

Report to	Planning Committee
Date	08 October 2020
By	Director of Planning
Local Authority	Wealden District Council
Application Number	SDNP/20/02124/FUL & SDNP/20/02244/LIS
Applicant	South Downs National Park Authority
Application	SDNP/20/02124/FUL: Exceat - Additional toilet facilities, and improvement to existing facilities - Improvements to pedestrian and vehicular access - minor internal alterations within Visitor Centre building (Grade II Listed) and Dairy Barn to provide additional office accommodation; Improvements to the public realm to enhance the farmstead character of Exceat; Foxhole Camping Barn - Extension of facilities block; 1-3 Foxhole Cottages - erection of extensions and subdivision of Cottages to create 4 residential units (consisting of 1 unit of warden accommodation and 3 holiday lets).
Address	Seven Sisters Country Park, East Dean Road, Exceat, East Sussex, BN25 4AD
Application	SDNP/20/02244/LIS: Internal alterations to existing toilet block, workshop, ranger office, dairy barn and visitor centre to facilitate increased accessibility to visitor centre, additional toilets, confectionery outlet and office space. Replacement of existing glazed door in Visitor Centre and installation of doors in existing toilet block.
Address	Exceat Barn, East Dean Road, Exceat, East Sussex, BN25 4AD

Recommendation for SDNP/20/02124/FUL: That planning permission be granted subject to conditions as set out in Paragraph 10.1 of the report.

Recommendation for SDNP/20/02244/LIS: That listed building consent be granted subject to the conditions as set out in Paragraph 10.2 of the report.

Executive Summary

The report concerns two applications concerning the Seven Sisters Country Park. The application for planning permission concerns three sites Exceat, Foxhole Cottages and Foxhole Camping Barn. The application proposes enhancements of the existing facilities at Exceat and improvements of the existing camping barn and provision of holiday lets at Foxhole Cottages.

Objections have been received from East Sussex County Council (ESCC) Highways and ESCC Drainage as well as an objection having been raised by Cuckmere Valley Parish Council. It is considered that the issues raised through these consultation responses do not result in sufficient harm as to justify refusal of the application and can be adequately addressed through the use of appropriately worded conditions.

The Development Plan contains a number of directly relevant policies, key of which in relation to the principle of the proposed development is SD23. Together with all relevant development plan policies the proposal is found to be acceptable subject to the imposition of appropriately worded conditions.

The alterations to Exceat require listed building consent and an application for this has been submitted under reference SDNP/20/02244/LIS. The alterations to Exceat are deemed to either result in no harm or at the very worst 'less than substantial harm'. Where less than substantial harm has been identified this has been weighed against the public benefits of the development and found to be acceptable in accordance with the NPPF. The impact of the development upon the non-designated heritage assets of Foxhole Cottages and camping barn have also been considered and are deemed acceptable.

Therefore, it is recommended that planning permission is granted for the proposed development subject to the conditions proposed. The application is placed before Committee for consideration by virtue of the developments nature and because the South Downs National Park Authority is the applicant.

I. Site Description

- I.1 The application concerns Seven Sisters Country Park which is situated within the Cuckmere Valley and is a Site of Special Scientific Interest (SSSI) and also a Local Nature Reserve (LNR). The application relates to three specific areas which are the converted agricultural buildings (formerly Exceat Farm) located to the north of the A259. As well as Foxhole Cottages and Foxhole Camping Barn which are located to the south of the A259 within the Seven Sisters Country Park.
- I.2 Exceat is a traditional farmstead located on the east side of the valley of Cuckmere River and is located approximately 0.5km west of the village of Westdean. The farmstead is currently in use as a visitor's centre, offices and stores for the rangers of the Seven Sisters Country Park. The farmhouse and the linked barns are Grade II listed buildings.
- I.3 Foxhole Cottages consist of a pair of semi-detached two storey dwellings and a detached two storey dwelling. Foxhole 1 is constructed from flint with brick dressings to the windows and brick quoins and features a gabled clay tile roof with end stacks. Foxhole 2 and 3 are constructed from flint with brick dressings and a plain clay hipped roof with a central stack. The Cottages are located approximately 1.2km south of the village of West Dean on the eastern side of the valley of Cuckmere River and are well screened by existing tree planting. To the north-east of the cottages are a number of modern pre-fabricated farm buildings. The cottages have a restricted presence within views by virtue of their position at the foot of the valley and the significant tree screening they benefit from.
- I.4 Foxhole Camping Barn is situated approximately 150m to the south-east of Foxhole Cottages and is a six-bay barn constructed from flint with brick dressings to the openings of the threshing bay and ventilation slits; unusually, at the corners where there are usually brick quoins the flint walling is curved so that bricks were not required. The roof is half-hipped and features clay tiles. The yard to the south of the barn is enclosed by a high flint wall to the east and south with a modern single-storey brick and tile mono-pitched building located to the west which provides services in association with the existing camping use.
- I.5 The barn has strong presence within views from the north by virtue of the topography of the site but benefits from mature tree screening to the south which, in conjunction with its location in a sheltered fold in the hillside, results in only limited views from the south.

2. Relevant Planning History

- 2.1 SDNP/14/05195/LIS: Replace Rangers office roof, including placement of bat boxes attached to the building. Rebuild flint wall and re-cover roof of Canoe Barn. The application was approved on the 19 December 2014.

Pre-application advice

- 2.2 A pre-application enquiry was submitted under reference SDNP/20/00738/PRE. The pre-application response concluded that the principle of the proposed development was

acceptable and that it would be likely to accord with relevant development plan policies subject to appropriate evidence being submitted in support of any application.

3. Proposal

3.1 The proposal SDNP/20/02124/FUL seeks planning permission for:

Exceat

- Visitors Barn – Introduction of flooring-over existing bays to the south-west end of building to bring floor level to the same height as the threshing bay and north-eastern bays and introduction of replacement glazed entrance.
- Toilet Block – Relocation of existing toilet facilities to the existing Workshop building and change of use to provide 'Grab and Go' facility for food and drink. This will include the removal of existing modern internal partitions. New larger opening to be created in the south-western elevation to provide serving window and insertion of folding glazed doors.
- Dairy Barn – Conversion to provide a series of offices and meeting rooms, together with staff toilets and locker room. External alterations to the building consisting of infilling of two existing doors on the south-eastern elevation and a window on the same elevation to be altered to provide a new door opening.
- Rangers Offices – Provision of a new ramped access on the south-west elevation in place of the existing ramp and handrail.
- Workshop – Conversion of existing building to provide larger toilet facility for the site and external cladding of the building with vertical timber boarding.
- Boundary Wall – A new opening in the flint wall to the north of the site will provide vehicle access to the Saltmarsh Café and staff car park.

1 Foxhole Cottage

- Use of No.1 Foxhole Cottage as a holiday let and the construction of a single storey extension connected to the host dwelling by link structure providing an accessible bedroom suite.
- Introduction of storage structure to the western elevation of the dwelling incorporating log store, bin store and air source heat pump. The proposed structure will measure approximately 4.64m in length, 1.45m in width with a maximum height of 2m.
- The proposed extension will measure approximately 3.77m by 8.37m with an eaves height of 2.6m and a maximum ridge height of 4.93m. The proposed link will measure approximately 1.26m in length, 1.45m in width with a maximum height of 2.6m.

2 and 3 Foxhole Cottage

- Conversion of cottages to form one three-bedroom holiday let and two one-bedroom flats within no. 3 Foxhole Cottages.
- Extension to the western elevation of no. 3 Foxhole Cottage which will have a minimal impact upon the existing angle of the roof. The proposed extension will measure approximately 0.71m in width and 6.34m in length with an eaves height of 2.45m and a maximum ridge height of 2.92m.

Camping Barn

- Improvement of internal facilities within the camping barn to create sleeping pods for various sized groups.
- Extension of the existing modern service building to provide a larger structure containing toilets, washing and kitchen facilities. The extended structure will be L-shaped with the south-east to north-west element measuring approximately 15.5m in length and 4m in width. The element extending from the south-west to the north-east will measure approximately 6.4m in length and 3.23m in width with the building featuring a maximum eaves height of approximately 2.65m and a ridge height of 3.78m.

Vehicular Access

- Motorised vehicle access to Foxhole Cottages and the camping barn will be restricted with guests required to park in the existing car parks. An electric vehicle will be available to transport luggage and those guests who require support, some exceptions may be made for blue badge holders. Pedestrian and cyclist access will remain unchanged from the current situation as will the existing arrangements for refuse collection.

3.2 The application SDNP/20/02244/LIS, for listed building consent relates solely to Exceat and seeks planning permission for the following works:

Exceat

- Visitors Barn – Introduction of flooring-over existing bays to the south-west end of building to bring floor level to the same height as the threshing bay and north-eastern bays and introduction of replacement glazed entrance.
- Toilet Block – Relocation of existing toilet facilities to the existing Workshop building and change of use to provide ‘Grab and Go’ facility for food and drink. This will include the removal of existing modern internal partitions. New larger opening to be created in the south-western elevation to provide serving window and insertion of folding glazed doors.
- Dairy Barn – Conversion to provide a series of offices and meeting rooms, together with staff toilets and locker room. External alterations to the building consisting of infilling of two existing doors on the south-eastern elevation and a window on the same elevation to be altered to provide a new door opening.
- Rangers Offices – Provision of a new ramped access on the south-west elevation in place of the existing ramp and handrail.
- Workshop – Conversion of existing building to provide larger toilet facility for the site and external cladding of the building with vertical timber boarding.
- Boundary Wall – A new opening in the flint wall to the north of the site will provide vehicle access to the Saltmarsh Café and staff car park.

4. Consultations

4.1 Natural England: No Objection

- The proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.

4.2 Ecology; Recommend for approval in principle subject to the imposition of conditions

- Whilst the proposed development is likely to have an impact on biodiversity, those impacts can be mitigated through the application of planning conditions.

4.3 Environment Agency: No Objection subject to condition

4.4 Environmental Health: No Objection subject to condition

4.5 Design Officer: No Objection

- The applicant has provided a landscape-led approach to design with a clear rationale for this phase of works. Furthermore, they have set out a clear narrative and iterative design process, demonstrating how the final design appropriately responds to the site and its setting.
- The proposals are delivered with minimal intervention, causing no significant loss to the special architectural or landscape qualities of the site and its surrounding context. Additionally, the design provides significant net-gains across many important South Downs Local Plan policies.
- The reuse of locally sourced materials, might provide some further inspiration, even reflect how vernacular buildings were traditionally built. The black metal cladding is a material found in agricultural landscapes but the contrast it creates between old and new

is quite stark and more natural materials would weather far more naturally – black zinc cladding would also soften the contrast.

- Most of the practical elements of the scheme are addressed with care and some ingenuity, it is evident that these have been well-considered and successfully integrated whilst retaining the overall character of the development, at both Exceat and Foxhole Cottages

4.6 Tree Officer: No Objection

- Sufficient detail has been provided to adequately inform the application. The proposals have limited impact on local tree amenity value and are reasonable for the restoration of the development of the buildings, structures and services onsite. Suitable methodology has been provided to ensure retained trees are protected and sustainably retained post-development.

4.7 Wealden District Council: No comments

4.8 Cuckmere Valley Parish Council: Objection

- Not enough provision has been put into the car parking capacity and management. Both need to be improved in Phase I.
- A proactive approach is needed to keep the river mouth clear of shingle, to allow unimpeded drainage of the valley into the sea. Without this there will be further prolonged flooding of the valley and the roads, and even the car parks.
- Parking is already a problem here. There needs to be measures in place which prevent parking on the road and its verges. The increase in visitor numbers will result in more damage to the verges and even more cases of dangerous parking which impedes access around Exceat and to the villages.
- The car parks are inadequate and the cost of parking is too expensive for short stays which results in people parking on the roads and verges. Parking should be supervised until the issue can be more permanently addressed as part of the next phase.
- The wisdom of expecting self-catering guests to walk or cycle to the cottages or wait for an electric vehicle is questioned by Councillors.
- There are concerns with the amount of litter and the impacts this will have on the surrounding areas especially from the 'Grab and Go' food outlet. The impact of dog mess on the wider area also needs to be addressed with carefully sited bins needed.
- Cuckmere Valley Parish Council do consider the plans for Exceat and the cottages to be well thought out but the water level management and parking, in particular are serious cause for concern.

4.9 County Landscape Architect: Recommended for approval subject to condition

- A Landscape and Visual Appraisal (LVA) has been submitted to support the application. This provides an accurate description of the baseline landscape and visual context for the site(s) and surrounding area. It is recommended that any future proposals for vegetation management in the gardens are informed by detailed surveys and a retention and protection plan for the existing trees and shrubs.
- There are some fine specimens of sycamore to the rear of the camping barn which do actually contribute to local character and setting of the barn and walled courtyard. For both sites it is recommended that the proposed tree retention and protection measures suggested in the arboriculture report are required by condition. It is also recommended that a management plan is required for the removal and replacement of ash where showing signs of ash die back disease.
- The conclusions of the LVA with regard to potential landscape and visual effects of the proposed development are not disputed. It is noted that these would be generally beneficial.

- The landscape led approach to the development proposals is welcomed and would ensure that the proposed development would conserve and enhance the landscape character and visual amenity of the South Downs National Park. The retention of the farmstead character and sensitive choice of materials for the Foxhole site will ensure protection and enhancement of the SDNP landscape.

4.10 **Archaeology:** No Objection

- After consideration of the information supplied, there are no significant below ground archaeological remains that are likely to be affected by these proposals.

4.11 **Highways:** Objection

- Whilst the applicant seems to suggest that there would not be an increase in use the enhancement of facilities at Exceat it will inevitably attract more visitors to the site. Furthermore, the camping barn with additional facilities and the 3 holiday cottages will increase footfall and vehicles to this site using the existing accesses onto the A259 and Litlington Road [C120]. Thus, a Transport Statement needs to be submitted as part of this Application This will need to recommend realistic proposals for providing for and improving non-car modes of travel, through walking, cycling and public transport and assess the residual impact of the development on the surrounding highway network with ameliorative measures as necessary.

4.12 **Drainage:** Objection due to insufficient information

- The applicant proposes to discharge surface water runoff from the proposed development via infiltration at both Exceat and the Foxhole Cottages and camping barn. The site is predominantly underlain by the Seaford Chalk Formation and survey data indicates that groundwater could be less than 3m beneath surface. Given the sites proximity to the River Cuckmere, ESCC have concerns that elevated groundwater levels will preclude the use of soakaways.
- It is recommended that surface water is attenuated on site and discharged to the River Cuckmere at a restricted rate, via a newly established outfall. The proposed drainage strategy should demonstrate that runoff from the proposed development will be restricted as close to greenfield runoff rates as is feasible for all events.
- Little detail is given on the existing drainage that serves the existing impermeable areas and buildings. Should the applicant wish to make use of existing drainage infrastructure then details will be required, along with evidence that any increase in surface water drainage can be accommodated without increasing flood risk.
- A drainage management plan, detailing the schedule of maintenance as well as contact details for those responsible and evidence that this agreement will be in place for the lifetime of the development.

4.13 **Seaford Town Council:** Support

- Proposal brings several vacant buildings back into beneficial use and enhances the general character and appearance of the group of buildings.
- Concerns with the additional vehicular and pedestrian traffic which the proposals would generate.
- Consideration needs to be given to the proper level of safe and adequate parking provision without prejudicing the character and appearance of the area.
- Concerns of the Saltmarsh Farmhouse Café noted and hoped that the SDNPA will address these concerns fair and reasonably.
- Materials for the extension of 1 Foxhole Cottages considered to be unattractive and out of keeping with the existing character of the cottage.

4.14 **East Dean and Friston Parish Council**

- Recommended that improved provision of car parking and management, enhanced pedestrian safety and proactive approach to keeping the river mouth clear of shingle

5. Representations

5.1 SDNP/20/02124/FUL: There have been 8 representations objecting, 3 general comments and 2 in support of the application.

5.2 The main concerns raised by objectors include:

- Lack of parking facilities to cope with the visitors, already issues with parking on verges.
- The A259 cannot sustain the increase in traffic movement, causing congestion and pollution.
- Pedestrian safety could be put at risk without appropriate measures
- Lack of waste facilities, in particular dog waste bins. Waste facilities for the holiday lodges will be commercial waste, concerns raised as to where the waste will be stored and how removed from the site;
- River and general site maintenance, if the river is not maintained appropriately there could be issues with flooding upstream. Concerns have been raised over the increase in footpath use, and their maintenance
- Impact of the development on wildlife
- Toilet cleaning, maintenance and general workings. Current toilets are susceptible to flooding when the water table is high
- No overhead cabling should be included due to impact on wildlife, particularly birds.
- Choice of materials on foxhole cottages is out of character and inappropriate for the locality
- Over commercialisation of the area

5.3 SDNP/20/02244/LIS: A public representation has been received from the Saltmarsh Café in relation to both the application for planning permission as well as the application for listed building consent. The representation focuses largely upon the existing legal arrangements between the café operators and the freeholder of the site. Whilst, these comments are noted they are a legal matter which falls outside the scope of the application for planning permission and listed building consent. Concerns have also been raised in regards to surfacing and bin provision which again falls outside the scope of the consideration of this application for listed building consent but has been given due consideration in regards to the application for planning permission.

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 in the determination of this application comprises of the South Downs Local Plan 2014-2033. 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 National Planning Policy Framework (NPPF) which was issued and came into effect on 24 July 2018 and revised 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 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.

National Planning Policy Framework (NPPF) 2019

6.4 The National Planning Policy Framework has been considered as a whole. The following NPPF sections have been considered in the assessment of this application:

- Achieving sustainable development
- Promoting sustainable transport
- Delivering a wide choice of high quality homes
- Requiring good design
- Meeting the challenge of climate change, flooding and coastal change.
- Conserving and enhancing the natural environment

Relationship of the Development Plan to the NPPF and Circular 2010

6.5 The development plan policies listed below 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 2014-2019

6.6 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 relevant Outcomes include: 1, 3, 4, 5 and 7.

6.7 Other relevant guidance and evidence documents

- South Downs Integrated Landscape Character Assessment (2011)

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, significance, character or appearance.

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

6.10 Section 16 relates to applications for listed building consent and states that “In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.

7. Planning Policy

7.1 The following policies of the South Downs Local Plan 2014-2033 are relevant:

- 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
- SD18: The Open Coast
- SD19: Transport and Accessibility
- SD20: Walking, cycling and Equestrian routes
- SD21: Public Realm, Highway Design and Public Art
- SD22: Parking Provision
- SD23: Sustainable Tourism
- SD25: Development Strategy
- SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings
- SD43: New and existing community facilities
- SD48: Climate Change and Sustainable Use of Resources
- SD49: Flood Risk Management
- SD50: Sustainable Drainage Systems
- SD51: Renewable Energy

8. Planning Assessment

Principle of development

- 8.1 The application site is situated outside of the settlement boundary as defined by policy SD25 of the South Downs Local Plan (SDLP).
- 8.2 Policy SD25(2) identifies that exceptionally development will be permitted outside of settlement boundaries, where it complies with relevant policies in the local plan and responds to the relevant broad area and complies with one or more of (a), (b), (c) and (d) of SD25(2).
- 8.3 SD25(2)(d) states that exceptionally development outside of the settlement boundary will be acceptable where it is an appropriate re-use of a previously developed site which conserves and enhances the special qualities of the National Park. In this case the enhancement of facilities at Exceat and the Foxhole camping barn would not conflict with any of the Special Qualities of the South Downs National Park whilst providing great opportunities for recreational activities and learning experiences. Therefore, these elements of the proposals would accord with policy SD25(2)(d) of the SDLP.
- 8.4 Paragraph 7.10 of the SDLP identifies that exceptions to the development strategy are set out in other policies in the Local Plan so long as robust evidence is provided in support of such applications to demonstrate that an exceptional approach is fully justified. In the consideration of this application policies SD23 (Sustainable Tourism) and SD43 (New and Existing Community Facilities) of the SDLP are relevant.
- 8.5 Policy SD23 identifies that development proposals for visitor accommodation, visitor attractions and recreation facilities will be permitted where they accord with the requirements of the policy. The entirety of the development proposed by this application would fall within the scope of policy SD23.
- 8.6 All aspects of the proposal would provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities of the National Park. Providing the facilities for recreational and learning experiences whilst enhancing opportunities for visitors and guests to experience diverse and inspirational landscapes, breath taking views and a rich variety of wildlife and habitats in accordance with SD23(1)(a).

- 8.7 The proposed developments make use of existing built form with some minor additions which do not adversely impact upon the experience of visitors or the character, historical significance, appearance or amenity of the area. The development is located in close proximity to public transportation and the wider public rights of way network. Therefore, access to the facilities proposed will be possible via sustainable means. It is proposed to discourage the use of private motor vehicles to access the cottages and camping barn which will reduce vehicular movements to and from the cottages and camping barn and encourage the use of sustainable transport. Therefore, the proposals are deemed to be in accordance with SD23(1)(b), (c) and (d).
- 8.8 The proposed 'grab and go' facility and other amendments are not deemed to be disproportionately large in relation to the rest of the visitor facilities at Exceat. Nor are any of the proposals which form part of this application deemed to have an adverse impact upon the vitality and viability of town or village centres of any assets of community value. Therefore, the proposals will accord with SD23(1)(e) and (f).
- 8.9 SD23(1)(g) identifies that development proposals that are located outside of the settlement boundary must contribute to the natural beauty, wildlife and cultural heritage of the National Park; and be closely associated with other attractions/established tourism uses, including the public rights of way network.
- 8.10 The development will make a positive contribution to the natural beauty, wildlife and cultural heritage of the National Park through the sympathetic alteration of a listed building to ensure it remains accessible to all and viable for its continued operation which the development will result in a net gain in biodiversity. The proposals will be closely associated with established tourism uses (Seven Sisters Country Park) as well as the public rights of way network. Therefore, the development would meet the tests of SD23(1)(g)(i) and (ii).
- 8.11 The application concerns the improvement and enhancement of an existing community facility and as such Policy SD43 is relevant to the consideration of the proposals. Policy SD43 seeks to support new facilities and protect existing community facilities. In this case the proposals are for the enhancement of an existing facility with the application seeking to improve the existing offer within the existing structures on site. Therefore, the proposals do not expand upon the existing tourism offer but rather improve it. As such the policy tests are not directly relevant to the proposed development which would not conflict with the requirements of policy SD43.
- 8.12 As identified above the proposed development at Exceat and the camping barn would accord with policy SD25(2) whilst the entirety of the proposals would accord with policy SD23(1) of the SDLP. Therefore, the principle of the proposed development is acceptable subject to the developments accordance with all other relevant development plan policies.

Design and landscape

- 8.13 Proposals must 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.
- 8.14 The application was accompanied by a Landscape Visual Assessment (LVA) which has sought to set out how the landscape led approach had been adopted in the preparation of the proposed development. The LVA has been the subject of consideration by the County Landscape Architect who has raised no objection and identified that the design of the development has been landscape led.
- 8.15 It has also been confirmed by the County Landscape Architect that the LVA provides an accurate assessment of the value, susceptibility and sensitivity of the landscape of the site and surrounding areas. A comprehensive range of viewpoints have been used to assess the potential visual effects and the County Landscape Architect does not dispute the conclusions of the LVA.
- 8.16 The LVA concludes that the impact of the proposals would have either neutral or beneficial effects with many of the potentially negative effects having been avoided, designed-out or mitigated through the early design stages. Therefore, the proposals would conserve and

enhance the landscape of both Exceat and Foxhole Farm and as such the development would accord with policies SD4 and SD5 of the South Downs Local Plan (SDLP) insofar as they concern the landscape led approach.

- 8.17 Concerns have been raised by local residents and the Parish Council in regards to the number of vehicles parking upon grass verges in and around Exceat. It is acknowledged by the Local Planning Authority (LPA) that the parking of vehicles in this manner can adversely impact upon the character of the locality and the wider landscape character. However, the proposed enhancements to Exceat, Foxhole Cottages and Foxhole camping barn will not by themselves give rise to a significant increase in vehicular movements to and from the site.
- 8.18 The proposals are unlikely to generate a significant level of additional vehicular movements or increase the level of parking upon the grass verges to the extent that the impacts of this upon the character of the area and wider landscape would make the proposed development unacceptable.
- 8.19 Consideration has been given to each specific element of the proposals below in more detail.
- Exceat:
- 8.20 The majority of the alterations proposed in regards to Exceat consist of internal alterations with some minor external alterations to facilitate the conversion of existing structures. The primary external alterations concern the conversion of the existing toilet block to provide new refreshment facilities; introduction of a replacement glass door on the primary elevation of the Visitor Centre building; in conjunction with public realm enhancements in and around the site.
- 8.21 A number of minor alterations are also proposed to the dairy barn primarily the introduction of a new opening in the location of an existing window; replacement of existing stepped access with a ramp; removal of an existing soil vent pipe; and removal of flue.
- 8.22 The proposed external alterations to Exceat do not result in any unacceptably adverse impacts upon the established character and appearance of the existing buildings, immediate locality or wider landscape. Therefore, the proposals are deemed to accord with the requirements of SD4 and SD5 of the SDLP.
- 8.23 A number of representations have made reference to the lack of bin provision in and around the site. Given the nature of the proposals it is considered reasonable to secure details of bin provision to ensure that visitors to the site are provided with adequate opportunity to dispose of any rubbish or refuse obtained through the use of the proposed 'Grab and Go' facility. The use of a suitably worded pre-commencement conditions is deemed to be an appropriate means by which to secure these details.

Foxhole Camping Barn:

- 8.24 The application proposed some internal alterations to the existing camping barn which would see the introduction of free-standing camping pods and bunks. These works would not constitute development under Section 55 of The Town and Country Planning Act 1995 (as amended) and as such do not form part of the consideration of the design of the proposals.
- 8.25 The key elements of the scheme in relation to the camping barn are the removal of the open-sided shelter which is currently sited in the north-eastern corner of the site and the extension of the existing facilities building which is located to the south-west of the existing camping barn.
- 8.26 The proposed extension will increase the footprint of the existing facilities building greatly enhancing the facilities available to campers. The proposed floor plan shows a significant increase in toilet and shower facilities as well as improved kitchen and food preparation facilities. These enhancements are of great value when the proposals are considered against the second purpose of the National Park.
- 8.27 The proposed extension will have an impact upon the character of the site itself but it will appear in keeping with the existing agricultural character and is not deemed to result in unacceptably adverse harm to the site or importantly its wider setting. The South Downs

Way (Footpath 27) is situated to the south-west of the application site but by virtue of the topography of the land views of the site will not be possible to users of the South Downs Way.

- 8.28 There are a number of informal footpaths which exist around the site from which the proposed extension will be visible. However, the proposed extension is considered to respect the established character of the site whilst the existing tree screening will limit long range views with the existing barn obscuring the proposed extension when viewed from the north. Therefore, the proposed extension to the facilities building is deemed to accord with the requirements of SD4 and SD5 of the SDLP.

Foxhole Cottages:

- 8.29 The alterations to Foxhole Cottages will consist of the introduction of a single storey extension to 1 Foxhole Cottage; introduction of a log store, bin store and air source heat pump housing to the west of 1 Foxhole Cottage; a single storey side extension to 3 Foxhole; and the conversion of 3 Foxhole cottage to provide 1 no. 2 bedroom unit and 1 no. 1 bed unit.
- 8.30 The proposals also include the introduction of a building for use as storage of tools and equipment associated with the management and maintenance of the Camping Barn and Cottages as well as improvements to the gardens and surrounding area to enable better access to the cottages and support a 'car free' zone at Foxhole.
- 8.31 The proposed single storey extension to 1 Foxhole Cottage has been designed to read as a detached outbuilding with access to the bedroom via a single storey link. This approach is supported as it will ensure that the existing character of the dwelling is retained. The proposed extension by virtue of its size and height is not considered to result in any unacceptably adverse harm to the established character of the host dwelling or the wider locality. Whilst, it will be visible from the north, east and south it will be obscured by the existing tree planting and will read as an ancillary structure to the host dwelling.
- 8.32 The proposed extension to 1 Foxhole Cottages will feature a bike store, bedroom and en-suite bathroom and would result in the dwelling going from a three-bedroom dwelling to a four-bedroom dwelling. The proposed gross internal floor area of the extension and store to 1 Foxhole Cottages in combination will measure approximately 34.01m² which will equate to a 28% increase in floor area. Therefore, the proposals will accord with policy SD31(I) of the SDLP.
- 8.33 The alterations to 2 and 3 Foxhole Cottage will include the introduction of a single storey extension to the west of cottage 3 with a door introduced to the northern elevation to provide access to the operational store. Attempts have been made for the extension to replicate the existing design of the cottage but the small extension will unbalance the pair of cottages. However, this is not considered to result in unacceptably adverse harm to the established character of the cottages, especially when the extent of screening present around the site is taken into consideration. The proposed extension to 3 Foxhole Cottage by virtue of its floor area does not conflict with policy SD31 of the SDLP.
- 8.34 The final element of the proposals in regards to Foxhole Cottages concerns the subdivision of 3 Foxhole Cottage to provide an additional unit to provide warden accommodation. The units which will be created through the subdivision of the existing 3 bed dwelling will consist of 2 no. 1 bedroom units resulting in the loss of one bed space.
- 8.35 In the consideration of this element there are no specific policies contained within the South Downs Local Plan which are directly relevant to the subdivision of an existing residential unit. However, Policy SD23 of the South Downs Local Plan concerns sustainable tourism and is the most relevant consideration for this element of the proposals. The subdivision of the existing dwelling will create two units of accommodation one of which will be occupied solely as holiday accommodation with the first-floor unit to provide warden accommodation associated with the tourism use at Foxhole Cottages as well as the camping barn.
- 8.36 The proposed subdivision will result in the loss of an existing three-bedroom dwelling which along with two-bedroom dwellings are identified as the most needed within the park.

However, the HEDNA also identifies a significant shortfall in one-bedroom units which are rarely developed within the Park. Irrespective of this the provision of sustainable visitor accommodation is supported by policy SD23 of the South Downs Local Plan. Therefore, the use of a suitably worded condition, restricting occupation of the properties to visitor and warden accommodation only would overcome any concerns with the change from a three bed dwelling to a one-bedroom dwelling (which will provide tourism accommodation) in this isolated location. Therefore, in this case the subdivision of the existing dwelling is considered to accord with policy SD23 of the SDLP.

Residential amenity

- 8.37 The proposals by virtue of their design, siting and location will not give rise to any unacceptably adverse harm to the amenity of any neighbouring uses or residential properties. Environmental Health have also been consulted on the proposals and have raised no objections to the development. However, it was recommended that a condition restricting hours of operation for electrical equipment was proposed. It is considered that in this case it would be appropriate specially to ensure the tranquillity of the sites is preserved during development.
- 8.38 Therefore, subject to the proposed condition the proposals are deemed to accord with policies SD5(k) and SD31 of the South Downs Local Plan.

Listed Building and Heritage

- 8.39 The Planning (Listed Building and Conservation Areas) Act 1990 sets out the statutory approach to the management of historic buildings and areas and requires special regard to be given to the desirability of preserving a listed building and any features of architectural or historic interest it possesses under Section 66 which should be afforded considerable importance and weight.
- 8.40 This statutory approach is reflected in Outcome 4 and Priority 4.1 of the Partnership Management Plan 2020-2025, as well as policy SD12 of the South Downs Local Plan.
- 8.41 The National Planning Policy Framework (NPPF) under paragraph 20(d) states that the planning system should contribute to and enhance the natural and local environment. The application is accompanied by a 'Heritage Assessment' which provides proportionate detail in regards to the proposed developments upon the setting or significance of heritage assets affected by this development in accordance with paragraph 189 of the NPPF.
- 8.42 Paragraph 190 of the NPPF identifies that the Local Planning Authority (LPA) should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including development which may affect the setting of a heritage asset), taking into account any available evidence and necessary expertise. Paragraph 192 states that in determining planning applications the LPA should take into account the desirability of sustaining and enhancing the significance of the heritage asset; the positive contribution that conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 8.43 Paragraph 193 of the NPPF 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 assets conservation and the more important the asset the greater the weight should be irrespective of whether any harm amounts to substantial harm.
- 8.44 Historic England's Good Practice Advice in Planning Note 2 (March 2015) states that understanding the nature of significance is important for understanding the need for and best means of conservation. Understanding the extent of that significance leads to a better understanding of how adaptable a heritage asset may be and provides the essential guide as to how policies should be applied.
- 8.45 The farmhouse and the two linked barns, including the connecting Ranger Office are listed at Grade II. These buildings are identified in the heritage statement as being of importance in a national context as examples of local vernacular style of farm building architecture. The ox stall range (Dairy Barn) and through this the Jaguar Barn (the former open-fronted shed) by being attached to the listed building are also considered to be listed.

- 8.46 The alterations to the Visitor Barn will consist of flooring-over the two bays to the south-west to bring the floor level to the same height as the threshing bay and north-eastern bays. This will be achieved through the insertion of a suspended timber floor supported on posts which require no intervention into the historic fabric of the barn. The heritage statement identifies that the lower floor level in the south-western part of the barn is unlikely to be original and as such would not represent an important part of the significance of this building and as such the creation of a level floor would not harm the character or understanding of the listed building. Similarly, the alteration is reversible and as such does not impact upon the history of the development of the barn.
- 8.47 The provision of level access across the whole of the building represents a (non-heritage) public benefit by providing equal access to all parts of the barn for visitors. Therefore, these alterations are not considered to result in any irreversible harm to the special interest or significance of the listed building.
- 8.48 Alterations to the Dairy Barn consist of the conversion to provide a series of office and meeting rooms, together with staff toilet and locker room. The Dairy Barn has been previously compartmentalised and there has been a near total loss of agricultural character and a higher quality conversion is likely to constitute an enhancement of the existing interior. The north-eastern section of the building retains some agricultural character but the fittings are late 20th century concrete. The alterations will result in an impact upon the character of the building but the only feature of historic significance is the roof structure. The conversion of the building will bring a partially redundant building back into viable and active use as part of the wider Exeat complex.
- 8.49 The alterations to the dairy barn will have minimal impact upon the external appearance or character of the building although some minor alterations are proposed externally. However, these alterations do not harm the significance or setting of the building.
- 8.50 The only alteration proposed to the Ranger Office is the introduction of a paved ramp to the entrance on the south-west elevation. There is already an existing platform bounded by a low brick wall and metal handrail. The alterations proposed will only have a minimal impact upon the existing appearance of the building and would not result in any harm to the setting or significance of the listed building.
- 8.51 The application proposes the removal of the existing toilet facilities from the toilet block and incorporate them within the Workshop. It is then proposed for this building to be converted to provide a 'Grab and Go' facility for food and drink. The proposal required the removal of the modern partitions to form a single large space with the exception of an enclosed store in the western corner of the building.
- 8.52 The primary external impact in the appearance of the building will be upon the south-western elevation, where a larger opening will be provided. This element of the proposals will result in the loss of some historic flint work but no features of archaeological or architectural interest that provide evidence for the original use of the building would be lost. The heritage statement concludes that this building has limited significance apart from its use of vernacular materials and as such the proposed alterations would result in less than substantial harm to the significance of the designated heritage asset.
- 8.53 Therefore, in accordance with paragraph 196 of the NPPF this harm will need to be weighed against the public benefits of the proposed development. The provision of the 'Grab and Go' facility will bring additional income to the Seven Sisters Country Park assisting with the ongoing maintenance of the wider listed buildings complex. It will also encourage greater use and appreciation of the designated heritage asset by the public. Therefore, in this case the minimal loss of historic fabric is considered to be outweighed by the benefits of the proposals.
- 8.54 The proposal is to convert the existing Workshop to provide a larger toilet facility for the site. The workshop is of the late 20th century and as such has no heritage value. Therefore, the alterations to the fabric and interior of the building will not cause any harm to the heritage value of the farmstead. It is proposed to clad the brickwork with vertical timber

cladding which will represent an enhancement in the appearance of the building making a positive contribution to the setting and significance of the designated heritage asset.

- 8.55 The final element of the proposals to Exceat consist of the creation of a new opening in the boundary wall to the north-west of the farmstead to provide improved access to the car park. The removal of this area of historic boundary wall will again result in less than substantial harm and as such in accordance with paragraph 196 of the NPPF this must be balanced against the public benefits of the proposal. In this case the alterations will improve the arrangements for pedestrian and vehicular movements around the site providing benefits to public safety whilst using the site. Therefore, the public benefits of the proposal would outweigh any harm to the setting or significance of the designated heritage asset.
- 8.56 In terms of Foxhole cottages and the camping barn the development as proposed will not impact upon the setting or significance of any designated heritage assets. However, there are three Scheduled Monuments in the vicinity of Foxhole which are the Barracks at Cuckmere Haven; Bowl Barrow at Newbarn Bottom (450m east of Foxhole); and Remains of Exceat parish Church. These scheduled monuments are the focus of Archaeological Notification Areas (ANA) but Foxhole does not fall within any of these ANAs.
- 8.57 Foxhole Cottages (1, 2 and 3) are identified within the heritage statement submitted in support of the application to have the potential to be viewed as non-designated heritage assets. Whilst, Foxhole camping barn as potentially having sufficient architectural and historic interest to merit designation as a listed building. The statement does conclude that the present wash house and toilet block to the west of the camping barn yard has no heritage value but does enclose the western side of the yard which is important to the character of the yard.
- 8.58 The proposed alterations to the cottages at Foxhole is not considered to result in any harm to the non-designated heritage assets. The historic elements of the dwellings will be subject to only minimal change which will not alter the contribution they make to the character of the site and the wider landscape. Whilst, the alterations to the camping barn preserve what could be regarded as being of 'special interest' which not listed is probably of listable quality.
- 8.59 The replacement of the modern service building which is of no heritage value with a larger structure will preserve the setting of the barn. The design of the proposed building reflects the form and scale of a shelter shed which is appropriate in this context and will not result in any harm to the character of the site or landscape character.
- 8.60 The proposals have also been the subject of consideration by the Authorities Archaeological Adviser who has raised no objection to the proposed development. Concluding that there no significant below ground archaeological remains that are likely to be affected by these proposals.
- 8.61 Therefore, the proposed development would not result in any harm to the non-designated heritage assets in accordance with the NPPF and Policy 9 of the South Downs National Park Management Plan and Policy SD12 of the South Downs Local Plan.

Highways

- 8.62 A number of objections have been raised through representations and an objection has also been raised by ESCC Highways Authority. The Local Highway Authority are concerned primarily that the enhancement of the facilities at Exceat will generate additional visitors. It is also stated that the enhancement of facilities at the camping barn and introduction of the three units of holiday accommodation will generate additional visitors.
- 8.63 However, in terms of the holiday cottages it is important to note that these are currently in residential occupation and as such already generate associated vehicular movements currently. Similarly, the camping barn is also already in use and whilst the enhancement of facilities (at the camping barn) may well make this element of the proposals more attractive it is unlikely to generate such a significant increase in vehicular traffic to the site as to warrant the level of detail requested by the Highways Authority. Paragraph 109 of the National Planning Policy Framework (NPPF) identifies that development should only be refused on highways grounds when it would result in an unacceptable impact on highway

safety or a residual cumulative impact on the road network that would be severe. Therefore, given the limited impact that the proposed development at Foxhole Cottages and the camping barn would have upon the operation of the highways network refusal of these elements of the application on highways grounds would be contrary to paragraph 109 of the NPPF.

- 8.64 In terms of the enhancement of facilities at Exceat it is clear that this will make the facilities more attractive to those visiting the Seven Sisters Country Park (SSCP) but it seems unlikely that the enhancements themselves would generate a significant level of uplift in visitors to the site. It is possible that by virtue of the enhancements a greater number of visitors to the SSCP will make use of the facilities but this itself is unlikely to generate significant impacts upon the safe operation of the highways network. In addition, the application seeks to improve pedestrian movements through Exceat with better signage and better-defined routes. As such, the proposals are likely to encourage pedestrians to cross the A259 at the most appropriate location as opposed to the current situation.
- 8.65 In terms of specific concerns raised by the Highway Authority these included waste vehicle access to the site and the potential reuse of a redundant access. However, the applicant has provided a response to these matters confirming that no objections have been raised by the local waste team and that the redundant access is intended to be used solely for the purposes of occasional maintenance access. Therefore, these elements alone are also not deemed to warrant refusal of the application in accordance with paragraph 109 of the NPPF.
- 8.66 It is appreciated that the current parking situation on grass verges in and around the site is inappropriate but this development alone will not materially alter this situation. However, it is likely that should any proposals come forward to further enhance the tourism provision at the site then a detailed transport assessment will be required to consider a means by which the existing situation can be improved and any further vehicular movements generated by the site mitigated.

Surface water drainage and flood risk

- 8.67 As identified above the ESCC Drainage Officer has raised an objection on the basis that surface water at the site is less than 3m below surface which may prevent the use of infiltration drainage solutions. The Local Planning Authority (LPA) discussed potential solutions with the drainage officer who identified that they would want to see ground water monitoring results as well as an alternative drainage solution should infiltration not be possible due to ground water conditions. This alternative methodology was provided to ESCC Drainage who have maintained their objection on the basis that the alternative outfall to the pond would still be influenced by ground water levels.
- 8.68 Whilst, the concerns of the Drainage Officer are noted in this instance the LPA are of the view that the use of a suitably worded pre-commencement condition would provide the applicant with the opportunity to undertake winter ground water monitoring to confirm the appropriateness of infiltration drainage at the site. Whilst, not unduly delaying the determination of the application. Should winter ground water monitoring reveal that infiltration is indeed not viable then details of an alternative drainage solution should be set out by the applicant for approval by the LPA in consultation with ESCC Drainage. A condition is also deemed an appropriate means by which to secure an ongoing maintenance manual for the drainage features at the site.
- 8.69 The application was accompanied by a flood risk assessment and was the subject of consultation with the Environment Agency who raised no objection subject to the development being carried out in accordance with the flood risk assessment.
- 8.70 Therefore, subject to the use of appropriately worded conditions concerning the above matters the development is deemed to accord with policies SD49 and SD50.

Ecology and biodiversity

- 8.71 The Authorities Ecologist as well as Natural England have been consulted on the proposed development neither of which have raised an objection to the development subject to the inclusion of appropriately worded conditions.

- 8.72 In terms of badgers the Ecologist has confirmed that the measures identified within the Preliminary Ecological Appraisal (PEA) are appropriate and should be implemented. Mitigation measures have also been identified to avoid any adverse impacts from the development upon bats and breeding birds.
- 8.73 In terms of hazel dormice Foxhole Cottages have been identified as providing low foraging, commuting and nesting potential with connectivity to the larger off-site areas via the boundary hedgerows. The ecologist has confirmed that given the small amount of suitable vegetation to be removed and the fact that the site will remain connected, surveys are not considered necessary, but it is recommended that a precautionary approach is taken which should be established through a method statement.
- 8.74 The proposal includes the loss of amenity grassland, shrub and hedgerow which will result in the loss of terrestrial habitat associated with great crested newts. However, the area to be lost is small and there are significant areas of better-quality habitat in the surrounding landscape. Therefore, it is confirmed that a licence is not required but the works should be carried out under a non-licensed method statement with the mitigation outlined in the 'Protected Species' report being appropriate. In regards to the camping barn the habitats required for removal are small in extent and sub-optimal. Therefore, a precautionary approach is again recommended including phased removal during the active period along with finger-tip searches, again this detail should be set out clearly through a method statement.
- 8.75 Similar method statements are deemed to be necessary for reptiles. As such, the ecologist has recommended that a condition securing a Construction Environmental Management Plan (CEMP) is necessary. Sensitive lighting is also identified as necessary and an Ecological Design Strategy should be secured clearly setting out the measures that will be implemented to mitigate and compensate for the loss of habitats and to provide a net gain for biodiversity.
- 8.76 Therefore, subject to the use of appropriately worded conditions the application is deemed to accord with policies SD2 and SD9 of the South Downs Local Plan.

Climate Change

- 8.77 The application was accompanied by statements concerning SD48 and the measures proposed to meet the policy requirements. Comments are expected from the Authorities Design team concerning the proposals compliance with SD48. Once received this information will be provided to Members as a report update prior to committee.

Dark Night Skies

- 8.78 The proposal does not seek to introduce significant levels of glazing or roof lights and as such the built form will not result in any unacceptably adverse impacts upon dark night skies. The application proposes the removal of 8 no. external light fittings at Exceat with a further 6 no. lights proposed; it is proposed for two lights to be removed and a further 7 external light fittings to be installed at Foxhole Cottages; and 5 no. external lights are to be removed at the camping barn with a single light proposed on the rear elevation.
- 8.79 Overall the number of external light fittings proposed has been reduced but only the plan for the camping barn confirms that the light fitting is to be fitted with a daylight sensor. In order to minimise the impacts of the external light fittings upon dark night skies it is expected that they would be fitted with movement activated sensors or timed. Therefore, it is considered necessary to include a suitably worded condition to secure these details and ensure that the proposals will not conflict with policy SD8 of the South Downs Local Plan.

9. Conclusion

- 9.1 The principle of the proposed development is deemed to be established through the proposals compliance with SD23 and SD25(2) of the South Downs Local Plan. The application for planning permission relates to sustainable tourism and has been found in accordance with the policy requirements.

- 9.2 The proposed development has also been deemed in accordance with all relevant development plan policies and will conserve and enhance the character of the Heritage Coast as well as complying with the special qualities of the South Downs Local Plan.
- 9.3 The application for listed building consent under reference SDNP/20/02244/LIS has also been considered above with the alterations to the listed building resulting in either no harm or less than substantial harm. Where less than substantial harm has been identified the development has been weighed against the public benefit of the proposals and be found acceptable in accordance with the NPPF and policy SD13 of the South Downs Local Plan.

10. Reason for Recommendation and Conditions

- 10.1 It is recommended that planning permission be granted for application SDNP/20/02124/FUL 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 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.

Materials

3. No development above slab level shall be commenced unless and until a schedule of materials and samples of such materials, finishes and colours to be used for external walls, windows, doors, roofs and rainwater goods of the proposed extension and alterations and details of all hard surfacing have been submitted to and approved in writing by the Local Planning Authority. All materials used shall conform to those approved.

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 in accordance with policy SD5 of the South Downs Local Plan.

Landscaping

4. Landscaping (hard and soft) shall be carried out in accordance with the approved details. All planting, seeding or turfing comprised in the approved details shall be carried out in the first planting and seeding seasons following the completion of the development, and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: In the interests of amenity and of the environment of the development in accordance with Policy SD5 of the South Downs Local Plan.

Drainage

5. Development shall not commence at Foxhole Cottages and camping barn, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should 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. No 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 for the lifetime of the development.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Policy SD50 of the South Downs Local Plan. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

6. The development at Foxhole Cottages and camping barn shall not proceed until details have been submitted to and approved in writing by the Local Planning Authority for any proposals to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values. No construction is permitted, which will restrict current and future land owners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policy SD50 of the South Downs Local Plan. And to ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion. It is considered necessary for this to be a pre-commencement condition to protect existing watercourses prior to the construction commencing.

7. Development shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policy SD50 of the South Downs Local Plan. It is considered necessary for this to be a pre-commencement condition to ensure that the future maintenance and funding arrangements for the surface water disposal scheme are agreed before construction commences.

8. The development shall be carried out in accordance with the submitted flood risk assessment (ref 5690/01/HOP/FRA and 15690/02/HOP/FRA). The measures detailed within the FRAs shall be retained and maintained thereafter throughout the lifetime of the development.

Reasons: The condition is in line with the Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change and policy SD49 of the South Downs Local Plan.

Bin Provision

9. Development shall not commence until details of bin provision and details of their maintenance and management have been submitted to and approved in writing by the Local Planning Authority. Prior to the development hereby permitted being brought into use the bins shall be provided on site in accordance with the approved details and retained thereafter.

Reason: In the interests of amenity in accordance with policies SD4 and SD5 of the South Downs Local Plan. It is necessary for this to be a pre-commencement condition to ensure that appropriate bin provision is made prior to the development being brought into use.

Ecology

10. Prior to occupation, a “lighting design strategy for biodiversity” shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the planning authority.

Reason: Many species active at night (e.g. bats and badgers) are sensitive to light pollution. The introduction of artificial light might mean such species are disturbed and /or discouraged from using their breeding and resting places, established flyways or foraging areas. Such disturbance can constitute an offence under relevant wildlife legislation.

11. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

- a) risk assessment of potentially damaging construction activities;
- b) identification of “biodiversity protection zones”;
- c) practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
- d) the location and timing of sensitive works to avoid harm to biodiversity features;
- e) the times during construction when specialist ecologists need to be present on site to oversee works;
- f) responsible persons and lines of communication;
- g) the role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person;
- h) use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period in accordance with the approved details.

Reason: To ensure that any adverse environmental impacts of development activities are mitigated, and to avoid an offence under wildlife legislation.

12. No development shall take place until an ecological design strategy (EDS) addressing the protection and enhancement of retained habitats and the creation of new semi-natural habitats, the provision of bird, bat and insect boxes and the creation of hibernacula and log piles has been submitted to and approved in writing by the local planning authority. The EDS shall include the following:

- a) purpose and conservation objectives for the proposed works;
- b) review of site potential and constraints;
- c) detailed design(s) and/or working method(s) to achieve stated objectives;
- d) extent and location /area of proposed works on appropriate scale maps and plans;

- e) type and source of materials to be used where appropriate, e.g. native species of local provenance;
- f) timetable for implementation demonstrating that works are aligned with the proposed phasing of development;
- g) persons responsible for implementing the works;
- h) details of initial aftercare and long-term maintenance;
- i) details for monitoring and remedial measures;
- j) details for disposal of any wastes arising from works.

The EDS shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To ensure that any adverse environmental impacts of development activities can be mitigated, compensated and restored and that the proposed design, specification and implementation can demonstrate this, and to provide a net gain for biodiversity as required by Section 40 of the Natural Environment and Rural Communities Act 2006, paragraphs 170 and 175 of the National Planning Policy Framework, and Strategic Policy SD9 of the National Park Local Plan.

Environmental Health

13. No power driven machinery shall be used for the construction of the development hereby approved except between the hours of Mon-Fri 0800-1800; Sat 0800-1300 hours; and at no time on Sundays, bank holidays or public holidays.

Reason: In the interests of residential amenity in accordance with policy SD5 of the South Downs Local Plan.

Residential Occupation

14. Foxhole Cottages shall only be occupied as holiday and warden accommodation and shall not be used as an individual's sole or main residence.

Reason: In the interests of sustainability in accordance with policies SD1, SD23 and SD25 of the South Downs Local Plan and the National Planning Policy Framework.

- 10.2 It is recommended that planning permission be granted for application SDNP/20/02244/LIS subject to the following conditions:

1. The works hereby consented shall be begun before the expiration of three years from the date of this consent.

Reason: To comply with the provision of Section 18(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

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. Upon completion of any element of the works for which listed building consent is hereby granted, any damage caused to the fabric of the building shall be made good to the satisfaction of the Local Planning Authority.

Reason: To safeguard the historic fabric and the architectural character and appearance of the listed building.

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

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South Downs National Park Authority

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Appendices I. Site Location Map

SDNPA Legal Services, Development Manager.

Consultees

Background Documents All planning application plans, supporting documents, consultation and third party responses

<https://planningpublicaccess.southdowns.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

South Downs National Park Partnership Management Plan 2013

<https://www.southdowns.gov.uk/national-park-authority/our-work/key-documents/partnership-management-plan/>

South Downs Integrated Landscape Character Assessment 2005 and 2011

<https://www.southdowns.gov.uk/planning/planning-advice/landscape/>

SDNP Local Plan 2019

https://www.southdowns.gov.uk/planning/south-downs-local-plan_2019/

Sustainable Construction SPD 2020

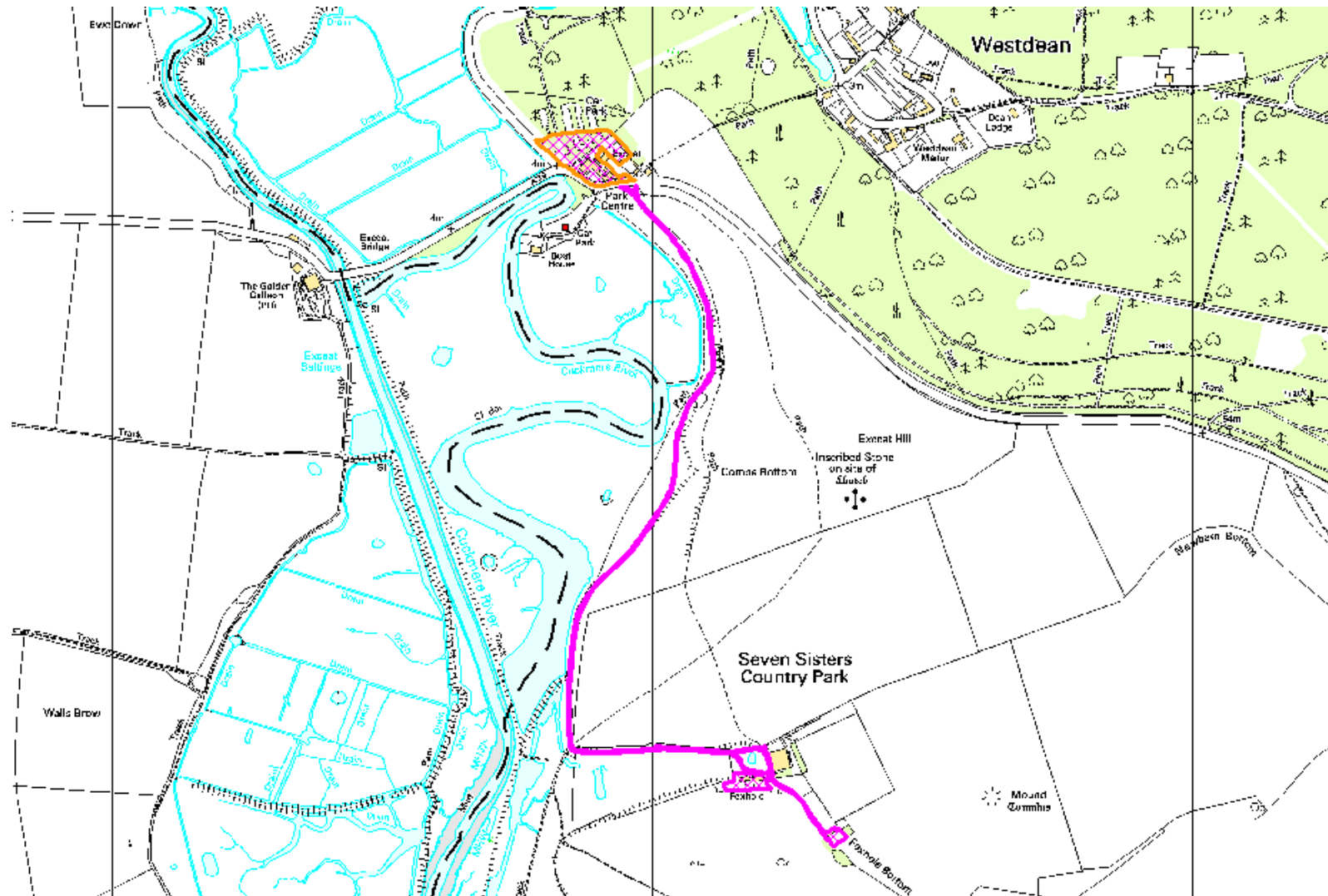
<https://www.southdowns.gov.uk/wp-content/uploads/2020/08/Sustainable-Construction-SPD-FINAL-25-Aug-2020.pdf>

Dark Skies Technical Advice Note 2018

<https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-10-SDNPA-Dark-Skies-Technical-Advice-Note-2018.pdf>

Ecosystem Services Technical Advice Note (non-householder)

<https://www.southdowns.gov.uk/wp-content/uploads/2018/04/Core-07-Ecosystem-Services-Technical-Advice-Note-non-householder.pdf>



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