

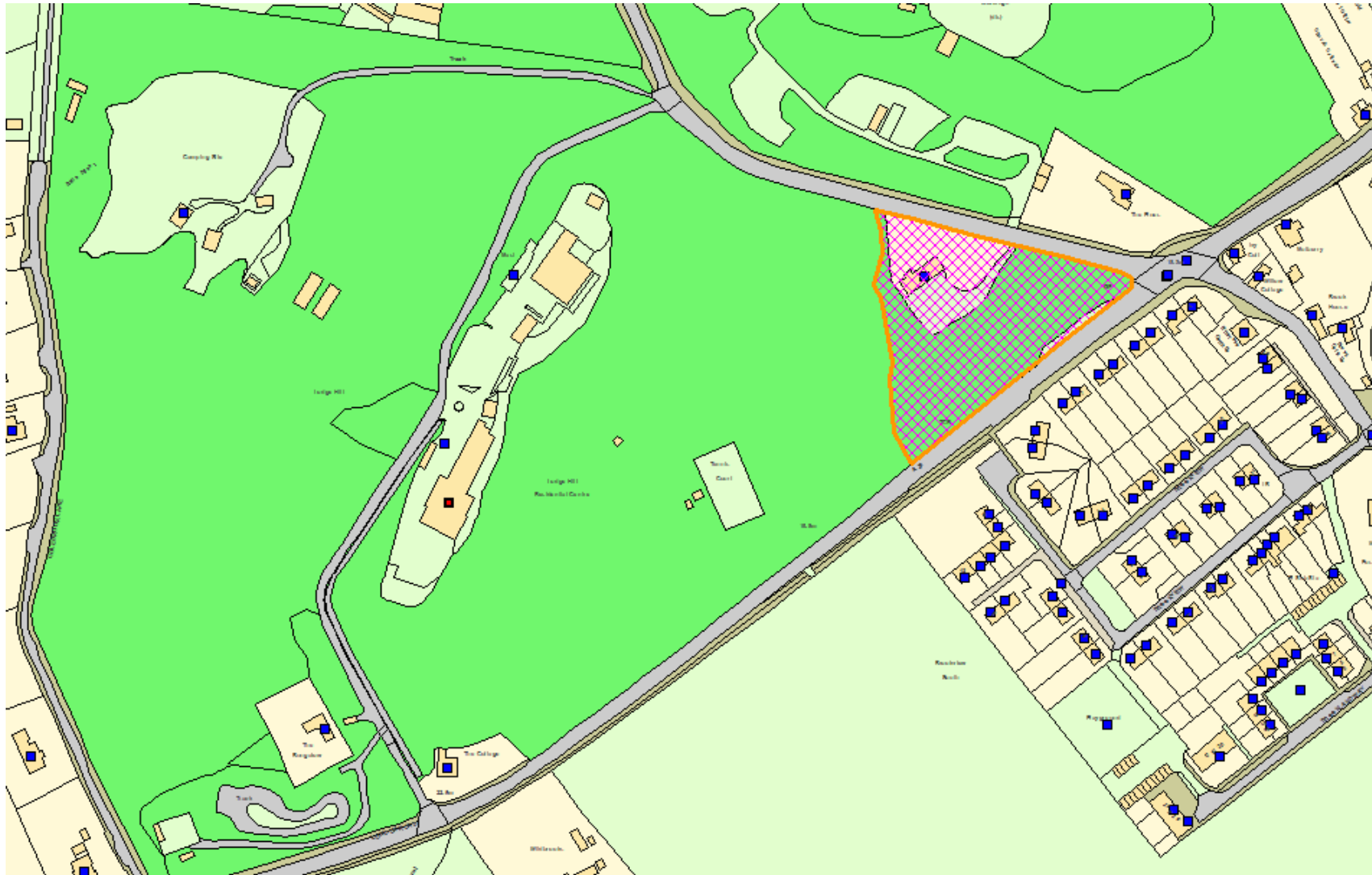
Agenda Item 9
Report PC 21/22-10

Report to	Planning Committee
Date	9 September 2021
By	Director of Planning
Local Authority	Horsham District Council
Application Number	SDNP/21/00627/OUT
Applicant	Lodge Hill Charitable Trust
Application	Outline application, with all matters reserved, other than means of access, for the construction of up to 5 dwellings to enable improvement and capital works at the Lodge Hill Centre
Address	Lodge Hill Education Centre, London Road, Watersfield, Pulborough, West Sussex RH20 1LZ

Recommendation:

- 1) That permission be granted subject to the conditions set out in paragraph 10.1 of the report and a legal agreement to secure proceeds from the sale of the land for essential maintenance works to the Centre;**
 - 2) That authority be delegated to the Director of Planning to refuse the application with appropriate reasons if the legal agreement is not completed or sufficient progress not made within six months of the Planning Committee meeting of 9 September 2021.**
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Site Location Map



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Executive Summary

Key Matters

- The proposal has been scaled back significantly during the course of the application from 16No to 'up to 5No' market dwellings in order to address concerns raised by consultees and third parties with regard to scale, intensity and impacts on ecology/woodland habitat;
- The proposal is in conflict with SD25 as the site is outside the settlement boundary and, although partly previously developed would not meet any of the exceptions outlined in the policy;
- The proposal would however provide 'enabling' capital funds for the Lodge Hill Trust and would strongly align with the National Park's Second Purpose and Duty in assisting the long-term viability of a charitable outdoor-education provider and key stakeholder within the National Park;
- The scheme is capable of conserving the natural beauty and wildlife of the area given the ability to secure biodiversity net gain within the site, and in the wider Lodge Hill grounds;
- The key concerns raised by the Parish Council and third parties relates to the general principle being contrary to Policy SD25, the loss of woodland habitat and impacts on protected species, cumulative impacts given allocation SD64 for 25-30 dwellings in Coldwaltham, lack of affordable housing provision, highway safety and Impact on Dark Skies;
- The proposal is recommended, on balance, for approval.

1. Site Description

- 1.1 This small triangular site is located in the south eastern corner of the wooded grounds of the Lodge Hill education centre, which extend over approximately 13 hectares (32 acres.) Lodge Hill has been in operation as a residential outdoor activity centre since 1946, and since 1999 has been run as a not-for-profit charity providing educational outdoor activities for visitors from both within and outside the National Park who might otherwise not experience its Special Qualities.
- 1.2 Part of the site previously accommodated a youth hut leased by the Parish Council for community use, and an area of hard-standing for associated parking. The youth hut building was demolished in 2019 when the community use ceased, however the footings and hardstanding remain in place. The main part of the site is fenced off from the remaining grounds, and not actively used by the Centre. There is an existing access off Waltham Park Road which currently provides emergency through access to the Lodge Wood grounds. Waltham Park Road is indicated on the second edition of the Ordnance Survey (1891-1914), and falls within the SDNPA's 'Roads in the South Downs' (2015) definition of a 'historic rural road.'
- 1.3 The site is located within the Dark Skies Intrinsic Zone of Darkness (EIa), which is classified as 'dark sky.' The Lodge Hill grounds are recorded on the Historic Landscape Characterisation as 'wooded over common' comprising plantation woodland and self-seeded trees, with a high percentage of invasive non-native species (rhododendron, laurel and bamboo). There are a number of mature trees within the site's hedgerow boundaries and other self-seeded trees within the site. There are no Tree Preservation Orders relating to the site.
- 1.4 The Waltham Chase Site of Special Scientific Interest (SSSI), designated for its unimproved neutral meadow habitat is located within 300m to the south east of the site. The site also falls within the buffer zones of the Arun Valley Special Protection Area (SPA); and the Ebernoe Common and Mens Special Areas of Conservation (SACs).

2. Relevant Planning History

- 2.1 The most recent planning history relating to the site is as follows:
 - SDNP/19/00357/PRE erection of 20 dwellings to enable improvement and capital works at the Lodge Hill Centre. Advice provided 10.04.2019

The advice stated that the proposal was unlikely to be acceptable due to the lack of policy support for enabling development for the needs of a private charitable foundation, given the scale of development and associated impacts on ecology, trees and landscape character. Although the housing would provide valuable funding for a facility which furthers National Park Purpose 2, this of itself is not a material consideration of sufficient strength likely to be able to overcome overriding conflict with development plan policies and National Park Purpose 1 on the scale proposed, which has priority.

[Case officer note: the current proposal for up to 5 No dwellings is much reduced in scale and quantum and allows a more balanced judgement to be made.]

3. Proposal

- 3.1 The application is for up to five market dwellings, including four 4-bedroom and one 3-bedroom units. The 4-bedroom units would be sold to raise capital to fund essential maintenance works to the infrastructure of the main lodge building and associated grounds (detailed at **Appendix I** of this report), whilst the 3-bedroom unit would be retained by The Trust to house staff, or provide an ongoing rental income. The applicants have expressed a willingness for the associated land sale value to be secured via an appropriate legal agreement and tied to delivering these works, or as otherwise agreed with the South Downs National Park Authority. No affordable units are proposed due to the requirement to provide capital funds with the minimum necessary amount of development.
- 3.2 Given this is an outline application with only the means of access to be considered, the layout and elevations set out in the Design and Access Statement are indicative. Detailed matters relating to the appearance, landscaping, layout and scale of development would be the subject of a future reserved matters planning application.
- 3.3 The existing access onto Waltham Park Road would be slightly widened to provide the necessary visibility required by the Highway Authority. Pedestrian access to the footpath along the north-west side of the A29, this maintains an existing link on the southern boundary connecting with the footpath network along the A29. Means of access would also be retained through the site in to the wider Lodge Hill Centre site for emergency purposes
- 3.4 The majority of trees proposed for removal comprise self-seeded immature trees, with the exception of a single Category B lime tree adjacent to the existing access. All other trees would be retained. 5m ecological buffers, comprising native trees and thorny hedgerow would be provided along the entire site boundary.

4. Consultations

- 4.1 **Archaeology:** No objection to original scheme or revised scheme, subject to condition.
- 4.2 **Coldwaltham Parish Council:** Objection to original scheme; objection sustained to revised scheme:

Original Scheme (for 16 Dwellings)

- Support in principle but reservations about assumptions and lack of detail;
- Another planning application is expected close to the site on the other side of the A29 which could impinge on decisions made;
- No affordable housing provision which could set precedent for other applications ;
- Proposed dwelling sizes are modest but risk future developer would apply for larger dwellings;
- Would impact dark skies;
- Lack of proposed ecology mitigation monitoring;
- Hedges insufficiently robust to protect wildlife and privacy of existing dwellings nearby;
- Would exacerbate dangerous junction with A29 given Brook Lane/Waltham Park Road is a short cut between Storrington and Fittleworth / Petworth;

- The proposed pedestrian pathway crossing the A29 is close to dangerous junction;
- No footpath along Waltham Park Road endangering pedestrians and cyclists.

Amended Scheme (for 5 Dwellings)

- The reduction in quantum, proposed ground/air source heating and use of “grey “water collection is supported; however previous concerns still stand;
- Outside the settlement policy boundary;
- Highway safety concerns due to increase in traffic and danger to pedestrians and cyclists;
- Footpath should be relocated to southern end of the site or at the site entrance across Waltham Park Road;
- Removal and replacement of existing buffer along A29 would take time to mature;
- Should be no street lighting within the development.

4.3 **Design:** Objection to original scheme on a number of grounds including site’s capacity; no objection to amended scheme:

- Any reserved matters scheme should follow a landscape-led approach demonstrating a high quality of design comprising dwellings within a woodland setting;
- The indicative scheme is too urban in its layout, architectural forms and materials;
- The density may need to be reviewed as the scheme appears to not include a required 5m buffer along the western boundary.

4.4 **Ecology:** Objection to original scheme; no objection to amended scheme, subject to conditions:

- Proposed mitigation in relation to dormice, bats and reptiles is appropriate.

4.5 **Education officer:** General comment

- The pandemic has impacted income generation for all outdoor learning providers across the SDNP, including Lodge Hill;
- Supportive of Lodge Hill’s charitable provision for young and disadvantaged people, and the significant and positive contribution it makes the delivery of Priority Programmes 5.1 and 6.1 in the SDNPA’s Partnership Management Plan.

4.6 **Environmental Health:** Holding objection to original scheme:

- Lack of information with regard to noise exposure of dwellings and amenity spaces to A29 London Road, or how the design has sought to reduce noise exposure;
- Design should be amended to allow buildings to function as noise barriers, with noise sensitive rooms and amenity spaces located on quietest facades.

4.7 **Highway Authority:** Holding objection to original scheme (shown below given interest and comments of Parish Council); no objection to amended scheme subject to conditions:

Original Scheme

- Recorded injury accident on Waltham Park Road in vicinity of the site and 2 x incidents at the junction of Waltham Park Road / London Road attributed to driver error and not due to any defect with the junction or road layout;
- Sufficient visibility is available at the point of access, however confirmation of land ownership required for strip of land between public highway and site boundary;
- Road safety audit and tracking plans required to demonstrate in-site turning and sufficient access width for two cars passing;

- Footway link to new extended footway on London Road and dropped kerb tactile paving crossing of London Road is acceptable.

Amended Scheme

- Above concerns addressed.

4.8 **Historic Buildings:** No objection to original or amended scheme:

- Due to physical separation from heritage assets, including Watersfield Conservation Area, Grade II listed Ivy Cottage and the non-designated Lodge Hill main building, heritage impacts are considered to be minimal;
- Essential that mature vegetation along boundaries is retained to ensure physical and visual separation from Ivy Cottage.

4.9 **Landscape:** Objection sustained to amended scheme:

- Fails to support settlement pattern and character;
- May be visible in longer views;
- Negative effects on the character of Waltham Park Road due to loss of vegetation and (possibly historic) boundary bank to widen access;
- Unconvinced site has capacity for five dwellings
- Any scheme should conserve and enhance woodland character
- Smaller units are likely to be more characteristic of development close to/within common land;
- Consideration should be given to future site wide Tree Preservation Order (TPO) to support tree protection as part of any scheme.

4.10 **Local Lead Flood Authority:** No objection to original scheme.

4.11 **Natural England:** No objection to original or amended scheme.

4.12 **Planning Policy:** General comment.

- Reduced quantum of development may achieve the necessary balance of SDI 4) that would enable the continued operation of Lodge Hill;

4.13 **Southern Water:** No objection to original or amended scheme, subject to condition.

4.14 **Tree Officer:** No objection, subject to conditions.

- Trees proposed for removal are Category B and C and of limited merit and amenity (from the public domain);
- New planting is favourable and will help maintain wooded nature of the site when viewed from public domain;
- Dwellings located outside root protection areas of retained trees;
- Retained mature trees may be subject to pressure from pruning and should be protected by planning condition;
- A TPO may be appropriate if further protection is required.

4.15 **Woodland Officer:** No objection to the amended scheme, subject to conditions:

- Aims and objectives of the submitted Management Plan's Strategic Vision for landscape and biodiversity are supported;
- On-site mitigation secured via 5m buffer and new native species hedgerow within the site boundaries;

- An additional objective should be secured to replace non-native invasive species with native species, and set out in a Woodland Management Plan (WMP) to complement the Landscape and Ecology Management Plan;
- Clarification required to confirm the extent of the removal of non-native invasive species provided by way of off-site enhancement/compensation;
- Measures to protect retained trees should be secured.

5. Representations

Objections

5.1 Nine letters of objection were received to the original scheme (of 16 dwellings), raising the following concerns:

Principle

- Contrary to National Park purposes;
- Outside settlement boundary and doesn't meet any of exceptions;
- No affordable housing;
- Coldwaltham already has more new houses allocated than any other rural village in the SDNP; Cumulative impacts of development when considered against policy SD64;
- Will not prevent housing development on allocated site;
- Dwellings have small footprints so will be 3 storey to maximise profit;
- The grounds should be protected and kept for future generations.
- Financial difficulties should not be a justification for development;
- Charity will require more future development to provide income;
- Majority of supporters do not live in the Parish;

Design and Landscape Impacts

- Overdevelopment of the site;
- Too urban and incongruous with its surroundings;
- Light pollution;

Ecology and Trees

- The land and ecosystem it supports will be permanently lost;
- Inability to mitigate impacts on protected species including Barbastelle bats;

Highways and Access

- Impacts of increased traffic on Waltham Park Road which narrow and has no footpaths, is already busy with farm machinery and horse box traffic, and used by walkers, cyclists and horse riders;
- Will introduce new traffic onto the dangerous crossroad at the end of Waltham Park Road close to the blind brow of the hill on the A29;
- Dangerous junctions onto the A29 at one end [of Waltham Park Road] and the B2138 at the other;
- The access could be provided more safely further north along Waltham Park Road;
- There have been road traffic accidents in the location, and a pedestrian killed whilst crossing the road;
- Traffic counts during the pandemic are not representative of the usual situation.

5.2 One further letter of objection to the amended scheme was received, raising the following additional concerns:

- Coldwaltham does not need 5 more houses aimed at those with substantial wealth but more affordable housing for younger generations;
- Would result in 50% increase of dwellings on a quiet country lane;
- Will set a precedent for more in-fill housing along the lane;
- Barren field 200m away was unable to obtain permission [for housing];
- Local issue with speeding along the A29 regularly attended by the Police which has required involvement of local MP;
- The site access should be moved further towards Watersfield along the A29 and a roundabout provided;
- Do not believe in selling off land/assets for the purpose of financial gain;
- The Charity previously argued the sale of land [with permission for 16No dwellings] was necessary to fund maintenance costs, so risk that further applications will be made for remaining funding;
- The current business model should be re-aligned to meet the needs of the property as well as customers;
- Other income generation such as renting rooms or charging public to use go-kart track should be employed to avoid unnecessary development.

Support Comments

5.3 251 letters of support were received for the original scheme (of 16 dwellings), raising the following:

Principle

- Would have been supported by many parishioners if presented as a potential housing site when allocations were made through the Local Plan;
- Will address housing shortage in Coldwaltham;
- No proof that any social housing is needed in in the Parish;
- Would support subject to the Meadows site (SD64) being removed or at least halved; both developments would not be supported as would be unsustainable housing increase of over 15%;
- Will benefit local businesses/services and local employment, which are not provided by the Meadows site (SD64);
- Morally more acceptable for the charity to benefit from development than an estate landowner;
- Will help secure the long term future of Lodge Hill which works with over 25,000 disabled and vulnerable young people, young offenders and disabled veterans every year;
- Provider for outdoor learning for children and those with Special Educational Needs and Disabilities (SEND);
- If the centre closes the cost to the local tax payer will be higher as SEND obligations would have to be met further afield;
- Valuable asset for the SDNP, important for protecting the National Park in the longer term and educating the public;
- Essential to post-Covid community recovery, given rise in youth mental illness;
- Allows young people who have rarely visited the countryside to enjoy nature and realise their full potential;

- The Trust was already financially frail and is struggling following the pandemic, reduction in school budgets and lack of funding for mental health;
- Closure would result in job losses of 50 staff and 30 support staff;
- The sale of a small plot of land for housing is preferable to the sale of the whole site and potential corporate or hotel ownership/use;
- The capital and revenue accruing from the proposed development should be subject to measures to ensure use for the restricted purposes of the Centre.

Design and Landscape Impacts

- The application is sympathetic to its village setting and the SDNP, and will have no impact on the beauty of the National Park;
- The site is unused previously developed land (unlike the greenfield Meadows site (SD64)) and the youth/scout hut has been demolished;
- The SD64 site compromises views of the South Downs;
- There is nearby residential development so would not be an extension of the settlement;
- Will be screened by trees and hedgerow; this should be retained/strengthened to minimise noise and visual impacts, including the concert and recording facilities at Champs Hill during construction;
- Will result in the removal of a single mature tree, so meets all three sustainable objectives of the NPPF;
- Will secure the removal of invasive non-native species;

Highways and Access

- Will utilise the original access away from the main junction that was heavily used by the previous youth facility;
- There should be no pedestrian access, or parking of construction or residential vehicles along Waltham Park Road;
- The Waltham Park Road access is preferable to the Brook Lane access for the Meadows site (SD64).

5.4 13 further letters of support for the amended scheme were received, raising the following additional points:

- Will allow the Trust to continue and provide funds for the site to be renovated having fallen into poor condition;
- Reduction to five homes will reduce any parking and access impacts on Waltham Park Road;
- Family homes will attract a younger demographic;
- Will not be detrimental to surrounding areas.

6. Planning Policy Context

6.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The relevant statutory development plan is the South Downs National Park Local Plan (2014-33). The relevant policies are set out in section 7 below.

National Park Purposes

6.2 The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of their areas;

- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is a conflict between these two purposes, conservation takes precedence. There is also a duty upon the Local Planning Authority to foster the economic and social wellbeing of the local community in pursuit of these purposes.

National Planning Policy Framework and Circular 2010

- 6.3 The National Planning Policy Framework (2021) is considered holistically although the following sections are of particular relevance to the applications:
- Section 2: Achieving sustainable development
 - Section 6: Building a strong, competitive economy
 - Section 8: Promoting healthy and safe communities
 - Section 12: Achieving well-designed places
 - Section 15: Conserving and enhancing the natural environment
 - Section 16: Conserving and enhancing the historic environment.
- 6.4 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and the revised National Planning Policy Framework (NPPF) (2021). The Circular and NPPF confirm that National Parks have the highest status of protection, and the NPPF states at paragraph 176 that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks and that the conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight in National Parks.

Major Development

- 6.5 Officers are of the view that the proposal does not constitute major development for the purposes of paragraph 177 of the NPPF, and accompanying footnote 60, advising that ‘major development’ in designated landscapes is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. In this case, the proposal is for a modest development of five dwellings, and officers are of the view that any adverse impacts on the designation as a result of development would not be significant.
- 6.6 The proposal has also been assessed against the Town & Country Planning (Environmental Impact Assessment) (EIA) (England & Wales) Regulations 2017. The development does not fall within the thresholds listed under Infrastructure Projects (Part 10 b ii) and iii) of Schedule 2 of the Regulations, being less than 1ha in size, and for less than 150 dwellings, however falls within a wooded location in a ‘sensitive area,’ namely a National Park. Having regard to the selection criteria under Schedule 3 of the Regulations, and the location and characteristics of the development, it is considered that the proposed development is unlikely to have significant effects on the environment within the meaning of the EIA Regulations 2017.

The South Downs National Park Partnership Management Plan 2020-25

- 6.7 The South Downs National Park Partnership Management Plan (SDPMP) (2020-25) is a material consideration in the determination of planning applications, as outlined in national planning practice guidance, and has some weight. It outlines a vision and long term outcomes for the National Park. Policies 1, 3, 5, 8, 29, 30, 41, 43, 50 and 55 are relevant.

Statutory Requirements

- 6.8 The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations) (HRA) places a duty on planning authorities when determining applications that may affect international sites to determine the potential for likely significant effects. Where proposals are likely (without mitigation) to have significant effects on international sites, the planning authority is required to undertake an appropriate assessment in order to ascertain

that there would not be adverse impacts on the integrity of the international site, and whether the proposal demonstrates that impacts would be avoided or adequately mitigated against.

7. Planning Policy

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

7.1 Whilst the South Downs Local Plan must be read as a whole, the following policies are particularly relevant:

- SD1: Sustainable Development
- SD2: Ecosystems Services
- SD4: Landscape Character
- SD5: Design
- SD8: Dark Night Skies
- SD9: Biodiversity and Geodiversity
- SD10: International Sites
- SD11: Trees, Woodland and Hedgerows
- SD19: Transport and Accessibility
- SD25: Development Strategy
- SD26: Supply of Homes
- SD64: Land South of London Road, Coldwaltham.

8. Planning Assessment

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

- The principle of providing new residential accommodation;
- Landscape and ecology impacts (Purpose 1);
- Wider public benefits and rural economy (Purpose 2 and Duty);
- Highways and access.

Principle of Development

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

8.3 SD26 allocates a housing provision of approximately 28 dwellings to Coldwaltham, which is provided for by SD64: Land South of London Road, Coldwaltham (25-30 dwellings.) SD26 allows for windfall developments however these should "primarily within tightly drawn settlement boundaries, generally in the form of infill development."

8.4 Policy SD25 of the Local Plan directs new development to within settlement policy boundaries. Exceptionally, proposals outside settlement boundaries may be supported if these

- Comply with other relevant development plan policies; respond to the context of the relevant broad area; and there is "an essential need for a countryside location;" or
- The proposal would comprise "an appropriate reuse of a previously developed site... and conserve[s] and enhance[s] the special qualities of the National Park."

Supporting paragraph 7.10 states that the exceptional circumstances whereby development outside settlements may be acceptable include community and tourism uses, and rural exception (100% affordable housing) sites. Policy SD25 provides limited flexibility, in exceptional circumstances, to allow 'brownfield' development outside settlement boundaries, where "demonstrably necessary to meet the wider objectives of this Local Plan."

- 8.5 Policy SD1 promotes a presumption in favour of sustainable development where development proposals accord with other relevant policies in the South Downs Local Plan and with National Park Purposes. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first purpose. Under SD1 4), where proposals fail to meet the first purpose, these will be refused 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.
- 8.6 In this case, a proportion of the site, comprising the footings of the demolished scout hut and parking area, is previously developed. However, no affordable dwellings are proposed as this would require a higher quantum of housing in order to provide the sought for capital funding. The proposal for up to five market dwellings does not represent an 'exceptional' use, and given the Authority's healthy 7.92 year supply of deliverable housing sites, is not necessary to meet wider Local Plan objectives. The proposal therefore fails to meet any of the criteria under SD25.
- 8.7 The acceptability of development of the site turns to consideration of SD1 4), and consideration of the following:
- i) The ability of the proposal to conserve and enhance the natural beauty, wildlife and cultural heritage of the area (Purpose 1);
 - ii) The ability to accord with key development plan policies including SD2, SD4, SD5, SD8, SD9 and SD11;
 - iii) In the case that the proposal fails to conserve the interests attached to i), that the benefits of the proposal demonstrably outweigh the great weight to be attached to those interests.
- 8.8 These and other matters that are material considerations are considered in more detail below.

Landscape Impacts

- 8.9 Policies SD4 and SD5 require the design of development to adopt a landscape-led approach in order to conserve and enhance existing landscape character features; and be of a scale and nature appropriate to the character and function of the settlement in its landscape context. Policy SD21 states that development will not be permitted where it would reduce the biodiversity, landscape and amenity value and character of historic rural roads. Particular attention will be given to new access points and other physical alterations to roads, and to the impacts of additional traffic. Development proposals involving physical alterations to historic rural roads and their immediate setting should demonstrate that the historical significance, ecological, landscape and recreational value and character of those roads are conserved and enhanced. The integrity of banks, hedges, walls and roadside trees must also be maintained.
- 8.10 Although appearance, layout, and scale are not matters for consideration at this outline stage, it is important to understand whether the site is capable in principle of supporting 'up to five' dwellings in landscape terms.
- 8.11 The SDNPA Landscape officer has an in-principle objection to the proposal as it would fail to support the settlement pattern of Coldwaltham along the valley slopes, and would negatively impact the village's wooded setting. The widening of the access would result in a loss of vegetation and part of the boundary bank, which would negatively impact the character of Waltham Park Road. It is also unclear whether the site has capacity for five dwellings.

- 8.12 It is acknowledged that there would be a level of intrinsic landscape harm, given the permanent nature of residential development and the inability for the site to be enhanced at any future point by returning it to a natural state, re-planting it and managing it as native woodland habitat. However, in this case the site is partly previously developed, and was until recently in a community use, being separated from the main Lodge Hill grounds by an existing boundary. There is also an existing emergency access through the site such that it cannot be viewed as an 'unused' forestry site. The parts of the site that comprise semi-natural and plantation woodland (approximately 0.3ha) are dominated by invasive species (laurel and rhododendron). Visual impacts are considered to be limited, given the proposed retention and strengthening of the existing hedged boundaries along Waltham Park Road and the A29 to provide 5m woodland buffers, and would be limited to views into the site via the proposed access. The density of development would also be comparatively low (approximately 7 dwellings per hectare (dph) or less), and would allow for there to be a level of tree planting within the site. Development of the site would also secure landscape enhancements of the wider Lodge Hill Grounds, and an overall net-gain in biodiversity (see paras 8.16-8.21 below).
- 8.13 It is also acknowledged that there would be a loss of some vegetation and part of the raised bank at the site entrance onto Waltham Park Road, which is a historic rural road for the purposes of SD21, and a single lime tree within the site, due to the unavoidable need to widen the existing access to be able to accommodate two cars in the interests of highway safety. However, the vegetation that would be lost mainly comprises a group of multi-stemmed, self-seeded saplings, and ivy, bramble and laurel, which are considered to be of limited amenity value. A section of the existing bank (approximately 5m) would also be removed. It is considered that the loss of this vegetation would be partly mitigated for by the enhancement of the site's boundary with Waltham Park Road via the proposed removal of non-native species and native 5m buffer planting. Details of suitable planting and an extension of the bank in to the site either side of the new access, alongside suitably low-key surface treatment, could also be secured via the landscaping details at Reserved Matters, and would ensure that impacts on the landscape and amenity value and character of Waltham Park Road would be limited. As such, officers are of the view that the degree of landscape harm is not so significant as to warrant a reason for refusal given other benefits.
- 8.14 With regard to cumulative impacts of development, given allocation SD64 for 25 to 30 dwellings in Coldwaltham, the provision of up to 5No additional market dwellings would have a limited impact in terms of overall numbers. It is also the case that until an additional level of landscape evidence analysis has been undertaken in greater detail, the precise arrangement of up to five dwellings within the site remains unknown. It would need to be clearly demonstrated at Reserved Matters, when matters relating to layout, scale, appearance, quantum and form would be considered, that the amount of development proposed would not result in unacceptable harm to the character of the area and wider landscape. The proposal wording allows flexibility for a smaller amount of development to be brought forward at Reserved Matters.
- 8.15 In summary, given the ability to secure landscape enhancements over the wider site, and subject to further consideration of impacts on trees and ecology, it is considered that the proposal is capable of conserving landscape character. It will, however, be critical to the success of any Reserved Matters application for the design process to be demonstrably led by detailed landscape evidence and analysis in order to meet policies SD4 and SD5. It is also considered appropriate to secure an amended Landscape and Ecological Management Plan (LEMP) via a suitably worded condition to ensure landscape character evidence features prominently in any ongoing management of the site and wider grounds post development.
- Trees, Ecology and Woodland Habitat
- 8.16 Policies SD2, SD9, SD11 and SD45 support proposals that conserve and enhance biodiversity, trees and woodland, and green infrastructure; retain, protect and enhance features of biodiversity and supporting habitat, and identify and incorporate net gains for biodiversity and green infrastructure.
- 8.17 The application is supported by a draft Landscape and Ecological Management Plan (LEMP)

setting out habitat mitigation and enhancement strategies. The LEMP sets out that there would be a total loss of 2.59 biodiversity units as a result of development, which would be compensated for by on- and off-site enhancements which would result in an overall 41.61% net gain in habitats. This would largely be achieved through the provision of 5m woodland buffers along the site's boundaries, and enhancement of the wider wooded site through removal of non-native species and re-planting. An inner, thorny native hedge would be provided to protect the buffer zones.

- 8.18 The Habitats Regulations Assessments (HRAs) conclude that the proposal would not have an adverse effect on the integrity of the Arun Valley Special Protection Area (SPA); and the Ebernoe Common and Mens Special Areas of Conservation (SACs) on the basis of the avoidance and mitigation measures proposed.
- 8.19 The Authority's Ecologist is satisfied that the proposed mitigation for bats, dormice and reptiles, which include the 5m wooded buffers and thorny inner hedge; and proposed ecological management of the off-site woodland, is appropriate, subject to conditions securing the measures set out in the submitted Landscape and Ecological Management Plan, and the securement of a further Habitat Enhancement and Management Strategy.
- 8.20 The SDNPA Woodland and Biodiversity Officer is also of the view that the proposal would provide adequate on- and off-site mitigation. Securement of a Woodland Management Plan (WMP) has been suggested to complement the Landscape and Ecology Management Plan (LEMP;); however woodland management would be covered by the LEMP. The Tree Officer has no objection to the proposal subject to conditions securing details of tree protection, and a condition preventing works to trees for a period of five years post completion without written consent from the LPA. A future Tree Preservation Order may be appropriate to secure tree protection.
- 8.21 Whilst it is best practice to avoid private gardens backing onto buffer zones; this may prove not to be practicable here and is not unfamiliar in planning. However, the buffer zones would be protected by an inner, thorny hedge which would deter encroachment and prevent access.
- 8.22 In summary, subject to the above measures being secured, it is considered that the proposal is capable of more than mitigating for the loss of existing habitat within the site and enhancing woodland habitat within the wider grounds. The planting of new native species and the removal of non-native invasive species within the site and wider grounds represents an overall enhancement. Given the nature of development proposed and the landscape considerations above, Officers are of the view that the proposal overall would, on balance, conserve this part of the National Park.

Purpose 2 and Rural Economy

- 8.23 The second purpose of the National Park is to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. The National Park also has a Duty, when carrying out the Purposes' to foster the economic and social well-being of communities living within the National Park.
- 8.24 Policy SD34 supports proposals that foster the economic well-being of local communities and promote businesses linked to tourism and the knowledge sector, both of which are key business sectors in the National Park. The Authority has also issued a COVID-19 Position Statement setting out how it plans to assist local businesses during the pandemic in line with its Duty. The Statement adds the Knowledge Sector to the list of key rural economy sectors that are supported by SD34, which would extend to outdoor learning providers.

- 8.25 As a charitable provider of outdoor education for young and disadvantaged people within and outside the National Park, who would ordinarily not experience the National Park's Special Qualities, the work done by Lodge Hill Trust strongly aligns with the National Park's second purpose. The Charity is also an important local employer, currently 12 FTEs which will rise to 15-16 FTEs when full post-COVID operations are resumed, as well as many local casual workers who assist with activities, domestic work and administration. The Trust also employ 20-30 local suppliers for catering provisions, on-site maintenance and works, site servicing, external service provision for large events, equipment purchase, machinery servicing, tree surgery and grounds maintenance.
- 8.26 The proposal has applied 'enabling' principles, which are usually only applicable in the interests of preserving designated heritage assets, and is supported by a viability report setting out how the funds raised from the land sale would be utilised. This sets out that whilst funding is more easily obtained for specific projects, funds for ongoing maintenance are difficult to procure, and the charity has furthermore been financially impacted by the pandemic. The sale of the land is therefore required to ensure the long term ability of the Trust to carry out necessary repairs and continue its charitable works. The works required and associated costs are detailed at **Appendix I**. The retention of 1 No dwelling would either provide long-term rental income for the Trust, or be used for staff accommodation.
- 8.27 The requirement for 5 No units as a minimum is driven by the cost of repair works, taking into account the loss of the land asset, but also by the requirement for the payment of a 25% overage to West Sussex County Council, who are the previous landowner. It is understood that the applicant is in discussions with WSCC to seek a reduction in the overage, given that the Lodge Hill Trust are a key provider for WSCC, which may assist in reducing the total number of units brought forwards at Reserved Matters.
- 8.28 In summary, the proposal would accord with the National Park's Purpose 2 and Duty and policy SD34 in accruing significant public benefits, by assisting the ability of the Lodge Hill Trust to continue providing outdoor learning to a wide range of visitors to the National Park, and support the rural economy.

Traffic and Access

- 8.29 Policy SD21 states that proposals will be permitted provided that they protect and enhance highway safety.
- 8.30 The site will be accessed via an existing vehicular access off Waltham Park Road, with an existing pedestrian access to the northern side of London Road/A29 proposed to be upgraded. The existing emergency access to Lodge Hill grounds along the Western boundary will be retained for emergency use.
- 8.31 The Highway Authority has no objection on highway safety grounds, and are satisfied that the necessary visibility splay, vehicle tracking can be achieved. The proposal would not result in 'severe' cumulative impacts on the operation of the highway network.
- 8.32 A single category B Lime tree and part of the existing hedgerow boundary would be removed to allow the access to be widened to accommodate two cars. No vegetation is required to be removed to provide the required visibility display; however this would continue be trimmed back to prevent overhanging the highway as per the existing access arrangement.
- 8.33 Details provided of dropped kerbing for the uncontrolled pedestrian crossing over London Road are also considered acceptable. Matters of internal layout and car and bicycle parking would be expected at Reserved Matters stage.

Other Considerations

Dark night skies

- 8.34 Policy SD8 requires proposals must to that all opportunities to reduce light pollution have been taken, and ensure that the measured and observed sky quality in the surrounding area is not affected.

- 8.35 The site falls within zone EI(a), or ‘intrinsic rural darkness,’ which is classified as ‘dark sky’ and includes isolated areas that may not be connected to the main core.
- 8.36 Details of an appropriate external lighting scheme to protect dark skies and wildlife, and other dark skies measures such as low transmittance glazing, may be secured via suitably worded conditions.

9. Conclusion

- 9.1 As set out above, the proposal does not comply with SD25 as it does not meet any of the exceptions. The in-principle acceptability of development of the site is therefore dependent on the consideration of the following:
 - i) The ability of the proposal to conserve and enhance the natural beauty, wildlife and cultural heritage of the area (Purpose 1);
 - ii) The ability to accord with key development plan policies including SD2, SD4, SD5, SD8, SD9 and SD11;
 - iii) Whether the benefits of the proposal demonstrably outweigh the great weight to be attached to those interests in i) having regard to the level of harm (or benefit) to those elements.
- 9.2 In this instance, officers are of the view that, on balance, the proposal would provide appropriate mitigation for loss of habitat and deliver significant biodiversity net gain both within the site and in the wider Lodge Hill grounds; and is capable of conserving the natural beauty and wildlife of the area, in accordance with i) above. The proposal would also substantially accord with policies SD9 and SD11, and subject to the consideration of further design details at Reserved Matters stage, is considered capable of complying with SD2, SD4, SD5, and SD8 and ii) above. As such, it is considered that the proposal would conserve this part of the National Park.
- 9.3 The proposal would also accrue significant public benefit in assisting the ability of the Lodge Hill Trust to continue providing its unique outdoor learning programme to a wide range of visitors to the National Park, and support the rural economy, in accordance with the National Park’s Purpose 2 and Duty. The application is therefore recommended for approval.

10. Reason for Recommendation and Conditions

- 10.1 The application is recommended for approval subject to the following conditions and a legal agreement to secure proceeds from the sale of the land for essential maintenance works. If the legal agreement is not completed or sufficient progress been made within six months of the Planning Committee meeting of 13 August 2020, it is recommended that authority be delegated to the Director of Planning to refuse the application.
 - 1. The permission hereby granted is an outline permission under Section 92 of the Town and Country Planning Act 1990 (as amended) and an application to the Local Planning Authority for the approval of the following matters shall be made not later than the expiration of 2 years from the date of this permission:
 - i) Layout;
 - ii) Scale;
 - iii) Appearance; and
 - iv) Landscaping.
 Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).
 - 2. The development permitted shall be begun either before the expiration of five years from the date of this permission, or before expiration of 2 years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

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

3. The development hereby permitted shall be carried out strictly in accordance with the approved plans unless otherwise agreed in writing by the Local Planning Authority.

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

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

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

Construction

5. No works pursuant to this permission shall commence until plans and cross sections of the existing and proposed ground levels of the development, site boundaries and finished floor levels in relation to a nearby datum point (above Ordnance datum) have been submitted to and approved by the Local Planning Authority in writing. The development shall be completed in full accordance with the approved details.

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

6. No works pursuant to this permission, including any works of demolition, shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved plan shall be implemented and adhered to in full throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:

- i) An indicative programme for carrying out the works;
- ii) The anticipated number, frequency and types of vehicles used during construction;
- iii) The method of access and routing of vehicles during construction;
- iv) The parking of vehicles by site operatives and visitors;
- v) The loading and unloading of plant, materials and waste;
- vi) The storage of plant and materials used in construction of the development;
- vii) The erection and maintenance of security hoarding;
- viii) No burning of construction materials on site;
- ix) The provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders where necessary);
- x) Measures to minimise the noise (including vibration) generated by the demolition/construction process to include hours of work, proposed method should foundation piling occur, the careful selection of plant and machinery and use of noise mitigation barriers;
- xi) No work to be undertaken on the site except between the hours of 08.00 and 18.00 on Mondays to Fridays inclusive and 08.00 hours and 13.00 hours on Saturdays, and no work to be undertaken on Sundays, Bank and Public Holidays;
- xii) Details of any flood lighting, including location, height, type and direction;
- xiii) Measures to control the emission of dust and dirt during demolition/construction;

- xiv) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- xv) A method to record the quantity of recovered material (re-used on site or off site);
- xvi) Details of public engagement both prior to and during the construction works.

Reason: In the interests of highway safety and the amenities of the area. This is required to be a pre-commencement condition because it is necessary to agree such details prior to commencing works.

7. All new electricity and telephone lines shall be laid underground.

Reason: To safeguard the landscape character of the site.

Design and Materials

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

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

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

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

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

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

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

- i) Proposed planting plans and strategy, including written specifications, cultivation and other operations associated with plant, grass, shrub and replacement tree establishment; schedules of plants and trees (achieving where possible closed canopies along the green corridor through the site) noting species, sizes; and proposed numbers/densities where appropriate;
- ii) Tree guards, staking and tree-pit construction;
- iii) Location, height and materials/construction technique for all boundary treatments and other built means of enclosure (including gates and setbacks) to property frontages, including the 5m site boundary buffers and inner thorny hedge;
- iv) Details of the construction of the access, to address the loss of vegetation and existing boundary bank, including appropriate surface treatment to maintain the character of the historic rural road;

- v) Retained areas of grassland cover, scrub, hedgerow, and trees;
- vi) Treatment of surfaces, paths, access ways, courtyards, seating areas, patio areas and parking spaces, including their appearance, depth and permeability, kerbs, edges, steps and ramps, spot levels, finished floor levels, upstands and demarcation;
- vii) Above ground rainwater harvesting solutions and rain gardens;
- viii) Ancillary structures (including cycle and refuse storage to the rear of dwellings);
- ix) Electric vehicle charging points;
- x) A timetable for implementation of the soft and hard landscaping works.
- xi) A schedule of landscape maintenance for a minimum period of 5 years to include details of the arrangements for its implementation.

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

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

Reason: To achieve an appropriate landscaping scheme to integrate the development into the landscape and mitigate any impact upon the amenities of neighbouring properties.

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

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

12. No works pursuant to this permission shall commence until a design stage construction report (in the form of design stage SAP data and SBEM calculations; a BRE water calculator; product specifications; and building design details, layout or landscape plans), has been submitted to, and approved in writing, by the Local Planning Authority. The report shall demonstrate that:
- i) Each dwelling has reduced predicted CO₂ emissions by at least 19% due to energy efficiency and a further 20% due to on site renewable energy compared with the maximum allowed by building regulations;
 - ii) Predicted water consumption no more than 110 litres/person/day;
 - iii) Evidence demonstrating sustainable drainage and adaptation to climate change;
 - iv) Sustainable, locally sourced materials (including plastic-free windows and doors).

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

Reason: To ensure development demonstrates a high level of sustainable performance to address mitigation of and adaptation to predicted climate change. This is required to be a pre-commencement condition because it is necessary to agree such details prior to commencing works.

13. Prior to the first occupation of the development hereby permitted detailed information in a post construction stage sustainable construction report (in the form of design stage SAP data and SBEM calculations; a BRE water calculator; product specifications; and building design details, layout or landscape plans), has been submitted to, and approved in writing, by the Local Planning Authority. The report shall demonstrate that:

- i) Each dwelling has reduced predicted CO₂ emissions by at least 19% due to energy efficiency and a further 20% due to on site renewable energy compared with the maximum allowed by building regulations;
- ii) Predicted water consumption no more than 110 litres/person/day;
- iii) Evidence demonstrating sustainable drainage and adaptation to climate change;
- iv) Sustainable, locally sourced materials (including plastic-free windows and doors).

The development shall be occupied in accordance with these agreed details and these details will hereafter be retained.

Reason: To ensure development demonstrates a high level of sustainable performance to address mitigation of and adaptation to predicted climate change.

14. Prior to the first occupation of the development hereby permitted, a refuse storage and management strategy, incorporating collection for recyclables and private garden compost, shall be submitted to and approved, in writing, by the Local Planning Authority. Thereafter the development shall be undertaken in full accordance with the agreed strategy.

Reason: To safeguard against an unacceptable impact upon amenity.

Lighting and Dark Night Skies

15. Prior to development above slab level, a scheme of external lighting to be installed at the site shall be submitted to, and approved in writing by the Local Planning Authority. The lighting shall:

- i) Comply with the guidance set out in the SDNPA's Dark Night Skies Technical Advice Note;
- ii) Be designed to minimise impacts on wildlife, particularly along the ecological buffers on the southern, eastern and northern boundaries.

The lighting shall be installed, maintained and operated in full accordance with the approved details, and no other external lighting shall be installed anywhere within the site,

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

16. Prior to first occupation of the development hereby permitted, details of low transmittance glazing and timed black-out blinds to be affixed to any rooflight(s) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out and retained in full accordance with the approved details.

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

Archaeology

17. No works pursuant to this permission shall commence until a programme of archaeological monitoring on any groundworks (including the removal of tree stumps) associated with the development. 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. This is

required to be a pre-commencement condition because it is necessary to agree such details prior to commencing works.

Drainage

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

Reason: To ensure satisfactory provision of foul water drainage. This is required to be a pre-commencement condition because it is necessary to agree such details prior to commencing works.

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

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

The maintenance and management of the SuDS system should be set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

Reason: To ensure satisfactory provision of surface water drainage. This is required to be a pre-commencement condition because it is necessary to agree such details prior to commencing works.

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

These may include, but are not limited to the provision of:

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

The details shall be implemented and maintained as approved in full accordance with the approved details,

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

Ecology and Trees

21. Notwithstanding the submitted Landscape and Ecological Management Plan (LEMP), no works pursuant to this permission shall commence (including any demolition, ground works, site clearance) until a further LEMP has been submitted to and approved in writing by the Local Planning Authority, incorporating the measures detailed at sections 5 'Protected Species and Habitat Mitigation', 6 'Habitat Creation', 7 'Other Enhancements' and 8 'Post Construction Management Plan' and including:

- i) A description, plan and evaluation of landscape and ecological features to be managed within the site and wider Lodge Hill grounds;
- ii) Ecological trends and constraints on site that might influence management;
- iii) Long-term aims and objectives of management;

- iv) Appropriate management options for achieving aims and objectives;
- v) Prescriptions for management actions, together with a plan of management compartments;
- vi) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a 10-year period);
- vii) Details of the persons, body or organisation responsible for implementation of the plan;
- viii) A scheme of ongoing monitoring over a 10 year period, to ensure management is generating the desired outcomes and remedial measures (within the 10 year monitoring period) incorporated where appropriate, including a mechanism to discharge the monitoring by the Local Planning Authority;
- ix) Details of any legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer in partnership with any management body(ies) responsible for its delivery.

The approved LEMP shall thereafter be implemented in accordance with the approved details and where deemed necessary by the Local Planning Authority shall include contingencies and/or remedial action to be further agreed and implemented where the results from monitoring show that conservation aims and objectives of the LEMP are not being met.

Reason: To ensure appropriate on-going management of the land beyond the completion of the development, to ensure fully functioning landscape and biodiversity objectives of the originally approved scheme, to meet the purposes of the South Downs National Park.

22. No works pursuant to this permission shall commence (including any demolition, ground works, site clearance) until a detailed Habitat Enhancement and Management Strategy, supported by drawings, and stating management aims, objectives and prescriptions as well as a monitoring and review process, has been submitted to and approved in writing by the Local Planning Authority. Development shall subsequently proceed in accordance with any such approved details.

Reason: To enhance biodiversity in accordance with the NPPF. This is required to be a pre-commencement condition because it is necessary to agree such details prior to commencing works.

23. No trees or shrubs on the site other than those the Local Planning Authority has agreed shall be felled as part of this permission shall be wilfully damaged or uprooted, felled/removed, topped or lopped, unless agreed in writing by the Local Planning Authority, until 5 years after the completion of the development hereby permitted.

Any trees on the site which die or become damaged during the construction process shall be replaced with trees of a type, size and in positions agreed by the Local Planning Authority.

Reason: To ensure the retention of the vegetation important to the amenity and environment of the development.

24. All trees on the site shown for retention as part of the proposal shall be fully protected throughout all construction works by tree protective fencing placed along the edge of the root protection areas (RPA). The fencing shall be affixed to the ground in full accordance with section 6 of BS 5837 'Trees in Relation to Design, Demolition and Construction - Recommendations' (2012).

Once installed, the fencing shall be maintained during the course of the development works until all machinery and materials have been removed from the site.

Areas so fenced off shall be treated as zones of prohibited access, and shall not be used for the storage of materials, equipment or machinery in any circumstances. No mixing of cement, concrete, or use of other materials or substances shall take place within any

tree protective zone, or close enough to such a zone that seepage or displacement of those materials and substances could cause them to enter a zone.

Reason: To ensure the successful and satisfactory protection of the retained trees on the site.

Lighting and Dark Night Skies

25. Prior to development above slab level, a scheme of external lighting to be installed at the site shall be submitted to, and approved in writing by the Local Planning Authority. The lighting shall:

- i) Comply with the guidance set out in the SDNPA's Dark Night Skies Technical Advice Note;
- ii) Be designed to minimise impacts on wildlife, particularly along the ecological buffers on the southern, eastern and northern boundaries.

The lighting shall be installed, maintained and operated in full accordance with the approved details, and no other external lighting shall be installed anywhere within the site,

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

Highways and Parking

26. Prior to the first occupation of the development hereby permitted, the vehicular access, footway and crossing serving the development shall be constructed in accordance with the details shown on the drawing titled Potential Access Arrangements and numbered ITBI6035-GA-001 Rev A. Thereafter the development shall be carried out in full accordance with the approved details.

Reason: In the interests of road safety.

27. Prior to the first occupation of the development hereby permitted, visibility splays of 2.4 metres by 56 metres east and 2.4 metres by 55 metres west shall be provided at the proposed site vehicular access onto Waltham Park Road in accordance with the approved planning drawings. Once provided the splays shall thereafter be maintained and kept free of all obstructions over a height of 0.6 metre above adjoining carriageway level or as otherwise agreed. Thereafter the development shall be carried out in full accordance with the approved details.

Reason: In the interests of road safety.

Informatives

1. It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.
2. The proposed development lies within a Source Protection Zone. The applicant will need to consult with the Environment Agency to ensure the protection of the public water supply source is maintained and inform Southern Water of the outcome of this consultation.
3. The applicant is advised that the erection of temporary directional signage should be agreed with the Local Traffic Engineer prior to any signage being installed. The applicant should be aware that a charge will be applied for this service.
4. The applicant is required to obtain all appropriate consents from West Sussex County Council, as Highway Authority, to cover the off-site highway works. The applicant is requested to contact The Implementation Team Leader (01243 642105) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.

11. Crime and Disorder Implication

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

12. Human Rights Implications

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

13. Equality Act 2010

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

14. Proactive Working

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

TIM SLANEY

Director of Planning

South Downs National Park Authority

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Appendices I. Lodge Hill Maintenance and Development Programme

SDNPA Consultees Legal Services, Development Manager.

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

[National Planning Policy Framework \(2021\)](#)

[Planning Portal \(Outline Permission\)](#)

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

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

[South Downs Integrated Landscape Character Assessment 2020](#)

[Roads in the South Downs \(2015\)](#)

[SDNPA COVID-19 Position Statement](#)



Maintenance & Development Programme - Lodge Hill 2021 - 2025

Ref.	Building/Element	Year 1 (2020)	Year 2 (2021)	Year 3 (2022)	Year 4 (2023)	Year 5 (2024)	TOTAL Years 1 - 5
1.A	Main House Building	£20,000.00	£30,000.00	£50,000.00	£0.00	£20,000.00	£120,000.00
1.B	The Limerick Studio	£0.00	£20,000.00	£0.00	£0.00	£10,000.00	£30,000.00
1.C	Toilet/Activities store	£0.00	£5,000.00	£0.00	£0.00	£5,000.00	£10,000.00
1.D	Garage/Workshop	£0.00	£0.00	£10,000.00	£0.00	£0.00	£10,000.00
1.E	Campsite- Classroom	£0.00	£0.00	£30,000.00	£0.00	£0.00	£30,000.00
1.F	Campsite- Cook house	£0.00	£0.00	£20,000.00	£0.00	£0.00	£20,000.00
1.G	Campsite- WC/Shower block 1	£0.00	£0.00	£0.00	£50,000.00	£0.00	£50,000.00
1.H	Campsite- WC/Shower block 2	£0.00	£0.00	£0.00	£50,000.00	£0.00	£50,000.00
1.I	Boilers	£0.00	£0.00	£0.00	£40,000.00	£0.00	£40,000.00
1.J	Bradbury Referb- Floor/toilet extensions	£0.00	£0.00	£100,000.00	£0.00	£0.00	£100,000.00
1.K	Driveways	£0.00	£45,000.00	£0.00	£0.00	£0.00	£45,000.00
1.L	Roof repairs- Estimates 5 years	£0.00	£10,000.00	£0.00	£10,000.00	£0.00	£20,000.00
1.M	Activity additions- assault course	£0.00	£0.00	£0.00	£75,000.00	£0.00	£75,000.00
1.N	Existing activity repairs/renewals- Incl trail	£5,000.00	£10,000.00	£5,000.00	£10,000.00	£5,000.00	£35,000.00
1.O	Activity shelter and storage near climbing tower	£0.00	£35,000.00	£0.00	£0.00	£0.00	£35,000.00
1.P	WiFi/IT budget	£5,000.00	£3,000.00	£3,000.00	£10,000.00	£3,000.00	£24,000.00
1.Q	Perimeter refencing/hedging	£0.00	£26,000.00	£0.00	£0.00	£5,000.00	£31,000.00
1.R	Double glazing first floor- Main house	£0.00	£0.00	£26,000.00	£0.00	£0.00	£26,000.00
1.S	Additional seating- picnic around site & disabled facilities	£6,000.00	£0.00	£0.00	£6,000.00	£0.00	£12,000.00
1.T	Lodges referb- internal work	£0.00	£0.00	£15,000.00	£0.00	£0.00	£15,000.00
	Subtotal:	£36,000.00	£184,000.00	£259,000.00	£251,000.00	£481,000.00	£778,000.00
	Builders Work on Service Items @ 10%:	£3,600.00	£18,400.00	£25,900.00	£25,100.00	£48,000.00	£77,800.00
	Preliminaries @ 12.5%:	£4,500.00	£23,000.00	£32,375.00	£31,375.00	£6,000.00	£97,250.00
	Contingency @ 5%:	£1,800.00	£9,200.00	£12,950.00	£12,550.00	£200.00	£38,900.00
	Allowance for Response Maintenance (to be confirmed by client - say £5,000.00)	£5,000.00	£5,000.00	£5,000.00	£5,000.00	£5,000.00	£25,000.00
	TOTAL:	£50,900.00	£239,600.00	£335,225.00	£325,025.00	£492,680.00	£1,016,950.00

