low air tightness values and minimised thermal bridging⁶ together with the use of good passive solar energy and mechanical ventilation and heat recovery (MVHR) are all part of the passive house approach.

2.56 There is no architectural style associated with passive house homes and many examples of traditionally inspired and contemporary designed passive house homes exist.



Traditional style passive house cottages, Norfolk and 2019 Stirling Prize winning 93 passive house homes, Norwich (Source: Passivhaus Trust)

Minor Residential Non-Residential Development

2.57 Minor non-residential development (between 2 and 9 homes) will be encouraged to follow passive design principles to reduce both heating and cooling demands.

Major Non-Residential and Multi-Residential Development

2.58 Major non- and multi-residential applications will be expected to achieve the relevant BREEAM passive design analysis credit which is currently 1 no. Ene 04 (Low Carbon Design) credit in the 2018 version of BREEAM NC but otherwise the equivalent in future updates.



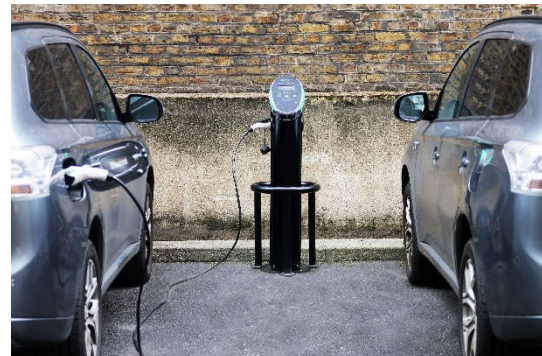
Wereham Village Hall, Norfolk (Passive house certified) (Source: Passivhaus trust) and 2 passive houses in Petersfield

ELECTRIC VEHICLES (Application of Policy SD22)

All residential development

2.59 The requirement is that all new dwellings with a suitable car parking space have an electric charge point provided.

2.60 A 'suitable car parking space' would include on-plot spaces, spaces within nearby car parking courts, and then, only when the previous two locations prove unfeasible, on-street spaces with sufficient space to allow good pedestrian access around a charge point.



Electric charging on plot and electric charging in a car park

2.61 Charging cars at home overnight using a dedicated charge point is generally cheaper and more convenient for consumers and ensures that EVs can play a full part in our future smart and flexible energy system. For these reasons, today the majority (around 80%) of all electric car charging happens at home and Government expects the home to be central to the future charging system.

Minor Non-Residential and Multi-Residential development

2.62 The requirement is that developments with at least 10 car spaces should have at least 1 electric charge point.

Major Non-Residential and Multi-Residential development

2.63 The requirement is that developments with at least 10 car spaces should have at least 1 electric charge point and the ducting infrastructure for at least every 1 in 5 spaces.

Technical Guidance

2.64 The charge points must have a minimum power rating output of 7kW, be fitted with a universal socket that can charge all types of electric vehicle currently on the market and meet relevant safety and accessibility requirements. Further technical information including 'Electric vehicle charging in residential and non-residential buildings' and 'Annex C Draft Technical Guidance' or subsequent Government guidance that supersedes this can be found here:

<https://www.gov.uk/government/consultations/electric-vehicle-chargepoints-in-residential-and-non-residential-buildings>

WATER CONSUMPTION

All Residential Development (Application of Policy SD48.2. ii)

2.65 The requirement is that all new dwellings, and residential conversions must meet the higher water consumption figure allowed by Government which is a predicted internal and external mains water consumption of 110 litres/person/day.

2.66 This standard is relatively easy to achieve through the selection of water efficient fittings (such as aerated taps) and appliances (such as water efficient dishwashers and washing machines).

2.67 The completion of a water calculator (e.g. <http://www.thewatercalculator.org.uk/>) is needed to demonstrate the 110 or below target is being reached. This is already required for building regulations (which currently requires a maximum of 125 litres/person/day).

2.68 Further water efficiency measures beyond this including grey water recycling and rain water harvesting will be **encouraged**.

Minor Non-Residential Development

2.69 Water efficient measures will be **encouraged**, such as the use of water efficient fittings and fixtures and appliances; water monitoring via sub-metering; and water leak detection.

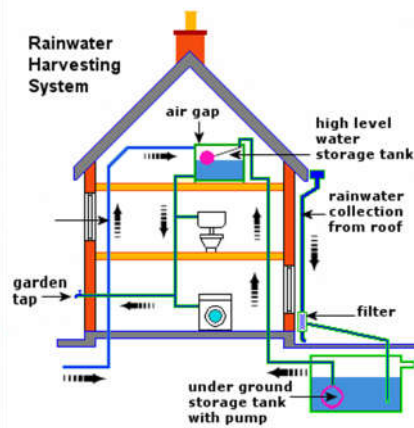
Major Non-Residential and Multi-Residential Development (Application of Policy SD48.2.iii)

2.70 The requirement is that Major non- and multi-residential applications will need to meet at least 2 credits (25% improvement on baseline based on Part G of building regulations) in the water consumption issue (Wat 01). This is mandatory at BREEAM New Construction 'excellent' standard.

2.71 Further water efficiency measures beyond this including water monitoring via sub-metering; water leak detection; and grey water recycling and rain water harvesting will be encouraged.



Water efficient fixtures and appliances



Rainwater harvesting (Source: Taylors of Bath)

2.72 A rainwater harvesting system is essentially a method of rainwater collection and it works by filtering rainfall and storing this rainwater in a rainwater tank, usually underground. The water can then be used to flush toilets, for washing machines, washing cars and for garden irrigation saving significant mains water consumption.

2.73 Greywater is waste water from bathroom sinks, showers, baths, and washing machines. It is filtered and treated and can then be used for flushing toilets and for outside irrigation.

2.74 For more information on saving water: <http://www.energysavingtrust.org.uk/home-energy-efficiency/saving-water>

WASTE (Application of Policy SD48.3)

2.75 Construction waste and the operational waste generated by buildings in use have significant impacts on greenhouse gas emissions in the built sector.

All Residential Development

2.76 The requirement is that homes (normally in kitchens) should be fitted with separate bins in line with the recycling and waste collection policy of the local authority (the district, borough or city council in which the site sits) and a compost bin should be provided for any ground floor private garden of 50m² or above.

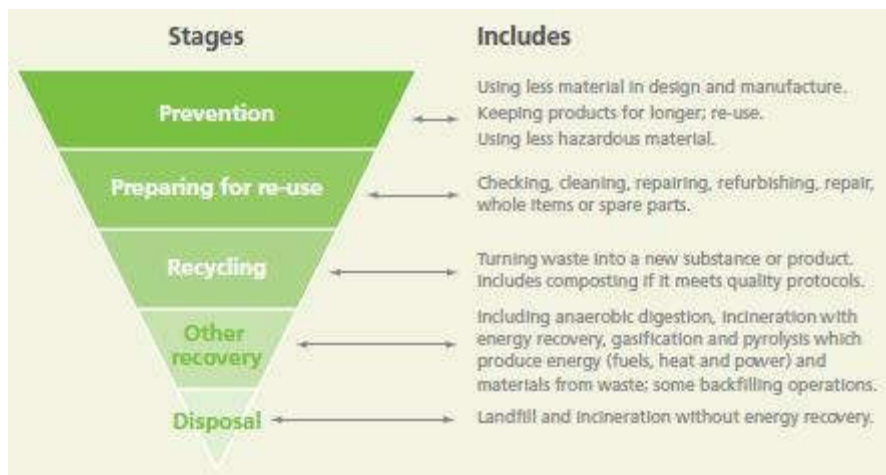
2.77 Segregated kitchen bins make it convenient and simple for occupants to contribute fully to the recycling of domestic waste.



Segregated kitchen waste bins



Segregated construction waste



The waste hierarchy (Source: DEFRA)

Where there is a Local Authority collection scheme (with a collection frequency of at least fortnightly) the applicant should provide:

- A combination of internal storage capacity provided in an adequate internal space meeting least one of the following requirements (depending on the waste collection service which is locally prevalent):
- Recyclable household waste is sorted after collection and a single bin of at least 30 litres is provided in an adequate internal space, OR;

Materials are sorted before collection and at least three separate bins are provided with a total capacity of 30 litres. Each bin must have a capacity of at least 7 litres and be located in an adequate internal space.

- 2.78** Applicants should find out from their local authority what nature of collection service is provided.

Waste Authority	Waste collection frequency	Recycling collection frequency	Garden waste collection frequency	Glass box collection frequency
Winchester	2 weeks	2 weeks	2 weeks	1 month
E Hants	2 weeks	1 month	2 weeks	1 month
Chichester	2 weeks	2 weeks	N/A	N/A
Horsham	2 weeks	2 weeks	N/A	N/A
Mid-Sussex	2 weeks	2 weeks	N/A	N/A
Lewes	1 weeks	2 weeks	N/A	N/A
Wealden	2 weeks	2 weeks	2 weeks	N/A
Brighton & Hove	2 weeks	2 weeks	N/A	N/A
Adur & Worthing	1 week	2 weeks	1 week	N/A
Arun	1 week	2 weeks	N/A	N/A

Waste Collection Service for each Authority across South Downs National Park (as at 2020)

Major Residential Development (at least 10 units)

- 2.79** Major Residential development should demonstrate best practice through the efficient management of waste during construction. This consists of measures to minimise construction waste and also to maximise diversion of remaining waste from landfill.
- 2.80** The requirement is that Applicants will be expected to produce a **Site Waste Management Plan (SWMP)⁶** (which may include mobile recycling plant) and to demonstrate that at least the following minimum percentage by weight or by volume of non-hazardous construction waste generated by the project has been diverted from landfill.

Type of waste	Minimum Volume	Minimum Tonnage
Non-demolition	50%	60%
Demolition	50%	60%
Excavation	N/A	N/A

Source: Table 10.2 from BREEAM NC 2018

Minor Non-Residential Development

- 2.81** Applicants are encouraged to minimise construction waste and to maximise diversion of remaining waste from landfill.
- 2.82** The requirement is that a statement setting out the applicant's approach to minimising construction waste will be expected.

Major Non-Residential and Multi-Residential Development

- 2.83** The requirement is that Major non-residential and multi-residential development applicants will be expected to achieve at least 2 of the **BREEAM New Construction Wst 01 (Construction Waste Management)** credits or future equivalents. (see BREEAM table 10.2 above).
- 2.84** BREEAM Wst 03 (Operational Waste) credit is mandatory for BREEAM excellent.

MATERIALS (Application of Policy SD48.3)

2.85 Materials and products used in building, such as steel, plastic and aluminium, are created by a production process of raw material extraction, raw material process, melting, manufacture to final products and transportation to a building site. Each of the steps consumes energy, which is also expressed in terms of carbon emissions. Total carbon emissions of all building materials and products and the construction involved to put them together is known as building's embodied carbon. Some estimates suggest embodied carbon accounts for about 20% of the carbon emissions from the building sector.

2.86 Applicants are encouraged to:

- re-use materials, such as existing stone on site or other materials reclaimed from existing buildings (such as bricks or timber) on or near site or use substituted materials in priority to primary aggregate.
- use recycled materials where appropriate, such as crushed bricks or concrete for hard-core. <http://www.greenspec.co.uk/building-design/reclaimed-materials/>
- use low carbon alternatives to standard building products where possible and appropriate, such as low carbon bricks or 'green concrete' straw bales or 'hempcrete'.
- use timber from well managed sources, ideally from Grown in Britain sources <https://www.growninbritain.org/> or failing that, using FSC certified timber or equivalent. <https://www.fsc-uk.org/en-uk/about-fsc/what-is-fsc>
- use timber from a local source in lieu of Grown in Britain or FSC certified if provenance of this timber can be assured through written documentation.
- use locally-sourced materials where possible due to the need to reduce carbon miles inherent in transporting materials from afar.

2.87 Applicants are discouraged from using plastic building elements such as window frames, doors, barge boards and fascias etc. Although in theory some of these plastic elements can be recycled, in practice this rarely happens, which means the high embodied carbon cost is never recouped.

Single Dwelling Development

2.88 The use of low carbon and well managed materials is encouraged.

Multiple Homes and Major Non-Residential and Multi-Residential Development

2.89 The use of low carbon and well managed materials is **expected**.

2.90 **The requirement is that Applicants should set out what measures they are taking to maximise the use of green materials and that all construction timber is 'Grown in Britain' certified, or where this is not feasible, FSC certified.**

All Non-residential and Multi-Residential Development

2.91 The use of low carbon and well managed materials is **expected**.

2.92 **The requirement is that Applicants should set out what measures they are taking to maximise the use of green materials (with reference to BREEAM New Construction credits for Major development) and that all construction timber is 'Grown in Britain' certified, or where this is not feasible, FSC certified.**



'Grown in Britain' timber



FSC' timber



Recycled bricks

ADAPTATION TO CLIMATE CHANGE

Predicted Climate Change for the South Downs

2.93 Development needs to adapt to predicted climate change, which in the South Downs National Park consists of:

- wetter, warmer winters, leading to increased flood risk;
- hotter, drier summers, leading to water scarcity, drought and placing greater strain on wildlife and human health;
- rising sea levels, with more coastal erosion and a greater risk of coastal flooding;
- more frequent extreme events, such as heatwaves, gales, storms, tidal surges and intense rainfall.

All Development (Application of Policies SD2, SD4.1d, SD4.4, SD5e, SD9, SD45, SD48.3, SD49, SD50)

2.94 The requirement is to provide an ecosystem services statement (as already required in policy SD2) which includes proportionately, the following adaptation to climate change measures:

a) To conserve or enhance wildlife in the national park:

- Where possible, retain existing 'green and blue infrastructure' on the site (mature trees and especially natives); native habitats (such as heathland or woodland); natural water features;
- Enhance and connect green and blue infrastructure by connecting habitats across the site (e.g. native woodland or heathland);
- the selection of native species of plants and trees; other plants which attract pollinating insects; and the creation of natural water features.

b) To reduce the effects of storm water runoff:

- Provide sustainable drainage systems (SuDS), such as permeable paving for drives (e.g. free draining gravel); green roofs; rain water harvesting, rain gardens, swales etc. Where there is space for ground level open to air, multi-functional SuDS, these should be designed by multi-disciplinary teams to address run-off volumes, and enhancements in water quality, biodiversity and landscape amenity



Rain garden in suburban street with street trees

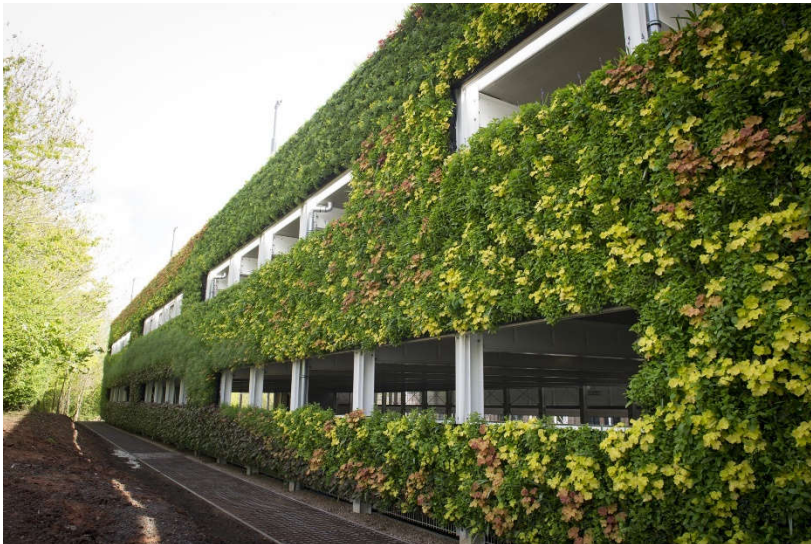
c) To reduce the effects of summer heatwaves:

- Provide shade with deciduous trees.
- Ensure buildings are designed to minimise overheating (e.g. orientation and size and over shading of windows and good insulation). The Passivhaus Standard defines overheating as when indoor temperatures exceed 25°C. The [Passivhaus Planning Package](#) verification page reports a percentage of hours in a year that exceeds 25°C in the design model PHPP. For certification purposes, the limit is 10% of the annual hours. However, it is better to aim for below 5% of occupied hours and ideally 0% if possible to ensure the best summer comfort.
- Provide water features near buildings, where appropriate.
- Consider green roofs and green walls.
- Design natural ventilation systems for homes.

d) To reduce the effects of summer droughts:

- Reduce mains water consumption.
- Select native trees and plants more adaptable to prolonged dry spells.
- Design drought resistant gardens and open spaces.

2.95 Multiple home developments are likely to have more opportunities than most single dwelling schemes. The 'landscape led approach' in the national park will mean applicants will need to identify significant opportunities to enhance the landscape and wildlife of sites and their immediate surroundings which will inform their landscape strategies.



Green wall on multi-storey car park, Warwick (Source: Architect's Journal)

Minor Non-Residential Development

2.96 The measures for adapting to climate change for residential development would equally apply (but proportionately) to minor non-residential and multi-residential development. SuDS; measures for conserving and enhancing landscape and wildlife; providing urban cooling through design and green and blue infrastructure; adapting to drought through water efficiency; and drought resistant planting will all be expected.

All Large Residential and Major Non-Residential Development

2.97 The requirement is that at least 10% of the total roof area of the development (including all sheds, garages and outbuildings) should consist of green roofs unless there are clear landscape or urban design reasons making this inappropriate.



Green roofs on bike stores and car barns



Green roofs on sheds and commercial buildings

Major Non-residential and Multi-Residential Development

2.98 The requirement is that the adaptation to climate change strategy for major non- and multi-residential applications will need to demonstrate how the development proposals will contribute to measures adapting to predicted climate change as above (for all development) but also meet specific BREEAM NC credits (or their updated equivalents).

2.99 The 'landscape led approach' in the national park will mean applicants will need to identify significant opportunities to enhance the landscape and wildlife of sites and their immediate surroundings which will inform their landscape strategies. The cooling effects of landscape design will also need to be considered as well as the use of locally native plant selection and other drought resistant landscape design elements.

2.100 Development will be expected to achieve the credit in **Wst 05** Adaptation to Climate Change (or future equivalent), as well as at least one of the two available flood resilience and two SuDS credits in **Pol 03** (or future equivalents).

Further Guidance

2.101 Green roofs should be implemented in accordance with the GRO Green Roof Code (2014) or subsequent update.

<https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf>

2.102 Further technical guidance can be found on the Green Roof Guidelines website

<http://www.greenroofguide.co.uk/>

2.103 See also The SDNPA Design Guide Supplementary Planning Document.

<https://www.southdowns.gov.uk/planning/supplementary-documents/>

3. TECHNICAL GUIDANCE FOR POLICY SD3: MAJOR DEVELOPMENT

Definition of 'Major Development'

- 3.1** Major development in the National Park will be refused under paragraph 172 of the National Planning Policy Framework (NPPF) and Policy SD3 other than in exceptional circumstances and where it can be demonstrated to be in the public interest. Policy SD3 of the Local Plan gives advice on what constitutes 'major development' for the purposes of the NPPF (see Appendix I). This generally tends to be the largest and most significant proposals in the National Park.

One Planet Living

- 3.2** Policy SD3 requires all major development which is deemed acceptable under the definition of this policy to meet One Planet Living standards of sustainable performance devised by Bioregional

<https://www.bioregional.com/one-planet-living>

- 3.3** Development proposals should be sustainable as measured against the following factors:

- Zero Carbon
- Zero Waste
- Sustainable Transport
- Sustainable Materials
- Sustainable Water
- Land Use and Wildlife
- Culture and Community
- Health and Wellbeing

ZERO CARBON

- 3.4** There are several definitions of 'Zero Carbon' development. Two definitions from the UK Green Building Council (UK GBC) relate firstly to 'operational energy' only and secondly to a 'whole life' assessment.

<https://www.ukgbc.org/ukgbc-work/net-zero-carbon-buildings-a-framework-definition>

- 3.5** Net zero carbon – 'operational energy' is defined by the UK GBC as:

"When the amount of carbon emissions associated with the building's operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources, with any remaining carbon balance offset."

- 3.6** Net zero carbon – 'whole life' is defined by the UK GBC as:

"When the amount of carbon emissions associated with a building's embodied and operational impacts over the life of the building, including its disposal, are zero or negative."

- 3.7** For the purposes of this Supplementary Planning Document, 'zero carbon' will be defined as being restricted to operational energy.
- 3.8** It should be understood that the operational energy of a building includes all energy including non-regulated energy such as for cooking and appliances.
- 3.9** Although construction impacts on greenhouse gas emissions are not part of the SDNPA definition of 'zero carbon' there will be separate requirements (later in this chapter) to maximise the use of low carbon and environmentally-friendly construction materials and to minimise waste, both of which will reduce the embodied energy and carbon of development.
- 3.10** Therefore, **the requirement is to ensure that the amount of carbon emissions associated with the building's operational (regulated and unregulated) energy on an annual basis is zero or negative.**
- 3.11** In practice this needs to involve:
- a)** Calculating the dwelling emission rate (DER) or building emission rate (BER) in SAP and SBEM for residential and non-residential buildings respectively to ensure that they are zero or below zero to demonstrate all regulated energy emissions are eliminated.
 - b)** A calculation of the building's non-regulated emissions will then need to be made and these reduced to zero by on-site measures such as zero carbon energy production if possible.
 - c)** If (b) is shown to be impossible in full for genuine site or development reasons the shortfall in emissions can be offset by agreed off-site carbon reduction measures on public or community buildings OR
 - d)** An agreed financial contribution to SDNPA for carbon reduction projects elsewhere.

ZERO WASTE

Non- residential and Multi-Residential development

- 3.12** The requirement is that a site waste management plan (SWMP) is carried out and that at least 3 out of 4 BREEAM NC Wst 01 Construction waste management credits, the Wst 02 Use of recycled and sustainably sourced aggregates and the Wst 03 Operational waste credits are achieved (or equivalents if BREEAM scheme updated).

Residential development

- 3.13** The requirement is that Applicants will be expected to produce a Site Waste Management Plan (SWMP) and to demonstrate that at least the following minimum percentage by weight or by volume of non-hazardous construction waste generated by the project has been diverted from landfill

Type of waste	Minimum Volume	Minimum Tonnage	Type of waste
Non-demolition	85%	90%	Non-demolition
Demolition	85%	95%	Demolition
Excavation	95%	95%	Excavation

Source: Table 10.2 from BREEAM NC 2018

- 3.14** The requirements for separated waste and recycling storage in kitchens required to satisfy policy SD48 will also apply in the case of 'major development' as described in para 2.77.

SUSTAINABLE TRANSPORT

3.15 The requirement is for:

- a) A transport assessment and travel plan for the development (always required for development at this scale in any case)**
- b) EV Charge Points for all residential units, visitor spaces and at least 1 charge point for every 5 car spaces in non-residential development The charge points must have a minimum power rating output of 7kW, be fitted with a universal socket that can charge all types of electric vehicle currently on the market and meet relevant safety and accessibility requirements.**
- c) At least 1 commercial rapid charge point in an accessible location on or within 500m of the site.**
- d) The creation of an ambitious network of safe, convenient and attractive routes for non-motorised transport users, connecting the site to existing and/or future routes around the site and to local facilities and services.**
- e) The provision of a car club with at least 1 car club car per 30 dwellings or at a level to be agreed with the Authority.**
- f) The support of local public transport and its facility to serve the residents or occupants of the development.**
- g) Non-residential development (with at least 10 employees) to provide cycle user showers and changing facilities as well as secure cycle storage proportionate to scale of the development in accordance with BREEAM NC Tra 02.**

SUSTAINABLE MATERIALS

- 3.16 Construction materials need to minimise environmental impacts including their embodied greenhouse gas emissions.**
- 3.17 The requirement is for a sustainable materials report which should include an account of alternative, recycled and substituted materials used on site and consider alternatives to plastic windows and doors and other elevational elements such as rainwater goods and barge boards, fascias etc. All timber should be 'Grown in Britain' certified or FSC certified.**



UPVC windows



Traditional style timber windows



Anodized aluminium windows



Painted aluminium and timber composite windows

SUSTAINABLE WATER

Residential Development

3.18 The requirement is for all homes to have a predicted mains water consumption figure of less than 90 litres/person/day.

Non-Residential Development

3.19 The requirement is for buildings to achieve all 5 standard BREEAM NC Wat 1 credits as well as at least half or remaining BREEAM Water credits.

LAND USE AND WILDLIFE

All Development

3.20 The requirement is for generously dimensioned green infrastructure links across the site linking to surrounding habitats and based on what the evidence shows is locally characteristic, including green roofs for at least 80% of roof area.

- 3.21** If there are design reasons agreed by the SDNPA why this is deemed inappropriate, then the 80% figure can be reduced. Similarly, if it is agreed that roof area is needed for solar collection for e.g. PV then the 80% figure can be reduced accordingly.

Non-Residential Development

- 3.22** The requirement is for the development to meet both **BREEAM LE 01** credits where applicable and all remaining Land Use and Ecology credits.

CULTURE AND COMMUNITY

- 3.23** The requirement is for:

- a)** Comprehensive community involvement in the design of the development at project 'vision' and masterplan stages.
- b)** The provision of some form of publically accessible community facilities on site, proportionate to the size of development.
- c)** Creation of a community project aimed at development residents/occupants such as community based management of communal gardens/ set up of community food project/other green infrastructure management project
- d)** Provision of comprehensive user guides for all building users covering building services, energy and water saving, community groups, local facilities, transport options and other relevant issues.

HEALTH AND WELLBEING

Residential Development

- 3.24** The requirement is for best practice environmental quality of buildings (which should include daylight/ventilation/thermal comfort/overheating risk/acoustics) which should be converted into actual metrics agreed with the Authority.

- 3.25** Opportunities for on-site or close local food growing opportunities should be provided.

Non- Residential and Multi-Residential Development

- 3.26** The requirement is that at least half of all the available **BREEAM NC Health and Wellbeing** credits should be achieved.

All development

- 3.27** The requirement is that a **Post Occupancy Evaluation** of a representative sample of all house types and orientations or non-residential uses should be funded by the applicant. This should cover energy and water use, indoor air quality, thermal comfort and user feedback on a range of issues including environmental quality (daylight/ventilation/thermal comfort/acoustics).

APPENDIX I:

RELEVANT LOCAL PLAN POLICIES

Core Policy SD2: Ecosystem Services

1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:
 - a) Sustainably manage land and water environments;
 - b) Protect and provide more, better and joined up natural habitats;
 - c) Conserve water resources and improve water quality;
 - d) Manage and mitigate the risk of flooding;
 - e) Improve the National Park's resilience to, and mitigation of, climate change;
 - f) Increase the ability to store carbon through new planting or other means;
 - g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land;
 - h) Support the sustainable production and use of food, forestry and raw materials;
 - i) Reduce levels of pollution;
 - j) Improve opportunities for peoples' health and wellbeing; and
 - k) Provide opportunities for access to the natural and cultural resources which contribute to the special qualities.
2. Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services.

Core Policy SD3: Major Development

1. In determining what constitutes major development the National Park Authority will consider whether the development, including temporary events should they be deemed to constitute development, by reason of its scale, character or nature, has the **potential** to have a significant adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park. The potential for significant adverse impact on the National Park will include the consideration of both the impact of cumulative development and the individual characteristics of each proposal and its context.
2. Planning permission will be refused for major developments in the National Park except in exceptional circumstances, and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:
 - a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
 - c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
3. If it is considered that exceptional circumstances exist and development would be in the public interest, all opportunities to conserve and enhance the special qualities should be sought. Development proposals should be sustainable as measured against the following factors:
 - Zero Carbon
 - Zero Waste
 - Sustainable Transport
 - Sustainable Materials
 - Sustainable Water
 - Land Use and Wildlife
 - Culture and Community
 - Health and Wellbeing

Development Management Policy SD22: Parking Provision

1. Development proposals for new, extended or re-located public parking will be permitted provided that they are located in or adjacent to the settlements listed in Policy SD25: Development Strategy, or have a strong functional link to an established cultural heritage, wildlife or landscape visitor attraction, provided that:
 - a) There is evidence that overriding traffic management or recreation management benefits can be achieved;
 - b) It is a component of a strategic traffic management scheme which gives precedence to sustainable transport; and
 - c) The site is close to and easily accessible from main roads by appropriate routes, and well connected to the PRow network.
2. Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the relevant adopted parking standards for the locality. Wherever feasible, electric vehicle charging facilities must also be provided.
3. All new private and public parking provision will:
 - a) Be of a location, scale and design that reflects its context; and
 - b) Incorporate appropriate sustainable drainage systems.
4. All new public parking provision will comply with the following:
 - a) Wherever feasible, electric vehicle charging facilities must be provided. Where located with potential for onward travel by mobility scooter, this should include charging facilities for such scooters; and
 - b) Where located with good accessibility to the bridleway network, include provision for horse box parking.

Strategic Policy SD48: Climate Change and Sustainable Use of Resources

1. The Authority will encourage all new development to incorporate sustainable design features, as appropriate to the scale and type of development.
2. All development proposals will be required to achieve the minimum standards as set out below unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable:

Residential:

- i. Energy efficiency: 19% carbon dioxide reduction improvement against Part L (2013)⁹⁶ through the energy efficiency of the building and;
- ii. Water: Total mains consumption of no more than 110 litres per person per day⁹⁷.

Non-residential and Multi-residential⁹⁷:

- i. Major: Building Research Establishment Environmental Assessment Method (BREEAM) Excellent⁹⁸
3. All development proposals, including retrofitting, will be required to demonstrate, proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.
4. Major development proposals should also include an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site.

Other Local Plan Policies, relating to Adaptation to Climate Change:

SD4 Landscape Character and SD5 Design, SD9 Biodiversity and Geodiversity, SD45 Green Infrastructure, SD49 Flood Risk Management, SD50 Sustainable Drainage Systems

SD4.1 SD4.4, SD5e, SD9, SD45, SD49 and SD50 require GI and Blue Infrastructure enhancement and SuDS.

APPENDIX 2: SINGLE DWELLING SUSTAINABILITY CHECKLIST

Issue	Requirement	Check (Yes, No or N/A)	Design Stage Evidence	Details/Comments
The following are required unless exceptional circumstances are demonstrated:				
Energy Efficiency	A 19% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data showing DER 19% less than TER entirely due to energy efficiency (or 29% overall improvement)	
Green Energy	A further 20% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data showing DER 20% less than TER entirely due to on site low/zero carbon energy (or 39% overall improvement)	
Electric Vehicle Charging	All homes with on-plot or other suitable car parking to have EV charge point ³		Design stage plans and specifications	
Waste	Separate internal bins in line with the recycling and waste collection policy of the local authority		Product specification and confirmation of relevant Waste Authority collection service	
	Provide compost bin where private garden ³		Product specification and location on landscape plan	
Water Use	No more than 110 litres/person/day predicted mains water consumption ⁴		Design stage water calculator	
The following are expected where feasible and appropriate:				
Adaptation to Climate Change	Retain existing mature trees, hedges or water features or other native habitats and select native trees and plants		Layout plan showing all proposed retained and removed trees, hedges, water features or other native habitats	
	Provide sustainable drainage systems, such as permeable paving for drives (e.g. free draining gravel); green roofs; swales etc.		Layout plan to show all proposed SuDS features	

	Provide shade with deciduous trees		Landscape or layout plan to indicate where existing or proposed deciduous trees to provide shade to garden space or to internal living spaces vulnerable to overheating.	
	Building design minimises overheating		Building design such as orientation, generous window reveals, natural ventilation, brise soleil	
	Design drought resistant gardens		Landscape plan	
The following are encouraged:				
Energy Efficiency	A greater than 19% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data	
Green Energy	A greater than 20% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data	
Adaptation to Climate Change	New water feature, e.g. pond		Landscape plan	
	Reduce mains water use below 110 litres		Design stage water calculator	
	Green roofs or green walls		In landscape plan	
Materials	Use of any substituted, re-used, recycled or other green materials in construction		Written account	
	Alternatives to plastic windows and doors		Written evidence	
	Selection of certified 'Grown in Britain' or FSC timber in construction		Confirmation Grown in Britain or FSC certified timber to be specified for listed building elements	
Passive House	Passive house principles or full certification		Building design to meet passive house metrics or design on target for passive house certification	

1. This is generated in the design stage SAP data calculation that is already required for building regulations.
2. A minimum power rating output of 7kW, untethered Mode 3 or equivalent charge point, fitted with a universal socket that can charge all types of electric vehicle currently on the market and meets relevant safety and accessibility requirements.
3. Compost bin only expected if garden size at least 50 sqm
4. This is found using a water calculator e.g. <http://www.thewatercalculator.org.uk/>

APPENDIX 3:

SMALL RESIDENTIAL DEVELOPMENT*

SUSTAINABILITY CHECKLIST

*(2-9 homes)

Issue	Requirement	Check (Yes, No or N/A)	Design Stage Evidence	Details/Comments
The following are required unless exceptional circumstances are demonstrated::				
Energy Efficiency	A 19% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data showing DER 19% less than TER entirely due to energy efficiency (or 39% overall improvement)	
Green Energy	A further 20% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data showing DER 20% less than TER entirely due to on site low/zero carbon energy (or 39% overall improvement)	
Electric Vehicle Charging	All homes with on-plot or other suitable car parking to have EV charge point ²		Design stage plans and specifications	
Waste	Separate internal bins in line with the recycling and waste collection policy of the local authority		Product specification and confirmation of relevant Waste Authority collection service	
	Provide compost bin where private garden ³		Product specification and location on landscape plan	
Materials	Use of any substituted, re-used, recycled or other green materials in construction		Written account	

	Selection of certified 'Grown in Britain' or FSC timber in construction		Confirmation Grown in Britain or FSC certified timber to be specified for building elements	
Water Use	No more than 110 litres/person/day predicted mains water consumption ⁴		Design stage water calculator	
The following are expected where feasible and appropriate:				
Adaptation to Climate Change	Retain existing mature trees, hedges or water features or other native habitats and select native trees and plants		Layout plan showing all proposed retained and removed trees, hedges, water features or other native habitats	
	Provide sustainable drainage systems, such as permeable paving for drives (e.g. free draining gravel); green roofs; swales etc.		Layout plan to show all proposed SuDS features	
	Provide shade with deciduous trees		Landscape or layout plan to indicate where existing or proposed deciduous trees to provide shade to garden space or to internal living spaces vulnerable to overheating.	
	Building design minimises overheating		Building design such as orientation, generous window reveals, natural ventilation, brise soleil	
	New water feature, e.g. pond		In landscape plan	
	Design drought resistant gardens		Landscape plan	
	Provide green infrastructure links across the site		Layout plan showing all proposed retained and removed trees, hedges, water features or other native habitats	
The following are encouraged:				
Energy Efficiency	A greater than 19% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data	
Green Energy	A greater than 10% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data	
Materials	Alternatives to plastic windows and doors		Written evidence	

Adaptation to Climate Change	Reduce mains water use below 110 litres		Design stage water calculator	
	Green roofs or green walls		Landscape plan	
Passive House	Passive house principles or full certification		Building design to meet passive house metrics or design has passive house certification	

1. This is generated in the design stage SAP data calculation that is already required for building regulations.
2. A minimum power rating output of 7kW, untethered Mode 3 or equivalent charge point, fitted with a universal socket that can charge all types of electric vehicle currently on the market and meets relevant safety and accessibility requirements.
3. Compost bin only expected if garden size at least 50 sqm
4. This is found using a water calculator e.g. <http://www.thewatercalculator.org.uk>

APPENDIX 4:

LARGE RESIDENTIAL DEVELOPMENT*

SUSTAINABILITY CHECKLIST

*(10 homes and above)

Issue	Requirement	Check (Yes, No or N/A)	Design Stage Evidence	Construction Stage Evidence	Details/Comments
The following are required unless exceptional circumstances are demonstrated:					
Energy Efficiency	19% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data showing DER 19% less than TER entirely due to energy efficiency (or 39% overall improvement)	As built stage SAP data showing DER 19% less than TER entirely due to energy efficiency (or 39% overall improvement)	
Green Energy	A further 20% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data showing DER 20% less than TER entirely due to on site low/zero carbon energy (or 39% overall improvement)	As built stage SAP data showing DER 20% less than TER entirely due to on site low/zero carbon energy (or 39% overall improvement) and photographic evidence of installation	
Passive House Standard	Full passive house certification for 10% ² of units		PHPP report demonstrating design on target for passive house certification covering: space heating demand; airtightness; u-values;	Passive house certificates for completed passive houses	

			overheating; renewables; primary energy		
Electric Vehicle Charging	All homes with on-plot or other suitable car parking to have EV charge point ³		Design stage plans and specifications	Photographic evidence of installed product	
Waste	Separate internal bins in line with the recycling and waste collection policy of the local authority		Product specification and confirmation of relevant Waste Authority collection service	Photographic evidence of installed product	
	Provide compost bin where private garden ⁴		Product specification and location on landscape plan	Photographic evidence of installed product	
	Site Waste Management Plan and at least 50% by weight or by volume of non-hazardous construction waste generated by the project diverted from landfill.		SWMP evidence at least 50% of construction waste to be diverted	SWMP evidence 50% waste diverted.	
Materials	Strategy for use of any substituted, re-used, recycled or other green materials		Provide written strategy	Evidence how strategy carried out in the completed construction	
	Selection of certified 'Grown in Britain' or FSC timber in construction		Confirmation Grown in Britain or FSC certified timber to be specified for building elements	Written evidence of Grown in Britain or FSC certification	
Water Use	No more than 110 litres/person/day predicted mains water consumption ⁵		Design stage water calculator	As built stage water calculator	
Adaptation to Climate Change	retain existing mature trees, hedges or water features or other native habitats (where possible) and select native trees and plants		Layout plan showing all proposed retained and removed trees, hedges, water features or other native habitats	As built Layout plan showing all retained and removed trees, hedges, water features or other native habitats.	
	Provide SuDS systems for all hard surfaces		Layout plan to show all proposed SuDS features	As built Layout plan showing all SuDS features	

	Provide shade with deciduous trees		Landscape or layout plan to indicate where existing or proposed deciduous trees to provide shade to garden space or to internal living spaces vulnerable to overheating.	Confirm no changes or provide evidence of changes	
	Building design minimises overheating		Building design such as orientation, generous window reveals, natural ventilation, brise soleil	Confirm no changes or provide evidence of changes	
	New water features, e.g. pond		Landscape plan	Confirm no changes or provide evidence of changes	
	At least 10% of total roof area to be provided as green roofs. Green walls where appropriate		Landscape plan	Confirm no changes or provide evidence of changes and provide management plan	
	Reduce mains water use		Design stage water calculator	As built water calculator	
	Select native trees and plants		Landscape plan	Landscape plan	
	Design drought resistant gardens		Landscape plan	Landscape plan	
	Provide green infrastructure links across the site		Landscape plan	Landscape plan	
The following are encouraged:					
Energy Efficiency	A greater than 19% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data	As built stage SAP data	
Green Energy	A greater than 10% improvement of CO ₂ emissions: DER over TER in SAP data ¹		Design stage SAP data	As built stage SAP data	
Passive House	Passive house principles or full certification for the remainder of the units		Building design to meet passive house metrics or design has passive house certification	As built design meets passive house metrics or design has passive house certification	

Materials	Alternatives to plastic windows and doors		Written evidence	Written evidence	
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1. This is generated in the design stage SAP data calculation that is already required for building regulations.
2. Nos. rounded up to nearest whole unit, so e.g. 10% of 15 dwellings = 1.5, so 2 dwellings required to be passive house certified.
3. A minimum power rating output of 7kW, untethered Mode 3 or equivalent charge point, fitted with a universal socket that can charge all types of electric vehicle currently on the market and meets relevant safety and accessibility requirements.
4. Compost bin only expected if garden size at least 50 sqm
5. This is found using a water calculator e.g. <http://www.thewatercalculator.org.uk/>

APPENDIX 5:

MINOR NON-RESIDENTIAL DEVELOPMENT*

SUSTAINABILITY CHECKLIST

*(floor space more than 250 m², less than 1000 m² and a site area of less than 0.5ha)

Issue	Requirement	Check (Yes, No or N/A)	Design Stage Evidence	Details/Comments
The following are required unless exceptional circumstances are demonstrated:				
Energy Efficiency	19% improvement of CO ₂ emissions: BER over TER in SBEM data ¹		Design stage SBEM data showing BER 19% less than TER entirely due to energy efficiency (or 39% overall improvement)	
Green Energy	A further 20% improvement of CO ₂ emissions: BER over TER in SBEM data ¹ through on-site low/zero carbon energy		Design stage SAP data showing BER 20% less than TER entirely due to on site low/zero carbon energy (or 39% overall improvement)	
Electric Vehicle Charging	All development with at least 10 car spaces to have at least one EV charge point ²		Design stage plans and specifications	
Waste	Strategy for reducing construction and operational waste		Provide written strategy	
Materials	Strategy for use of any substituted, re-used, recycled or other green materials		Provide written strategy	
	Selection of certified 'Grown in Britain' or FSC timber in construction		Confirmation Grown in Britain or FSC certified timber to be specified for building elements	
The following are encouraged:				

Adaptation to Climate Change	Retain existing mature trees, hedges or water features or other native habitats and select native trees and plants		Layout plan showing all proposed retained and removed trees, hedges, water features or other native habitats	
	Provide SuDS systems for all hard surfaces		Layout plan to show all proposed SuDS features	
	Provide shade with deciduous trees		Landscape or layout plan to indicate where existing or proposed deciduous trees to provide shade to garden space or to internal living spaces vulnerable to overheating.	
	Building design minimises overheating		Building design such as generous window reveals, natural ventilation, brise soleil	
	New water features, e.g. pond		In landscape plan	
	Green roofs or green walls		Landscape plan	
	Natural ventilation (opening windows)		Building design	
	Reduce mains water use		Water calculator	
	Design drought resistant gardens		Landscape plan	
	Provide green infrastructure links across the site		Landscape plan	
Passive House	Passive house principles or full certification		Building design to meet passive house metrics or design has passive house certification	
Water Use	Water efficient measures		Set out water efficient measures such as water efficient fittings and appliances, leak detection	
Materials	Strategy for use of any re-used, recycled or other green materials		Provide written strategy	
	Selection of certified 'Grown in Britain' or FSC timber in construction		Confirmation Grown in Britain or FSC certified timber to be specified for listed building elements	

1. This is generated in the design stage SBEM data calculation that is already required for building regulations.
2. A minimum power rating output of 7kW, untethered Mode 3 or equivalent charge point, fitted with a universal socket that can charge all types of electric vehicle currently on the market and meets relevant safety and accessibility requirements.

APPENDIX 6:

MAJOR NON-RESIDENTIAL DEVELOPMENT*

SUSTAINABILITY CHECKLIST

*floor space of 1000 m² or more is provided or a site of 0.5ha or more

Issue	Requirement	Check (Yes, No or N/A)	Design Stage Evidence	Construction Stage Evidence	Details/Comments
The following are required unless exceptional circumstances are demonstrated:					
Energy Efficiency	BREEAM NC excellent mandatory		BREEAM interim certificate showing BREEAM excellent rating.	BREEAM post construction certificate showing BREEAM excellent rating.	
Green Energy	A 20% improvement of CO ₂ emissions: BER over TER in SBEM data ¹ through on-site low/zero carbon energy		Design stage SBEM data showing BER before & after inclusion of low/zero carbon energy - this to be at least 20% improvement over TER	As built stage SBEM data showing BER before & after inclusion of low/zero carbon energy - this to be at least 20% improvement over TER.	
Passive Design	BREEAM NC Ene 04 (passive design analysis) credit*		BREEAM design stage assessment showing credit achieved	BREEAM post construction stage assessment showing credit achieved	
Electric Charging	On-site car parking to have cable routes for an EV charge point for one in five spaces		Design stage plans and specifications	Photographic evidence of installed product	
Water Use	BREEAM 2no. Wat 01 credits*		BREEAM design stage assessment showing credits achieved	BREEAM post construction stage assessment showing credits achieved	

Waste	At least 1 of the BREEAM NC Wst 01 diversion of resources from landfill credits*		BREEAM design stage assessment showing credit achieved	BREEAM post construction stage assessment showing credit achieved	
Materials	At least 2 out of available 4 Mat 03 measuring responsible sourcing credits*.		BREEAM design stage assessment showing credits achieved	BREEAM post construction stage assessment showing credits achieved	
	Strategy for use of any substituted, re-used, recycled or other green materials		Provide written strategy	Evidence how strategy carried out in the completed construction	
	Selection of certified 'Grown in Britain' or FSC timber in construction		Confirmation Grown in Britain or FSC certified timber to be specified for building elements	Written evidence of Grown in Britain or FSC certification	
Adaptation to Climate Change	1 flood resilience and 2 SuDS BREEAM NC Pol 03 credits*		BREEAM design stage assessment showing credits achieved	BREEAM post construction stage assessment showing credits achieved	
	BREEAM NC Wst 05 credit*		BREEAM design stage assessment showing credit achieved	BREEAM post construction stage assessment showing credit achieved	
The following are expected where feasible and appropriate:					
Materials	Alternatives to plastic windows and doors		Written evidence	Written evidence	
Adaptation to Climate Change	Retain existing mature trees, hedges or water features or other native habitats and select native trees and plants		Layout plan showing all proposed retained and removed trees, hedges, water features or other native habitats	As built Layout plan showing all retained and removed trees, hedges, water features or other native habitats.	
	Provide SuDS systems for all hard surfaces		Layout plan to show all proposed SuDS features	As built Layout plan showing all SuDS features	
	Provide shade with deciduous trees		Landscape or layout plan to indicate where existing or proposed deciduous trees to provide shade to garden	Confirm no changes from design stage or provide evidence of changes	

			space or to internal living spaces vulnerable to overheating.		
	Building design minimises overheating		Building design such as generous window reveals, natural ventilation, brise soleil	Confirm no changes from design stage or provide evidence of changes	
	New water features, e.g. pond		In landscape plan	Confirm no changes from design stage or provide evidence of changes	
	At least 10% of total roof area green roofs Green walls where appropriate		Landscape plan	Confirm no changes from design stage or provide evidence of changes and provide management plan	
	Natural ventilation (opening windows)		Building design	Confirm no changes from design stage or provide evidence of changes	
	Reduce mains water use		Water calculator	As built water calculator	
	Select native trees and plants		Landscape plan	Landscape plan	
	Design drought resistant gardens		Landscape plan	Landscape plan	
	Provide green infrastructure links across the site		Landscape plan	Landscape plan	
The following are encouraged:					
Passive House Standard	Passive house principles or full certification		Building design to meet passive house metrics or design has passive house certification	Building design to meet passive house metrics or design has passive house certification	

*Or equivalent in future BREEAM updates

1. This is generated in the design stage SBEM data calculation that is already required for building regulations.
2. A minimum power rating output of 7kW, untethered Mode 3 or equivalent charge point, fitted with a universal socket that can charge all types of electric vehicle currently on the market and meets relevant safety and accessibility requirements.

APPENDIX 7:

MAJOR DEVELOPMENT*

SUSTAINABILITY CHECKLIST

*As defined by SDNP Local Plan Policy SD3

Issue	Requirement	Check (Yes, No or N/A)	Design Stage Evidence	Construction Stage Evidence	Details/Comments
The following are required in all cases unless exceptional circumstances:					
Zero Carbon	Zero Carbon homes and/or non-residential buildings		Design stage SAP/SBEM data ¹ showing DER/BER - this to be at least 100% improvement over TER plus further reduction to meet non-regulated energy emissions	As-built stage SAP/SBEM data ¹ showing DER/BER - this to be at least 100% improvement over TER plus further reduction to meet non-regulated energy emissions	
Zero Waste	Residential: Site Waste Management Plan committing to % compliance as per para 3.13 of SPD; compost bins ³ and segregated kitchen waste Non-residential:		Residential: Site Waste Management Plan; compost bins ³ and segregated kitchen waste bins to be provided Non-residential: BREEAM design stage assessment showing credits achieved	Residential: Site Waste Management Plan demonstrating % compliance as per para 3.13 of SPD; compost bins ³ and segregated kitchen waste bins provided Non-residential: BREEAM post construction stage assessment showing credits achieved	

	BREEAM NC* 3 no. Wst 01; 1 no. Wst 02 and 1 no. Wst 03 credits.				
Sustainable Transport	Transport Assessment and Travel Plan; 1 no. rapid EV charger; non-motorised transport network enhancements; public transport support. Residential: All dwellings to have EV charge point ² Non-residential: an EV charge point ² for one in five spaces; cyclist facilities		Transport Assessment and Travel Plan Design stage plans and specifications	Photographic evidence of installed products	
Sustainable Materials	Sustainable Materials Report demonstrating low carbon and environmentally friendly materials (substituted, re-used, recycled and locally sourced) including alternatives to uPVC building products (windows, doors, rainwater goods, fascias and sockets etc.); Grown in Britain certified timber (FSC or equivalent where G in B not feasible)		Sustainable Materials Report, elevational details	Updated Sustainable Materials Report, elevational details. Grown in Britain (or FSC where this not feasible) certificates	
Sustainable Water	Residential:		Residential: Design stage water calculator ⁴	Residential: As built stage water calculator ⁴	

	Homes to have predicted mains water use below 90 litres/person/day Non-residential: All 5 BREEAM NC 2018 Wat 1 credits and at least half remaining Water credits*		Non-residential: BREEAM design stage assessment showing credits achieved	Non-residential: BREEAM post construction stage assessment showing credits achieved	
Land Use and Wildlife	All development: Generous green infrastructure including at least 80% available roof area green roof. Non-residential: Both BREEAM NC 2018 LE 01 credits*		Plans showing GI and green roofs and green roof calculation Non-residential: BREEAM design stage assessment showing credits achieved	As built showing GI and green roofs and green roof calculation Non-residential: BREEAM post construction stage assessment showing credits achieved	
Culture and Community	Community involvement in critical design stages		Community design workshops	Report on community involvement	
	Community facilities provision		Planning Statement, masterplan	Completion of community facility buildings/structures on site	
	Community Project		Planning Statement	Fully funded project agreed with SDNPA	
	User Guides		Planning Statement	Provision of user guides	
Health and Wellbeing	Residential development: Best practice environmental quality of development		Residential: Agreed metrics and targets for daylight/ventilation/thermal comfort/overheating/acoustics	Residential: Report on measured representative sample of completed buildings using agreed metrics and targets	

	Non-residential: At least half of BREEAM NC 2018 Hea credits*		Non-residential: BREEAM design stage assessment showing credits achieved	Non-residential: BREEAM post construction stage assessment showing credits achieved	
	All development: A Post Occupancy Evaluation report		POE brief agreed with Authority	POE submitted at least 1 year after occupation and less than 3 years after	

*Or the equivalent in an updated BREEAM version.

1. This is generated in the design stage SAP/SBEM data calculation that is already required for building regulations.
2. A minimum power rating output of 7kW, untethered Mode 3 or equivalent chargepoint, fitted with a universal socket that can charge all types of electric vehicle currently on the market and meets relevant safety and accessibility requirements.
3. Compost bin only expected if garden size at least 50 sqm
4. This is found using a water calculator e.g. <http://www.thewatercalculator.org.uk/>

GLOSSARY

BRE

The Building Research Establishment (BRE) is a multi-disciplinary, building science centre with is focused on how to improve buildings and infrastructure, through research and knowledge generation. The BRE is the owner of the BREEAM assessment method.

BREEAM NC

The Building Research Establishment Environmental Assessment Method (BREEAM) New Construction (NC) is an assessment method covering a wide range of sustainable performance issues in new development, namely: Management, Health and Wellbeing, Energy, Transport, Water, Materials, Land Use and Ecology and Pollution, There are different standards relating to the percentage of points achieved, namely Pass (30%), Good (45%), Very Good (55%), Excellent (70%) and Outstanding (85%).

DER and TER

The Dwelling Emission Rate (DER) and the Target Emission Rate (TER) are the headline CO₂ figures which SAP Calculations measure. These figures will determine whether a new dwelling passes or fails on its carbon emission targets set within Part L of the building regulations.

EV

Electric Vehicle

FSC

The Forest Stewardship Council (FSC) is an international non-profit, multi-stakeholder organization that promotes responsible management of the world's forests. FSC runs a global forest certification system with two key components: Forest Management and Chain of Custody.

<https://www.fsc-uk.org/en-uk>

HETAS

Heating Equipment and Testing Approval Scheme

<https://www.hetas.co.uk/ecodesign-ready/>

‘GREENER MATERIALS’

This is a catch all term used in the summary table (*Table 1*) to describe materials that are re-used; recycled; have lower embodied carbon than standard products; are sourced locally; include timber from locally certified and well-managed sources; and where possible does not include plastic building elements such as windows, doors, barge boards etc.

GROWN IN BRITAIN

The Grown in Britain brand identifies wood that has been grown in Britain from well managed forests and assured through a certification scheme. <https://www.growninbritain.org/>

PASSIVE HOUSE CERTIFICATION & PHPP

All proposed Passivhaus (or 'passive house') designs for residential or non-residential buildings must undergo energy modelling conducted via the [Passivhaus Planning Package \(PHPP\)](#). Tests ensure these targets are met, completing the quality assurance process. A certificate is only issued if the exactly defined [criteria](#) have been met without exception. Learn more about the different classes & [certification process for Passivhaus buildings](#). For more general information on passive house buildings see <http://www.passivhaustrust.org.uk/>

SAP

The Standard Assessment Procedure (SAP) is the methodology used by the Government to assess and compare the energy and environmental performance of dwellings in Part L of the building regulations.

SBEM

Simplified Building Energy Model (SBEM) is a software tool developed by BRE that provides an analysis of a building's energy consumption. It is used for non-residential buildings like SAP is for new homes.

SWMP

A Site Waste Management Plan (SWMP) is a planning document that must be created prior to the start of construction where required. It must:

- Identify each type of waste expected to be produced during the project
- Estimate the quantity of each type that will be produced
- Identify the planned waste management action proposed for each different type, including on- or off-site reuse, on- or off-site recycling, or disposal

During the project, the principal contractor must monitor the plan and update it with details of the waste of each type actually produced, along with the action taken and any removal activity.

https://www.designingbuildings.co.uk/wiki/Site_waste_management_plan_SWMP

SuDS

Sustainable Drainage Systems (SuDS) are designed to reduce the potential impact of new and existing developments with respect to surface water drainage discharges. The Authority expects there to be an emphasis on multi-functional SuDS which also have water quality, biodiversity and amenity enhancement values wherever possible.

THERMAL BRIDGING

A thermal bridge, also called a cold bridge, heat bridge, or thermal bypass, is an area or component of an object which has higher thermal conductivity than the surrounding materials, creating a path of least resistance for heat transfer. These are weak points in a building in terms of heat loss, e.g. where windows meet walls, but can be minimised through good design details and construction practices.

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Sustainable Construction Supplementary Planning Document

**Strategic Environmental Assessment (SEA) –
Screening Statement**

**Habitats Regulations Assessment (HRA) –
Screening Statement**

Determination Statement

I. INTRODUCTION

- I.1** This statement sets out the Authority's determination under Regulation 9 (1) of the Environmental Assessment of Plans and Programmes Regulations 2004 on whether or not a Strategic Environmental Assessment is required for the consultation draft Sustainable Construction Supplementary Planning Document (SPD).
- I.2** This statement also sets out the Authority's determination as to whether Appropriate Assessment is required under the Conservation of Habitats & Species Regulations 2017.

Strategic Environmental Assessment

- I.3** Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive) and Environmental Assessment of Plans and Programmes Regulations (2004) specific types of plans that set out the framework for future development consents on projects must be subject to an environmental assessment.
- I.4** Supplementary planning documents may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies.
- I.5** In accordance with the provisions of the Directive and Regulations, the Authority must determine if a plan requires an environmental assessment. Where the Authority determines that SEA is not required then under Regulation 9(3) the Authority must prepare a statement setting out the reasons for this determination. The need for a SEA of the Sustainable Construction SPC is considered in Section 3 of this report.

Sustainability Appraisal

- I.6** Under separate legislation (the Planning and Compulsory Purchase Act 2004 and associated Regulations), the Authority is required to carry out a Sustainability Appraisal (SA) for all Development Plan Documents. This considers the social and economic impacts of a plan as well as the environmental impacts. However, in accordance with current Regulations (Town & Country Planning (Local Development) (England) (Amendment) Regulations 2012) a SA is not required to be carried out for SPD.

Habitats Regulations Assessment

- I.7** Habitats Regulations Assessment is required to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or Natura 2000 sites. The need for HRA is set out within the EC Habitats Directive 92/43/EC (transposed into British Law). Section 4 of this report deals with the need for Habitats Regulation Assessment.

2. SCOPE OF THE SUSTAINABLE CONSTRUCTION SPD

2.1 The scope of the SPD is to provide guidance which supports the implementation of sustainable construction policies of the South Downs Local Plan (SDLP) adopted in 2019. The SPD will elaborate upon policies SD2 Ecosystem Services; SD48: Climate Change and Sustainable Use of Resources; the element of SD22: Parking Provision, as it relates to electric vehicle charging; and SD3 Major Development. The SPD applies to the whole of the South Downs National Park. The SPD provides further detail on the following matters:

- Reducing predicted CO₂ emissions through the energy efficiency of new development;
- Reducing CO₂ emissions through the generation of on-site low or zero carbon energy;
- Reducing CO₂ emissions through the provision of electric car charging in new development;
- Reducing CO₂ emissions through the reduction of waste as part of construction and operational waste in new development;
- Reducing CO₂ emissions through the use of low carbon materials in new development;
- Adapting to predicted climate change by reducing predicted mains water consumption;
- Adapting to predicted climate change by conserving and enhancing green and blue infrastructure and promoting multi-functional sustainable drainage systems.
- Adapting to predicted climate change by encouraging green roofs on new buildings
- Adapting to predicted climate change by encouraging the use of native species and low irrigation planting.
- Adapting to predicted climate change by encouraging shade-casting street trees, green walls and other design measures to reduce overheating in new development

3. STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

The SEA Screening Process

- 3.1 The process for determining whether or not an SEA is required is called screening. In order to screen, it is necessary to determine if a plan will have significant environmental effects using the criteria set out in Annex II of the Directive and Schedule I of the Regulations. Table I below sets out the Authority's screening of the Sustainable Construction SPD.
- 3.2 Within 28 days of making its determination the authority must publish a statement such as this one, setting out its decision. If it determines that an SEA is not required, the statement must include the reasons for this.

SEA Determination and Reasons for Determination

- 3.3 Before making a determination, the three statutory consultation bodies are consulted. The responses received will be set out in Table I below:

Table I – Comments received by Consultation bodies

Consultation Body	Comments
Environment Agency	<i>I can confirm that we agree with your conclusion that due to the nature of the SPD itself and as it is expanding on Local Plan policy that has already been subject to SEA that no SEA is required for the SPD.</i>
Historic England	<i>In light of the Environmental Assessment of Plans and Programmes Regulations 2004, our view is that a SEA is not required in this instance for the reason set out in paragraph 3.4 of the Screening Report.</i>
Natural England	None

Table 2 – SEA Screening for the Sustainable Construction SPD

Criteria (from Annex II) of the SEA Directive and Schedule I of the Regulations	SDNPA Comments
Characteristics of the plan or programme	
a) The degree to which the plan or programme sets a framework for projects and other activities, either with regards to the location, nature, size and operating	The Sustainable Construction SPD sits at the lowest tier of the development plan system. It provides more detail on the policies and principles contained in the Adopted South Downs Local Plan, specifically policies SD2 Ecosystem Services; SD48: Climate Change and Sustainable Use of Resources; the element of SD22:

conditions or by allocating resources.	<p>Parking Provision, as it relates to electric vehicle charging; and SD3 Major Development.</p> <p>The Local Plan was subject to a full SA/SEA.</p> <p>The SPD applies to the whole of the South Downs National Park but does not directly determine the location, nature or size of a project. It is more directly relevant to how that project is implemented or constructed.</p>
b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	<p>The requirements for sustainable construction are already set out in the Adopted South Downs Local Plan. The SPD provides additional detail. The adoption of this SPD may influence forthcoming Area Action Plans and Neighbourhood Development Plans due to the greater prominence of this issues that will be generated as a result of the SPD. It is more likely that the issues will be considered from the outset which often leads to better outcomes. This could lead to some positive effects above those resulting from the Local Plan.</p>
c) The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.	<p>The content of the SPD is directly and positively linked to the promotion of sustainable development.</p>
d) Environmental problems relevant to the plan or programme.	<p>UK air temperatures are predicted to continue to rise, with 10 of the hottest years recorded since 1999. The strongest average monthly temperature increases have been in the South East along with the Midlands and East Anglia. Projections indicate that the South East will experience hotter, drier summers and warmer wetter winters with more extreme weather events. Sea level rises are predicted for the south east as a result of isostatic readjustment and ice sheet melt.</p> <p>Climate change will result in a range of direct and indirect effects on both the natural and human environment including flooding and increased soil erosion related to current and projected wetter winters. This may impact on soil condition with increased erosion and nutrient loss. Drier summers will exacerbate the predicted supply/demand deficit for water supply and extreme weather events will impact on human health.</p> <p>Evidence prepared to support the preparation of the Local Plan shows that:</p>

	<ul style="list-style-type: none"> – Annual energy demand within buildings in the National Park is around 2,287,271 MWh. Given the current mix of fuel sources used, this contributes around 675,438 tCO₂/yr. – Energy use is generally higher per residential dwelling than it is in other parts of the country, reflecting the largely detached and semi-detached nature of the housing stock. The majority of this demand comes from residential energy use. – Taking into account savings already made nationally, to achieve an 80% reduction in CO₂ emissions based on 1990 levels by, the SDNP would need to reduce building related emissions to 164,751 tCO₂/yr. – Generation of electricity from renewable sources is increasing in the South East including that generated by the Rampion Offshore Wind Farm. <p>The SDNP is the custodian of land rich in woodlands and there is significant potential for additional carbon sequestration through additional woodland planting in the National Park.</p> <p>The SPD will not introduce or exacerbate any environmental problems. Rather, it will have a positive impact helping to address environmental problems identified. It is also making a contribution towards tackling global climate change.</p>
e) The relevance of the plan or programme for the implementation of Community (EU) legislation on the environment (for example plans and programmes linked to waste management or water protection).	<p>The SPD will help support the implementation of the Local Plan which in itself is contributing or responding to EU legislation, for example:</p> <ul style="list-style-type: none"> – EU Directive 2009/28/EC Energy produced from renewable energy sources – EU Directive 2018/844/EU Energy Performance of Buildings – EU Directive 2008/98/EC Waste framework directive – Commission of the European Communities (2007) Limiting Global Climate Change to two degrees Celsius: The way ahead for 2020 and beyond – The Climate Change Act 2008.
Characteristics of the effects and of the area likely to be affected	
a) The probability, duration, frequency and reversibility of the effects.	<p>The Sustainable Construction SPD provides more detail on the policies and principles contained in the Adopted South Downs Local Plan. It applies to most developments across the entire National Park and in combination with the Local Plan should result in multiple small, positive, potentially permanent environmental, social and economic effects. The Local Plan was the subject of a SA/SEA.</p>

b) The cumulative nature of the effects	The SPD will have a range of beneficial environmental, social and economic impacts which will result in positive cumulative effects when sitting alongside the Local Plan, national and European legislation. The cumulative effects of the Local Plan policies are addressed in the accompanying SA/SEA.
c) The transboundary nature of the effects	The direct effects of this SPD are limited to developments within the South Downs National Park. However the nature of climate change means that there are inherently transboundary issues and consequences. The transboundary effects of this SPD are limited, but when combined with plans and strategies across adjoining Authorities this may lead to more significant positive environmental impacts over the medium to long term.
d) The risks to human health or the environment (for example, due to accidents)	The SPD presents no direct risks to human health or the environment. Rather, the implementation of sustainable construction methods will lead to improvements to human health and the environment.
e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The SPD will cover the whole of the South Downs National Park area with a population of around 117,000 people.
f) The value and vulnerability of the area likely to be affected due to: i) Special natural characteristics or cultural heritage; ii) Exceeding environmental quality standards or limit values; ii) Intensive land-use	<p>The South Downs National Park covers an area with a wide variety of characteristics. It is a nationally designated landscape and in summary it:</p> <ul style="list-style-type: none"> – Measures over 1,600km² of which over 70% is farmland, 15% is protected for wildlife. – 117,000 residents, 18.8 million visitors annually – 19 landscape types – 4 market towns – 616 Scheduled monuments, 5,860 listed buildings and 166 conservation areas. – 17.5km of coastline <p>Key environmental issues include:</p> <ul style="list-style-type: none"> – Habitat decline in both extent and quality – Species decline, particularly farmland – Impact of climate change on the historic environment. – Climate change – Water extraction – There are two Air Quality Management Zones within the National Park.
g) The effects on areas or landscapes which have recognised national, community or international protection status.	The SPD will cover the whole of the South Downs National Park which has been designated for its special landscape, wildlife and cultural value. The SPD should provide positive effects by promoting sustainable construction and conserving and enhancing green and blue infrastructure throughout the National Park.

SEA Conclusion

- 3.4 Having regard to the considerations above, the Authority concludes that the Sustainable Construction SPD is unlikely to have any significant environmental effects and therefore does not require a Strategic Environmental Assessment. The SPD does not present new policies but seeks to clarify the Authority's approach to implementing the SDLP sustainable construction policies. Where environmental effects are identified they will be positive.
- 3.5 This determination was made on 14th January 2020.

4. HABITATS REGULATIONS ASSESSMENT SCREENING STATEMENT

- 4.1 This part of the report seeks to determine whether the Authority's policies and proposals set out in the Sustainable Construction SPD will have any significant impacts on Natura 2000 sites.
- 4.2 This SPD will support policies SD2 Ecosystem Services; SD48: Climate Change and Sustainable Use of Resources; the element of SD22: Parking Provision, as it relates to electric vehicle charging; and SD3 Major Development. The South Downs Local Plan was subject to a Habitats Regulation Assessment which was prepared in consultation with Natural England. The purpose of HRA is to assess the impacts of plans and/or projects against the conservation objectives of a European protected site. The assessment must determine whether the plan and/ or project would adversely affect the integrity of the site in terms of its conservation objectives. Where adverse effects are identified these effects should be avoided or mitigated.
- 4.3 The Appropriate Assessment stage of HRA is only required should the preliminary screening assessment not be able to rule out likely significant effects.
- 4.4 The Directive states that any plan or project not connected to, or necessary for a sites management, but likely to have significant effect thereon shall be subject to appropriate assessment. There are 4 distinct stages in HRA namely:
- Step 1: Screening - Identification of likely impacts on a European site either alone or in combination with other plans/projects and consideration of whether these are significant.
 - Step 2: Appropriate Assessment - consideration of the impact on the integrity of the European Site whether alone or in combination with other plans or projects with respect to the sites structure, function and conservation objectives. Where there are significant effects, step 2 should consider potential mitigation measures.
 - Step 3: Assessment of Alternative Solutions - Assessing alternative ways of achieving the objectives of the plan/project which avoid impacts; and
 - Step 4: Assessment of Compensatory Measures - Identification of compensatory measures should impact not be avoided and no alternative solutions exist and an assessment of imperative reasons of overriding public interest (IROPI) deems that a project should proceed.
- 4.5 Should screening (Step 1) reveal that significant effects are likely or the effect cannot be discounted because of uncertainty, then it is necessary to move onto Step 2: Appropriate Assessment. If Step 2 cannot rule out significant effect even with mitigation, then the process moves onto Step 3 and finally Step 4 if no alternative solutions arise.

Step I - Screening

4.6 There are four stages to consider in a screening exercise:

Stage 1: Determining whether the plan/project is directly connected with or necessary to the management of the site;

Stage 2: Describing the plan/project and description of other plan/projects that have the potential for in-combination impacts;

Stage 3: Identifying potential effects on the European site(s); and

Stage 4: Assessing the significance of any effects

Stage 1

4.7 It can be determined that the Sustainable Construction SPD is not directly connected with, or necessary to the management of a site.

Stage 2 to 4

4.8 Information about the scope of the SPD can be found in Section 2 of this Screening Document. The SPD supports South Downs Local Plan policies, which are already subject to a full HRA, including of any in-combination effects with other plans and / or project. The South Downs Local Plan HRA considered the potential effects on the following European sites:

- Calcareous grassland sites: Lewes Downs SAC, Castle Hill SAC and Butser Hill SAC
- Woodland sites: Duncton to Bignor Escarpment SAC, Kingley Vale SAC, East Hampshire Hangers SAC and Rook Cliff SAC
- Heathland bog sites: Thursley, Ash, Pirbright and Chobham SAC, Woolmer Forest SAC, Ashdown Forest and Shortheath Common SAC
- Bat sites: The Mens SAC, Singleton and Cocking Tunnels SAC, and Ebernoe Common SAC
- Heathland bird sites: Wealden Heaths Phase II SPA, Ashdown Forest SPA and Woolmer Forest SAC
- Riverine sites: River Itchen SAC, Arun Valley SAC/SPA/Ramsar
- Estuarine sites: Chichester and Langstone Harbours SPA / Ramsar, Solent Maritime SAC, Dorest and Solent potential SPA
- Wetland sites: Pevensey Levels SAC/ Ramsar site

4.9 The following impact pathways were identified as relevant to the South Downs Local Plan HRA:

- Recreation pressure
- Air Quality
- Water quantity and changes in hydrological cycles
- Water quality
- Loss of supporting habitat
- Urbanisation

4.10 Through the HRA of the Local Plan, the following assessment was made of SDLP policies SD2 / SD3 / SD22 and SD48.

Policy	HRA Implications
Core Policy SD2: Ecosystem Services	No HRA implications. This policy identifies that development will not be permitted if it is likely to have a detrimental impact upon ecosystem services. This is a positive policy. There are no linking impact pathways present.
Core Policy SD3: Major Development	No HRA implications. This policy identifies the criteria that constitute major development rather than presenting actual allocations. It identifies that major development will only be permitted in exceptional circumstances and it is in the public interest. This policy also provides for the requirement of sustainable measures. Whilst major development could potential result in likely significant effects, this policy does not explicitly provide for major development, merely criteria by which it will be assessed against and enhancement opportunities that will be sought. There are no linking impact pathways present.
Development Management Policy SD22: Parking Provision	No HRA implications. This is a development management policy relating to parking provision. It is a positive policy as it provides for connections to allow vehicle charging, thus encouraging the use of electric vehicles which has the potential to reduce atmospheric pollution contributions. There are no linking impact pathways present.
Strategic Policy SD48: Climate Change and Sustainable Use of Resources	No HRA implications. This is a positive policy in that it promotes sustainable development, which has potential to reduce greenhouse gas emissions, and thus theoretically improve air quality. There are no linking impact pathways present.

HRA screening conclusion

4.11 The Sustainable Construction SPD provides further guidance to support the implementation of a number of policies within the Local Plan. These policies have already been considered through the HRA of the Local Plan, there are no impact pathways present and no implications were found. The SPD does not set the principle of development nor does it direct development to a specific location. A full appropriate assessment is not required.

4.12 This determination was made on 14th January 2020.

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