

Agenda Item 9 Report PC 21/22-03

| Report to | Planning Committee |
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| Date | 12 th August 2021 |
| Ву | Director of Planning |
| Local Authority | Winchester City Council |
| Application Number | SDNP/19/06161/FUL |
| Applicant | Marwell Activity Centre |
| Application | Use of land to station 40 timber holiday lodges within a new native woodland and associated waste water treatment system. |
| Address | Marwell Activity Centre, Hurst Lane, Owslebury, Hampshire, SO21 1EZ. |

Recommendation: That planning permission be granted subject to:

- 1) Receipt and consideration of further advice from Natural England by the Director of Planning, in consultation with the Chair of the Planning Committee.
- 2) That authority be delegated to the Director of Planning, in consultation with the Chair of the Planning Committee, to grant planning permission with any amended or additional conditions, or obligation, consequent to Natural England's advice. Or, to refuse Planning Permission if it is determined that an acceptable foul water strategy cannot be achieved.
- 3) The conditions as set out in paragraph 10.2 of this report.

Executive Summary

The application site is located within the grounds of Marwell Activity Centre, which is located south of Owslebury. Forty new holiday lodges are proposed which would be set within a new wooded landscape scheme. These are revised proposals following the originally submitted scheme for 52 lodges which was unacceptable and officers have sought to work with the Applicant.

Holiday accommodation is acceptable in principle in this location. The scale and design of the scheme is also acceptable insofar as it is more in keeping with the prevailing landscape character of the area and includes a variety of biodiversity and ecosystems services net gains. It is also acceptable in regard to other matters such as highway safety, impact on surrounding amenities, as well as providing visitors with opportunities to enjoy the National Park. In all of these respects, the scheme accords with the relevant Local Plan policies as well as National Park Purposes and Duty.

Outstanding advice is awaited from Natural England regarding the proposed means of foul water drainage and the impact upon the Solent Special Protection Area from increased eutrophication caused by the discharge of nitrates into it. There has been dialogue with Natural England on this issue, which has included meetings and the submission of further information. However, their final response has not been received during a recent formal re-consultation for the revised scheme during June and July.

Consequently, to avoid further delay, the recommendation to Members is to delegate the consideration of this issue and subsequent determination of the application to the Director of

Planning, in consultation with the Chair of the Planning Committee, once Natural England's advice has been received. Given the technical nature of this issue and officers consider the scheme is acceptable in all other respects (subject to conditions), this is considered to be an acceptable way for progressing the application.

The application is before Members due to the scale and nature of the proposals.

I. Site Description

- 1.1 Marwell Activity Centre (MAC) operates a range of outdoor and indoor activities, courses for schools, colleges, youth groups, corporate/team building days. It also has camping areas and bunk house accommodation which are used for these groups.
- 1.2 It is located between Lower Upham and Owslebury. Marwell Zoo is approximately 500m to the north, which is a separate site and business. MAC is on the very edge of the South Downs National Park. The National Park boundaries run around the southern and western site boundaries of MAC, which are defined by mature tree and hedgerow belts along the B2177 (Portsmouth Road) and field boundaries.
- 1.3 MAC has a central access drive from Hurst Lane which leads up to a 'cluster' of buildings. These comprise a reception building, bunk house accommodation, dining hall, education and indoor activities building, and a group of tourist lodges. North-east and east of these buildings are camping fields, which include an amenity block, parking area and some paddocks for grazing horses. South-west of these buildings is woodland and Bow lake and other ponds and fields which are used for MAC's activities. There is also an unnamed watercourse which flows through the southern part of the site into Bow Lake. The siting of the central access demarcates a historic park pale which runs through the site.
- 1.4 The application site itself comprises of 3.6ha of fields at the eastern extent of MAC, adjacent to Hurst Lane and near to the site's main access. These fields gently slope southwards and they are bordered by mature hedgerows, trees alongside Hurst Lane and a fenced gravel car park at their southern extent.
- 1.5 The site is accessed from the B2177 and via Hurst Lane, which is a narrower and more rural road lined by trees and hedging. The main signposted site access is wide enough for two-way traffic and is located at a bend along Hurst Lane.
- 1.6 Immediately surrounding MAC are fields in agricultural use, paddocks, commercial premises and farm buildings. Further north on Hurst Lane is a group of dwellings. The surrounding landscape character is one of wooded enclosures, watercourses and features with the River Itchen further to the west of the site.

2. Relevant Planning History

- 2.1 02/02500/FUL: Change of use of land to recreational use. Approved 22.01.2003.
- 2.2 07/00021/FUL: Erection of bunk house with maintenance room and store. Approved 17.04.2007.
- 2.3 07/00430/FUL: Extension to building to provide tea room/café (retrospective). Approved 17.04.2007
- 2.4 09/01885/FUL: Change of use of garage and store to bunk house accommodation. Approved 12.02.2009.
- 2.5 SDNP/13/03035/FUL: Use of the land for siting of portable visitor accommodation; 5 no. timber lodges and 7 no. timber eco-pods. Approved 07.11.2013.
- 2.6 SDNP/13/06130/DCOND: Application to discharge conditions 3 (materials), 4 (landscape scheme), 5 (maintenance of landscaping) and 8 (Construction Environment Management Plan) of permitted permission SDNP/13/03035/FUL. Approved 23.05.2014.
- 2.7 SDNP/15/02189/FUL: Proposed amendments to site layout and portable visitor accommodation permitted under planning Ref: SDNP/13/03035/FUL 5 no. timber lodges to replace permitted 2 no. three bedroom lodges, 5 no. two person eco-pods and 1 no. four person eco pod. Approved 24.07.2015.

- 2.8 SDNP/16/00479/FUL: Retrospective Planning Application for 2 No. Horse Stables. Approved 29.04.2016.
- 2.9 SDNP/16/02606/FUL: (Part Retrospective) Use of land to site seasonal tents with ancillary shower and WC building. Approved 08.12.2016.
- 2.10 SDNP/17/06374/PRE: Erection of 'paragraph 55' dwelling. Advice issued 22.06.2018.
- 2.11 SDNP/19/01528/PRE: Master Plan proposals to upgrade and extend existing buildings and facilities and additional timber holiday lodges. Advice issued 27.06.2019, aspects relating to new tourist accommodation are summarised below:
 - New tourist accommodation could be acceptable in principle.
 - Concern about the proposed number of tourist lodges (52).
 - Proposals must be landscape-led and deliver eco-systems services benefits.
 - Proposals do not show significant landscape and ecological enhancements.
 - Consider the sustainability of the lodges, including energy and water efficiency, construction materials including potential for green roofs.
- 2.12 SDNP/20/04839/FUL: Installation of mini Adventure Golf course (activity) for use ancillary to the Activity Centre. Approved 11.02.2021.

3. Proposal

- 3.1 The Covid-19 pandemic has had a significant detrimental impact upon MAC given the nature of the business. The application originally proposed 52 lodges in a different layout. Both the scale and design of this scheme was considered unacceptable and officers, consequently, have worked with MAC to reach a more acceptable revised scheme on the same site.
- 3.2 The application proposes 40 holiday lodges comprising a mix of no.2, 3 and 4 bedroom lodges which would cater for a wide market from couples to families and other groups. The lodges would be available all year round.
- 3.3 The scheme would be accessed via the existing main site entrance on Hurst Lane. An existing car park would be utilised, with a capacity of 45 spaces. Originally, the scheme involved visitors parking next to the lodges. The revised scheme now proposes to use the existing car park from which new pathways leading into and throughout the scheme would be used to access the lodges.
- 3.4 The lodges would be set within a new comprehensive landscape scheme of native trees, understorey planting and scrub areas to create a new wooded environment. The number and siting of the lodges is heavily informed by this landscape framework and to ensure good access, privacy and seclusion and a setting within this overall wooded character. The landscape design also includes some parkland elements which seek to reflect the local landscape character and influences from Marwell House and Lodge north of the site.
- 3.5 The layout includes a circular main pedestrian track which would lead from the car park. It would have a central tussock grass strip and be predominantly flanked by native woodland with some understorey planting, whilst meadow grass would line this path in other areas. The path also leads around a central grassed area of open space which would incorporate natural play features to encourage interaction amongst visitors. Feature trees would be planted within this central area. Natural play equipment would be sited in two other areas amongst the more wooded areas of the scheme. A standalone decked area would also be sited next to one of these play areas which is proposed to be used as a platform for viewing and understanding dark night skies.
- 3.6 The layout includes a wetland area at the southern and lower extent of the scheme. It would be linked with the management of surface water which includes various swales running through the scheme, alongside access paths. The wetland would add to the variety of new habitats within the scheme. Next to the wetland would also be a further area of amenity space with natural play features, such as boulders. An interpretation board is proposed in this area improve visitor's awareness and understanding of the various functions

a wetland can provide. Further boards are proposed elsewhere to highlight features such as the park pale.

3.7 By virtue of the landscape framework and species choices, the scheme proposes to provide biodiversity net gain and ecosystems services enhancements. These are addressed in section 8.

The Lodges

3.8 The lodges would be constructed out of timber. They would range in size from a no.2 bed measuring 9.2m x 6.1m (56sqm) to a no.4 bed measuring 14.4m x 6.1m (88sqm). Each lodge would also have a timber terrace that would wrap around two sides. Their pitched roofs would be clad with timber shingles and the walls would be clad with horizontal timber boarding. Inside, there would be open plan living and kitchen areas and a central corridor leading to the bedrooms. Two of the lodges would be accessible in regard to catering for people with disabilities.

Sustainability

3.9 The lodges would include energy and water conservation measures in their fabric, fixtures and fittings and installed appliances, and the timber used for their construction would be UK sourced where possible. Eight lodges are proposed to have green roofs. Four electric vehicle charging points are proposed within the new car park.

<u>Drainage</u>

- 3.10 Foul waste water is proposed to be managed by a new private treatment package system on site which would replace and improve upon the existing system. Waste water from the system would discharge to the watercourse at the south end of the site via a wetland area. Whilst the wetland area would allow additional filtering of waste water, its primary function would be to improve biodiversity given the performance and efficiency of the new treatment system.
- 3.11 Surface water would be managed via new pipework connecting lodges to swales within the landscape scheme, which would channel water to the wetland area. The scheme has been designed so as not increase flood risk on site or elsewhere.

4. Consultations

- 4.1 **Arboriculture**: No objection, subject to conditions.
- 4.2 **Dark Night Skies Officer**: Awaiting comments, Members will be updated.
- 4.3 **Design & Landscape Officers (joint response):** Objection.
 - Layout of holiday lodges, their access, and the mosaic of landscape types across the scheme are supported.
 - Species mixes amongst proposed habitats acceptable but need to make sure that these are found locally; need necessary checks that the right balance of species is proposed (eg. 50% hawthorn within new native hedging).
 - Conditions need to include planting specifications, swale details, tree protection measures, and Landscape and Ecological Management Plan.

Objection for the following reasons:

- The drainage plans show swales conveying water through the site but the drainage strategy is still dependent on much underground piping, some of which is long.
- A Sustainable Drainage Sytem (SuDS) system may require some short section of pipework to connect to swales but the proposed balance between these surface features and extent of pipework is not supported; need to avoid extent of engineered (non-SuDs) pipework.
- SuDS elements, including swales, should be seen as an integral part of the scheme and can be designed to include some play value.

- 4.4 **Drainage**: No objection, subject to satisfying Building Regulations and any Environment Agency and Natural England requirements.
- 4.5 **Ecology**: No objection, subject to conditions.
- 4.6 **Environment Agency**: No objection. Further detailed design and costings of the drainage scheme to be considered in any future Environmental Permit application.
- 4.7 **Environmental Health:** No objection, subject to conditions.
- 4.8 **Highways Authority:** No objection subject to condition.
- 4.9 **Historic Environment Officer (WCC)**: No objection, subject to conditions.
- 4.10 Lead Flood Authority (HCC): No objection, subject to conditions.
- 4.11 **Natural England**: Objection (previous consultation response).
 - Further information and evidence required.
 - Development must achieve 'nutrient neutrality.'
 - Specific nitrogen budget calculations should be re-assessed for the proposed package treatment plant against the Natural England's revised guidance.
 - Above assessment needs to be supported by technical evidence.
 - Applicant's information uses differences in efficiency between the existing and proposed treatment plant and the development replacing the existing camping to demonstrate mitigation for the proposals. This principle is supported, however, further technical information to evidence this is needed.
 - Complete evidence/information required to ensure the proposals do not affect the integrity of international sites.
 - Appropriate long-term management and monitoring of the drainage system will be needed for the lifetime of the development.

4.12 **Owslebury Parish Council:** Objection.

- Poor visibility at the access when leaving the site.
- Wish to see new warning signage for exiting vehicles.
- Request condition for new road signage to improve highways safety with vehicles entering/exiting the site.
- Concern for pedestrian safety along Whaddon and Hurst Lane from Owlsebury to B2177; lowering the speed limit from 60mph to 30mph is needed.
- Noise pollution given proximity of dwellings and lack of any submitted assessment; recommend a condition for a 10pm curfew on music and loud noise if approved.
- Site prone to flooding and concern regarding drainage. SUDs drainage needs to be managed/maintained for the long term in accordance with policy SD50.
- Wish to see semi mature trees planted in open areas.
- 4.13 **Southern Water**: Comments received. Site lies within a source protection zone; defer to Environment Agency regarding the protection of public water supply and Local Authority officers to consider proposed surface water drainage.
- 4.14 Winchester City Council: Comments only received on the original scheme, as below:
 - No objection to 52 lodges. Whilst it appears dense and out of character in this sensitive location, the site is sufficiently screened.
 - Recommend a landscape condition to secure the recommendations of the Landscape and Visual Impact Appraisal.

5. Representations

5.1 One third party objection has been received which raises the following:

Noise and Amenity Impacts

- Impact from noise, especially in summer months, upon neighbouring property.
- Noise from large scale development will transmit into the wider countryside without substantial mitigation.
- Application lacks a Noise Assessment.
- Light pollution not sufficiently addressed.

<u>Highways</u>

- Access is on a narrow bend and has poor geometry.
- Poor visibility at site access; exiting traffic 'blind' of vehicles travelling south.
- Access must be improved prior to the development.
- Highway safety; speed of traffic, not volume, an issue on Hurst Lane which is significantly used by cyclists and horse riders. Additional traffic will exacerbate highway dangers.
- Plan to be agreed with Highways Authority needed to mitigate traffic speed and improve visibility of the access when looking northwards.

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 comprises the South Downs Local Plan (SDLP) 2014-2033 and the particularly 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 an irreconcilable conflict between these two purposes, conservation takes precedence. There is also a duty in pursuing National Park purposes to foster the economic and social wellbeing of the local community.

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 in July 2021. The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 176 that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks. It also states that the scale and extent of development within these designated areas should be limited.

Major Development

6.4 Paragraph 177 of the NPPF 2021 outlines that "when considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is 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 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"

- 6.5 Footnote 60 to paragraph 177 provides further clarification; "For the purposes of paragraphs 176 and 177, whether a proposal is 'major development' 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".
- 6.6 Having assessed the application and considered relevant case law, the scheme is not major development for the purposes of paragraph 177 of the NPPF and policy SD3. This is a matter of judgement based on the scale, character, nature and setting of the development and whether there would be a significant adverse impact on the purposes for which the National Park has been designated or defined.
- 6.7 In this instance, the site is located well contained within the well-established landscape boundaries of MAC with limited elevated views of the site. It is surrounded by a mix of agricultural, commercial uses and dwellings. Given the overall scale of development and its surrounding context there would not be a significant adverse impact upon the National Park landscape and the purposes for which the area has been designated or defined.

Relationship of the Development Plan to the NPPF and Circular 2010

6.8 The Development Plan policies listed below have been assessed for their compliance with the NPPF and are considered to be compliant with it.

National Planning Policy Framework (NPPF) 2021

- 6.9 The NPPF has been considered as a whole and its following sections are particularly relevant in the assessment of this application:
 - Achieving sustainable development
 - Decision making
 - Building a strong, competitive economy
 - Promoting sustainable transport
 - Making effective use of land
 - Achieving well-designed places
 - Meeting the challenge of climate change, flooding and coastal change
 - Conserving and enhancing the natural environment
 - Conserving and enhancing the historic environment

The South Downs National Park Partnership Management Plan 2020-2025

6.10 The Environment Act 1995 (as amended) 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 particular relevance include: 1, 3, 5, 9, 24, 25, 38, 39, 40, 44, and 50.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

6.11 A screening of the current application proposals has concluded that they do not constitute EIA development, within the meaning of the 2017 legislation (as amended), for reasons of its

scale, use, character and design and environmental considerations associated with the site and proposals.

The Conservation of Habitats and Species Regulations 2017

6.12 Following a screening of the proposals, it is considered that a likely significant effect upon a European designated site, either alone or in combination with other proposals, may occur given the scale, use, and location of what is proposed. Consequently, an Appropriate Assessment (AA) under a Habitats Regulation Assessment has been undertaken. The main consideration is any potential effect of nitrates leaving the site via waste water and affecting European designated sites. The AA concludes that appropriate on site mitigation could be achieved, to the extent that a Habitats Regulation Assessment is not required.

Other Relevant Material Considerations

- 6.13 The following are relevant considerations:
 - Adopted Sustainable Construction SPD.
 - Adopted Parking for Residential and Non-Residential Development SPD.
 - Ecosystems Services Technical Advice Note 2019.
 - Dark Night Skies Technical Advice Note 2021.
 - Owslebury and Morestead Parish Plan 2014-2019.
 - Habitats Regulations Assessment Technical Advice Note 2021.
 - Draft Design Guide SPD. This draft document is currently undergoing public consultation and has limited weight in decision making.

7. Planning Policy

- 7.1 Whilst the SDLP must be read as a whole, the following policies are particularly relevant:
 - SDI: Sustainable Development
 - SD2: Ecosystems Services
 - SD3: Major Development
 - SD4: Landscape Character
 - SD5: Design
 - SD8: Dark Night Skies
 - SD9: Biodiversity and Geodiversity
 - SDII: Trees, Woodland and Hedgerows
 - SD17: Protection of the Water Environment
 - SD19: Transport and Accessibility
 - SD21: Public Realm, Highways Design and Public Art
 - SD22: Parking Provision
 - SD25: Development Strategy
 - SD34: Sustaining the Local Economy
 - SD45: Green Infrastructure
 - SD48: Climate Change and Sustainable Use of Resources
 - SD49: Flood Risk Management
 - SD50: Sustainable Drainage Systems

8. Planning Assessment

Background

- 8.1 MAC has been operating for c.40 years and until the pandemic received around 25,000 visitors annually. It offers a variety of educational, recreation and sporting activities for schools, colleges, youth groups, families, and private groups including corporate team building days. These activities can be residential and involve the use of the on site accommodation and camping fields. The 8 existing holiday lodges also diversify MAC's income in the tourist market.
- 8.2 The proposed holiday lodges would operate all year and help to support its wide range of activities and cater for demand in the competitive 'staycation' market, particularly in light of Covid-19. It would also be close to other attractions including Marwell Zoo and improve visitor's access into the National Park.
- 8.3 Overall, the SDNPA is supportive of MAC's aims. However, these must still be balanced with the aims and policies of the Local Plan, National Park purposes, the Partnership Management Plan and the revised NPPF.

Principle of Development

- 8.4 Paragraph 2.1 above highlights that planning permission was granted in 2003 for a change of use of the fields within the current application site for recreational use associated with MAC. A planning condition explicitly limits the use of the land to archery, orienteering, football, cricket, team building, art and craft, children's games and horse riding. In this context, the proposals involve the development of land with a lawful recreational use within the confines of MAC, rather than on land which otherwise would have had an agricultural use however benign this may have been.
- 8.5 The site is within designated countryside and Policy SD25 only permits development outside of settlement policy boundaries in exceptional circumstances where they comply with other relevant Local Plan policies, responds to the local context and conserve and enhance the National Park's special qualities.
- 8.6 SD25 allows development outside of settlement policy boundaries where it complies with other policies and a countryside location has been justified. The SDNPA's Visitor Accommodation Review cites a need for a wide variety of tourist accommodation. The need for holiday lodges to be in a countryside location is largely due to the nature of this type of development. For this reason and given that they would be on recreational land within MAC, and the considerations concerning other relevant Local Plan policies, the proposed use accords with SD25.
- 8.7 Policy SD1 requires new development to be sustainable and this is achieved where other relevant Local Plan policies and National Park purposes are accorded with. The NPPF outlines overarching economic, social and environmental objectives to sustainable development. In these respects, the scheme would assist in widely supporting the rural economy and employment opportunities, whilst meeting social objectives of enhancing access to outdoor space and recreation on site and the surrounding National Park. These considerations would meet with the 2nd Purpose and Duty also. Environmental considerations are outlined in more detail below.
- 8.8 Policy SD23 is directly relevant. Its supportive of new tourism development and the year round visitor economy, subject to its criteria as summarised below:
 - a) providing opportunities to increase visitors awareness and understanding of the National Park;
 - b) Minimise the need to travel by car and encourages more sustainable travel;
 - c) Development not detracting from visitor's experiences and having adverse impacts upon an area;
 - d) Proposals make best use of existing buildings or new development is sensitive to the character and setting;

- e) Ancillary facilities are not disproportionately large in relation to the rest of the proposed facilities;
- f) No adverse impact on the vitality and viability of town or village centres or assets of community value;
- g) Where development is in countryside locations, it positively contribute to natural beauty, wildlife and cultural heritage, are closely associated with other attractions/established tourism uses (including the public rights of way network), and are part of a farm diversification scheme or Whole Estate Plan (WEP).
- 8.9 The proposals would accord with (a), (c), (d), (e), (f). In regard to criterion (b) the location and nature of the development would result in more car journeys, the Highways Authority has not provided any comments regarding more sustainable travel options. Notwithstanding, officers recommend that a Travel Plan is conditioned in order to consider further how the scheme could be more sustainable.
- 8.10 Regarding criterion (g), considerations on the proposed design and landscape character of the area are addressed below. The site is also closely associated with Marwell Zoo which is a notable draw for visitors to the area and the site offers reasonable access to enjoy the countryside via public rights of way. The scheme does not relate to farm diversification or a WEP, however, it would help to diversify the income and activities of an established rural business and this, together with the considerations regarding the other criteria in the policy, outweigh this aspect of SD23. Overall, the scheme broadly accords with SD23.

Design and Landscape

- 8.11 Further to Policies SD1 and SD25, the principle of this scheme is also based on the capacity of the site to accommodate it, the design, and whether it conserves and enhances the landscape in accordance with policies SD4 and SD5.
- 8.12 The revised scheme has been informed by the prevailing local landscape character. The layout has been devised first through the landscape strategy to reflect this character and to link new planting and habitat together so as there is a good robust network of green infrastructure running through the scheme. This approach enables benefits in making space for nature, wildlife corridors, managing surface water, creating a sense of place and setting for the lodges.
- 8.13 A consequence of this landscape-led approach has been to help inform the number of lodges and their siting. The number has been reduced from 52 to 40 which is an improvement because it has meant the scheme is less intensive and allows for more environmental benefits such as those highlighted above. Less lodges has also enabled their more irregular layout amongst the landscape scheme which is a positive attribute.
- 8.14 Importantly, the revised scheme has removed car parking from being next to lodges into a single existing parking area. This has led to narrower and more naturalist paths that are appropriately routed through the scheme and connected with a new central open space, plus it has created a hierarchy between main and secondary routes to help with legibility for visitors and the overall character of the scheme. A new pedestrian/cyclist route leading to the north east corner of the site onto Hurst Lane, away from the main site access, would also facilitate access to the wider countryside.
- 8.15 The scheme would be well contained within the site and would not be readily visible from wider surrounding vantage points. Any visual impact from public views would likely be along Hurst Lane. Here, additional planting along the eastern site boundary would supplement the existing vegetation and would provide effective screening once established. Furthermore, the lodges would be set back a reasonable distance from Hurst Lane and in winter months they are unlikely to appear intrusive when native planting is not in leaf, plus their timber cladding would also weather over time to reduce any visual harm. In these regards, the scheme is unlikely to affect the rural character and appearance the area.
- 8.16 Given the approach of the landscape scheme, layout, and that the development would be located within MAC the wider landscape would be conserved. The SDNPA Design and Landscape Officers are supportive in these regards and more detailed design considerations

for the scheme, for example species planting within new planting, could be addressed via conditions.

8.17 The SDNPA landscape officer has not raised a concern regarding impact upon tranquility and the Environmental Health officer has not objected on the grounds of noise and disturbance. Also, for these reasons, it is considered that the landscape character of the area and surrounding amenities would not be significantly impacted upon.

Surface Water Drainage Scheme and SDNPA Design and Landscape Officers concerns

- 8.18 SDNPA design and landscape officers have raised concern that the SUDs scheme includes too much pipework and that the balance between this and above ground features such as swales and rills (hard surfaced narrow channels) is unacceptable. Their view is that there is an over-reliance on underground pipes particularly in the northern part of the scheme and if this can be addressed then they would no longer object.
- 8.19 Surface water would be captured and managed in a variety of ways. Firstly, the landscaping itself would capture rainfall. Three main swales would run through the scheme alongside internal paths to the wetland/attenuation basin at the southern end of the site. All lodges would have guttering to catch rainwater which would then feed into underground pipes that link into the open surface swales, which would then carry water to the wetland. Lodges with green roofs would also pipe any excess run off to the swales.
- 8.20 The longer lengths of pipework predominantly relate to the lodges farthest away from the swales at the northern area of the scheme, whilst the pipework for other lodges is much shorter. It is not unfeasible to seek to reduce the extent of pipework and increase above ground SUDs features within the drainage strategy and it is recommended that these considerations are reviewed further via conditions relating to the landscape scheme, levels, and the surface water drainage scheme.
- 8.21 Pipework would likely remain in the eventual design, however, this in itself is not detrimental to managing surface water, rather there is need for a good balance between this type of engineering in conjunction with 'softer' approaches to managing surface water in above ground features. Regarding the parking area, its gravel surface would be a permeable surface and further drainage measures here are not necessary.
- 8.22 Regarding flood risk, the County Council, as Lead Flood Authority, the Environment Agency and the district council engineer have not raised objections regarding the drainage scheme subject to conditions.

The Lodges and their Sustainability

- 8.23 The lodges are essentially a pre-fabricated product and would not be wholly bespoke. This should, however, be balanced with all of the other enhancements outlined which themselves have notable financial costs. They would be a traditional timber construction and their scale and appearance are characteristic of this type of accommodation. They would exhibit a simple and understated form and appearance that would be in keeping with their wooded landscape setting and, along with their terraces, they would not appear overly intrusive or excessive in scale within the scheme. The mix of lodge sizes would also be acceptable in terms of catering for a wide variety of guests and the mix is satisfactorily accommodated within the overall scheme.
- 8.24 Each lodge would include water efficiency measures through fixtures and fittings and appliances and would accord with SD48 and the Sustainable Construction SPD. The lodges reduce energy demand through their fabric and construction and they are understood to be a 'high-end' product within the market, but they don't meet the 19% reduction in CO2 emissions required by SD48 via their construction and the Sustainable Construction SPD. Solar PV could be used to off-set this and address demand but given the wooded nature of the scheme and general size of the units it has been contended in the submitted Sustainability Assessment that small array of panels on their roofs is not feasible.
- 8.25 It is, however, an ambition of MAC to improve their overall sustainability and the submitted information identifies that the roofs of the larger existing buildings could be used for a new PV system to help power the whole site and it is understood that MAC are considering this,

although it does not form part of the application. Were this to be the case, then the submitted information quantifies that the scheme could largely accord with SD48 and the Sustainable Construction SPD. The Design Officer has not commented or objected to the proposals on the basis of SD48 and, on balance, this aspect of the proposals is considered to be acceptable.

Ecology and Eco-systems Services Benefits

- 8.26 Further to paragraph 8.10, the scheme could deliver notable net biodiversity gain for a variety of flora and fauna species amongst the habitats that would be created and joined up through the landscape scheme. Numerous lodges would also include bird boxes and those with green roofs (20% of lodges) would add to these enhancements. Although the extent of biodiversity net gain has not been measured, it can be confidently assumed that the scheme would exceed the minimum 10% biodiversity net gain that national legislation is anticipated to include and DEFRA's own assessment for measuring this. In these respects the proposals accord with policy SD9.
- 8.27 The scheme could also deliver many of the ecosystems services benefits outlined in policy SD2. These include providing more, better and joined up habitats, storing carbon through new planting, conserving water resources and improving water quality. It would also improve visitor's health and well-being and increase opportunities for access into the National Park, which are recognised objectives within SD2. Conditions are recommended to secure the above enhancements.

Foul Waste Water Strategy and Nitrates

- 8.28 Foul waste is proposed to be managed via a new private treatment system, which would replace the existing, and an accompanying constructed wetland on site. The waste water treatment plant would discharge treated water into the wetland before being released into the water course which runs through the southern part of the site. This approach is less reliant on the more natural processes of a wetland due to the performance and efficiency of the new treatment plant (based on the Applicant's consultant advice).
- 8.29 The inability to connect to a mains sewer has been justified and the Environment Agency hasn't objected on this basis or to the proposed scheme. The connection to a main sewer is the first option favoured by the relevant statutory bodies and policy guidance.
- 8.30 There have been numerous discussions and the submission of further technical information in an attempt to address Natural England's outstanding concerns. These relate to the levels of nitrogen and phosphorous that would be generated by the scheme from waste water and their consequent impact upon the Solent Special Protection Area (SPA) once discharged from the site. Their view is that it has not been satisfactorily demonstrated that there is sufficient supporting evidence and information, based on their guidance, that the proposed drainage is acceptable.
- 8.31 Natural England are yet to respond with their final comments on the formally submitted revised scheme but it is anticipated that, subject to more detailed understanding of the system proposed, there is reasonable confidence that they will remove their current objection. Notwithstanding their objection, the acceptability of the drainage scheme is the responsibility of the SDNPA, as the competent authority in making decisions.
- 8.32 An Appropriate Assessment has determined that there is the potential for a likely significant effect upon the SPA subject to further detail on the drainage scheme and mitigation being agreed. Due to the specific technical nature of the drainage scheme, and to avoid further delay in Members considering the merits of the proposals, the recommendation is that planning permission be granted subject to the consideration of the final advice from Natural England and the inclusion of any consequent additional or amended conditions, or obligation, being delegated to the Director of Planning in consultation with the Chair of the Planning Committee.

Highways & Parking

8.33 The Parish Council and a local objection raise concerns about the adequacy of the site access particularly in relation to poor visibility and its location on a bend, plus safety

concerns regarding other road users (pedestrians, cyclists, horse riders). New signage has also been requested by the Parish Council to help minimise the risk of accidents.

- 8.34 The Highways Authority have not raised any concerns about increased traffic or use of the existing main access in relation to highway safety matters. They have only recommended one condition concerning a construction management plan. Having given consideration to local views and those of the Highways Authority, it is considered that the use of the main access as it exists and the anticipated level of traffic is acceptable and, therefore, the scheme accords with SD19. As above, a condition is recommended to require a detailed Travel Plan that could help to manage visitors and reduce car journeys where feasible.
- 8.35 The proposed car park would be sufficient to meet the needs of the development, in accordance with policy SD22 and the Parking SPD. Four new electric vehicle charging points are proposed and further details are recommended via a condition and to ensure that they are delivered. This is sufficient to accord with SD22.

Impact on Surrounding Uses and Amenities

- 8.36 The third party objection received has raised concern about the impact upon their property (c.200m to the north) and wider countryside from noise. There would be additional activity created on site that has the potential to cause noise and disturbance from comings and goings, but the scheme has been designed within a wooded and enclosed setting where the arguably the most significant noise could come from the central open space which would be enclosed and surrounded by lodges. Parking would also be well contained within the site.
- 8.37 Any impact on noise could also be seen in comparison with the application site having previously been used for camping and sporting activities within open fields, albeit with the camping this has been more seasonable. Notwithstanding, there is not considered to be a significantly material increase in noise disturbance. The scheme would not materially impact upon the amenities of other surrounding uses and properties, particularly dwellings given their distance from the site. A site management plan is also recommended as a planning condition to consider further details on how the development would be managed.

Dark Night Skies

8.38 A lighting scheme is proposed to be the subject of a condition. It is envisaged that a low key scheme would be introduced to avoid upward light spill, disturbance to wildlife, and be practical for the amenity of visitors.

Cultural Heritage

8.39 The scheme would not impact upon any listed buildings or conservation areas. Running through the site is a historic park pale which is considered to be part of the cultural heritage of the area. The scheme would not impact upon this and an interpretation board has been proposed to highlight its existence as part of the overall understanding of the site and surrounding context. This and other interpretation boards are proposed to be secured via a condition. The County Archaeologist has also recommended conditions regarding further archaeological investigation of the site, which are included in the recommendation below.

<u>CIL</u>

8.40 The development is considered to be CIL liable, however, further assessment and discussion with the Applicant will be needed to ascertain the exact contribution.

9. Conclusion

9.1 The proposals are acceptable in principle for the reasons outlined. They have been the subject of lengthy discussions on a range of considerations and particularly regarding the design and layout of the landscape scheme and lodges. The revised scale and design is now more appropriate in the context of the surrounding landscape character and has the ability to deliver multiple enhancements as highlighted. Consequently, the proposals would accord with the First Purpose and relevant Local Plan policies. In addition, given the nature of the scheme it would also meet the 2nd Purpose and statutory Duty.

- 9.2 Consideration has been given to consultee advice, however, a further response from Natural England is awaited concerning the wider impact upon the Solent SPA. Given the scheme is acceptable in all other respects and the technical nature of establishing whether the drainage scheme is acceptable, it is recommended that subject to the final comments from Natural England being received and considered Planning Permission is granted which includes any further necessary planning conditions or obligation, as a result of Natural England's advice, being included. It is recommended that this approach is delegated to the Director of Planning in consultation with the Chair of the Planning Committee.
- 9.3 The application has been assessed in relation to the Development Plan, the revised NPPF, National Park Purposes and duty, material planning considerations and relevant legislation.

10. Reason for Recommendation and Conditions

- 10.1 The recommendation is that planning permission be granted subject to:
 - 1) Receipt and consideration of further advice from Natural England by the Director of Planning, in consultation with the Chair of the Planning Committee.
 - 2) That authority be delegated to the Director of Planning, in consultation with the Chair of the Planning Committee, to grant planning permission with any amended or additional conditions, or obligation, consequent to Natural England's advice. Or, to refuse Planning Permission if it is determined that an acceptable foul water strategy cannot be achieved.
 - 3) The conditions as set out in paragraph 10.2 of this report.
- 10.2 And 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.

<u>Use</u>

3) The development hereby approved shall not be used at any time for any purpose other than as holiday accommodation. The lodges shall not be used as permanent residential accommodation or for any other purpose in Use Class C3 (dwelling houses) of the Town and Country Planning (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: This development in the countryside, outside of any identified settlement, is only acceptable as holiday accommodation for use by short term visitors to the area.

4) The holiday accommodation hereby approved shall not be occupied by any person, group or their dependants, for a period of more than 28 days in any twelve month period. A register of the occupancy of the lodges shall be maintained and kept up-to-date by the operator of the units, and shall be made available to the Local Planning Authority upon request (within 14 days of a written request being made). It shall record the names and addresses of all visitors and their arrival and departures dates.

Reason: This development is only acceptable as holiday accommodation for use by short term visitors to the area. There is a need to ensure that practical and permanent management measures are in place to control the short term visitor accommodation

5) Prior to the first occupation of any lodge hereby approved, a Site Management Plan shall be submitted to and approved in writing by the Local Planning Authority. This Plan shall include (but not limited to) the following:

- a) Site management in respect of noise and visitor activities such as barbeques, pets and amplified music.
- b) A Waste Management Plan identifying all waste streams and confirming how waste shall be collected, stored and disposed of.
- c) Management and maintenance of external lighting.
- d) Measures to educate visitors about the special qualities of the South Downs National Park.
- e) Management of the car parking area, including electric vehicle charging points, and visitors accessing the lodges upon arrival.

The Site Management Plan shall be implemented in accordance with the approved details and thereafter adhered to in the operation of the development, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the site is managed in an environmentally sensitive way, to minimise impacts upon surrounding amenities and inform visitors of the recreational and educational and activities in the South Downs National Park.

Materials & Construction

6) 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 and doors, roofs, and rainwater goods of the lodges have been submitted to and approved in writing by the Local Planning Authority. All materials used shall conform to those approved in full.

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.

- 7) No development shall commence until a Construction Environmental Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The approved Plan shall be adhered to in full throughout the construction period. The Plan shall provide for:
 - a) An indicative programme for carrying out of the works and methods and phasing of construction works;
 - b) Construction work shall only take place in accordance with the approved method statement.
 - c) The arrangements for public consultation and liaison during the construction works;
 - d) Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method for constructing foundations, the selection of plant and machinery and use of noise mitigation barrier(s);
 - e) Details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination;
 - f) The parking of vehicles of site operatives and visitors;
 - g) The arrangements for deliveries associated with all construction work;
 - h) Loading and unloading of plant, machinery, and materials and access and egress;
 - i) Storage of plant and materials used in demolition (if any) and constructing the development;
 - j) Location of temporary site buildings and compounds;
 - k) Protection of pedestrian routes during construction.
 - I) The erection and maintenance of security hoarding, where appropriate;
 - m) Wheel washing facilities;

- n) Measures to control the emission of dust and dirt during construction;
- o) A scheme for recycling/disposing of waste, including spoil, resulting from demolition and construction works;
- p) Construction working hours.

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

8) No development shall commence until details of site levels and longitudinal and latitudinal sections through the site of the holiday lodges and wetland has been submitted to and approval in writing by the Local Planning Authority to show how the buildings shall be set into the topography of the site. The development shall thereafter proceed in full accordance with the approved details.

Reason: To ensure a satisfactory development which responds to the characteristics of the site.

Landscaping and Ecology

- 9) No development above slab level shall take place until a detailed Scheme of Soft and Hard Landscape works has been submitted to and approved in writing by the Local Planning Authority. These details shall include:
 - a) Written specifications (including cultivation and other operations associated with plant and grass establishment);
 - b) Planting methods, tree pits & guying methods;
 - c) Schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate;
 - d) Retained areas of trees and hedgerows;
 - e) Details of all hard-surfaces, including paths, kerb edges, access ways, boundary treatments, bin and cycle stores and parking spaces, including their appearance, dimensions and siting.
 - f) Details of the siting, specifications and management of the Sustainable Urban Drainage systems.
 - g) A landscape schedule and management plan designed to deliver the management of all new and retained landscape elements to benefit people and wildlife for a minimum period of 5 years including details of the arrangements for its implementation;
 - h) A timetable for implementation of the soft and hard landscaping works.

The scheme of Soft and Hard Landscaping works shall be implemented in full accordance with the approved details and timetable. Any plant which dies, becomes diseased or is removed within the first five years of planting, shall be replaced with another of similar type and size, 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 provide a setting for the new development.

10) Prior to the commencement of the development, a Tree Protection Plan and Arboricultural Method Statement for the site boundary vegetation around the whole application site shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter proceed in accordance with the approved details.

Reason: To conserve trees on site which are proposed to be retained.

11) Prior to the commencement of development, a detailed Ecological Mitigation, Compensation and Enhancement Strategy shall be submitted to and agreed in writing by the local planning authority. This strategy shall be in accordance with the outlined ecological mitigation and enhancement measures detailed within the Preliminary Ecological Appraisal (Vesper, July 2020) unless otherwise agreed in writing by the Local Planning Authority. The Strategy shall include (but not be restricted to): details of all habitat- and species-related avoidance and mitigation measures (e.g. timings, methods, responsibilities); detailed lighting strategy and evidence to demonstrate this takes full account of ecological receptors; plans of, and details describing, all habitat impacts and measures to compensate impacts (e.g. location, methods of establishment, responsibilities, care and maintenance); plans and details of all habitat- and species-related enhancement measures (e.g. location, methods, responsibilities, care and maintenance); plans and details of all habitat- and species-related enhancement measures (e.g. location, methods, responsibilities, care and maintenance); hereafter, be implemented in full accordance with these approved details.

Reason: to conserve and enhance biodiversity.

12) The development shall not be occupied until a site-wide detailed Landscape and Ecological Management Plan (LEMP) is submitted to and approved in writing by the Local Planning Authority. The LEMP shall include, but not necessarily be restricted to, details of measures to retain existing boundary features; long term objectives and management responsibilities; the management regime of the landscape scheme and; measures to enhance ecology through the provision of landscape species. The approved measures shall thereafter be implemented in full and maintained in accordance with the approved details.

Reason: To conserve and enhance flora and fauna.

13) Prior to the construction of the green roofs on the lodges identified on the approved Site Layout Plan LLF-1090-01, the technical details of its design and species specification, planting methods, means of drainage, future management and maintenance shall be submitted to and approved in writing by the Local Planning Authority. In the event that part of or the whole of any green roof does not become established or fails it shall be repaired or replaced with a like for like replacement. The development shall be implemented in full accordance with the approved details.

Reason: To secure a satisfactory implementation and management of the green roof and to ensure its establishment and long term retention.

14) No development shall commence until a more detailed Eco-systems Statement is received and approved which accords with the details pursuant to conditions 9, 10,11, 12 and 13. The development shall thereafter be implemented in full accordance with the agreed details prior to the development being brought into use.

Reason: To secure biodiversity enhancements.

Interpretation Boards

15) Prior to the development being brought into use, the details to be included for the interpretation boards identified on Site Layout Plan LLF-1090-01 shall be submitted to and approved in writing by the Local Planning Authority. They shall thereafter be erected in accordance with these details and within 3 months after the development has been brought into use and maintained thereafter.

Reason: To promote the understanding and enjoyment of the scheme to visitors.

Means of Enclosure

16) Details of all fencing, gates or other means of enclosure shall first be submitted to and approved in writing by the Local Planning Authority and carried out in accordance with the approved details. No other fences or means of enclosure nor any hard-surfaces, buildings or enclosures or additional site accesses shall be constructed or erected or without the further written approval of the Authority. This condition shall apply notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), Schedule 2, Part I Classes E & F or Part 2, Classes A & B, or any order revoking or re-enacting that Order.

Reason: In the interests of landscape and visual amenity and to safeguard the rural character of the area.

Lighting

17) No development shall commence beyond slab level of the lodges until a detailed external lighting scheme that accords with the SDNPA Dark Night Skies Technical Advice Note (2021) has been submitted to and agreed in writing by the Local Planning Authority. The external lighting scheme shall thereafter be implemented in full prior to the site being brought into use and retained thereafter.

Reason: In the interests of the amenities of nearby residential properties and dark skies.

<u>Highways</u>

18) Prior to the development being brought into use, the car parking and cycle parking shall be provided in full. They shall, thereafter, be retained at all times for their designated purpose.

Reason: To provide sufficient parking on site to serve the development.

19) Prior to the development being brought into use, provision of a minimum of 4 electric vehicle charging spaces within the approved car park shall be provided. These shall thereafter be maintained and retained for use.

Reason: To provide on-site sustainable parking facilities.

20) Prior to the development being brought into use, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The measures within the Travel Plan shall, thereafter, be implemented in full.

Reason: To ensure a more sustainable form of development.

Drainage

21) No development shall commence until a detailed surface water drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall seek to minimise the extent of underground pipework in favour of further above ground surface water management features such as swales and rills. The sustainable drainage scheme shall be managed and maintained thereafter in full accordance with a management and maintenance plan to be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure satisfactory provision of surface water drainage.

22) No development shall commence until a detailed drainage scheme for the proposed means of foul water disposal has been submitted to and approved in writing by the Local Planning Authority. These details shall include the specification of the connected wetland that shall accord with details pursuant to condition 9 regarding the landscape scheme. A maintenance plan with management responsibilities shall also be submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in full accordance with the approved details.

Reason: To ensure satisfactory provision of foul water drainage.

Contamination

23) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the Local Planning Authority. The remediation strategy shall be implemented as approved.

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

<u>Archaeology</u>

24) No development shall commence until the implementation of a programme of archaeological mitigation work in accordance with a Written Scheme of Investigation has

been submitted to and approved by the Local Planning Authority in writing. The development shall, thereafter, be undertaken in full accordance with the agreed Written Scheme of Investigation. The Written Scheme of Investigation shall include:

- The programme and methodology of site investigation and recording.
- Provision for post investigation assessment, reporting and dissemination.
- Provision to be made for deposition of the analysis and records of the site investigation
- Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

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

25) Following completion of archaeological work outlined in condition 24, a report detailing a post-excavation assessment and specialist analysis shall be submitted to and agreed in writing by the Local Planning Authority. The report shall, subsequently be included within the Hampshire County Council Historic Environment Records.

Reason: To ensure that evidence from the historic environment contributing to our knowledge and understanding of our past is recorded and made publicly available.

II. 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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|-------------------------|---|
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| Appendices | I. Site Location Map |
| SDNPA Consultees | Legal Services, Development Manager. |
| Background Documents | All planning application plans, supporting documents, consultation and third party responses <u>https://planningpublicaccess.southdowns.gov.uk/online-applications/simpleSearchResults.do?action=firstPage</u> |
| | South Downs National Park Local Plan 2019 https://www.southdowns.gov.uk/planning/national-park-local-plan/ |
| | Revised National Planning Policy Framework (2021) |

https://www.gov.uk/government/publications/national-planning-policy-framework--2

South Downs National Park Partnership Management Plan 2020-2025 https://www.southdowns.gov.uk/partnership-management-plan/

South Downs Integrated Landscape Character Assessment 2005 and 2011 <u>https://www.southdowns.gov.uk/planning/planning-advice/landscape/</u>



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