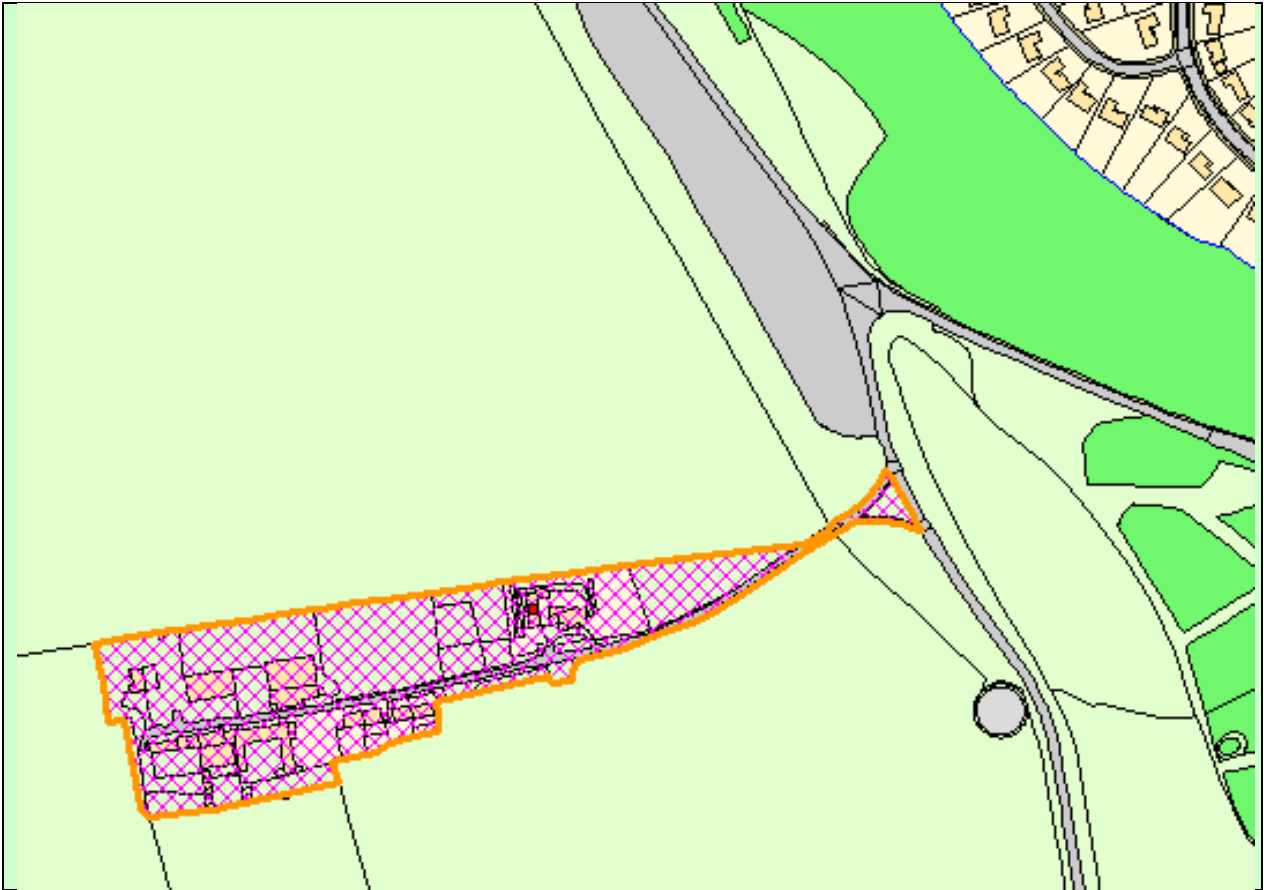


Report to	Planning Committee
Date	15 February 2024
By	Director of Planning
Application Number	SDNP/23/04238/FUL
Applicant	Eastbourne Borough Council (Mr Justin Johnston)
Application	Hybrid Application: Change of use of Black Robin Farm to a cultural and education centre with business studios, refectory, and event space. In outline: the erection of a refectory building in place of the covered yard building (due to be relocated); the internal reconfiguration of the flint barn to form a heritage visitor centre; and the erection of a prep kitchen and learning kitchen (matters of layout, scale, appearance, and landscaping reserved). In full: the erection of a new gallery building in place of the lambing barn (due to be relocated); the erection of an education building in place of the cow shed; change of use of milking parlour to learning space; the erection of a boot room and covered walkway; change of use of west stables to plant room and store; the internal reconfiguration of the farmhouse and its ancillary flats to form business studios; internal alterations and recladding of the general storage barn to form events and catering space and changing places facility; recladding of the holiday cottages and change of use to ancillary staff accommodation and facilities; new pedestrian access and works to the existing vehicular access, associated alterations, infrastructure, vehicle parking, and landscaping; landscape enhancements; and a new public right of way.
Address	Black Robin Farm, Beachy Head Road, Eastbourne, BN20 7XX

Recommendation:

- I) That authority be delegated to the Director of Planning, in consultation with the Chair of the Planning Committee, to grant planning permission subject to**
 - i) The satisfactory resolution of technical matters relating to ecology;**
 - ii) The conditions set out in paragraph 10.1 of the report and any amendments or other conditions required to address ecology matters;**
 - iii) A S.106 legal agreement, the final form of which is delegated to the Director of Planning, to secure:**

- a) **A financial contribution to be agreed to provide an expanded public bus service in broad accordance with Table I of the report;**
 - b) **Highway works associated with:**
 - **Relocation of and improvements to the north and south bound bus stops;**
 - **Pedestrian crossing point over Beachy Head Road;**
 - **Improvement of the access onto Beachy Head Road;**
 - c) **A new public footpath between Beachy Head Road and Bridleway 48e, and its maintenance in perpetuity;**
 - d) **The provision of updated Staff, Studio User and Visitor Travel Plans;**
 - e) **A £4,500 travel plan monitoring fee;**
 - f) **The provision of a Landscape and Ecological Management Plan;**
 - g) **The provision of a Site Management Plan (to include drainage, SuDS and lighting.)**
- 2) **That authority be delegated to the Director of Planning to refuse the application with appropriate reasons if technical matters relating to ecology have not been resolved, or the legal agreement is not completed, or sufficient progress made, within six months of the Planning Committee meeting of 15 February 2024.**
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Executive Summary

This hybrid application relates to the change of use of and new development within a historic farmstead to form a cultural and education centre. Full planning permission is sought for the majority of the works, including the new gallery. Outline permission is sought for works to the historic flint barn to form a heritage visitor centre, a new refectory building and kitchen facilities, with matters of layout, scale, appearance, and landscaping reserved. The application is made by the landowner, Eastbourne Borough Council (EBC), and the site will be operated by the Towner Gallery. The project is subject to Levelling Up funding from the Government.

The key considerations for this application are:

- The proposals will provide new cultural and education facilities and a downland gateway visitor centre for the local area;
- The development will attract up to 100,000 visitors per year and includes sustainable travel measures such as improved local bus services and staff and visitor travel plans;
- The scheme will deliver a 1km section of new public footpath linking Beachy Head Road and the rights of way network to the west;
- The scheme includes areas for chalk grassland restoration, and the restoration of two dew ponds, both of which are actions of the endorsed Eastbourne Downland Estate Whole Estate Plan (WEP) and in terms of Biodiversity Net Gain will achieve 34% increase in area-based habitats and a 54% increase in linear (hedgerow) habitats;
- The proposals will re-purpose a historic farmstead in a working agricultural landscape and involve the introduction of new buildings albeit with a loss of some historic fabric;
- The proposal is strongly aligned with the National Park's Purpose 2 and Duty in terms of promoting opportunities for the understanding and enjoyment of the National Park's special qualities and supporting the local economy and will promote cultural heritage in accordance with Purpose 1.

The application is placed before Members due to the scale and nature of this high-profile project, and the need to balance any potential impacts on the natural beauty, wildlife and cultural heritage of this part of the National Park with the public benefits and opportunities it will deliver for the understanding and enjoyment of the special qualities. Officers consider the application is in accordance with the Policies within the Local Plan and the Purposes of the National Park and recommend approval.

I. Site Description

- I.1 The 3ha application site forms part of the Eastbourne Downland Estate, which is owned by Eastbourne Borough Council. The application site is located on the eastern edge of the Downland some 200m to the west of the Eastbourne built up area, approximately 1.8km north of the Beachy Head cliffs. The site falls within the designated Sussex Heritage Coast and is adjacent to a section of the Seaford to Beachy Head Site of Special Scientific Interest (SSSI.)
- I.2 The Estate forms part of the Ouse to Eastbourne Open Downs Landscape Character Area (LCA), an expansive open landscape characterised by rolling pastoral downland, panoramic views and steep chalk cliffs along the coastline. Development is typically scattered and primarily comprises of traditional farmsteads and isolated agricultural buildings, in sharp contrast to the townscape of Eastbourne at the bottom of the scarp slope to the east.
- I.3 The site is a historic farmstead that is highly characteristic of the LCA, and currently the core operational facility for a 400 hectare livestock (sheep and cattle) farm which is tenant farmed in partnership with the neighbouring farm to the immediate south, Bullock Down Farm. There are three other farmsteads located within the wider holding. The tenant farmer (who will be moving to the farm house at Ringwood Farm) currently occupies one of the four cottages on site, with the remainder being used as holiday lets following refurbishment in 2021. The farmhouse and workshop are currently used for storage by Eastbourne Borough Council. The relocation of the farm business to nearby Ringwood Farm and Crapham Barn will be the subject of separate applications.

- 1.4 The site is located in a natural depression however is surrounded by open chalk grassland with occasional low-level scrub and is exposed in some views. The traditional flint and brick buildings and fold walls to the south of the site form a Regular Courtyard E-plan with two sheltered cattle yards, which is typically associated with areas of large-scale downland enclosure. The 18th Century Flint Barn is the oldest structure, followed by later additions including the flint fold walls, South Stables, West Parlour, Milking Parlour, Cow Parlour, West Stable (which together form the E-plan), farmhouse, workshop and two surviving pairs of semi-detached single storey cottages. The WEP describes the Flint Barn, Milking Parlour and Main Barns and Yard and Farmhouse as locally listed by Eastbourne Borough Council. The 20th Century agricultural buildings to the north of the track are larger in scale and include a metal and asbestos sheet-clad general store and a lambing barn. There is a modern open sided cow shelter to the rear of the flint barn, and an unusual two-storey brick storage building to the west of the farmstead which may have been a former sub-station.
- 1.5 The site falls by approximately 26m from the Beachy Head Road in the north-eastern corner of the site to the far side of the Flint Barn in the south-western corner. The buildings and yards to the south of and perpendicular to the Flint Barn and Milking Parlour step down the falling gradient.
- 1.6 The site is accessed by means of a private single vehicular drove way directly from the Beachy Head Road which forks at the road junction. There is a marked but informal north-bound bus stop for the seasonal 13X bus service to the north of the site entrance, with an unmarked, informal south-bound stopping area opposite. The site is close to several public rights of way including the South Downs Way to the east and bridleways 48e to the north and 49c to the south, as well as various footpaths connecting the site to Eastbourne and beyond.

2. Relevant Planning History

2.1 The following is the most relevant planning history pertaining to the site:

- EB/2002/0618 COU to farm shop and store, lean-to-roof over yard, refreshment area, Parking. Approved September 2002
- SDNP/22/02206/PRE Change of use of land and installation of converted bus, for use as glamping accommodation. Advice provided 30.06.2022

The advice was not encouraging of an application given the prominence of the site within a sensitive open downland landscape and resultant visual/landscape harm.

- SDNP/22/01496/PRES Change of use of farm building group to an Arts-Driven Cultural and Education Centre with associated works including building alterations, access arrangements and parking. Pre-app closed 16.11.2023

The pre-application process included two Design Review Panel workshops in July and November 2022 focussing on transport, landscape, heritage, sustainability and the form and scale of the new gallery. Whilst the overall vision was supported, the need to conserve and enhance the existing historic agricultural character, its built form and landscape setting was a strong theme, and the amount and location of on-site parking proposed at that time was a concern.

Following further evolution of the scheme, informal advice was provided by officers supporting the principle of the scheme however with some concerns regarding impacts to heritage and landscape character, the design of the new art gallery and the need for sustainable transport provision.

- SDNP/23/02662/SCREEN EIA Screening Opinion for proposed cultural and education centre. EIA not required 12.09.2023 (Decision attached at **Appendix 2**)

- 2.2 The following application pertains to the nearby holding at Crapham Barn, and is the first of two planning applications for the relocation of the farm holding:
- SDNP/24/00486/APNB New steel portal framed barn to replace existing deteriorating barn; resurfacing of an existing farm track and yard; demolition of an existing steel framed barn and an agricultural shed. Pending Consideration
- 3. Proposal**
- 3.1 The application for the change of use of Black Robin Farm to a cultural and education centre is hybrid. Outline permission (including access) is sought to establish the acceptability of the conversion of the flint barn to form a heritage visitor centre; a new refectory building in place of the covered yard building; and provision of kitchen facilities. Matters of layout, scale, appearance, and landscaping are reserved. Full planning permission is sought for:
- The erection of a new art gallery building in place of the modern lambing barn (which will be re-erected for use elsewhere on the holding);
 - Refurbishment of a standalone storage building;
 - The change of use of the ‘West Stables’ to a plant room and store;
 - Use of the undercroft bays on the ground floor of the flint barn for cycle parking;
 - Demolition of the Cow Shed, part of the Milking Parlour and lean-to garages and the erection of two Learning Studios;
 - The change of use of the milking parlour to a learning space;
 - The erection of a boot room and covered walkway;
 - Internal alterations to and recladding of the general storage barn to form an events and catering space and changing places facility;
 - Refurbishment of the holiday cottages to provide ancillary staff accommodation and facilities;
 - The change of use and internal reconfiguration of the farmhouse and ancillary flats and storage to business studios;
 - New pedestrian access, works to the existing vehicular access, vehicle parking, and associated landscaping and landscape enhancements; and
 - A new public right of way.
- 3.2 The site will be promoted as a gateway for visitors to experience the landscape of the South Downs and is expected to receive up to 100,000 visitors a year, many of whom will already be visiting the area. The submitted Site Management Plan Overview states that the site will be open to the public during daylight hours only, four days per week (Thursday to Sunday) during the low season (October-April) and six days per week (Tuesday to Sunday) during the high season (May-September.) The site will also be used for private/filming events on Mondays during the high season. Weekly evening ‘sundowner’ events are anticipated to be held in the events barn and refectory between May-September. The business studios will be used 7am-10pm seven days a week.
- 3.3 As a cultural and educational centre, the site will deliver a range of educational programs for adults and young people, and a schools programme for up to 2,000 local children. The new art gallery will include free and paid-for exhibitions, talks and events. A programme of events including markets, performances and community events will also be delivered using the events barn, which will temporarily house the visitor centre and all catering facilities until the works to the Flint Barn and other elements in outline are implemented. The 17 business studios will be available for hire by creative makers and artists. The development is estimated to create 45 FTE posts and will be supported by a volunteer and apprenticeship programme.

Outline Elements

- 3.4 The outline element of the proposal is highlighted in blue on the submitted Hybrid Plan drawing (see **Appendix 3**.) It involves some of the oldest buildings and the westernmost fold yard. Following concerns relating to the proposed loss and treatment of historic fabric, the detailed design of this element of the scheme will now be the subject of a later reserved matters application. Due to the special circumstance of the application, submission of a reserved matters application is proposed to be subject to a seven-year time limit rather than the statutory three years to allow sufficient time for a more sensitive approach to be evolved.

Flint Barn

- 3.5 The ground floor of the existing Flint Barn is proposed to be retained as a visitor centre with a main reception area and shop. The mezzanine space will be boarded off to provide bat mitigation space. Some design refinements will be required to ensure the historic significance of the building is preserved in terms of internal insulation and new openings.

Refectory Building

- 3.6 The existing covered yard adjoining the southern elevation of the flint barn is proposed to be removed and re-purposed elsewhere on the holding and be replaced by a new refectory building. Indicative plans suggest that this will be accessed via the flint barn and will open to the south to an area of covered seating within a sheltered courtyard.

Kitchen Buildings

- 3.7 The existing West Parlour building, which runs perpendicular to the flint barn, a section of the central fold wall it rests upon, and a small section at the western end of the Milking Parlour are indicated to be demolished and replaced with a new Prep Kitchen to serve the Refectory and Learning Kitchen, which would be separately accessed via the adjoining Eastern Courtyard. Again, this element is in outline, which allows scope to revisit the need to demolish historic fabric especially as some of the catering provision will now be met by the Events Barn. It is understood that essential repair works will be carried out to the roof of the West Parlour building to ensure it is secured in the meantime.

Refectory Foldyard

- 3.8 The remaining part of the existing western fold yard, including the South Stables and the majority of the fold walls will be retained to provide a sheltered courtyard space for the Refectory.

Full Planning Elements

- 3.9 The part of the site subject to full planning permission is highlighted in pink on the Hybrid Plan drawing (see **Appendix 3**), and the various elements are described in turn below.

New Gallery Building

- 3.10 The existing modern lambing barn occupying this part of the site will be taken down and re-erected for use elsewhere on the holding. The new gallery building is contemporary in design and will comprise of three mono-pitched gallery spaces arranged around a central welcome space. The structure will be partially sunk into the rising slope behind it and will be accessed via a steel framed glazed entranceway. At approximately 14m at the highest point the building will be slightly higher than the existing barn. The facing materials for the main galleries will be recycled flint, lime mortar and site sourced field flints.

Western Storage Building

- 3.11 The westernmost storage building will be retained as an implement store, with no external changes other than galvanised steel doors being added to existing openings.

Western Stables

- 3.12 The Western Stables building will be converted to a plant room, with minimal changes to the building fabric other than the removal of two original timber stall partitions (which will be stored for later use), internal partitions and making good.

Undercroft Bays on Ground Floor of Flint Barn

- 3.13 The two undercroft storage bays at the western end of the flint barn will be used to provide cycle parking spaces, including six adapted cycle parking spaces.

Milking Parlour, Learning Studios, Education Yard and Covered Walkway

- 3.14 As noted above, demolition of a small section at the western end of the Milking Parlour to provide the new kitchen block is indicated under outline. Full planning permission is sought for the conversion of the remainder of the building to a learning space, utilising the existing stalls as small booths. The small flint and brick lean-tos on the eastern (side) elevation will also be removed.
- 3.15 The existing Cow Shed, which adjoins and runs perpendicular to the Milking Parlour, and the easternmost fold wall it rests upon, will be demolished and replaced with two conjoined Learning Studios, stepping down the slope to provide an accessible space. The buildings will be clad with corrugated metal to exposed faces and timber to the fold yard facing elevations.
- 3.16 To the south of the Milking Parlour the existing fold yard will be converted to an Education Yard, from which the Learning Kitchen (in outline, see above) and new Learning Studios will be accessed. This area will include a vegetable garden. A covered walkway will be provided along the full length of the southern elevation of the Milking Parlour, and either side of the Education Yard, providing sheltered access to all learning spaces.

Boot Room

- 3.17 Two lean-to buildings attached to the eastern elevation of the Milking Parlour will be demolished, and a new Boot Room with an office, first aid room and toilet facilities will be constructed to the east of the Milking Parlour from salvaged/recycled brick. This will be accessed from the west via the covered walkway between the southern elevation of the Milking Parlour and the northern elevation of the new Learning Studios. A sunken yard will be provided to the north of the covered walkway.

Events Barn

- 3.18 The existing modern General Storage Barn will be insulated and re-clad with cement board and translucent corrugated cladding for use as a flexible event space, with catering and WC and changing place facilities that will be accessible to walkers and cyclists passing through the site. It will also provide space for the Visitor Centre until the works to the Flint Barn (in outline) have been completed, all terrain wheelchair hire and storage, and storage space for the gallery.

Farmhouse, Workshop/Flat Building and Holiday Cottages

- 3.19 The farmhouse and associated ground floor storage/first floor flats building will be converted to provide 17 No commercial studio units for the creative industry (eight at ground floor and nine at first floor level), including one accessible studio with accessible parking space, with a communal kitchen and garden area.
- 3.20 Two of the Holiday Cottages will be refurbished to provide operational staff accommodation, kitchen and office space. The remaining two units will be refurbished to provide accommodation, one of which will be fully accessible, for staff involved in the Towner events programme.

Access, Pedestrian Routes and Parking

- 3.21 The northern arm of the access off Beachy Head Road will be widened to allow two-way traffic movements and the existing driveway through the site will be retained and widened (to 3.7m with passing bays) to provide vehicular access to the car parking locations, and for drop off/turning for minibuses and coaches. The central part of the site will be mainly vehicle free (aside from delivery/ emergency access.)
- 3.22 The southern arm of the access off Beachy Head Road will provide pedestrian-only access to the site. The existing bus drop off points will be improved to provide level and sheltered waiting areas and will link to the pedestrian only access, with a tactile pedestrian crossing point from the

south bound bus stop to assist with crossing Beachy Head Road. The north bound bus stop will be relocated to the south of the access for reasons of accessibility.

- 3.23 Agricultural access to the surrounding fields will be provided from the north at Warren Hill via Bridleway 48e, and from Beachy Head Road to the south via Bridleway 49c. There will also be a field gate immediately west of the site crossing the new public footpath to allow connectivity between the north and south fields.
- 3.24 A new 2m wide public footpath approximately 1km in length will be provided along an existing field boundary which forms the northern boundary of the site, connecting the Beachy Head Road (and South Downs Way just to the east) with Bridleway 48e to the west. The footpath will be stock fenced to avoid conflict with grazing animals, however will be accessible from within the site from a range of locations.
- 3.25 A total of 63 parking spaces will be provided, including 42 visitor spaces on land to the east of the Farmhouse, which will require scrub clearance and some levelling works. There will also be five accessible parking spaces (next to the Events Barn), eight business (including one accessible) spaces to the south of the Farmhouse, and eight staff parking spaces either side of the Cottages. There will also be 56 cycle parking spaces including 14 covered cycle parking spaces in the main visitor car park, four adapted cycle spaces and 12 staff cycle spaces next to the Events Barn, and 20 covered and six adapted cycle parking spaces in the undercroft storage at the western end of the flint barn.
- 3.26 The currently seasonal 13X bus service which serves Black Robin Farm will also be improved to ensure that up to 50% of visitors will arrive by public transport.

Landscaping

- 3.27 There will be three grassed areas given over to chalk grassland restoration, and a 1m strip either side of the new public right of way amounting to 1.09ha in total. Two dew ponds will also be restored. The right of way will be stock fenced along much of its length to keep dogs away from grazing animals. The Learning foldyard will be planted to create a physic garden, and an area of wildflower rich grassland. The area to the south of the cottages will be a cottage garden with an orchard area and growing beds. Additional scrub planting will be provided to the east of the visitor car park.
- 3.28 In term of surfacing, the tarmac access road that extends into the site will be retained. The visitor car park will be reinforced with grasscrete. The pedestrian paths and bus stop waiting areas will be surfaced with permeable materials. The new public right of way surface will be assessed prior to dedication and localised surface improvements made where necessary.

4. Consultations

4.1 **Archaeology:** No objection subject to conditions.

4.2 **Contaminated Land:** No objection subject to conditions.

4.3 **Design:** Neutral. Comments:

- Key buildings retained, which is positive, however opportunity to fully celebrate and respect farmstead character has not been taken;
- Design, scale, use of domestic style glazing of new buildings and extent of monotone flintwork fails to respect building hierarchy or Black Robin Farm character;
- Materials for new buildings are agricultural however fail to reflect the farmstead's mixed material palette;
- Glazing should be minimised to mitigate harm to dark skies;
- Large visitor car park will harm landscape character;
- Passing places preferable to widening the access road;

- Carbon reduction and energy measures exceed policy requirements, however sustainable drainage could be more ambitious;
 - Events barn could be strengthened to provide PV panels and grass roof.
- 4.4 **Ecology:** Holding objection [*Officer note: further ecology information has been submitted and the Committee will be updated with the final ecology response.*]
- 4.5 **Environment Agency:** No objection subject to conditions.
- 4.6 **ESCC Highway Authority:** No objection subject to conditions.
- 4.7 **Fire and Rescue:** No objection.
- 4.8 **Historic Buildings:** Objection. Comments:
- The buildings are non-designated heritage assets that will be extensively altered or demolished to accommodate new uses, removing their cultural and evidential value;
 - Scale and materials of new/altered buildings are alien to farmstead character, notably the covered walkway and gallery;
 - Will result in significant harm to character of historic farmstead and its wider contribution to the historic downland landscape;
 - Misses opportunity to use the farmstead to explore the landscape through art, or promote understanding of the landscape and historic farm practices.
- 4.9 **Landscape:** Neutral (conditions needed to avoid objection). Comments:
- Preservation of some historic buildings, non-motorised access to the site and enhancements to dew pond and areas of grassland are positive in landscape terms;
 - Landscape benefits undermined by suburbanisation of historic farmstead with civic spaces and visitor paraphernalia;
 - Loss of cow shed and lean-tos negatively impacts site's distinctive qualities and character;
 - Visitor car parking excessive and poorly designed;
 - Multiple surfacing materials, kerbs, fencing and changes to landform are uncharacteristic of the site's rural and visually tranquil setting;
 - External lighting should be minimised to reduce harm to dark skies;
 - To minimise negative landscape effects and help retain distinctiveness of historic downland farm, conditions required to secure:
 - Landscape and Ecological Management Plan;
 - Soil management;
 - Removal of redundant electricity poles;
 - Characteristic, sensitive materials, surfacing, boundary treatments and hard/soft landscaping;
 - Limitation of visitor numbers and sustainable transport plan.
- 4.10 **Lead Local Flood Authority:** No objection subject to conditions.
- 4.11 **Natural England:** Holding objection. [*Officer note: further ecology information has been submitted and the Committee will be updated with the final NE response.*]
- 4.12 **Rights of Way (ESCC)** No objection. Comments:
- New footpath will be subject to path creation agreement under S.25 of the Highways Act
 - Maintenance of the path by the landowner to be secured by S.106

- 4.13 **SDNPA Countryside and Policy Manager:** Comments:
- Compatible with Eastbourne Downland Estate WEP vision;
 - Provides opportunity to achieve nature recovery and climate change outcomes;
 - Heritage Coast purposes and targets missing from the Preliminary Ecological Appraisal;
 - Transport/access plan for scheme should be linked to review of Heritage Coast as a sustainable visitor destination.
- 4.14 **SDNPA Cultural Heritage Officer:** Support. Comments:
- Will deliver skills and education programmes combining nature, heritage and creativity, and creative workspace;
 - Educational opportunities should be promoted to ensure a diverse audience and equitable opportunity;
 - Design sensitively incorporates historic built assets and landform;
 - New build elements should be ‘fabric first’ for environment and Net Zero benefits;
 - Focused marketing to secure long-term travel behaviour change will be required.
- 4.15 **SDNPA Education Officer:** Support. Comments:
- Will provide enhanced learning outside the classroom offer to local schools and wider SDNP area;
 - Will support green careers via adult education and apprenticeship programmes which are key priorities of the SDNP Partnership Management Plan.
- 4.16 **SDNPA Sustainable Economy:** Support. Comments:
- Diversification/repurposing of Black Robin Farm referenced in WEP;
 - Eastbourne Downland Estate contributes to SDNP purposes and duty;
 - Will enhance visitor economy and cultural heritage of SDNP which are Partnership Management Plan objectives;
 - Incentivising and promoting sustainable transport will be needed to deliver PMP outcomes.
- 4.17 As an adjoining parish (and therefore non-statutory consultee) **East Dean and Friston Parish Council** have objected to the scheme on the following grounds:
- Lack of sufficient parking will lead to traffic congestion;
 - Unclear where new footpaths and cycle ways would be located;
 - Unclear why EIA requirement has been waived;
 - Lack of community response to project;
 - Fails to conserve and enhance natural beauty;
 - Funding pressures have resulted in rushed application with a number of gaps.

5. Representations

- 5.1 16 letters of objection and seven neutral representations, including from Friends of the South Downs, the National Trust, the Beachy Head Ramblers, the Sussex Ornithological Society, Transport Futures East Sussex and the Emma Mason Gallery, were received raising the following concerns:

Principle

- Major commercial arts and education development not anticipated by WEP, and not needed as others already exist nearby;

- Use unrelated to downland setting and better suited to vacant buildings in Eastbourne; nature based agricultural project would be more appropriate;
- Project not inclusive and does not encourage access to the downland;
- Levelling up money would be better spent on residents/housing homeless/ fixing potholes/pavements/street furniture/addressing flood risk [*Officer comment: the use and distribution of 'Levelling Up' funding is a matter for the Government*]
- Lacks net gain or ecological mitigation in the wider site, and fails to protect natural environment;
- Not sustainable due to intensity of 100,000 visitors and associated traffic, noise and pollution;
- Fails to support agricultural economy; will sever connectivity of farmstead with the landscape;
- All buildings in use and unclear where farmer and livestock will go, intensive agri-business will replace low key farming;
- Loss of facilities will restrict seasonal grazing and impact animal welfare;
- Will increase pressure on Coastguard and Chaplains;
- Concerns about length of publicity, planning process, ability to access planning documents and lack of community consultation;
- Works of Robert Tavener should be exhibited;

Design, Heritage and Landscape Harm

- Fails to accord with Purpose I and key landscape policies;
- Only deals with buildings not wider landscape or impacts upon National Park;
- Lacks heritage, landscape and environmental aims;
- Contrary to Eastbourne Downland Estate Whole Estate Plan and Sussex Heritage Coast objectives;
- Intensity of use will harm tranquillity and dark skies;
- Loss of cow shed and sections of fold walls is regrettable;
- Events barn should be timber clad with green roof;
- Location of parking highly visible from Beachy Head Road and should be better screened;
- Will increase litter, pollution will harm aquifer;
- Agricultural Diversification Plan to increase stock will damage sensitive landscape and remove holding from Countryside Stewardship Scheme;

Ecology

- SSSI will be harmed by intensive use, increase in visitors will result in chalk grassland decline;
- Lack of enhancement of lowland chalk grassland;
- Ecological Impact Assessment fails to consider land taken out of environmental stewardship. botanical survey carried out outside season;
- Lack of assessment of impact to reptiles;
- Will result in harm to bats and ground nesting birds;
- New footpath encourages access of little used rights of way and will harm wildlife and flora;
- Car parking along Beachy Head Road will harm grass verges;

Traffic and Access

- Will increase traffic pollution, road widening will destroy downland;
- Unclear how proposal will meet EBC's ambition to be carbon neutral by 2030;
- Parking provision should be further minimised;
- Parking insufficient, will encourage parking on Beachy Head Road;
- Greater certainty needed regarding additional public bus services and electric shuttle buses should be provided;
- Use of Warren Hill car park reduces capacity for others, and exit dangerous;
- Use of National Trust car parks should not be relied upon for overspill;
- Better access required for disabled visitors, cyclists, dog walkers and horse riders;
- New footpath provision is minimal; should be bridleway of 2.4m minimum width;
- Lack of any north-south footpath link to Crapham Hill/Crapham Barn/Ringwood;
- Circular walks or trails needed to connect local features of interest;
- Lack of turning space for large vehicles.

5.2 A letter of objection has also been received from Maria Caulfield MP raising the following concerns:

- Limited public response suggests ineffective engagement, timeframe for comments should be extended;
- SDNPA's waiving of the requirement for an Environmental Impact Assessment indicates lack of proper assessment or commitment to safeguarding natural surroundings;
- Natural England unable to accurately assess extent of environmental impact due to lack of EIA;
- Lack of detail regarding start and end points of new paths;
- Local cultural centres already exist, and 'Levelling Up' funds should be used more equitably to prioritise the basic needs of the community [*Officer comment: the use and distribution of 'Levelling Up' funding is a matter for the Government.*]

5.3 11 letters of support have been received, including from the Meads Community Association, the Eastbourne Society, the Eastbourne Downland Group, the Coastal Schools Partnership and the Eastbourne Eco Action Network CIC, raising the following;

Principle

- Will provide public access to culture, history, geography, ecology, and land management practices of the Estate, which is a public asset;
- Will achieve objectives of Eastbourne Downland WEP;
- Will benefit physical and mental health of young people and aid delivery of Natural History GCSE;
- Greater emphasis should be placed on cultural heritage;
- Inclusive learning strategy and farm school trips required to justify unsustainable location;
- Unclear how Equalities and Fairness Analysis has included deprived and excluded groups;
- Review of Eastern Downland WEP and Heritage Coast Strategy required to include an access strategy;
- Applications for new farm buildings applications should be determined concurrently;

- Site management must have regard to Sussex Suicide Prevention Strategy & Action Plan 2024-27;

Design, Landscape and Ecology

- Demolition of cow barn is regrettable, design should incorporate and retain flint fold walls;
- Events barn should be timber clad;
- Should include landscape-scale nature recovery and wider chalk grassland restoration;
- The three nearby concrete-lined dew ponds should be restored;

Traffic and Access

- Sustainable travel measures will mitigate environmental impact of increased visitors;
- Visitor car parking onsite should be further reduced to incentivise sustainable travel;
- Lack of commitment to improving public transport to/from site; Business Plan should be more ambitious on cycling provision;
- Access would be best provided via electric arts shuttle bus;
- E-bike rentals should include concessions;
- New footpath should be a bridleway, and surrounding fields open access land;
- New route should be provided between Beachy Head and Black Robin Farm.

5.4 A letter of support has also been received from Caroline Ansell MP (for Eastbourne) raising the following:

- Conversion of farmstead into leading cultural and educational space is key part of Eastbourne's successful Levelling Up Fund bid;
- Commitment to apprenticeships, learning opportunities and delivery of the Natural History GCSE will provide educational opportunities for Eastbourne's young people;
- Eastbourne downland is underutilised for sustainable tourism, which is an economic mainstay for the town, and will assist Eastbourne as a gateway to the national park;
- Sustainable transport measures will ensure downland environment is safeguarded.

6. Planning Policy

Particularly Relevant Sections of the National Planning Policy Framework:

- NPPF04 – Decision making
- NPPF06 – Building a strong, competitive economy
- NPPF08 – Promoting healthy and safe communities
- NPPF09 – Promoting sustainable transport
- NPPF12 – Achieving well-designed and beautiful places
- NPPF14 – Meeting the challenge of climate change, flooding and coastal change
- NPPF15 – Conserving and enhancing the natural environment
- NPPF16 – Conserving and enhancing the historic environment

Most relevant Policies of Adopted South Downs Local Plan (2014-2033) (A full list of relevant policies can be found in Appendix I)

- SD4: Landscape Character
- SD5: Design
- SD9: Biodiversity and Geodiversity

- SD12: Historic Environment
- SD18: The Open Coast
- SD23: Sustainable Tourism
- SD25: Development Strategy
- SD34: Sustaining the Local Economy
- SD41: Conversion of Redundant Agricultural or Forestry Buildings
- SD43: New and Existing Community Facilities

Relevant Policies of South Downs Management Plan (2020-2025)

- Policies 1, 3, 5, 7, 9, 25, 28, 29, 30, 31, 32, 36, 38, 39, 41, 43, 45 are relevant.

Other Relevant Policy Documents (including SPDs and TANs)

- SDNPA Design Guide SPD (Jul 2022)
- SDNPA Parking SPD (Apr 2021)
- SDNPA Sustainable Construction SPD (Aug 2020)
- SDNPA Biodiversity TAN (Jan 2022)
- SDNPA Dark Skies TAN (May 2021)
- SDNPA Ecosystem Services TAN

7. Planning Assessment

7.1. The main matters for consideration relate to:

- Principle of Development
- Design, Heritage and Landscape Impacts
- Sustainable Construction
- Ecology and Ecosystem Services
- Highways, Access and Parking
- Dark Skies
- Drainage, Contamination and the Water Environment
- Amenity

Principle of development

Major Development

7.2. The proposal is not considered to be major development for the purposes of policy SD3 and paragraph 183 of the NPPF, which relate to development in National Park. The NPPF accompanying footnote 64 advises that whether a proposal is ‘major development’ in designated areas 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.

7.3. In this case, the proposal is mainly restricted to an existing building group within a contained farmstead. Although the site is exposed in some views, the elements of new build will be seen in the context of existing structures. The intensity of the proposed use will result in additional traffic movements, however sustainable travel plans to ensure the maximisation of staff and visitors travelling by sustainable means and reduced reliance on private vehicles can be secured by means of a legal agreement. Any potential impacts on the designated landscape as a result of development are therefore not considered to be significant for the purposes of SD3 or paragraph

183.

In-Principle Acceptability

- 7.4. Policy SD1 encourages a presumption in favour of sustainable development where development proposals accord with other relevant policies in the South Downs Local Plan and the National Park's statutory purposes which are i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes, and permission will be refused where proposals fail to meet Purpose 1 unless, exceptionally a) the benefits of the proposals demonstrably outweigh the great weight to be attached to those interests; and b) there is substantial compliance with other relevant policies in the development plan.
- 7.5. Policy SD18 requires proposals within the undeveloped coastal zone of the National Park to be appropriate to the coastal location and conserve and enhance the character of the undeveloped coastline. Policy SD25 seeks to direct new development to within settlement boundaries, but under SD25 2) there are exceptional circumstances whereby proposals may be supported providing these comply with other relevant policies; respond to the context of the relevant broad area; there is an essential need for a countryside location; or are an appropriate reuse of a previously developed site and conserve and enhance the special qualities of the National Park. SD25 3) also sets out that positive regard will be had to proposals located outside settlement boundaries within rural estates where these form part of a SDNPA endorsed Whole Estate Plan (WEP,) and deliver multiple benefits in line with the purposes and the special qualities of the National Park and in regard to ecosystem services.
- 7.6. The types of 'exceptional' development countenanced under SD25 2) include sustainable tourism and community facilities, which are supported by policies SD23 and SD43 respectively. The purpose of SD23 is to foster the responsible and sustainable delivery of tourism and recreation development in accordance with the Sustainable Tourism Strategy, and SD23 g) supports tourism proposals outside settlement boundaries where these:
- i) Positively contribute to the natural beauty, wildlife and cultural heritage of the National Park; and
 - ii) Are closely associated with other attractions/established tourism uses, including the public rights of way network; or
 - iii) Are part of farm diversification schemes or endorsed Whole Estate Plans.
- The purpose of SD43 is to support community facilities that serve the local communities of the National Park, and SD43 1) supports new community facility infrastructure proposals which demonstrate a local need; are proportionate to the local area; and are accessible and inclusive to the local communities they serve.
- 7.7. Other relevant policies include SD41 and SD34. SD41 supports the conversion of redundant agricultural buildings to alternative uses providing that the location is well related to existing services; the access is suitable for the use proposed; the buildings are worth of conversion without the need for substantial reconstruction/extension; conversion will not result in the need for another agricultural building on the holding; and there is no adverse impact on the character of the building and its setting, in particular its agricultural/forestry character. SD34 supports proposals that foster the economic and social well-being of local communities within the National Park providing they meet promote and protect businesses linked to the National Park's key sectors (which includes tourism) or provides for and supports small businesses through the provision of small, flexible business units.
- 7.8. A number of third-party concerns have been raised with regard to the nature and intensity of the proposed uses, the loss of agricultural buildings that are still in active use, and the potential for harmful impacts to the downland farmed landscape as a result of the proposals.
- 7.9. Although some of the buildings on site are in storage and residential uses, agricultural buildings

are not included in the definition of previously developed land, for the purposes of SD25 2). However, the vision for the development is to “*be a destination, a world-class centre for education and culture, befitting its special landscape setting, connecting the South Downs National Park with the town centre and seafront, providing new space for visitors, learners, and businesses.*” A countryside location is therefore accepted as essential for this particular development as it could not be met by a site in an urban location with no physical connection to the National Park. The proposals can therefore be considered exceptional development for the purposes of SD25 2)b.)

- 7.10. It is acknowledged that the proposed development does not neatly fit within the supporting policies, comprising a mix of tourism, educational/community and business uses and the conversion of agricultural buildings that are still in active use to a greater or lesser extent; however, it meets a number of their collective key criteria. As well as providing a strong cultural heritage offer, the development will promote one of the National Park’s key industries (tourism,) be closely associated with the public rights of way network and designed to complement other visitor attractions in the area. It will provide needed community/educational facilities that will support accessible outdoor learning for 31 local schools, young people and adults, a new art gallery, and small, flexible business units for the creative industry. The traditional farm buildings that will be retained are considered worthy of and suitable for conversion and are not generally well suited to modern farming needs. Although their conversion will result in the need for new agricultural buildings at nearby Ringwood Farm and Crapham Barn (which will be the subject of separate planning applications), the re-use of historic farm buildings will secure a number of wider public benefits in providing greater access to outdoor education, cultural heritage, the National Park’s landscape and farmstead itself, and will support the local rural economy. The scheme will also secure a new public right of way.
- 7.11. The proposals also align with a number of the endorsed Eastbourne Downland Estate Whole Estate Plan (WEP) key medium/long-term actions including the repurposing of built assets (the application site) for visitor and educational uses, improving the visitor centre offering at Beachy Head, and the restoration of areas of chalk grassland and two dew ponds. The WEP does not include a proposal for the application site on the scale or intensity proposed to the extent that SD25 3) and SD23 g) iii) above are engaged. However, the extent to which the scheme aligns with the WEP’s objectives and actions is a material planning consideration that weighs positively.

Design, Heritage and Landscape Impacts

- 7.12. SD4 and SD5 require proposals to conserve and enhance existing landscape character features, make a positive contribution to the overall character and appearance of the area, and be of a landscape-led design. SD23 1)g)i) also requires tourism proposals to positively contribute to the National Park’s natural beauty, wildlife and cultural heritage. Policies SD6 and SD7 support proposals that preserve the visual integrity, identity and scenic quality of the National Park, including views from public rights of way, and conserve relative visual and aural tranquillity. Policy SD18 requires proposals to be appropriate to the coastal location and conserve and enhance the character of the undeveloped coastline.
- 7.13. SD12 states that proposals that affect heritage assets (whether designated or non-designated) or their setting will be determined having regard to the significance of the asset, and whether the long-term conservation and enhancement of that asset would be secured. Proposals which appropriately re-use under-used heritage assets with the optimal viable use, which secures their long-term conservation and enhancement, including of their setting, will be supported. SD41) also supports the conversion of historic farm buildings providing that the development has no adverse impact on the agricultural character of the buildings and their setting; the use conserves and enhances the architectural and historic significance and setting of the asset; significant internal or external fabric is not harmed; and the existing historic fabric and features of architectural or historic significance are retained and respected.
- 7.14. Concerns have been raised by a number of third parties with regard to the loss of historic fabric, impacts upon visual and aural tranquillity, failure to meet the WEP objective of conserving the downland landscape, and a general lack of Purpose 1 benefits.
- 7.15. No concerns have been raised by the Cultural Heritage Officer, who is supportive of the

proposed re-use of the farmstead and the cultural heritage benefits that would be accrued. However, the Historic Buildings officer has objected to the scheme due the alteration and demolition of a number of historic farmstead buildings, which are considered to be non-designated heritage assets. He raises concerns that this, in combination with the uncharacteristic scale and materials of new/altered buildings, will result in harm to the character of the historic farmstead and the wider contribution it makes to the downland landscape.

- 7.16. The Design and Landscape officers have also raised concerns regarding the loss of historic fabric, including the cow shed, fold wall and ad-hoc lean-to buildings, and that the farmstead's character would be undermined by the design, scale, and domestic style glazing of the new buildings and the extent of the gallery building's monotone flintwork. The widened access, visitor car park, use of multiple surfaces and verges to delineate pathways and changes to landform would also, in their view, introduce an uncharacteristic, civic character. Some positive aspects of the scheme are nonetheless highlighted including the preservation of some historic buildings, non-motorised access to the site, and the restoration of dew ponds and areas of chalk grassland. A number of amendments/conditions are also suggested to address some of the above concerns.
- 7.17. It is acknowledged that the scheme will necessitate the full or partial demolition of historic structures, including the Cow Shed and a section of the central flint fold wall it sits upon, a small section of the Milking Parlour and two small lean-to garage buildings attached to the Milking Parlour. The Applicant has been unable to retain and incorporate these structures into the scheme due to a combination of the Cow Shed's low ceiling height and falling ground levels, and other factors which would prevent the practical delivery of required accessible standards for buildings, outside spaces and paths/routes through the site. These requirements result in the loss of some historic fabric and will have a degree of impact upon the agricultural character of the buildings and their setting.
- 7.18. However, the new buildings will broadly follow the existing building pattern and layout, retaining the fold yard spaces for sheltered outside learning uses and conserving the regular 'E' plan layout of the oldest building group. Internal fixtures such as the stalls in the Cow Shed will also be stored for re-use, and materials from demolished structures will be recycled for use in the new buildings, for example flints from the fold walls will be re-used to construct the new gallery building. The Visitor Centre display will also record and interpret the historic farmstead for the benefit of visitors. As a consequence, the site's historic character and setting would be broadly conserved.
- 7.19. Importantly, the elements that attracted significant concern, including the works affecting the Flint Barn, which is the oldest building in the group, the West Parlour and eastern fold yard wall, are now in outline. The proposed seven year time limit for submission of a reserved matters application (rather than the statutory three years) will allow time for a more sensitive design approach to be evolved that could retain a larger extent of historic fabric and features, ensuring the historic farmstead character would be appropriately conserved and enhanced.
- 7.20. The applicant has also agreed to restore two dew ponds located to the south of the site, and increased the area given over to chalk grassland restoration, including an area of land to the east of Beachy Head Road and a 1m strip either side of the new right of way amounting to 1.09ha in total. These elements accord with key objectives of the Eastbourne Downland Estate WEP and assist the scheme in meeting Purpose 1.
- 7.21. Concerns have been raised that the scheme fails to secure delivery of more extensive chalk grassland restoration in the wider land holding. This proposal will secure the restoration of chalk grassland areas and two dew ponds, and their ongoing management will be secured through a section 106 agreement which meets the statutory tests. Extensive chalk grassland restoration is a key medium-long term action of the WEP over the period until 2045, and the extent of restoration/creation will be informed by emerging habitat network mapping being carried out across the wider Estate. Areas of downland managed directly by EBC will be subject to a Countryside Stewardship Scheme agreement from January 2024 and Natural England are also working with partners to create a Chalk Coast super National Nature Reserve which may include Eastbourne Downland Estate Land. It is also understood that the tenanted land associated

with Black Robin Farm entered a new Countryside Stewardship Scheme agreement in January 2024.

- 7.22. In terms of Biodiversity Net Gain, the overall landscaping will achieve 34% increase in area-based habitats and a 54% increase in linear (hedgerow) habitats. Although the proposed planting requires some refinements in terms of species choices, a suitable native planting scheme and management of areas of new habitat can be secured by means of suitably worded planning conditions.
- 7.23. In summary, whilst the scheme leans more heavily towards delivering public benefits associated with Purpose 2 and the SDNPA's duty, the scheme as presented will broadly conserve built heritage and more generally it will enhance – via the proposed uses – the cultural heritage offer of the National Park. The phased approach to the conversion of key historic buildings allows time for a sensitive design approach to be evolved and ensure the historic farmstead character will be appropriately conserved and enhanced. The restoration of areas of chalk grassland and two dew ponds will conserve and enhance the natural beauty and wildlife of the site and its setting. As a consequence, Purpose 1 is met. The proposal is therefore considered to be acceptable in design, heritage and landscape terms, and in accordance with policies SD1, SD4, SD5, SD6, SD7, SD12, SD18, SD23, SD25 and SD41, and the National Park's Purposes.

Sustainable Construction

- 7.24. Policy SD48 requires the design of new development to address climate change mitigation through the on-site use of zero/low carbon technologies, sustainable design and construction, and low carbon materials. In addition, the SDNPA Sustainable Construction Supplementary Planning Document (SPD) requires BREEAM Excellent design standards to be achieved, as well as 20% improvement of CO2 emissions through onsite low/zero carbon energy, water savings, the use of sustainable materials, recycling strategy and provision of EV charging for 1 in 5 parking spaces.
- 7.25. All new buildings on the site will incorporate highly insulated buildings envelopes with high performance glazing to minimise heating demands. A communal ground source heating and cooling system will serve the new gallery, visitor centre, educational spaces, refectory and events barn, whilst the cottages and studios will be heated by air source heat pumps. The ground heat exchanger will comprise 27 No 100 meters deep boreholes located to the west of the site between the implement store and Western Stables buildings. A standalone Co2 air source heat pump will also generate hot water for the refectory and events spaces, located in an enclosure to the south of the kitchen building. Photovoltaic panels will also be provided on the roof of the new gallery building in line with the minimum requirements for BREEAM Excellent. EV charge points are proposed for the visitor car park.
- 7.26. The Design Officer has advised that the scheme's embodied carbon targets are good, and operational energy will supersede policy requirements with three new buildings meeting BREEAM Excellent. Operational energy use has been significantly improved in existing buildings through a combination of fabric improvements and on-site low carbon energy generation. However, there is a missed opportunity to provide PV panels on the south facing roof of the Events Barn, and sustainable drainage measures such as green roofs. The applicant has subsequently advised that the load bearing capacity of the Event Barn is insufficient to support the weight of PV panels or a green roof. In any case, the sustainable construction measures proposed already meet and in some cases exceed policy requirements. The scheme is therefore considered acceptable in terms of SD48 and the SDNPA Sustainable Construction SPD.

Ecology and Ecosystem Services

- 7.27. Policies SD2, SD9, SD11 and SD45 support proposals that conserve and enhance biodiversity, trees and woodland, hedgerow and green infrastructure; retain, protect and enhance features of biodiversity and supporting habitat, and identify and incorporate net gains for biodiversity and green infrastructure. The SDNPA Biodiversity Net Gain (BNG) Technical Advice Note (TAN) (Jan 2022) provides interim guidance ahead of legally mandatory BNG requirements, which apply for major applications submitted on or after 12 February 2024. The TAN states that developments on sites greater than 0.5ha in size should maximise biodiversity opportunities on site with a minimum of 10% BNG.

- 7.28. The Seaford to Beachy Head Site of Special Scientific Interest (SSSI) is located on the east side of Beachy Head Road. Within the SSSI there are two notable areas of Habitat of Principal Importance within close proximity of the site. These include Lowland Calcareous Grassland to the east of Beachy Head Road and Lowland Deciduous Woodland approximately 95m to the north east.
- 7.29. Concerns have been raised by third parties with regard to potential impacts upon the SSSI, bats, birds, flora and chalk grassland.
- 7.30. An area of approximately 50sqm within the SSSI area will be required to provide a bus stop with a hardstanding waiting area. Natural England have raised concerns regarding the works to provide the south bound bus stop, which is located within the SSSI and chalk grassland habitat area to the east of Beachy Head Road. The Authority's ecologist has also advised that it is unlikely that there would be significant recreational impacts, given that the promotion of sustainable transport will minimise additional vehicle movements and the main activity and parking will be located some distance west of the SSSI. However, there is a potential risk of impacts to the SSSI and associated habitats as a result of construction and operation related activities (noise, dust, air, light and surface water runoff pollution), as well as increased recreational pressure. However, the mitigation measures put forward in the submitted Ecological Impact Assessment (EclA) are supported and could be secured by condition. Measures to secure dormouse, reptile, management of spoil mitigation, pond clearance, compensatory habitat and enhancement measures and the management of newly created habitats can be secured via suitably worded planning conditions. However, further information was required with regard to Biodiversity Net Gain and bat mitigation.
- 7.31. At the time of writing this report, the applicant has submitted an updated EclA which provides further information including the consideration of alternative measures for the bus stop provision, and mitigation measures including the use of more sensitive surfacing than concrete paving. Further information has also provided with regard to Biodiversity Net Gain provision, estimated to be a 34% increase in area-based habitats and a 54% increase in linear (hedgerow) habitats, and bat mitigation and the Committee will be updated with the responses from Natural England and the Authority's Ecologist.
- 7.32. In summary, subject to the resolution of the above technical matters to the satisfaction of Natural England and the Authority's Ecologist, the development is considered capable of meeting the requirements of policies SD2, SD9 and SD45 and the Biodiversity Net Gain TAN.

Highways, Access and Parking

- 7.33. Policies SD19 and SD22 seek to promote sustainable modes of transport, and parking provision that is appropriate to the site's needs and accessibility to facilities and services, and of a location, scale and design that reflects its context. Policy SD21 promotes the safety and amenity of all road users and safe, direct walking and cycling routes.
- 7.34. Concerns have been raised by third parties with regard to impacts from increased traffic and associated pollution, excessive/insufficient car parking, insufficient sustainable transport measures and lack of new footpath/bridleway provision.

Access and Traffic

- 7.35. The ESCC Highway Authority has advised that there would not be a significant impact on the road network as a result of the development. The submitted TRICS data suggests that there will be a peak of 289 visitors per hour on site at weekends and 181 on weekdays in July with the peak occurring between 12:00-13:00. The peak two-way flow on weekends will generate 58 trips in the peak hour, however would mainly comprise of visitors already in the locality. The visibility splays and vehicle tracking are also acceptable, subject to a Stage 2 Road Safety Audit which may be secured via suitably worded planning condition.

Sustainable transport

- 7.36. Improvements to local bus services are key objectives of the ESCC Bus Service Improvement and Local Transport Plans, and the Eastbourne Downland Estate WEP. The submitted Workplace and Visitor Travel Plans seek to promote sustainable travel and staff and visitors will be incentivised to travel by public transport, and updated travel plans (to cover the slightly extended opening hours and events) are proposed to be secured via the S.106.
- 7.37. The level of visitor parking has been significantly reduced since that proposed at pre-application stage in order to minimise landscape harm. Whilst concerns have been raised by third parties that this will result in parking overspill, improvements to the 13X bus service which serves Black Robin Farm will result an estimated 50% of visitors arriving via public transport as a minimum. Currently the Brighton and Hove Buses service is seasonal, running three times a day between June-August on weekdays with an hourly service on Saturdays, and half hourly buses on Sundays and Public Holidays. To secure an hourly capacity of 80-100 passengers at weekends and 50-80 on weekdays in low season, and 150-160 passengers at weekends and 80-100 on weekdays in high season, an enhanced service is anticipated to run as follows:

	Current Service	Proposed Service
High Season Weekday	3x per day Half hourly on Public Holidays	80 seater 1x per hour or 50 seater 2x per hour
High Season Weekend	Hourly on Saturdays Half hourly on Sundays	80 seater 2x per hour or 50 seater 3x per hour
Low Season Weekday	Half hourly on Public Holidays	80 seater 1x per hour or 50 seater 1x per hour
Low Season Weekend	Half hourly Sundays only	80 seater 1x per hour or 50 seater 2x per hour

Table 1: Bus Service Improvements

The improvements are acceptable in principle to the ESCC Highway Authority, with final details and a contribution to be secured via a S.106 legal agreement.

- 7.38. The ESCC Highway Authority has also advised that the improvement and re-location of the north and south bound bus stops on Beachy Head Road and pedestrian crossing point is acceptable in principle and will assist in both providing an enhanced bus service and encouraging use of public transport. The works to the bus stop, the pedestrian crossing and the access works will be subject to a Stage 2 Road Safety Audit secured by a suitably worded planning condition and delivered via a S.278 agreement with the Highway Authority. The detailed design of the bus stops and any shelters can be secured via suitably worded planning condition.

New Public Footpath

- 7.39. The new public footpath along the northern boundary of the site will provide pedestrian access between the Beachy Head Road (and South Downs Way just to the east) with Bridleway 48e to the west. This is a welcomed and important public benefit that aligns with Local Plan policy, National Park Purpose 2, and the Eastbourne Downland WEP objectives.
- 7.40. Although a bridleway would also provide access for cyclists, the Applicant's preference is to prioritise the needs of visitors to the site who will predominantly be on foot and have a range of access needs, including wheelchair users. A footpath also means that there is less reduction of land in active agricultural use.
- 7.41. The ESCC Rights of Way team have advised that the footpath would be delivered via a S.25 public footpath creation agreement, with maintenance to be undertaken by the landowner and secured via the S.106 agreement.

Parking

- 7.42. In terms of vehicle parking, the proposals do not fit neatly into a specific use class, and for the purposes of the SDNPA Parking SPD should be assessed according to site-specific needs i.e. based on a travel plan and the needs of the development. There is also some tension between the need to provide adequate parking space to avoid overspill and the need to manage visitor behaviour change away from the use of private vehicles towards sustainable means of transport. Adequate parking provision must also be balanced against the impacts that arise from large areas of parked cars in this particularly open landscape. The parking has been minimised during the course of the application but cannot be reduced further at this stage given the anticipated needs of the development. The proposed cycle parking (56 spaces in total) is appropriate and can be secured by condition. The provision of an appropriate number of EV charge points can also be secured via a suitably worded planning condition.
- 7.43. Given the above it is considered that visitor parking is appropriate, subject to a visitor parking scheme that seeks to progressively reduce the number of parking spaces provided over a ten year period as sustainable transport measures and visitor behaviour change become more established over time (see Condition 32.)

Summary

- 7.44. Although there will be a relatively high number of visitors to the site there are unlikely to be significant impacts in terms of visitor vehicle movements compared to that already existing in the locality. The new public footpath and expanded bus service will be secured by means of a S.106 legal agreement, both of which bring wider, more general benefits to visitors to the National Park. The proposed access and amendments to the bus stops will be subject to a S.278 agreement with the Highway Authority. A visitor parking scheme will allow this provision to be re-evaluated and reduced as visitor behaviour changes over time, and sustainable transport provision increased in line with the agreed long-term goals of the Applicant and other relevant authorities (ESCC and BHCC,) and can be secured via a suitably worded planning condition.
- 7.45. Given the above, the proposal is considered to be acceptable in terms of highways, access and parking, and in accordance with the requirements of policies SD19, SD21, SD22 and the SDNPA Parking SPD.

Dark Skies

- 7.46. Policy SD8 requires proposals to take all opportunities to reduce light pollution and ensure that the measured and observed sky quality in the surrounding area is not affected.
- 7.47. The site falls within the dark skies zone the Dark Skies Transition Zone (E1b), which lies between dark zones and the urban environment. Whilst the skies are relatively brighter in this area due to its proximity to Eastbourne, it is still important to reduce light pollution from new sources, especially given the presence of a dark sky discovery site at Beachy Head.
- 7.48. The site will be mainly, but not exclusively, open during daylight hours, which limits the requirement for external lighting. The proposed lighting has three zones, which are:
- Two areas of space specific lighting with low level or wall mounted lights;
 - Four parking zones with low level, motion sensor-controlled lights; and
 - Wayfinding along key routes i.e. the main access road/footpath and building access points that will have low level or wall mounted, motion sensor controlled lights.
- 7.49. The submitted Lighting Assessment (EBS, September 2023) states that all lamps will also be of 500 lumens or less and PC-Amber LED technology which limits disturbance to ecology, which is also welcomed.
- 7.50. Concerns are raised that the proposed extent of glazing/rooflights and external lighting would be harmful to dark night skies and wildlife, specifically bats. However it must be recognised that the proposed lighting presents a notable improvement over that existing, which includes a number of floodlights and other high-capacity luminaires, albeit alternatives are required for the proposed wall mounted downlights and bollard lights. The extent of rooflights and glazing within the new

gallery, particularly the northern elevation, will also give rise to harmful light spill if unmitigated and the use of low transmission glazing and exterior shields will be required. A landscape assessment of residual lighting modelling impacts from internal and external lighting and obtrusive light calculations will also be required to ensure unacceptable light spill arising from the development is avoided.

- 7.51. It is considered appropriate to secure final design details of the external lighting and mitigation for internal light spill to ensure the protection of dark skies and wildlife via a suitably worded condition to ensure the development is capable of meeting SD8 and SD9.

Drainage, Contamination and the Water Environment

- 7.52. Policies SD17, SD49, SD50 and SD54 seek to reduce flood risk and ensure proposals within Groundwater Source Protection Zones (SPZs) do not have an adverse impact in terms of pollution or the quality of the groundwater source. Proposals should incorporate measures to eliminate risk of pollution to groundwater features, and sustainable drainage solutions provided to avoid increase of surface water run-off, taking account of climate change.
- 7.53. In this case the site is located in an area of major groundwater vulnerability due to the underlying aquifer. Given the use of the site for agriculture and storage there is also potential for contamination risk to controlled waters during the construction phase, including from the drilling of boreholes for the ground source heat pump.
- 7.54. With regard to foul drainage arrangements, a new package treatment plant will be provided in the field to the west of the site. This will discharge to ground via an infiltration drainage field, some 0.045ha in area. Surface water will be piped into an attenuation basin (described as a 'cloud pond' in some documents) that will overflow into an infiltration trench/swale and then into a soakaway measuring approximately 10m x 10m.
- 7.55. No concerns have been raised by the Local Lead Flood Authority with regard to surface water arrangements. The Environment Agency is also satisfied that it will be possible to manage the risks of contamination to the strategic water supply via measures secured by suitably worded planning conditions.
- 7.56. Given the above, the proposed foul and surface water arrangements are considered to comply with the requirements of SD17, SD49 and SD50 subject to suitably worded planning conditions to ensure contamination risks are avoided during construction.

Amenity

- 7.57. Policy SD5 k) requires proposals to have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.
- 7.58. Although there would be an increase in traffic movements, this is unlikely to significantly impact surrounding amenities in terms of noise or disturbance given the relatively self-contained and isolated nature of the site together with the hours of operation.

8. Conclusion and Planning Balance

- 8.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies in the Development Plan, unless other material considerations indicate otherwise. In a National Park, the acceptability of any proposal also depends on whether it is capable of meeting the statutory purposes and duty.
- 8.2. It is clear that the scheme aligns strongly with both Purpose 2 and the SDNPA's duty. However, there are also some policy conflicts in relation to the loss of historic fabric and the fact that some of the agricultural buildings are still in active use, arising in the need for new farm buildings elsewhere on the holding. There are also opposing specialist and other third party views as to whether the scheme would sufficiently conserve and enhance cultural heritage and landscape character. The acceptability of the scheme is therefore a matter of planning judgment.
- 8.3. The scheme will broadly conserve the cultural heritage of the area and will conserve and enhance its natural beauty and wildlife to the extent that Purpose one would be adequately met. It will also deliver a number of the Eastbourne Downland Estate WEP objectives. The seven year time

limit for submission of a reserved matters application also allows time for the treatment of the most sensitive part of the historic farmstead to be evolved so as to minimise any impacts on the non-designated heritage asset, and appropriately conserve and enhance its character. Having carefully weighed the planning merits of the proposals and considering the statutory purposes and Local Plan policies as a whole, it is therefore considered that the overall outcome and impact on the National Park will be positive.

- 8.4. Given the outstanding technical ecological matters, which at the time of writing this report have not yet been resolved, it is therefore recommended that authority be delegated to the Director of Planning, in consultation with the Chair of the Planning Committee, to grant planning permission subject to
- i) The satisfactory consideration and resolution of technical matters relating to ecology;
 - ii) The conditions set out at paragraph 10.1 and any amendments or other conditions required to address ecology concerns;
 - iii) A S.106 legal agreement to secure:
 - A financial contribution for an expanded public bus service to the site;
 - Highway works (bus stops, pedestrian crossing and access improvements;)
 - A new public footpath and its maintenance in perpetuity;
 - Updated Staff, Studio User and Visitor Travel Plans and associated monitoring fees;
 - Provision of a Site Management Plan and a Landscape and Ecological Management Plan.

9. Added Value

- 9.1. During the course of the application, officers have negotiated nature recovery improvements to maximise ecological enhancements and biodiversity net gain in accordance with Objective 1 of the SDNPA Corporate Plan 2020-25, and design, heritage and landscape character improvements in accordance with Objective 3.

10. Reason for Recommendation and Conditions/Reasons for refusal

- 10.1. It is recommended that authority be delegated to the Director of Planning, in consultation with the Chair of the Planning Committee, to grant planning permission subject to
- i) The satisfactory consideration and resolution of technical matters relating to ecology;
 - ii) The conditions set out at paragraph 10.1 and any amendments or other conditions required to address ecology concerns;
 - iii) A S.106 legal agreement the final form of which is delegated to the Director of Planning, to secure:
 - A financial contribution to be agreed to provide an expanded public bus service in broad accordance with Table 1 of the report;
 - Highway works associated with:
 - Relocation of and improvements to the north and south bound bus stops;
 - Pedestrian crossing point over Beachy Head Road;
 - Improvement of the access onto Beachy Head Road;
 - A new public footpath between Beachy Head Road and Bridleway 48e, and its maintenance in perpetuity;
 - The provision of updated Staff, Studio User and Visitor Travel Plans;
 - A £4,500 travel plan monitoring fee;
 - The provision of a Landscape and Ecological Management Plan;

- The provision of a Site Management Plan (to include drainage, SuDS and lighting.)

It is also recommended that authority be delegated to the Director of Planning to refuse the application with appropriate reasons if technical matters relating to ecology have not been resolved, or the legal agreement is not completed, or sufficient progress made, within six months of the Planning Committee meeting of 15 February 2024.

Conditions 16-18 and 38-39 relating to design and landscaping, 23-24 and 46 relating to drainage and management of surface water, and 25 relating to ecology, are pivotal to the recommendation for approval and specifically address concerns raised by consultees and/or ensure the proposal is capable of complying with the relevant development plan policies and the National Park's Purposes. The remaining standard conditions are required to make the development acceptable. Further ecology conditions will be applied once final responses are received from Natural England and the Authority's Ecologist.

Planning Conditions and Reasons

Implementation, Plans and Use (Full and Outline Permission)

1. The development hereby permitted in full (as defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012), shall begin before the expiration of three years from the date of this permission.

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

2. No development hereby permitted in outline (as defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012) shall commence until full details of the:
 - i) Appearance,
 - ii) Landscaping;
 - iii) Layout; and
 - iv) Scale;

(herein after called 'the Reserved Matters') have been submitted to and approved in writing by the Local Planning Authority. All applications for the approval of the Reserved Matters shall be made within seven years of the date of this permission. The development shall be constructed strictly in accordance with the approved details.

Reason: Having regard to the special circumstances of the proposals, a longer time frame is appropriate than that set out in Section 92 of the Town and Country Planning Act 1990 (as amended.)

3. The development hereby permitted in outline form with all matters reserved within the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012 shall begin before the expiration of two years from the date of the approval of the last Reserved Matters, as defined in condition 2.

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

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

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

5. The use hereby permitted shall be limited to the following operational hours and events:
 - i) Main site:
 - 10am-7pm seven days per week (except for a Weekly Public Event as specified below) from 1 May to 30 September;

- 10am-5pm four days per week (Thursday to Sunday) from 1 October to 30 April (for the avoidance of doubt there shall be no public use of the site on a Monday, Tuesday and Wednesday from 1 October to 30 April;)
- ii) Events Barn and refectory only:
 - No more than one public event per week (Tuesday to Sunday) 6pm-9pm from 1 May to 30 September and limited to a maximum of 200 people;
- iii) Gallery, learning and/or refectory only:
 - Up to 44 No private events 6-9pm and limited to a maximum of 100 people;
- iv) Business studios:
 - 7am-10pm seven days per week

Reason: In the interest of amenity and to enable the Local Planning Authority to regulate and control the development and use of land.

Site Management Plan

6. Prior to the first use of the development hereby permitted, a Site Management Plan for the site shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include, but not be limited to, details of:
- i) Management and maintenance of the entire drainage system and surface water attenuation features;
 - ii) Management of access roads, pathways, boundary treatment (including gates) and areas of landscaping;
 - iii) Management of external lighting;
 - iv) Measures to control noise and lighting during events;
 - v) An inclusive learning and visitor strategy;
 - vi) How positive visitor behaviour change will be promoted e.g. use of sustainable transport, keeping to public footpaths, management of litter and recycling, responsible dog ownership etc.
 - vii) How connectivity with the farming heritage, downland landscape and National Park special qualities will be promoted;
 - viii) Regard for the Sussex Suicide Prevention Strategy & Action Plan 2024-27.

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

Reason: To enable the Local Planning Authority to regulate and control the development and use of land and ensure the scheme delivers multiple benefits in line with the purposes, duty and special qualities of the National Park, in accordance with SD23 and SD25.

Full Planning Permission

Construction

7. Prior to the commencement of the development hereby permitted, including any site clearance work and any works of demolition, in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, a Demolition and Construction and Environmental Management Plan and Ecological Method Statement (or a combined document) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the approved plan shall be implemented and adhered to in full throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:
- i) Programme and timetable for implementation of works;

- ii) The anticipated number, frequency and types of vehicles used during construction, including routing and parking;
- iii) The loading, unloading and storage of plant, materials and waste;
- iv) The erection and maintenance of security hoarding;
- v) No burning of construction materials on site;
- vi) The provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway;
- vii) The storage of excavated spoil;
- viii) How surface water run-off will be managed;
- ix) Method statements for protected species and other wildlife (bats, reptiles, dormouse badgers, GCN, brown hare;)
- x) Measures to control/minimise flood risk, the emission of dust, dirt vibration, light and air pollution and odour during demolition/construction;
- xi) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- xii) Timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- xiii) Persons responsible for implementing the works;
- xiv) No work to be undertaken on the site except between the hours of 08.00 and 18.00 on Mondays to Fridays inclusive and 08.00 hours and 13.00 hours on Saturdays, and no work to be undertaken on Sundays, Bank and Public Holidays;
- xv) Details of public engagement both prior to and during the construction works.

The works shall be carried out in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To protect amenity, highway safety, habitats and species identified in the ecological surveys from adverse impacts during construction and to avoid an offence under the Wildlife and Countryside Act 1981, as amended and The Conservation of Habitats and Species Regulations 2017, as amended. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

8. Prior to the commencement of the development hereby permitted, in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, plans and cross sections of the existing and proposed ground levels of the development, site boundaries and finished floor levels in relation to a nearby datum point (above Ordnance datum) shall be submitted to and approved by the Local Planning Authority in writing. The development shall be completed in full accordance with the approved details.

Reason: To ensure a satisfactory relationship between the new development and adjacent buildings. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

9. Prior to the commencement of the development hereby permitted, in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, details of earthworks shall be submitted to and approved in writing by the Local Planning Authority. These details shall include:
- i) The proposed grading and mounding of land area including the levels and contours to be formed, showing the relationship of proposed mounding to existing vegetation and surrounding landform in relation to a nearby datum point;
 - ii) The volume of cut/fill material;

- iii) Where surplus material may be placed on site, or alternatively proposals for removing and distributing the soil resource from site.

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

Reason: To ensure a satisfactory development and in the interests of amenity and landscape character. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

10. Piling and other penetrative methods of construction shall not be carried out unless a piling risk assessment, demonstrating that disturbance of the aquifer will be avoided, is first submitted to and approved in writing by the Local Planning Authority. Any approved piling shall be implemented in accordance with the approved details.

Reason: To protect the strategic water supply from any possible effects of land contamination in accordance with policies SD2, SD54 and SD55 of the South Downs Local Plan (2014-33) and the NPPF.

Contamination

11. Prior to the commencement of the development hereby permitted, a remediation strategy that includes the following components to deal with the risks associated with contamination of the site, shall be submitted to and approved, in writing by the local planning authority:

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

Thereafter the approved strategy shall be implemented and adhered to in full throughout the entire construction period.

Reason: To ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in accordance with SD54 and the NPPF.

12. Prior to the first occupation of any part of development hereby permitted, a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall include a long term monitoring and maintenance plan for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long term monitoring and maintenance plan shall be implemented as approved.

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

accordance with SD54 and the NPPF.

13. If, during development, contamination not previously identified is found to be present at the site then no further development shall be carried out until a remediation strategy has been submitted to and approved in writing by the local planning authority detailing how the unsuspected contamination shall be dealt with. The remediation strategy shall then be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in accordance with SD54 and the NPPF.

14. Prior to the commencement of the development hereby permitted, a full asbestos survey to be carried out on the buildings to be stripped and/or demolished, including detail of the removal of asbestos containing materials (ACMs) by a suitable qualified contractor and disposal off-site to a licenced facility, shall be submitted to and approved in writing by the local planning authority together with a mitigation plan that removes the risk to future occupiers of exposure to asbestos. Thereafter the approved plan shall be implemented and adhered to in full throughout the entire construction period.

Reason: To ensure that risks from asbestos to the future users of the land and neighbouring land are minimised and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

15. Prior to the development hereby permitted (including any construction, demolition or site clearance) an assessment of UXO (unexploded ordnance) risk shall be undertaken. The assessment must be undertaken by a competent person and conform with current guidance and best practice. Any UXO identified shall be safely removed in accordance with current guidance before any site works are commenced.

Reason: To ensure that risks from UXO to the future users of the land are minimised and to ensure that the development can be carried out safely without unacceptable risks to workers and other receptors.

Design and Landscaping

16. Notwithstanding any submitted landscaping details, prior to the commencement of the development hereby permitted, in the area defined by the pink hatching on drawing BRFEBC-XX-RP-DR-A_0012, a detailed scheme of hard and soft landscaping works shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of, but not be limited to:
- i) Proposed planting plans and schedules of plants and trees, including written specifications, cultivation and other operations associated with plant, grass, shrub and replacement tree establishment, to be sourced from a peat-free nursery;
 - ii) Construction of parking spaces;
 - iii) Planting of the verges along the new public footpath
 - iv) Location of services and utilities in relation to planted areas;
 - v) Location, height and materials/construction technique for all boundary treatments including gates;
 - vi) Treatment of surfaces, paths and access ways, including the north and south bound bus stops and pedestrian crossing points;
 - vii) Design of ancillary structures including cycle and refuse storage, EV charge points;
 - viii) Establishment of areas of chalk grassland;
 - ix) A timetable for implementation of the soft and hard landscaping works.
 - x) A schedule of landscape maintenance for a minimum period of ten years to include details of the arrangements for its implementation.

The scheme shall also include details of the following which fall outside the identified area of pink hatching:

- xi) Treatment of surfaces, paths and access ways including those associated with the north and south bound bus stops;
- xii) Design of any bus shelters, which shall be informed by an appropriate landscape assessment;
- xiii) Establishment of chalk grassland area adjacent to Beachy Head Road.

All such works as may be approved shall then be fully implemented in accordance with the approved development.

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

Reason: To achieve an appropriate landscaping scheme to integrate the development into the landscape, in accordance with SD2, SD4 and SD5, and the SDNPA Design Guide SPD. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

17. Prior to development above slab level, in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, a schedule of materials and finishes and, where so required by the Local Planning Authority, samples of such materials and finishes, (to include but not be limited to bricks, render, doors, pipework, flues, timber cladding and rainwater goods,) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be provided in full accordance with the approved details.

Reason: In the interests of landscape character and preserving the historic character of the site in accordance with SD4, SD5 and SD12 and the SDNPA Design Guide SPD.

18. Prior to the commencement of the development hereby permitted, in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, a sample panel of flintwork shall be constructed on the site and approved in writing by the Local Planning Authority. The flintwork comprised within the development shall be carried out and completed to match the approved sample flint panel and shall be retained permanently as such.

Reason: In the interests of landscape character and preserving the historic character of the site in accordance with SD4, SD5 and SD12 and the SDNPA Design Guide SPD.

Archaeology

19. Prior to the commencement of the development hereby permitted, in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, a Written Scheme of Investigation to secure the implementation of a programme of archaeological assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment should take the form of trial trenches located across the proposed area of housing, access roads and service trenches to ensure that any archaeological remains encountered within the site are recognised, characterised and recorded.

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

Reason: To assess the extent, nature and date of any archaeological deposits that might be present and the impact of the development upon these heritage assets in accordance with SD17 and the NPPF.

20. Prior to first use of the development hereby permitted, in the area defined by the pink

hatching on drawing BRF-EBC-XX-RP-DR-A_0012, the archaeological site investigation and post-investigation assessment (including provision for analysis, publication and dissemination of results and archive deposition) for that phase shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the archaeological site investigation and post-investigation assessment shall be carried out in full accordance with the programme set out in the written scheme of investigation approved under Condition 19.

Reason: To mitigate the effect of the works associated with the development upon any heritage assets and to ensure that information regarding these heritage assets is preserved by record for future generations in accordance with SD17 and the NPPF.

Sustainable Construction

21. Prior to the commencement of the development hereby permitted in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, a design stage Sustainable Construction Report shall be submitted to and agreed in writing by the local Planning Authority. The report shall include details of:

- i) Design stage BREEAM certificate;
- ii) Design stage SAP data demonstrating that the new Gallery building will improve CO2 emissions by at least 21% over 2021 Part L building regulation standard;
- iii) Design stage evidence of improvements to fabric and low/zero carbon energy generation to improve the energy performance of existing buildings;
- iv) Water use demonstrating at least BREEAM 2no Wat 01 credits;
- v) Waste management (construction and operation) demonstrating at least 1 of the BREEAM NC Wst 01 diversion of resources from landfill credits;
- vi) Sustainable transport measures in addition to the secured Travel Plans i.e.
- vii) EV charge points (minimum 1 for every 5 spaces) with minimum power rating output of 7kW and universal sockets.

Thereafter the development shall be provided in full accordance with the approved details.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of and adaptation to predicted climate change, in accordance with SD2, SD48 and the SDNPA Sustainable Construction SPD. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

22. Prior to the first use of the development hereby permitted in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, detailed information in a Post Construction Stage Sustainable Construction Report demonstrating how the development has been carried out in accordance with all of the requirements set out in Condition 21 shall be submitted to, and approved in writing by, the Local Planning Authority. This documentary evidence shall include, but shall not be limited to, post construction BREEAM certificate, as built SAP and SBEM data, and as built stage BRE water calculator.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of, and adaptation to, predicted climate change, in accordance with SD2, SD48 and the SDNPA Sustainable Construction SPD.

Drainage

23. Prior to the commencement of development hereby permitted, details of the proposed surface water drainage and means of disposal, including on and/or off site works, shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:

- i) Full details of all components of the proposed drainage system including dimensions,

locations, gradients, invert and cover levels, headwall details, planting (if necessary) and drawings as appropriate;

- ii) Design of the attenuation pond (for both wildlife and water storage;)
- iii) Hydraulic calculations taking into account the connectivity of the different surface water drainage features and demonstrating that surface water flows can be infiltrated into the ground for all rainfall events including 1 in 100 (plus climate change) annual probability of occurrence;
- iv) An assessment by a qualified geotechnical engineer demonstrating that infiltration will not result in increased ground stability in the area, to include the recommended spacing between infiltrating structures and buildings;
- v) Technical design and supporting detailed calculations for each infiltration feature together with full infiltration testing to BRE365 methodology;
- vi) An assessment of the risks to controlled waters;
- vii) Information on how surface water flows exceeding the capacity of the surface water drainage features will be managed safely;
- viii) How surface water flows exceeding the capacity of the surface water drainage features will be managed safely.

No other drainage systems for the infiltration of surface water to the ground shall be provided other than those approved. The scheme shall subsequently be implemented in full accordance with the approved designs and retained thereafter.

Reason: To ensure satisfactory provision of surface water drainage and ensure surface water runoff from the development is managed safely whilst achieving maximum water quality and biodiversity benefits, in accordance with SD2, SD17 and SD50, and the SDNPA Design Guide SPD. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

24. Prior to first occupation of the development hereby permitted, evidence (including photographs) to demonstrate that the drainage system has been constructed in full accordance with the final agreed detailed drainage designs shall be submitted to and agreed in writing by the Local Planning Authority

Reason: To ensure satisfactory provision of surface water drainage and ensure surface water runoff from the development is managed safely.

Ecology

25. Prior to the commencement of the development hereby permitted, a Landscape and Ecological Management plan (LEMP) shall be submitted to, and approved in writing by, the Local Planning Authority. The LEMP shall include the following areas of newly created and restored habitats:

- i) New areas of chalk grassland, including 3No land parcels and new footpath verges;
- ii) 2No dew ponds.

The LEMP shall include details of ongoing management and monitoring for all newly created areas of habitat, including a ten-year annual work plan, the body or organisation responsible for implementation, and details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured. The plans shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented. The approved LEMP will be implemented in accordance with the approved details.

Reason: Biological communities are constantly changing and require positive management to maintain their conservation value, in accordance with the Natural Environment and

Rural Communities Act 2006 and policy SD9 of the South Downs Local Plan. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

Dark Skies

26. Prior to development above slab level, in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, a scheme of external lighting to be installed at the site shall be submitted to and approved in writing by the Local Planning Authority. The lighting shall:
- i) Be informed by an appropriate nighttime landscape lighting assessment of both internal and external lighting;
 - ii) Comply with the guidance set out in the SDNPA's Dark Night Skies TAN;
 - iii) Be designed to minimise impacts on wildlife.

The lighting shall be installed, maintained and operated in full accordance with the approved details.

Reason: In the interests of amenity and to protect the South Downs International Dark Skies Reserve and wildlife in accordance with SD8 and SD9.

27. Prior to development above slab level, in the area defined by the pink hatching on drawing BRF-EBC-XX-RP-DR-A_0012, details shall be submitted to and approved in writing by the Local Planning Authority of:
- i) Low transmission, non-reflective glazing for all glazed openings;
 - ii) Shutters or shields for the glazed elevations of the gallery buildings; and
 - iii) Automated black-out blinds for rooflights.

Thereafter the development shall be carried out and retained in full accordance with the approved details.

Reason: In the interests of amenity and to protect the South Downs International Dark Skies Reserve and wildlife in accordance with SD8 and SD9.

Highways and Parking

28. No development shall commence until a technically accepted highway scheme [i.e. layout of the new access, footway/cycleway, pedestrian crossing facilities, bus stops] including revised plans and details incorporating the recommendations given in a Stage 1/2 Road Safety Audit and accepted in the Designers Response have been submitted to and approved in writing by the Local Planning Authority. The approved highway scheme shall be completed prior to first occupation of the development hereby permitted.

Reason: In the interests of road safety.

29. The access as indicated on drawing number BF193-JCLA-DR-L-1002 REV P03 shall not be used until appropriate visibility splays are provided in both directions and maintained thereafter.

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

30. Prior to the first use of the development hereby permitted, detailed drawings of the parking areas shall be submitted to and approved in writing by the Local Planning Authority. The proposed parking spaces shall measure at least 2.5m by 5m (add an extra 50cm where spaces abut walls or fences.) Thereafter the development shall be carried out in full accordance with the approved details. At no time shall any vehicles be parked outside the areas designated for parking as indicated on drawing number BF193-JCLA-DR-L-0001 REV P03 Proposed Landscape Overview Plan.

Reason: To provide adequate space for the parking of vehicles and to ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.

31. Prior to the first use of the development hereby permitted, a scheme for visitor parking, in the area defined by the yellow hatching on drawing BRF-EBC-XX-RP-DR-A_0012, shall be submitted to and approved in writing by the Local Planning Authority. Taking into account public transport provision and other sustainable transport measures, the scheme shall identify how the amount of parking will be progressively reduced over a 10 year period. The scheme shall:
- i) Include measures to actively reduce/discourage the use of private vehicles;
 - ii) Identify measurable objectives for the reduction in the number of car parking spaces for years 5, 7, and 10 of operation;
 - iii) Include a schedule of restoration as the size of the car park is reduced, to include landscaping and landscaping maintenance.

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

Reason: To enable the parking requirement to be re-assessed and reduced as sustainable transport measures are increased in accordance with SD19 and the wider aims of the Eastbourne Downland Estate WEP.

32. Prior to the first use of the development hereby permitted, detailed drawings of the covered and secure cycle parking stores and spaces shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in full accordance with the approved details.

Reason: To provide alternative travel options to the use of the car and meet the objectives of sustainable development in accordance with SD19.

Outline Specific Conditions

Construction

33. Prior to the commencement of the development hereby permitted, including any site clearance work and any works of demolition, in the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012, a Demolition and Construction and Environmental Management Plan and Ecological Method Statement (or a combined document) has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved plan shall be implemented and adhered to in full throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:
- i) Programme and timetable for implementation of works;
 - ii) The anticipated number, frequency and types of vehicles used during construction, including routing and parking;
 - iii) The loading, unloading and storage of plant, materials and waste;
 - iv) The erection and maintenance of security hoarding;
 - v) No burning of construction materials on site;
 - vi) The provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway;
 - vii) The storage of excavated spoil;
 - viii) How surface water run-off will be managed;
 - ix) Method statements for protected species and other wildlife;
 - x) Measures to control/minimise flood risk, the emission of dust, dirt vibration, light and air pollution and odour during demolition/construction;

- xi) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- xii) Timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- xiii) Persons responsible for implementing the works;
- xiv) Hours of working;
- xv) Details of public engagement both prior to and during the construction works.

The works shall be carried out in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To protect amenity, highway safety, habitats and species identified in the ecological surveys from adverse impacts during construction and to avoid an offence under the Wildlife and Countryside Act 1981, as amended and The Conservation of Habitats and Species Regulations 2017, as amended. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

34. Prior to the commencement of the development hereby permitted, in the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012, plans and cross sections of the existing and proposed ground levels of the development, site boundaries and finished floor levels in relation to a nearby datum point (above Ordnance datum) shall be submitted to and approved by the Local Planning Authority in writing. The development shall be completed in full accordance with the approved details.

Reason: To ensure a satisfactory relationship between the new development and adjacent buildings. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

Contamination

35. No development permitted, including any demolition or works that disturb the ground within the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012, shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted has been submitted to and approved in writing by the Local Planning Authority.

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

The strategy shall include:

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

The above requirements shall be dealt with sequentially and in full unless any requirement is explicitly dispensed with in writing by the Local Planning Authority.

Reason: To avoid mobilising potential contaminants during the demolition, site clearance,

preparation and construction phases of development and to ensure protection of the environment and human health during works and when the site is in use.

36. If, during development within the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the Local Planning Authority. The remediation strategy shall be implemented as approved.

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

Design and Materials

37. The appearance particulars to be submitted in accordance with Condition 2 shall have careful regard to the historic significance of the subject buildings and include a schedule of architectural details, materials and finishes and, where so required, samples of such materials and finishes, to be submitted to and approved in writing by the Local Planning Authority. The schedule shall include, but not be limited to:

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

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

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

38. The landscaping and layout particulars to be submitted in accordance with Condition 2 shall include a detailed scheme of hard and soft landscaping works, which shall be submitted to and approved in writing by the Local Planning Authority. All such works as may be approved shall then be fully implemented in accordance with the approved development. The scheme shall include details of:

- i) Proposed planting plans and schedules of plants and trees, including written specifications, cultivation and other operations associated with plant, grass, shrub and replacement tree establishment, to be sourced from a peat-free nursery;
- ii) Location of services and utilities in relation to planted areas;
- iii) Location, height and materials/construction technique for all boundary treatments including gates;
- iv) Treatment of surfaces, paths and access ways;
- v) Design of ancillary structures;
- vi) A timetable for implementation of the soft and hard landscaping works.
- vii) A schedule of landscape maintenance for a minimum period of ten years to include details of the arrangements for its implementation.

Thereafter the development shall be undertaken in full accordance with the agreed details.

All soft landscaping shall be carried out in the first planting and seeding season following the completion of the development. All shrub and tree planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of ten years, die, are removed, or become seriously damaged or diseased

shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To achieve an appropriate landscaping scheme to integrate the development into the landscape in accordance with SD5.

Sustainable Construction

39. Prior to the commencement of the development hereby permitted in the area defined by the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012, a design stage Sustainable Construction Report shall be submitted to and agreed in writing by the local Planning Authority. The report shall include details of:

- i) A pre-assessment estimate report demonstrating that BREEAM excellent is achievable;
- ii) Design stage SAP data demonstrating that the following improvements of CO2 emissions over 2021 Part L building regulation standard will be achieved:
 - a) New Learning Studios building by at least 80%;
 - b) New Refectory building by at least 48%;
- iii) Design stage evidence of improvements to fabric and low/zero carbon energy generation to improve the energy performance of existing buildings;
- iv) Water use demonstrating at least BREEAM 2no Wat 01 credits;
- v) Waste management (construction and operation) demonstrating at least 1 of the BREEAM NC Wst 01 diversion of resources from landfill credits.

Thereafter the development shall be provided in full accordance with the approved details.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of and adaptation to predicted climate change, in accordance with SD2, SD48 and the SDNPA Sustainable Construction SPD. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

40. Prior to the first use of the development hereby permitted in the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012, detailed information in a Post Construction Stage Sustainable Construction Report demonstrating how the development has been carried out in accordance with all of the requirements set out in Condition 12 shall be submitted to, and approved in writing by, the Local Planning Authority. This documentary evidence shall include, but shall not be limited to, a post construction BREEAM certificate, as built SAP and SBEM data, and as built stage BRE water calculator.

Reason: To ensure the development demonstrates a high level of sustainable performance to address mitigation of, and adaptation to, predicted climate change, in accordance with SD2, SD48 and the SDNPA Sustainable Construction SPD.

Ecology

41. If the development hereby approved does not commence within 2 years from the original bat emergence surveys used to support the application, the need for updated surveys should be reviewed by a suitably qualified bat ecologist. Further surveys may be required to i) establish if there have been any changes in ecological conditions and ii) identify any likely new ecological impacts that might arise from any changes.

Where any survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the commencement of development. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

Reason: To ensure habitats and species are appropriately assessed at the time of submission, at it is important that the surveys reflect the situation at the time on any given impact occurring in order to ensure adequate mitigation and compensation can be put in place and to ensure that no offences are committed.

Dark Skies

42. Prior to development above slab level, in the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012, a scheme of external lighting to be installed at the site shall be submitted to and approved in writing by the Local Planning Authority. The lighting shall:
- i) Be informed by an appropriate nighttime landscape lighting assessment of both internal and external lighting;
 - ii) Comply with the guidance set out in the SDNPA's Dark Night Skies TAN;
 - iii) Be designed to minimise impacts on wildlife.

The lighting shall be installed, maintained and operated in full accordance with the approved details.

Reason: In the interests of amenity and to protect the South Downs International Dark Skies Reserve and wildlife in accordance with SD8 and SD9.

43. Prior to development above slab level, in the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012, details of
- i) Low transmission, non-reflective glazing for all glazed openings; and
 - ii) Automated black-out blinds for rooflights, and
 - iii) External shutters or shields to the glazed northern elevation of the gallery building

shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out and retained in full accordance with the approved details.

Reason: In the interests of amenity and to protect the South Downs International Dark Skies Reserve and wildlife in accordance with SD8 and SD9.

Archaeology

44. No development hereby permitted within the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012 shall commence until a written scheme of archaeological investigation of the site has been submitted to and approved in writing by the Local Planning Authority.

The scheme shall include proposals for an initial trial investigation and mitigation of damage through development to deposits of importance thus identified, and a schedule for the investigation, the recording of findings and subsequent publication of results, including a timetable for the publication.

Thereafter the scheme shall be undertaken fully in accordance with the approved details.

Reason: To enable the recording of any items of historical or archaeological interest.

Drainage

45. No development hereby permitted in the area defined by the blue hatching on drawing BRF-EBC-XX-RP-DR-A_0012 shall commence until final details of proposed means of foul drainage, and surface water conveyance, management and disposal have been submitted to and approved in writing by the Local Planning Authority.

The surface drainage scheme shall maximise use of infiltration where feasible and at-surface water conveyancing features and include sufficient capacity to accommodate a 1 in 100 year critical storm event plus 45% for climate change. Full details of the management and maintenance of the surface water drainage network on site shall be submitted as part of

the condition details. The scheme shall subsequently be implemented in full accordance with the approved details.

Reason: To ensure satisfactory provision of foul and surface water drainage.

Informatives

1. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act. Trees and scrub are likely to contain nesting birds between 1 March and 31 August inclusive. Trees and scrub are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.
2. The applicant is reminded of the Control of Asbestos Regulations 2012 when carrying out demolition and other works associated with the development hereby permitted. For more information please visit <http://www.hse.gov.uk/Asbestos/regulations.htm>.
3. The foul water discharge associated with the proposed redevelopment will likely require an environmental permit from the Environment Agency. As this site is located above the chalk principal aquifer, groundwater is relatively sensitive, and this may be reflected in any permit controls. A British Standard 6297 drainage field should be used for foul water disposal. Deep system or ring based soakaways will not be acceptable for the disposal of sewage at this location.

Mike Hughes
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South Downs National Park Authority

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 Appendices: Appendix 1 – Information concerning consideration of applications before committee
 Appendix 2 - Screening Decision SDNP/23/02662/SCREEN
 Appendix 3 – Hybrid Plan BRF-EBC-XX-RP-DR-A_0012
 SDNPA Consultees: Director of Planning, Legal Services
 Background Documents: [All planning application plans, supporting documents, consultations and third party responses](#)
[National Planning Policy Framework \(2023\)](#)
[South Downs Local Plan \(2014-33\)](#)
[South Downs National Park Partnership Management Plan \(2020-25\)](#)
[SDNPA Biodiversity TAN \(Jan 2022\)](#)
[SDNPA Corporate Plan \(2020-25\)](#)
[SDNPA Dark Skies TAN \(May 2021\)](#)
[SDNPA Design Guide SPD \(July 2022\)](#)
[SDNPA Ecosystem Services TAN](#)
[SDNPA Parking SPD \(Apr 2021\)](#)

[SDNPA Sustainable Construction SPD \(Aug 2020\)](#)