



APPLICATIONS & APPEALS SERVICES

**DEMOLITION OF STABLES AND POLE BARN.
CONSTRUCTION OF REPLACEMENT BUILDING
COMPRISING A ONE-BEDROOM HOLIDAY LET
AND VEHICLE STORE**

AT

**CARRIAGE HOUSE, BURTON PARK ROAD,
PETWORTH, GU28 0JS**

**PLANNING, DESIGN
AND ACCESS STATEMENT**

JUNE 2022

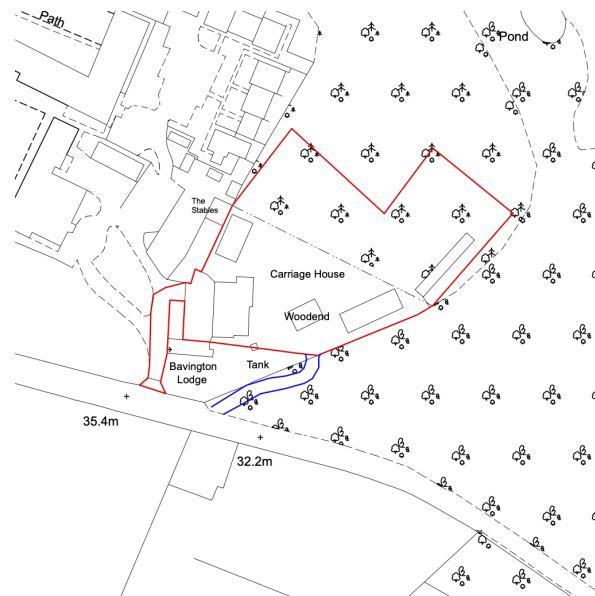


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1.0 INTRODUCTION

1.1 Planning permission is sought for the demolition of stables and a pole barn and the construction of a replacement building to comprise a small one bedroom holiday let and a vehicle store building at Carriage House, Burton Park Road, Petworth, GU28 0JS. Due to the topography of the site, the proposal also includes the construction of a low level stone gabion wall to the front of the new building.

Figure 1: Site Location Plan



1.2 The details of the proposal will be described and appraised having regard to the following aspects:

- **Physical Context** – explains the physical context of the site and its surroundings;
- **Planning Context** – the planning history of the site and broad policy requirements;
- **Use** – the purpose of the proposed additional accommodation;
- **Amount** – the extent of development on the site;
- **Scale** – the physical size of the development;
- **Layout** – the relationship of the proposed extension and alterations to neighbouring properties;
- **Appearance** – details of materials, style and impact upon the visual amenities of the area;
- **Landscape** – impact of the proposal on the existing landscape;
- **Access** – access to the development and parking provision.

1.3 This Statement will demonstrate that the proposed development accords with the relevant planning policies and that it is acceptable in all respects. It incorporates a **Dark**

Night Skies Statement and it should be considered alongside the following additional supporting information:

- Ecosystems Services Statement, NJA Town Planning Ltd, June 2022
- Preliminary Ecological Appraisal, Arbtech, April 2022
- Water Neutrality Report (Rev P), CGS Civils, May 2022
- Drainage Statement, Archibald Shaw, May 2022

2.0 PHYSICAL CONTEXT

2.1 Carriage House is a two storey detached dwelling with outbuildings located within the South Downs National Park, approximately 2 miles to the south of Petworth. The dwelling is located to the northern side of Burton Park Road and is adjacent to Barlavington Manor Care Home and Assisted Living Retirement Village along with the neighbouring dwelling, Bavington Lodge.

2.2 Carriage House is situated on a sloped site and to the east are stables and a pole barn in poor condition. These buildings are the subject of this planning application.

2.3 The property is surrounded and well screened by mature trees to the north and east. Burton Park, a grade II listed park is situated to the south, on the opposite side of the road and there are clusters of other residential development within the vicinity, including to the east, beyond woodland and to the west along Burton Park Road.

2.4 The following are photographs of Carriage House and the application site:





3.0 PLANNING HISTORY & PROPOSAL

Planning History

3.1 The following is the relevant planning history for Carriage House:

- 04/00103/DOM – Proposed barn style garage building. Planning permission granted March 2004.
- 03/02904/DOM – Ground and first floor extensions and alterations. Planning permission granted December 2003.
- 99/01710/FUL – Change of use of existing garage and store to annex for holiday accommodation. Planning permission granted October 1999.

Proposal

3.2 The proposal is for the removal of stables and a pole barn that are in poor condition and the construction of a replacement building to comprise a one bedroom holiday let and a vehicle store at Carriage House. It is proposed that the vehicle store will provide secure storage for the Applicants' motorhome and other vehicles and the holiday let will provide self-catered accommodation for visitors to the South Downs National Park.

3.3 The proposed building is single storey in height with the vehicle store section being slightly higher to accommodate the motorhome. Space will be laid out to the front of the building to allow for manoeuvring of the motor home and other vehicles and a low level stone gabion wall is proposed due to the change in land levels with land sloping upwards from east to west.

Figure 2: Proposed Block Plan

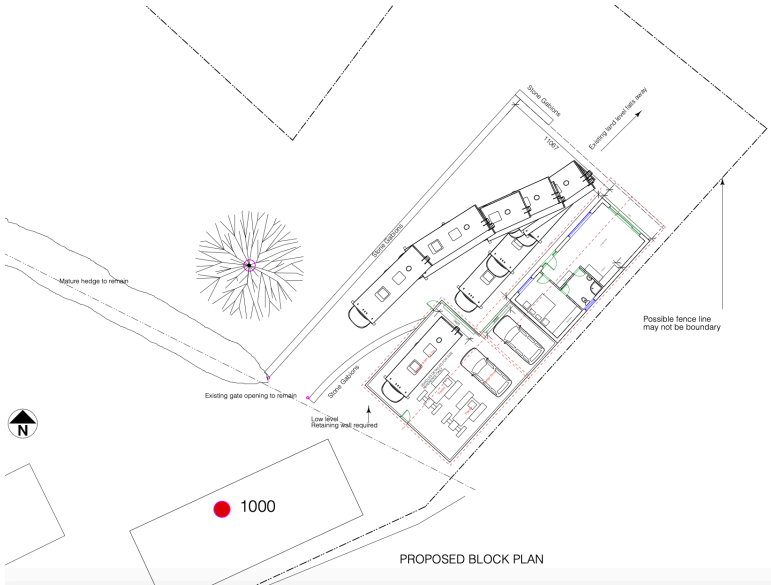


Figure 3: Proposed Elevations

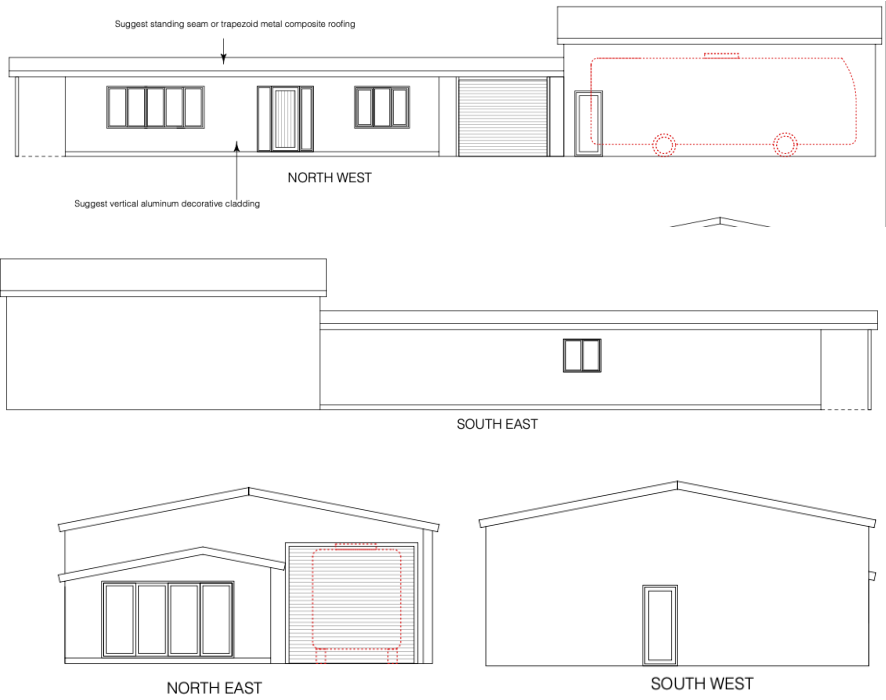
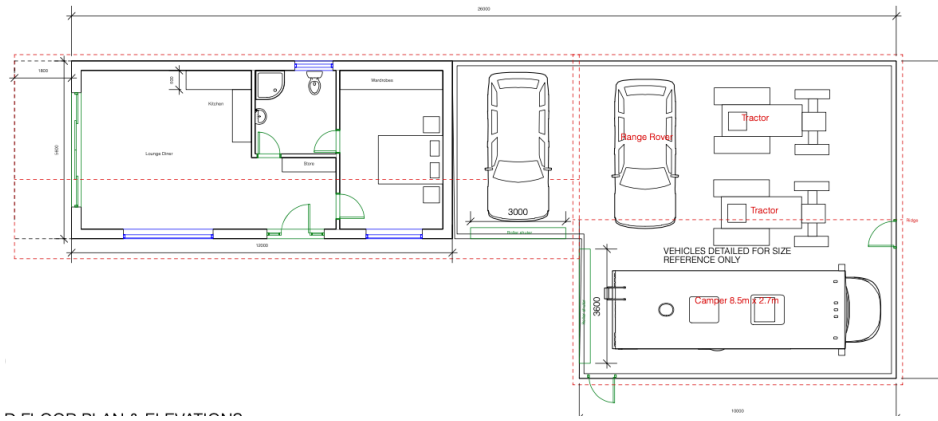


Figure 4: Proposed Floor Plan



3 FLOOR PLAN & ELEVATIONS

4.0 PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF) (2021)

- 4.1 The NPPF sets out the Government's planning policies for England and Wales and how these should be applied. It provides a framework for the preparation of local plans for housing and other development. The NPPF should be read as a whole.
- 4.2 Paragraph 2 of the NPPF sets out that ***'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements'***.
- 4.3 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning

system has the following three overarching objectives which are independent but need to be pursued in mutually supportive ways:

- a) ***'an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;***
- b) ***a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and***
- c) ***an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution***

and mitigating and adapting to climate change, including moving to a low carbon economy’.

4.4 Paragraph 10 states **‘So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)**. For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay.

4.5 Where there are no relevant development plan policies or the relevant policies are out of date, the NPPF states that planning permission should be granted unless the policies of the Framework indicate otherwise or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework considered as a whole (paragraph 11 d).

4.6 Paragraph 12 of the Framework states that **‘The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the**

development plan), permission should not normally be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed’.

4.7 In terms of decision-making, the Framework states at paragraph 38 that **‘Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible’.**

4.8 Paragraph 84 relates to supporting a prosperous rural economy highlighting that decisions should enable **‘a) the sustainable growth and expansion of all types of business in rural areas through conversion of existing buildings...’** along with **‘c) sustainable rural tourism and leisure**

developments which respect the character of the countryside’.

4.9 Paragraph 85 acknowledges that sites may be found beyond existing settlements and in locations not well served by public transport and goes on to note that in these circumstances it is important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits opportunities to improve the scope for access by more sustainable modes. The use of previously developed land, and sites that are physically well-related to existing settlements, are also encouraged by this paragraph.

4.10 Paragraph 104 requires transport issues to be considered at the early stages of plan-making and development proposals. This is to ensure that (inter alia) the potential impacts of development on transport networks can be addressed.

4.11 Paragraph 105 acknowledges that **‘opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making’.**

4.12 Paragraph 107 states that if setting local parking standards for residential and non-residential development, policies should

take into account the accessibility of the development, its type, mix and use, the availability of land and opportunities for public transport, local car ownership levels and the need to ensure that adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or optimising the density of development in city and town centres and other locations that are well served by public transport.

4.13 In assessing development proposals, paragraph 110 states that it should be ensured that there are appropriate opportunities to promote sustainable transport modes, that there is safe and suitable access to the site (for all road users) and that any significant impacts on the transport network or on highway safety terms can be cost effectively mitigated to an acceptable degree.

4.14 Paragraph 111 makes it clear that **‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’.**

- 4.15 Paragraph 119 of the Framework states that ***'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'***.
- 4.16 Paragraph 123 – ***'Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help meet identified development needs'***.
- 4.17 Paragraph 124 – ***'Planning policies and decisions should support development that makes efficient use of land.....'***
- 4.18 In terms of design, Section 12 seeks to achieve well designed places sets out that the ***'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'*** (paragraph 126).
- 4.19 Paragraph 130 further states that planning policies and decisions should ensure that developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Development should also be sympathetic to local character and history and should be designed with a high standard of amenity for existing and future users.
- 4.20 Paragraph 134 states that ***'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:***
- a) ***development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes: and/or***
 - b) ***outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of***

design more generally in an area, so long as they fit with the overall form and layout of their surroundings’.

4.21 Paragraph 174 states that planning policies and decisions should contribute to and enhance the natural local environment by (inter alia) ***‘recognising the intrinsic character and beauty of the countryside....’.***

4.22 Paragraph 176 states that ***‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which has the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all of these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas’.***

4.23 Section 16 of the NPPF refers to the conservation and enhancement of the historic environment. Paragraph 200 states that local planning authorities should look for opportunities within Conservation Areas and within the setting of heritage assets to enhance and better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.

Local Planning Policy

4.24 The application site is situated within the South Downs National Park. The relevant policies of the South Downs Local Plan (2019) are as follows:

- SD1: Sustainable Development
- SD2: Ecosystem Services
- SD4: Landscape Character
- SD5: Design
- SD6: Safeguarding Views
- SD7: Relative Tranquillity
- SD8: Dark Night Skies
- SD9: Biodiversity and Geodiversity

- SD12: Historic Environment
- SD13: Listed Buildings
- SD17: Protection of the Water Environment
- SD19: Transport and Accessibility
- SD22: Parking Provision
- SD23: Sustainable Tourism
- SD25: Development Strategy
- SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings
- SD34: Sustaining the Local Economy

Technical Advice Notes (TAN) and Supplementary Planning Documents (SPD)

- 4.25 The SDNPA TAN on Dark Night Skies (May 2021) sets out the Authority’s approach to lighting design and the protection and enhancement of dark skies in support of Local Plan policy SD8.
- 4.26 The SDNPA TAN on Biodiversity and Net Gain (January 2022) provides guidance on how biodiversity and net gain is to be achieved in the National Park and how it is expected to make a meaningful contribution to nature recovery.

4.27 The SDNPA SPD on Sustainable Construction (August 2020) is designed to provide further guidance and set out what the Authority’s expectations are for different types of development in respect of sustainable construction.

4.28 The SDNPA Guidance on Parking for Residential and Non Residential Development SPD (April 2021) gives direction regarding the provision of parking for different types of transportation within the National Park.

4.29 The SDNPA is in the process of preparing an SPD in respect of design in support of Local Plan policy SD5. Consultation on the draft SPD was carried out between June and September 2021 however it is not as yet an adopted planning policy document.

Neighbourhood Plan

4.30 The application site is located within the Parish of Sutton and Barlavington. There is no Neighbourhood Plan for the area.

South Downs Partnership Management Plan 2020-2025

4.31 The South Downs Partnership Management Plan 2020-2025 sets out the vision and long term outcomes for the National Park for a five year period until 2025. The Management Plan is a material consideration in the determination of planning applications within the National Park.

South Downs National Park Sustainable Tourism Strategy 2015-2020

4.32 The SDNPA Sustainable Tourism Strategy seeks to promote a more sustainable approach to the development of tourism so that visitors can enjoy the National Park without compromising its special qualities.

Visitor Accommodation Review 2015 (commissioned 2014)

4.33 The Visitor Accommodation Review identified shortages in all types of accommodation at peak times and a strong demand for high quality accommodation and increasing demand for accommodation in the future.

South Downs Landscape Character Assessment 2020

4.34 The South Downs Landscape Character Assessment is a study that provides an assessment of all aspects of the landscape character of the South Downs. The landscape classification defines 20 generic landscape types.

4.35 The application site is situated within Landscape Character Type: Wealden Farmland and Heath Mosaic which lies on the sandstones of the Folkstone Formation to the north of the chalk escarpment of the South Downs. More specifically, the site is located within the Character Area of the Rother Farmland and Heath Mosaic. This area is described by the Landscape Character Assessment as a long, elevated 'plateau' located between the Wealden landscapes to the north and the main chalk ridge of the South Downs to the south. The boundaries of the area form a transition with adjacent farmland landscapes. The key characteristics are set out within the Landscape Character Assessment as follows:

- ***'Slightly elevated, flat topped plateau formed from sandstones of the Folkstone formation, reaching 65m at Ambersham Common.'***

- *Well-drained sandy soils support a mix of nationally important heathland habitats including open heather heath, acid grassland, bracken, gorse, woody scrub, and oak-birch woodland.*
- *Large areas of woodland plantations covering areas of former commonland and earlier blocks of ancient (probably medieval) woodland.*
- *An intimate mix of semi-natural habitats and agriculture creating valuable foraging and over-wintering sites for a range of bird species.*
- *Numerous Bronze Age barrow cemeteries are indicative of a prehistoric ritual landscape.*
- *Roman roads and a posting station at Hardham reinforce the historic function of the area as a landscape to transverse rather than settle.*
- *Settlement is relatively late, comprising isolated farmsteads of 18th-19th century origin set within areas of recent enclosure, and 'squatter' settlement on the edges of the common land.*
- *Includes the planned medieval market town of Midhurst, constructed from local sandstones.*
- *Remnant unenclosed commons are of culture and historic significance and provide open access for recreation.*

- *Features including a large pond at Burton, formed by damming a stream, are evidence of the Wealden iron industry in the 16th – 18th century.*
- *Large number of sand pits indicating the economic value of the sands of the Folkstone Beds'.*

English National Parks and the Broads: UK Government Vision and Circular 2010 (published April 2013)

4.36 National planning policy relating to the protection of National Parks is set out in the English National Parks and Broads: UK Government Vision and Circular 2010. This Circular is also given weight in conjunction with the NPPF.

4.37 In this regard, the South Downs National Park has two statutory purposes that comprise:

- To conserve and enhance the natural beauty, wildlife and cultural heritage or their areas;
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

4.38 The Circular continues by stating that if a conflict arises between the two purposes then conservation takes precedence. The South Downs National Park Authority (SDNPA) additionally has a duty to foster the economic and social well-being of the local community in pursuit of the statutory purposes.

Relevant Legislation

4.39 In considering the issue of the principle of the proposed development it is necessary to also consider the legal framework within which planning decisions are made. Planning legislation holds that the determination of a planning application shall be made in accordance with the Development Plan unless material considerations indicate otherwise (as also confirmed at paragraph 2 of the NPPF).

4.40 Specifically, Section 70 (2) of the Town and Country Planning Act 1990 states that in dealing with planning applications, the Authority shall have regard to the provisions of the development plan (so far as material to the application), a post examination draft neighbourhood development plan, any local finance considerations (so far as material to the application) and any other material consideration.

4.41 Section 38(6) Planning and Compulsory Purchase Act 2004 provides:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

4.42 When considering whether or not a proposed development accords with a development plan, it is not necessary to say that it must accord with every policy within the development plan. The question is whether it accords overall with the development plan (Stratford on Avon v SSCLG [2014] JPL 104). Even if a proposal cannot be described as being in accordance with the development plan, the statutory test requires that a balance be struck against other material considerations. The Courts have emphasised that a planning authority is not obliged to slavishly adhere to the development plan and should apply inherent flexibility: Cala Homes (South) Limited v SSCLG [2011] JPL 1458 and Tesco Stores Ltd v Dundee City Council [2012] 2 P.&C.R. 9.

4.43 More recently in *Corbett v Cornwall Council* [2020] the appeal court judge – Lord Justice Lindblom emphasised the importance of considering the plan as a whole when he said;

“Under section 38(6) the members’ task was not to decide whether, on an individual assessment of the proposal’s compliance with the relevant policies, it could be said to accord with each and every one of them. They had to establish whether the proposal was in accordance with the development plan as a whole. Once the relevant policies were correctly understood, which in my view they were, this was classically a matter of planning judgment for the council as planning decision-maker.”

5.0 DETAILS OF THE PROPOSAL: USE, AMOUNT & SCALE OF DEVELOPMENT

The Principle of Development

5.1 The Government sets out the two following statutory purposes for National Parks in England:

Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area

Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

5.2 The SDNPA has a duty to seek to foster the social and economic wellbeing of the local communities within the National Park.

5.3 The NPPF at paragraph 176 states that '***Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of***

Outstanding Natural Beauty which have the highest status of protection in relation to these issues'.

5.4 The National Park requires the highest level of protection however, certain forms of development may be permitted in accordance with the statutory purposes.

5.5 The application site is situated outside of a settlement boundary. The proposed building will serve two purposes 1.) the provision of secure storage of the Applicants motorhome and other vehicles and 2.) the provision of a small one bedroom self-contained holiday let. The two elements of the proposal are assessed as follows:

Vehicle Storage

5.6 Local Plan policy SD31 (Extensions and provision of Annexes/Outbuildings) sets out (inter alia) that proposals for outbuildings will be permitted where it is demonstrated that they are required for purposes incidental to the use of the host dwelling. The proposed vehicle storage use is an incidental use to Carriage House and it is appropriately sited (and well connected), close to the dwelling and easily accessed via the existing access and driveway.

- 5.7 The proposal includes the creation of additional space to the front of the new building to provide suitable manoeuvring space into and out of the building by the Applicants' motorhome which is presently stored adjacent to the dwelling. The new building will provide secure storage for the motorhome which is not available elsewhere at the property.
- 5.8 For the reasons further described, the proposed building is appropriately designed to ensure that there would be no harm caused to the special landscape qualities of the National Park and the proposal complies with Local Plan policy SD31.

Holiday Let

- 5.9 Local Plan policy SD25 (Development Strategy) sets out the development strategy for the National Park and it states that exceptionally, development will be permitted outside of settlement boundaries where it complies with relevant policies of the Local Plan. In this respect, Local Plan policy SD23 (Sustainable Tourism) states that development proposals for visitor accommodation will be permitted subject to complying with the following criteria:

- 'a) The proposals will provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities;***
- b) The design and location of the development minimises the need for travel by private car and encourages access and/or subsequent travel by sustainable means, including public transport, walking, cycling or horse riding;***
- c) Development proposals will not detract from the experience of visitors or adversely affect the character, historical significance. Appearance or amenity of the area;***
- d) Development proposals make use of existing buildings, and, if no suitable existing buildings are available, the design of any new buildings are sensitive to the character and setting;***
- e) Ancillary facilities are not disproportionately large in relation to the rest of the visitor facilities;***
- f) Any proposal does not have an adverse impact on the vitality and viability of town or village centres or assets of community value; and***
- g) Where proposals are located outside settlement policy boundaries as defined on the Policies Map, they:***

- 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 public rights of way network; or***
- iii. Are part of farm diversification schemes or endorses Whole Estate Plans’.***

5.10 The proposal is to replace existing stables and a pole barn and therefore it makes efficient use of land without encroaching upon undeveloped countryside. Local Plan policy SD23 at criterion ‘d’ allows for the construction of new buildings which are sensitive to the character and setting. There should as such be no objection in principle to the creation of visitor accommodation within a new building as proposed.

5.11 The site is well screened to the northern and eastern boundaries in particular by woodland areas and it is also screened by trees and hedgerows within the property itself. The existing stables and pole barn are nestled into the land, situated at a lower level than Carriage House itself and adjacent outbuildings. The replacement building will replicate this and it will remain well screened from any wider landscape views.

5.12 In this respect, the replacement building is situated in the same position as the existing and occupies a similar sized footprint with a small enlargement to the front. The height of the building is also similar to the existing but with an increase in height to the proposed vehicle storage part of the building to allow for the practical storage of the Applicants’ motorhome. Furthermore, the design also reflects the design of the existing structures to be removed and seeks to replicate the appearance of a small outbuilding, as appropriate to the rural character of the area and in keeping with the design and scale of adjacent buildings.

5.13 Whilst Carriage House is located outside of a settlement boundary it is close to Petworth which is just over 2 miles away to the north. As such, visitors will be able to easily access the local services and facilities within Petworth whilst also being ideally placed to explore the wider South Downs National Park.

5.14 Petworth itself is an attractive, historic market town which together with Petworth House and Park (National Trust) is a popular visitor attraction within the National Park. Within Petworth there are a number of independent retailers including antique shops and art galleries, restaurants, cafes and other visitor accommodation. There is a monthly farmers market

within the Market Square selling local produce and regular events throughout the year including the Petworth music and arts festival over two weeks in July.

5.15 Other visitor attractions include the pleasure grounds at Petworth, laid out in the 16th century and redeveloped by Lancelot ‘Capability’ Brown in the latter half of the 18th century. There are also the Petworth Cottage Museum and Coultershaw Beam Pump with Bignor Park a short distance away to the south east and

5.16 There are many walking routes locally including around Petworth town and Shimmings Valley, Petworth Park, Lodsworth, Bexleyhill Parkland, Priory and Pinewoods, Lavington Common and around the Burton and Chingford Ponds Nature Reserve. Petworth itself can be accessed from Carriage House via public right of way routes starting from towards the western end of Burton Park Road and the South Downs Way is close by to the south. The application site therefore has good access to the network of surrounding public rights of way.

5.17 The closest train station to the site is at Pulborough, just under 7 miles to the east which provides a regular service between

London and the south coast. Therefore the proposed holiday let is accessible to visitors via public transport and a short taxi drive from the train station.

5.18 The SDNPA Visitor Accommodation Audit (2014) identified a strong demand for new visitor accommodation within the National Park during peak months (April – October) with potential for all forms of high quality accommodation across the National Park area. Furthermore, the SDNPA Partnership Management Plan makes a clear commitment to the development of sustainable tourism, including the development of a variety of visitor accommodation that responds to market demand.

5.19 The Visitor Accommodation Audit recognises that the development of visitor accommodation provides opportunities to:

- ***‘Improve the vitality of the National Park’s towns and villages, particularly in terms of helping to boost their evening economies;***
- ***Keep village and country pubs open and viable, maintaining them as a resource for local communities;***

- **Improve farming and country estate incomes and this supporting agriculture and landscape management;**
- **Create jobs for local people and self-employment opportunities;**
- **Sustain existing tourism and leisure business, such as golf courses, fishing lakes, horse riding stables, wedding venues and visitor attractions;**
- **Find new uses for redundant and even derelict buildings and sites'** (page 49).

5.20 The Audit concurs with the SDNPA's statutory purpose to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public as well as the duty to foster the economic and social well-being of local communities within the National Park.

5.21 Given the demand for new visitor accommodation within the National Park and having regard to the number of local attractions and public rights of way (providing access to the countryside including features of natural and historic interest), the proposal will help to provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities of the National Park.

5.22 In addition, and for the reasons described, the replacement of existing structures with a well-designed and appropriately sited building will have no additional impact upon the scenery of the National Park and as just one small holiday-let is proposed there would be no significant or harmful intensification of use.

5.23 The NPPF requires planning policies and decisions to enable the sustainable growth of all types of business in rural area **'both through the conversion of existing buildings and well-designed new buildings'**. It also supports sustainable rural tourism and leisure developments that respect the character of the countryside (paragraph 84). It requires policies and decisions to recognise that sites to meet local and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport (paragraph 85). The NPPF therefore provides support for the proposal which will make an important contribution to a sustainable rural economy.

5.24 In summary, the proposal supports sustainable tourism in accordance with the Sustainable Tourism Strategy through the provision of a one bedroom holiday let which will make a small but important contribution towards the need for more visitor accommodation within the National Park as identified in the

Visitor Accommodation Audit. The proposal therefore complies in full with the provisions of Local Plan policy SD23 and in turn there is no conflict with policy SD25 in terms of the location of new development within the National Park.

Case Studies

5.25 The SDNPA has permitted applications for the creation of new holiday let accommodation outside of settlement boundaries. Case Studies are included at Appendices NJA/1 – NJA/4 and include the following:

1. SDNP/21/02696/FUL – Use of outbuilding as self-catering holiday let, Great Drove Farm, Bostal Road, Steyning (Appendix NJA/1).
2. SDNP/21/04360/FUL – Conversion and small extension of stables to provide a one-bedroom holiday let, Kennets Beech, Beauworth Road, Beauworth (Appendix NJA/2). The proposal includes the addition of a first floor level to an existing stable building to create a two storey, one bedroom self-contained holiday let. The Case Officer's report notes that whilst situated outside of a settlement boundary, the proposal makes efficient use of an existing

building and that the site has good access to the surrounding public rights of way network.

3. SDNP/20/04569/FUL – Change of use of stables office/workshop store to one holiday let. The Oaks Stables, The Motor Road, Old Racecourse, Lewes (Appendix NJA/3).
4. SDNP/20/01800/FUL – Demolition of former agricultural/storage buildings and erection of three units of tourist accommodation. Hillview, London Road, Watersfield (Appendix NJA/4). In respect of the creation of visitor accommodation by the construction of replacement buildings, the Case Officer's report states:

'The development would not make use of the existing buildings which are in poor condition and do not appear to be capable of conversion. The proposed development would comprise three interlocking single storey buildings which would occupy a similar footprint to the existing buildings. The buildings are considered to be of an appropriate scale and design and would not adversely affect the character, setting or amenity of the area. The proposal would not affect

the vitality and viability of town and village centres or assets of community value. Despite being a relatively small scale scheme, the proposed visitor accommodation units have the potential to enhance the vitality and local economy...’.

Sustainable Development

5.26 The proposal complies with the principles of sustainable development set out in the NPPF. This includes the three key objectives – economic, social and environmental addressed as follows:

a.) an economic objective – the proposal will provide for a small, well equipped holiday let in place of existing structures which no longer serve their intended purpose. The proposal will appropriately redevelop a small part of the site with a use that will support local, accessible tourism will contribute to the vitality of the economy within the National Park. Furthermore, the proposal will make a small contribution to the local building industry and associated trades in constructing the replacement building. The proposal complies with the economic objective of sustainable development.

a) a social objective – the proposal provides a suitable site for the creation of a holiday let in close proximity to Petworth where there is a number of local services, facilities and visitor attractions. The site has good access to the surrounding public right of way network including access to the South Downs Way to the south. The proposal will assist with the public’s enjoyment and understanding of the National Park in line with the second statutory purpose. The proposal complies with the social objective of sustainable development.

b) an environmental objective – The proposal makes efficient use of land that has already been developed. The proposed replacement building is carefully designed so that it reasonably replicates the overall scale, height and bulk of the existing structures without resulting in any harmful encroachment into undeveloped parts of the site. There will as such be no impact upon the visual amenities and special landscape qualities of the National Park. Matters of drainage, ecology and water neutrality are appropriately addressed within the additional supporting documents which accompany this planning application. The proposal therefore complies with the first statutory

purpose and the environmental objective of sustainable development.

6.0 LAYOUT, DESIGN & APPEARANCE

Landscape and Design

- 6.1 In line with paragraphs 174 and 176 of the NPPF, Local Plan policy SD4 requires development proposals to conserve and enhance landscape character.
- 6.2 In respect of design, the NPPF sets out that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. Developments should be visually attractive and sympathetic to the local character of the surrounding area and should optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (paragraphs 126 and 130).
- 6.3 Local Plan policy SD5 (Design) sets out that development proposals will only be permitted where they adapt a landscape led approach and respect local character through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area.
- 6.4 As set out, the South Downs Landscape Character Assessment confirms that the site is located within Landscape Character Type 'Wealden Farmland and Heath Mosaic' which lies on the sandstones of the Folkstone Formation to the north of the chalk escarpment of the South Downs. The geology is formed of well-drained, sandy lowland landscape supporting a mosaic of oak-birch woodland, conifer plantations, open sandy heaths and rough grazed pasture.
- 6.5 More specifically the site is located within the Landscape Character Area 'Rother Farmland and Heath Mosaic' which forms a long, elevated 'plateau'. The northern boundary adjoins the River Rother while the southern boundary adjoins the Rother Valley Mixed Farmland and Woodland Vale. The boundaries of the area transition with adjacent farmland landscapes. Areas of arable land occur throughout and within a heavily wooded landscape.
- 6.6 The plateau is drained by small streams which flow into the Rother together with a large pond at Burton, formed by damming a tributary stream, associated with the former Wealden iron industry. It later fed an 18th century mill for corn milling. The northern part of Burton Park is within the

character area and is listed on Historic England's Register (grade II listed).

- 6.7 As set out, Carriage House and the location of the proposed holiday let/vehicle storage building are well screened from Burton Park Road and the wider countryside landscape by mature woodland to the north, east and south. The expanse of buildings of the adjacent Barlavington Manor on higher land screen the site from any views from the west.
- 6.8 The location of the proposed building is therefore very secluded and together with its low height and small overall scale and bulk, the proposal will have no impact upon any views from outside of the site. With the removal of the existing structures, the appearance of the site will be substantially improved and as views within the National Park will be safeguarded, there is no conflict with Local Plan policies SD4 (Landscape Character), SD5 (Design) and SD6 (Safeguarding Views) together with paragraphs 174 and 176 of the NPPF.
- 6.9 Similarly, the site is set away from Burton Park to the south (on the opposite side of the lane) and the proposal will have no visual impact upon the setting of this designated heritage

asset. There are no implications in respect of Local Plan policy SD12 (Historic Environment).

- 6.10 Furthermore, the proposed holiday let use is low key and together with the proposed vehicle storage use (incidental to Carriage House) the proposal will not result in a significant intensification of use or any harmful noise and disturbance. The tranquility of the National Park will therefore also be preserved in accordance with Local Plan policy SD7 (Relative Tranquility).

Dark Night Skies

- 6.11 The International Dark Sky Reserve covers the entirety of the National Park and the application site is located within the Dark Night Sky Core. Local Plan policy SD8 (Dark Night Skies) requires development proposals to conserve and enhance the intrinsic quality of dark night skies and the integrity of the Dark Sky Core of the National Park.
- 6.12 The proposal does not include the provision of any new external lighting and any new lighting can be agreed by condition. In terms of the holiday let, the amount of glazing has been kept to a minimum and which is only included to two

sides of the building with no windows included to the vehicle storage part of the building. The glazing provided is necessary to ensure sufficient natural light levels and to create a pleasant living environment for visitors. Blackout blinds and curtains will be installed which will prevent any potentially harmful levels of light pollution.

- 6.13 However, it must be noted that the proposed development is small in scale and the dense tree screening to the boundaries, tree canopy cover and secluded location on lower land will further assist to limit any potential light pollution. There is as such no conflict with the requirement of Local Plan policy SD8 to protect the dark night skies of the National Park.

Ecology & Trees

- 6.14 The application site is not located within an area designated for nature conservation and protection however it is close to the following local designations:

1. Burton and Chingford Ponds Local Nature Reserve is located just to the south on the opposite side of the lane.
2. Black Pond Copse Local Wildlife Site located to the south west (within Burton Park).

3. Hammer Moor and woodland west of Coats Castle Local Wildlife Site to the east.
4. Heath End Sand Pit Local Geological Site located to the far west on the opposite side of the A285.

- 6.15 The planning application is accompanied by a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA). The PEA finds that the proposed development will have no direct impact to any notable habitats, however, due to the proximity of the site to deciduous woodland, indirect effects could occur during construction. It is therefore recommended that a Construction Environmental Management Plan is prepared to outline best practice measures to minimise any potential pollution and/or tree damage during construction.

- 6.16 It is further confirmed that a suitable reptile habitat will be retained and no impacts are anticipated on reptiles as a result of the proposed development. Further reptile surveys are not therefore advised as being necessary.

- 6.17 In terms of bats, the proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats. However, any new lighting could affect bat

foraging activity and therefore a low impact lighting strategy is advised for the site.

6.18 It is noted that birds could nest within the existing buildings, trees and hedgerows on the site including within the adjacent woodland. It is therefore recommended that works should be undertaken outside of the period 1st March to 31st August but if this cannot be achieved, a close inspection of the buildings and vegetation should be carried out by a qualified ecologist prior to the commencement of works. Any active nests will need to be retained until the young have fledged.

6.19 The habitats on site could not support various species of invertebrates and there is no suitable habitat for otters, water voles. No suitable amphibian habitat will be lost, no evidence of badger activity has been found on site and no adverse impact is found to occur to hazel dormouse or hedgehogs. However, precautionary working methods will be implemented during construction.

6.20 It is therefore confirmed that the proposed development is carefully considered in respect of ecology and the proposal complies with Local Plan policies SD9 (Biodiversity and Geodiversity) and SD11 (Trees, Woodland and Hedgerows).

6.21 The site is located a substantial distance away from any of the International Nature Conservation Designations within the SDNP.

6.22 This planning application is also accompanied by an Ecosystems Services Statement in accordance with Local Plan policy SD2 (Ecosystems Services).

Amenity

6.23 The NPPF states planning should ensure a good quality of amenity for existing and future users of places and Local Plan policy SD5 (Design) requires regard to be made to avoiding harmful impact upon, or from, any surrounding uses and amenities.

6.24 The location of the proposed replacement building is not close to any neighbouring dwelling and given the small scale nature of the proposal (resulting in no significant or harmful intensification of use) no harm will be caused by any increased noise and disturbance. The proposal will result in no conflict with Local Plan policy SD5 in this regard.

Car Parking and Highways

- 6.25 Carriage House already benefits from a large driveway and parking area with adequate space for vehicles to turn. In addition, space will be provided to the front of the proposed building for the parking and turning of vehicles which will be enclosed in an attractive, low level stone gabion wall. The site therefore provides sufficient car parking for the small holiday let. Furthermore, the proposal will utilise the existing access with no alterations proposed or considered necessary. Overall, the proposal complies with Local Plan policies SD19 (Transport and Accessibility) and SD22 (Parking Provision).

Water Neutrality and Drainage

- 6.26 The application site falls within the Sussex North Water Supply Zone where Natural England have advised that water abstraction cannot be concluded to result in no adverse effect upon the integrity of the Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites.
- 6.27 In this case, given the small scale nature of the proposal, it is not considered that it will have a significant effect upon the Arun Valley sites. However, this planning application is

accompanied by a Water Neutrality report which demonstrates that not only will the proposed development be water neutral, but that it will result in a degree of betterment over the site's existing water demand/usage.

- 6.28 In terms of drainage, the Drainage Statement submitted with this planning application sets out the details in respect of proposed surface and foul water drainage measures to be incorporated within the proposed development. Overall, it is demonstrated that the proposal complies with Local Plan policy SD17 (Protection of the Water Environment).

Heritage

- 6.29 Burton Park on the opposite side of Burton Park Road to Carriage House is a grade II listed park and garden. There are also a number of other listed buildings along the road, including Burton Hill House and Burton Court (grade II listed) to the west and Burton Mill to the east.
- 6.30 The application site is secluded and set well away from the boundary of the Burton Park and the location of the stated listed building. Due to the degree of separation to these designated heritage assets and the amount of intervening screening, the proposed development will have no impact

upon their setting. As such, the proposal raises no implications in respect of Section 16 of the NPPF and Local Plan policies SD12 (Historic Environment) and SD13 (Listed Buildings).

7.0 CONCLUSION

- 7.1 This Statement supports an application for planning permission which seeks the demolition of stables and a pole barn at Carriage House and the construction of a replacement building comprising a small one-bedroom, self-catered holiday let and vehicle storage to accommodate the Applicants' motorhome and other vehicles.
- 7.2 Carriage House is located outside of a settlement boundary, however policy SD23 of the Local Plan permits development proposals for visitor accommodation subject to criteria. This Statement sets out that the proposed holiday let, which is small in scale and sustainably located provides an ideal opportunity for visitors to increase their awareness, understanding and enjoyment of the National Park and its special qualities. Furthermore, there will be no impact upon the special landscape qualities and scenic beauty of the National Park and the proposal will not result in any harmful intensification of use, thereby also protecting the tranquility of the area.
- 7.3 The South Downs National Park Visitor Accommodation Review (2014) identified a strong demand for new visitor

accommodation within the National Park during peak months with potential for all forms of high-quality accommodation across the National Park area. The proposal will make a small but important contribution to the supply of low key and appropriately located visitor accommodation which is also supported by the South Downs Management Plan.

- 7.4 It is further demonstrated that Local Plan policy SD31 permits the construction of outbuildings for purposes incidental to a dwelling. Alongside the holiday let, the building will be used for this purpose and it will be well connected and easily accessed from the host dwelling.
- 7.5 The proposed building is appropriately designed to ensure that there would be no harm caused to the special landscape qualities of the National Park. There will be no adverse impact in respect of neighbouring residential amenity, car parking or highway safety, ecology, drainage and water resources, trees or dark night skies.
- 7.6 In summary, the proposal complies in full with the relevant requirements of the NPPF and the SDNPA Local Plan. There is also no conflict with the National Park's Management Plan

and importantly the statutory purposes of the National Park are met. On this basis, planning permission should be granted.