

**Birdworld and Haskins
Garden Centre**

Forest Lodge, Farnham Road, Holt Pound, GU10 4LD

Planning Statement

January 2024



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1 Introduction & Summary of the Proposals

- 1.1 This Planning Statement has been prepared by MDAssociates in support of a full planning application made on behalf of Birdworld and Haskins Garden Centre, Forest Lodge, Farnham.

The application proposes the following:

Improvements to, and new facilities at Birdworld to include a new Entrance Building, Play Barn, Conservation and Breeding facility and an external Adventure Play Area. The re-development of Forest Lodge Garden Centre to include the demolition of the existing garden centre and the adjoining Plant Style structures to create a new garden centre (with covered and open sales areas, restaurant, plant, and warehouse). New service areas and car parking for both operations accessed from a new roundabout on the A235. The closure and removal of the existing Forest Lodge access. Enhanced landscaping throughout.

- 1.2 Haskins Garden Centres Ltd acquired the Forest Lodge Garden Centre and the adjoining Birdworld in January 2020. The past few years have allowed Haskins to review the re-development proposals put in place by the previous owners, as well as allowing them to assess how best to improve both operations, to deliver the very best customer and visitor experience.
- 1.3 The proposal is for the complete re-development of the existing garden centre with a new vehicular access from the A325 via a new roundabout; the existing garden centre access will be closed. The proposal involves the demolition of the existing structures on the garden centre site and the adjoining Plant Style; the erection of a new garden centre building with a larger outdoor, protected plant area as well as an enlarged external plant area. Improved car parking, service deliveries, warehousing and storage will ensure that the centre is more efficient and safer for both the customers and staff.
- 1.4 This Planning Statement should be read in conjunction with the other documents and drawings that together form the planning submission:
- Design and Access Statement - Roberts Limbrick
 - Transport Assessment - iTransport
 - Travel Plans for Birdworld and Haskins Forest Lodge - iTransport
 - Flood Risk Assessment and Drainage Strategy - Scott White and Hook
 - Tree Survey and Arboriculture Assessment – SJA Trees
 - Landscape Assessment and Indicative Landscape Master Plan - The Richards Partnership

- Ecological and Biodiversity Assessment - Ecology Solutions
- Sustainability Statements - ION Consulting
- Lighting Strategy – ION Consulting
- Planning Drawings, as listed in the MDA cover letter, and prepared by Roberts Limbrick
- Design and Access Statement
- Retail Impact Statement – Alder King
- Statement of Community Involvement - MDAssociates
- BREEAM Report - RPS

1.5 Pre-application advice was sought from the Local Planning Authority on three separate occasions and Hampshire County Council Highways twice. These meetings were invaluable in helping to formulate the re-development proposals as well as comments received from the Public Consultation event and the meeting with Binsted Parish Council. Input and comment have also been received from the South Downs National Park.

1.6 The remainder of this report considers the following:

- Site description and the Existing Operations
- Planning History
- The Planning Policy
- Pre-Application Advice
- Assessment of the Application Proposals.
- Conclusions

2 Site Description and The Existing Operations

- 2.1 Birdworld and Haskins Forest Lodge are located on the western side of the A325 which runs between Petersfield and Farnham. The site lies outside any settlement policy boundary, but the nearest village is Holt Pound to the northeast. Birdworld and Forest Lodge extend in total to 13.54 ha, with an extensive range of buildings, ancillary structures, parking areas and landscaping.
- 2.2 Birdworld was established in 1967 and the Garden Centre in 1981, from a former plant nursery. The previous Garden Centre owners purchased Birdworld in 1996 and since then the two businesses have been closely linked, with profits from the Garden Centre subsidising the running of Birdworld. Haskins Garden Centres acquired both businesses in 2020 and have committed to continue the Birdworld operation.
- 2.3 **Birdworld** is an important visitor attraction within the region with brown signs located on all the major routes. It is a unique experience; it is the largest Bird Park in the U.K, currently attracting over 100,000 visitors a year and has an extensive conservation and breeding program. It comprises a visitor centre with restaurant, offices, and a gift shop; numerous aviaries and enclosures for the birds and other small buildings associated with servicing visitor and staff requirements.
- 2.4 As well as being a visitor attraction, Birdworld also contains important bird collections and breeding programmes for endangered species; undertakes research; works with local and international conservation groups and is an education centre. The total built space is 6,801 sq m (see Appendix 1 Area Schedule).
- 2.5 Unfortunately, visitor numbers have been in decline, and this is attributed to the poor facilities, changing customer habits and competition from other attractions offering more modern facilities. It urgently needs a 'refresh' to retain and attract new visitors.
- 2.6 Approximately 8,000 school children visit the site each year for education purposes and in addition to an Outreach programme to schools, the site also carries out/hosts the following activities:
- Educational provision to students from Sparsholt College, Merrist Wood College and Surrey University through a work experience programme offering about 100 placements per year.

- Provides a resource and opportunity as a place of research for university students on their projects.
 - Provides all visitors with education on wildlife, nature, and an improvement in the understanding of the environment.
 - The current collection of 850 birds includes threatened species and the site works in close collaboration with other zoos both in the UK and around the world.
 - Birdworld has managed and achieved several conservation initiatives. This has relied largely upon fundraising strategies over and above the commercial activities of the business and has established a conservation fund to support these activities.
 - The site's success in breeding has helped raise many birds, including Penguins for other collections.
 - Through the site's own fundraising they have been able to support local, national and international projects. Previous donations have included the Penguin Conservation project (SANCOBB) in South Africa and support for the Great Bustard group initiative in Wiltshire.
 - They have also used the fund to support staff joining egg collection trips in Spain with the Great Bustard Group, Skills transfer trips to SANCCOB relating to incubation and hand rearing, and to provide field assistant roles on the Earthwatch African Penguin Project in South Africa.
 - The Birdworld Keepers conduct informative talks to educate visitors about the birds' roles, conservation importance, feeding habits, and breeding efforts. These talks serve as a vital tool for raising awareness and inspiring visitors to become advocates for bird conservation and habitat preservation.
- 2.7 The aim in the long term for Birdworld is to combine their educational role with play, by the introduction of the new facilities. Through interactive play, children can learn about the fascinating world of birds, their habitats, and the significance of conservation programmes. By merging play and education, it engages children of all age groups in meaningful learning experiences.
- 2.8 **Haskins Forest Lodge** is part of a family-run Garden Centre Business founded in 1882 by Harry Haskins on the south coast. Today, Harry Haskins' great grandson Warren Haskins is the Chairman and is very much involved in developing both businesses.

- 2.9 The garden centre has one main building and a separate warehouse. The main building has a two-storey brick section at its northern end whilst the remainder is single story, single glazed, glass house style structure. To the rear of the main building is a covered area for plants and other garden sundries area and beyond the open plant sales area. The total built space is 3,229 sq m; the covered external area is 1,489 and the external plant sales is 3,905 sqm. The ancillary restaurant, which is an integral part of any garden centre, has 260 covers.
- 2.10 **Garden Style.** This was a separate business operated by the previous owner of Forest Lodge and complemented the garden centre with customers having full access to both facilities. It focused more on larger trees and shrubs and other specialist plants. The total built area extends to 893 sq m and the external plant sales area to 6,886 sq m. This operation closed in 2022.
- 2.11 **Access** from the A325 is via two separate vehicle access points but service vehicles for Birdworld use the same access as the garden centre. Currently there is no direct pedestrian link between Haskins and Birdworld. Both operations have their own car parking areas.
- 2.12 **Holt Grange**, a separate dwelling that sits between the two businesses and in separate ownership. It has its own access onto the A325. This property does not form part of the re-development proposals.

3 Planning History

- 3.1 The planning history for both Birdworld and Forest Lodge is long and complex. The applications for redevelopment of Birdworld and the expansion of Forest Lodge go back to 2003. It culminated in the re-development permission granted in December 2018 (20533/059) This permission, which expired in December 2021, is referenced in this application as the “approved” scheme. The main difference between the proposed and “approved” schemes is that the residential development for 6 open market dwellings is no longer included. Appendix 2 provides a comparison of the existing, “approved” and proposed schemes and Appendix 1 provides the different areas for each one.

1. Partial Redevelopment of Birdworld and Forest Lodge Garden Centre. Approved 5 Dec 2018. Reference 20533/059.

Permission for a phased development of both Birdworld and Forest Lodge Garden Centre to include:

- New Birdworld Visitor Centre including children’s play barn.
- Enabling Development for 6 Private Dwellings.
- Demolition of existing visitor centre and provision of extended car parking.
- Forest Lodge Garden Centre phased extensions of retail areas and reconfiguration of outdoor sales areas and Garden Style site.
- Extended car parking and provision of single joint access.

2. Forest Lodge Garden Centre; Proposed Replacement Warehouse following demolition of existing warehouse and enlargement of car park. Approved 14 June 2016. Reference 20533/020.

Permission includes;

- Demolition of existing goods inwards building at Forest Lodge and erection of replacement warehouse.
- Enlargement of Forest Lodge car park and re-landscaping of road frontage.

This permission was started with the enlargement of the car park, but the warehouse project did not take place.

3. Formation of new plant centre with ancillary trade car park, load/unloading area, storage area shade structure, equipment shed, sales building and reception/office/staff building with access from Forest Lodge Garden Centre. Approved 15 June 2016. Reference 20533/021.

This permission was for the relocation of our Garden Style business to the main Forest Lodge/Birdworld site. This work was completed in July 2017.

4. Forest Lodge Garden Centre; Restaurant Extension with covered open sided seating areas, first floor plant room and screening of covered and open yard. Approved 16 May 2014. Reference 23318/019.

This permission was for the new restaurant at Forest Lodge. It was completed in November 2014.

5. Partial Redevelopment of Birdworld and Forest Lodge Garden Centre and Joint Single Access. Reference 20533/054. Approved 17 March 2014.

This was a renewal permission for the major redevelopment scheme first approved in 2010. It was not commenced but formed the basis for the 2018 permission.

6. Outline Application for five detached dwellings and improved access. Reference 20533/055. Approved 17 March 2014.

This was an outline permission for five larger houses promoted as enabling development for the necessary improvements to Birdworld. This was not started but formed the basis for the 2018 permission.

7. Forest Lodge; Extension to restaurant with covered seating area, screening to plant and bin areas. Reference 23318/018. Approved 24 May 2013.

This was an initial permission for the new restaurant project at Forest Lodge. It was not commenced, and a new application was submitted and approved in 2014.

8. Outline Application for five detached dwellings and improved access. Reference 20533/048. Approved 1 Nov 2010.

9. Partial redevelopment of Birdworld and Forest Lodge Garden Centre and Joint Single Access. Reference 20533/049. Approved 4 Nov 2010.

These two applications and permissions formed the basis for the main redevelopment plans for Birdworld and Forest Lodge Garden Centre. They were not commenced and were renewed in 2014. They then formed the basis for the 2018 permission as they had established a permission for the scale of the development proposed. The 2018 permission was amended and created a phased approach for the development to help with the CIL payments required. The Area Schedule at Appendix 1 sets out the total areas for the final approved re-development from 2018.

Birdworld Applications and Permissions.

- 3.2 Except for the inclusion in the major applications, there have been no other applications at Birdworld in the last 14 years apart from some tree preservation applications/permissions for tree work in areas affected by the Tree Preservation Order.
- 3.3 There have been numerous new aviaries and exhibits built, but the planning department have accepted that these did not need planning permissions as they regard them as temporary structures which form part of the established Birdworld attraction.

Summary

- 3.4 Throughout the discussions on the re-development proposals outlined above, it is understood that the Council were fully supportive of the plans to improve the Birdworld facilities. The park was viewed not only as a leisure attraction, much needed by the District's growing population, but also as a valued cultural, educational and environmental facility, the demise of which would be a positive disbenefit to local schools and the wider community. Therefore, the need to upgrade, rationalise and modernise the facilities, to help place them on to a sound footing, is a long-recognised principle of this re-development scheme.

4 Planning Policy

4.1 The relevant policies that might be applied to this application proposal are included in the following:-

- **The NPPF: December 2023**
- **The East Hampshire District Local Plan: Second Review (March 2006)**
- **East Hampshire District Council Local Plan: Joint Core Strategy 2014**
- **Draft Local Plan 2021 -2040: Regulation 18 Consultation, January 2024**
- **Climate Change and Sustainable Construction SPD: April 2022**

4.2 The NPPF

The updated NPPF was published in December 2023. Still at the heart of it is a presumption in favour of sustainable development. It states that the Development Plan is the starting point for consideration of planning applications, and planning applications must be determined in accordance with it, unless material considerations indicate otherwise.

The relevant sections for this proposal are:

- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Supporting a prosperous rural economy
- Promoting sustainable transport
- Requiring good design
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment

4.3 The East Hampshire District Local Plan: Second Review (March 2006)

Saved policy S7 states that Planning permission for garden centres will be granted on sites within or adjacent to settlement policy boundaries provided that the proposal:

- a. is not intrusive in the landscape;
- b. would not result in inconvenience or danger on the public highway;
- c. is not harmful to the character of the settlement; and
- d. will not harm the viability of retail facilities in any nearby town or village due to the scale and scope of retailing proposed.

Paragraph 6.90 of the justification text to policy S7 states that Garden centres in the

countryside can be very intrusive and attract high volumes of traffic onto rural roads. Such facilities should, therefore, be located on suitable sites within or adjacent to settlement policy boundaries and be in keeping with the character of the surrounding area. The goods and services sold or provided from a garden centre will be limited to requisites closely associated with gardening. Any permission for such a use may limit the range of the goods to be sold.

4.4 East Hampshire District Council Local Plan: Joint Core Strategy 2014 (JCS)

JCS policy CP2 states that new development growth in the period up to 2028 will be directed to the most sustainable and accessible locations in the District in accordance with the Spatial Strategy. New development will make the best use of previously developed land and buildings within existing built-up areas.

JCS policy CP8 states that the vitality and viability of the District's centres will be maintained and improved according to the role of the various centres set out in the hierarchy of centres set out below:

- Town centres - Alton, Petersfield and Whitehill & Bordon
- District centre - Liphook
- Local centres - Clanfield, Four Marks, Grayshott, Horndean, Liss and Forest Centre, Whitehill & Bordon
- Local parades and small local centres

Proposals for new retail, leisure, entertainment and cultural facilities in the centres set out above will be permitted provided that the proposal: a) sustains and enhances the range and quality of provision, and the vitality and viability of the centre; b) is in keeping with the scale and character of the centre; c) would not harm the function of the centre, particularly its shopping function; and d) is readily accessible by bicycle and on foot.

JCS policy CP9 states new development will be permitted for new tourism facilities, visitor attractions and visitor accommodation in towns and villages; in the countryside through the re-use of suitable rural buildings or as part of farm or rural business diversification, particularly where these would also benefit local communities and support the local economy; and where it retains and enhances existing tourism facilities, visitor attractions and visitor accommodation.

The development will also have regard to the following policies which are set out in full in the **Climate Change and Sustainable Construction SPD: April 2022**.

- **CP24 – Sustainable Construction**
- **CP25 – Flood Risk**
- **CP26 – Water resource/Water Quality**
- **CP27 – Pollution**
- **CP28 – Green Infrastructure**
- **CP29 – Design**
- **CP31 – Transport**
- **CSWB5 – Design**
- **CSWB6 – Sustainable Construction**
- **CSWB8 – Sustainable Water Management**
- **CSWB10 – Green Infrastructure**
- **CSWB12 – Pedestrian and Cycle Routes**
- **CSWB13 – Public Transport**
- **CSWB18 – Low Carbon Vehicles**

4.5 Draft Local Plan 2021-2040: Regulation 18 Consultation: January 2024

This Draft Local Plan is currently out on consultation. The key objectives of the Local Plan are:-

- Providing sustainable levels of growth through the Local Plan.
- Providing better quality, greener development in the right locations.
- Prioritising the health and well-being of communities in delivering what's needed to support new development.

4.6 Climate Change and Sustainable Construction SPD: April 2022

This SPD provides guidance and best practice on methods for delivering more energy efficient and more sustainable development. The Appendix 4 that forms part of this document provides a Sustainability Checklist which has been completed for this planning application.

Summary

At the time the last re-development proposal was considered in October 2017, the Forward Planning Officer stated that overall, planning policy supported the proposals and there was no objection from a policy point of view:-

“No objection. The site lies within open countryside where restrictive planning policies would normally apply. On the other hand, the site already accommodates well established businesses. Critically, there are already extant planning consents for a similar amount of development that is proposed in this scheme.

The overall concept of redevelopment at the location has been supported by the previous granting of permissions. No significant details have changed from the earlier applications or in terms of local planning policy and therefore there is no planning policy reason why different outcome should be reached on this occasion. As with previous planning consents, the proposed extensions to the garden centre and other retail elements would not have an adverse impact on neighbouring retail centres, subject to relevant conditions being imposed.”

It was also noted by the Planning Officer that Birdworld is an important regional tourist attraction and educational facility in the area and that Forest Lodge is an established garden centre. Saved policy S7 of the Local Plan: Second Review (2006), sets out that permission would normally be granted for garden centres within or adjacent to settlement policy boundaries.

“Whilst the impact of the development meets the other relevant criteria of the proposal (see below - landscape, highway considerations and retail impact), this site is clearly in a rural location. Having regard to the fact that this is a well-established site, the other relevant criteria of Policy S7 are met and the increased retail area (which is within the parameters of the previous approval) is considered, in this particular instance, to still be acceptable.”

It should be noted that the area of the proposed garden centre building will be less than that approved in 2018 (See Appendices 1 and 2).

5 Pre-Application Advice

East Hampshire District Council

- 5.1 Haskins acquired Forest Lodge Garden Centre and Birdworld in January 2020, but it was not until November 2021 that the first pre-application meeting could take place with the Council, due to the Covid restrictions. This initial meeting was helpful in explaining the past history on the site and what aspects of the re-development would need careful consideration.
- 5.2 The next pre-application meeting took place in July 2023, by when the full development team had been appointed and extensive research had been carried out to decide how best to improve the Birdworld offer and put it on a secure financial footing. The joint notes from this meeting are attached at Appendix 3.
- 5.3 Overall, the Planning Officers were positive about the new scheme. They were pleased to see that the residential element of the previous scheme had been removed as this had been a contentious issue on the previous application. The improvements to Birdworld would be supported by the Local Plan Tourism Policy CP9: - *'Development will be permitted.....where it retains and enhances existing tourism facilities, visitor attractions...'*
- 5.4 The importance of Birdworld as a tourism destination within the District was emphasised and that it would be essential that any scheme keeps Birdworld operating at all times. Phasing of the development will need to reflect that. (See the plans for the proposed phasing of the development which offers a much simpler approach than for the previous 2018 planning approval).
- 5.5 A further pre-application meeting was held in November 2023 to review the detailed design drawings and highlight matters that would need to be covered in the supporting material for the planning application.

South Downs National Park Authority

- 5.6 The SDNP were consulted by the District Council because the application site neighbours the National Park and therefore, as advised in the NPPF, "*development within their settings should be sensitively located and designed to avoid adverse impacts on the designated areas.*"

5.7 The comments provided by the National Park Authority, in a letter dated 12th December 2023, are included at Appendix 4.

1. **Development Setting:** - *“A development of the scale proposed will need to be informed by an assessment of how the site contributes to the setting of the SDNP, what adverse impacts (both direct and indirect) can be avoided and what opportunities there are to conserve and enhance that setting. This is not purely limited to landscape and visual impacts and consideration will need to be given to the ecological sensitivities of the surrounding area.”*

This has been addressed in the Design and Access Statement and careful consideration given to the landscape enhancements on the site.

2. Assurance that the **15m buffer zone** on the rear boundary **“is a sufficient buffer in this case.”** No development is proposed in this buffer zone and the intention is to supplement the planting with suitable species. See Landscape plans.
3. **Education** - *.....“additional opportunities to cover education about conservation of local native bird species.”*

Education is a key part of the work undertaken at Birdworld (see section 2 of the Planning Statement) and the existing and enhanced landscaping on site will provide an ideal opportunity to focus on the native species. This is a recent note from the General Manager at Birdworld on this subject matter.

“As discussed, we have had a series of very productive meetings with both Forestry research at Alice Holt and the RSPB.

For Forestry research they have a series of existing research projects both looking at habitat and also individual species (UK birds) that we can support by providing staff time to survey the grounds around us. For the RSPB at Farnham Heath they are keen to work with us on building/encouraging the return of wild birds to their rewilding project (turning a pine forest into the wild heathland it would have been). For both we are meeting in January to formalise the relationships with a MOA.

For rewilding of wild birds, we have approached 3 existing rewilding schemes (Thrush, stalk and chuffs) being run at zoos already, to let us join in and support their work. This will result in our staff releasing birds in the wild on a regular basis in the future.

This will be a move overall to how we approach our conservation on site to a more UK based focus, which also aligns with the new zoo licencing standards.”

4. **The new roundabout** – the boundary for the SDNP runs along the far (SW) side of the A325 and therefore the strip of land on this side, which is within the application site, falls within the National Park. Their comment is*“The experience of users entering the SNDP should be taken into account as part of the proposals and the road alterations and associated signage, etc, should be designed to avoid an urban appearance. There may be an opportunity for more locally sensitive roadside tree planting in place of the comparatively open existing entrances.Although the general principle of bus and footpath connections may be supportable, the loss of roadside hedge and other vegetation is likely to be a concern for the SDNPA.”*

Where possible the existing landscaping on the frontages has been preserved but the requirements for the safe visibility splays for vehicles and pedestrians has had to be considered. Both the DAS, the landscape plans and the Transport Assessment explain this point further in terms of the new access provisions.

5. Drainage

“The inclusion of surface water attenuation (SuDS) to reduce peak flows from the site and reduce flooding risk to the surrounding areas is welcomed in principle. We welcome the intention to design in biodiversity improvements into these SuDS, and would draw attention to the Cira SuDS Manual, which sets out four pillars that SuDS should be designed to achieve:

- *Benefit wildlife*
- *Function through the storage of flood water*
- *Clean water and improve water quality*
- *Provide positive amenity benefits.”*

All the above comments have been taken into account in formulating the drainage strategy.

6. Dark Skies

“Given the proximity to the SDNP/IDSR boundary and the inclusion of glazed structures in the garden centre and areas of external lighting including car parks, the proposals will need to demonstrate a sensitive approach to lighting which conforms the Institute of Lighting Professionals for lighting in environmental zones, and tries to achieve zero upwards light spill in all respects. An external lighting scheme should also take into account the biodiversity sensitivities of the site and not disturb or harm wildlife.”

The design of the garden centre and the materials used on the elevations will minimise the possible light spill in the evening. Both the garden centre and Birdworld will be closed after



6pm and the internal lights switched off. An external lighting scheme has been suggested and will be discussed further with the Council.

Hampshire County Council Highways

The Transport Assessment sets out the discussions that have taken place with HCC regarding the proposed highway improvements.

6 Assessment of the Application Proposals

- 6.1 The Design and Access Statement sets out in detail the constraints that both sites have in terms of layout, circulation, access, and the condition of the existing buildings. It became clear to the Development Team early on that a different approach was required than before, which would allow both businesses to function properly, and together create a unique destination.

Access

- 6.2 The first issue to resolve was the access. There are currently two access points off the A325 and neither have dedicated right turn entries. After consultation with Hampshire County Council highways, the solution being put forward is for a three-arm roundabout off the A325 giving joint access to both Birdworld and the Garden Centre. The roundabout has been welcomed by HCC as it will help reduce vehicle speeds on the A325.
- 6.3 Both existing junctions are sub-standard, and the proposed roundabout will provide a material highway safety benefit by:
- Providing a junction with adequate visibility.
 - Being designed to highway standards.
 - Reducing the number of operational junctions on the A325.
 - Reducing vehicle speeds; and
 - Providing improved pedestrian and cycle crossings on all arms.
- 6.4 There will be improvements to local footway connections and the existing bus stops on the A325. These include:
- An improved A325 crossing to Footpath 50, which will improve pedestrian connectivity across the A325; and
 - Improvements to the Gravel Hill Road bus stops, including providing shelters and real time information.
- 6.5 The position of the new roundabout along this stretch of the A325 has been carefully determined. Once this was established, the entrance route on site for both the Garden Centre and Birdworld, could be created, providing two dedicated car parks on either side.

Layout

- 6.6 Birdworld is located to the north of the site and Haskins Garden Centre to the south. The Play Barn and new Entrance Building to Birdworld are located centrally, just north of the

access road. All car parking is adjacent to the A325 in front of the respective buildings. The western boundary maintains a 15m 'No New Construction' buffer zone to provide a suitable threshold between the site redevelopment and the Alice Holt Forest to the rear.

- 6.7 The total site area as defined by the red line boundary is 13.54 Ha. The proposed Birdworld site makes up 64% of this total with the remaining 36% dedicated to the Garden Centre. (Refer to Appendix 1 - Area Schedule).

Landscaped Setting

- 6.8 The site has its own unique landscape character and Birdworld in particular is set within an existing park containing many mature trees. It is important that this character is retained and enhanced with any new proposals. This is particularly important given the site's proximity to the Alice Holt ancient woodland beyond the rear boundary and the sites location in respect of the South Downs National Park.

Parking

- 6.9 A total of 840 car parking spaces is provided across the site as follows:

- 418 spaces for Birdworld (including 26 accessible spaces); and
- 422 spaces for Forest Lodge (including 18 accessible spaces).

- 6.10 This is an increase of 258 spaces over the existing total.

- 6.11 A parking assessment has been undertaken which demonstrates that the proposed parking provision is sufficient to accommodate the parking demands of both Birdworld and Forest Lodge.

- 6.12 Dedicated coach spaces, accessible parking spaces, electric vehicle charging points, motorcycle parking spaces and parent/child parking spaces have all been provided in accordance with local standards. 90 covered and secure cycle parking spaces are also provided, as well as shower/changing facilities within the buildings.

Servicing

- 6.13 The existing route for HGV delivery vehicles for both the Garden Centre and Birdworld, conflicts with customer parking. The new layout had to provide a clearer, safer, service access. The new service yards for both operations are adjacent to each other and have been carefully positioned to minimise any visual and noise impact. All delivery, servicing and emergency vehicles can now access the site safely.

Drainage

6.14 The Flood Risk Assessment concludes that:

- The site is wholly located in Flood Zone 1: low probability of flooding from rivers.
- The site is largely at very low risk of surface water flooding, except in the southern area of the site and along the north-west boundary due to overtopping of the ordinary watercourses.
- Groundwater levels are shallow.

6.15 The Drainage Strategy that will be employed will utilise the existing discharge outfalls to Lodge Pond east of the development. Sustainable Drainage Systems (SUDS) are proposed across the development including permeable paving, rainwater harvesting, attenuation tanks, swales, and a retention pond. The attenuation provided will significantly reduce the peak flows from the site and reduce flooding risk to the surrounding areas. The Strategy will incorporate biodiversity aspects in combination with the landscaping and ecology plans for the site.

Ecology

6.16 The site has been subject to an ecological assessment including habitat and protected species surveys, the latter with a particular focus on bats. The site is directly adjacent to an area of ancient woodland, the majority of which is Plantation on an Ancient Woodland Site (PAWS), but that immediately adjacent is designated ancient and semi-natural. The woodland is also designated as a Site of Importance for Nature Conservation (SINC). The site lies within the Impact Risk Zone for Bentley Station Meadows Site of Special Scientific Interest (SSSI), but it is not one of the categories of development that requires consultation.

6.17 The site comprises buildings, woodland, trees, scrub, hedgerows, ponds, modified and neutral grassland, bare ground, ground level planters, introduced shrubs and hardstanding. Mature trees and habitats of relatively greater ecological interest within the site are retained, wherever feasible, as part of the proposed development. Significant new tree planting, along with the establishment of new and replacement habitats, is also proposed.

6.18 Survey work has identified the evidence of roosting bats in some of the buildings. These roosts are all of common species and, for the most part, small in nature. Habitats on site also offer suitability to foraging and commuting bats. The proposed demolition of some of these buildings – which will affect only small roosts of common species – will require a Natural England licence in due course. Replacement roosting opportunities are included within the proposed development, including a dedicated bat loft in the new Play Barn and the provision of bat boxes onto retained trees or new buildings.

Biodiversity Net Gain

6.19 The Environment Act 2021 sets out a compulsory increase of 10% biodiversity net gain on all new developments and will become mandatory in February 2024. **The proposed development will deliver a net gain for habitats of 12.36%, as well as a net gain in hedgerows of 27.41% and 74.65% for watercourses.**

Lighting

6.20 The site is in a sensitive location adjacent to the National Park and the ancient woodland. Moreover, the permanent occupants of Birdworld are also sensitive to night-time disturbance, therefore the lighting strategy for the site has had to be carefully thought through.

6.21 The SDNP have a Dark Skies SDP which requires that any artificial lighting should respect this unique setting. A lighting strategy has been prepared for the site by ION Consultants discusses the type and level of lighting requirements of the proposed Birdworld Ltd and Haskins Garden Centres Ltd. It is concluded that the Indicative Lighting Strategy provides an appropriate outline of the lighting requirements for the Proposed Development as part of the Application, and identifies potential measures to adequately provide full compliance with the following guidance documents:

- South Downs National Park, Dark Skies Technical Advice Note – Version 2 (May 2021)
- The Institute for Lighting Professionals Guidance Note 01 - The Reduction of Obtrusive Light (2021) GN 01/21
- The Institute for Lighting Professionals Guidance Note 08 - Bats and Artificial Lighting at Night (2023) GN 08/23

Birdworld

6.22 The main issues to resolve for Birdworld are, how to refresh the current offer within the Bird Park and retain a viable business throughout the year. Haskins employed the services of leisure consultants Dan Pearlman, who have advised Chester and Hanover Zoos and other leisure and activity parks throughout the UK and Europe. Their challenge was to build on the existing brand DNA of the Park, which is strong, and decide what would best complement the operation. Critically, the main objective is for Birdworld to have a profitable, secure future and create a leisure destination that has unique and repeatable year-round offers and experiences, for all ages.

6.23 The overall layout of the Birdworld site will change. Currently it wraps around the existing Garden Centre; this creates a single out and back route which results in a poor customer journey. There is also a wooded/landscaped area which is not accessed by the public. The proposal is to re-shape the site, utilise redundant areas and improve the overall

visitor experience. There is a 10% reduction in the quantum of site area occupied by Birdworld compared with the existing layout (64% cf to 74%). This is a similar reduction as on the 2018 approved scheme.

New Entrance Building

6.24 A new, distinctive arrival point for Birdworld is needed. The new Entrance Building creates a focal point for visitors arriving at the Park and the new activities area beyond the entrance. It is formed of two single storey wings and a central, double height section at 8.00 metres to the ridge. The materials chosen for the elevations will be traditional brick, stone and slate and large wood feature doors.

6.25 Internally the building will contain the Birdworld offices (currently located in a converted house on the site), the entrance and exit foyers and the relocated gift shop.

Play Barn

6.26 This timber clad barn will have an internal play area (800 sq m), primarily geared for children up to 12 years old; four 'party rooms' (60 sq m) and a café (180 sq m). The purpose of the Play Barn is to create year-round activity on site as well as helping draw in new visitors to Birdworld. The previous re-development scheme approved in 2018 also provided a 'Play Area'/ party rooms located within their Visitor Centre, and of a similar size.

Outdoor Adventure Play Area

6.27 This new feature of the Park utilises an existing landscaped area which contains a number of conifer trees and is currently not accessible to the public. The intention is to create an adventure play area, as illustrated in the Design and Access Statement. The final layout of the proposed equipment, some of which will be at a higher level, will be determined in conjunction with the development team's arboriculturist and ecologist.

Breeding and Conservation Programme

6.28 This will remain a key part of Birdworld. However, the current facilities need to be improved. The new proposals show a new building called Living Collection, as well as adjacent new aviaries. This area is in the far northwest of the site, adjacent to the rear boundary with the Alice Holt Forest. This allows it to be set away from the rest of the activity on the Bird Park. It will house 'sick bay' facilities, 'holding bays' needed for the breeding programme, the food preparation area and an office and staff facilities.

Education

6.29 The existing Entrance Building for Birdworld will be retained. The restaurant that is included in here will remain and the first-floor offices. However, the area currently

occupied by the entrance/exit foyer and the gift shop will be repurposed for use as an 'education hub' to allow talks to school parties and other groups visiting the Park. This is an important part of Birdworld's activity (refer to Section 2 on the existing operation and the comments on education in Section 5).

Haskins Garden Centre, Forest Lodge

- 6.30 Haskins know that the layout of their proposed garden centre works for their customers and is operationally successful because the layout has been refined across their other four garden centres. It is important to them for the new building at Forest Lodge to function on a similar basis, rather than being treated as an exception.
- 6.31 In the main garden centre building itself, there need to be clear routes for customers to navigate and which allow two wheelchairs or two customer trollies to pass each other. Given the increasing leisure function of garden centres, accessibility through the building, especially for disabled customers, is a key factor.
- 6.32 In summer a large section of the internal retail area is given over to garden furniture and barbeques, which are bulky items. This department area then changes in the late autumn to display Christmas decorations and festive displays.
- 6.33 The till and customer reception area also must be of a sufficient size to be able to cope with the busiest times in the year, particularly during the gardening season when customers will be bringing through bulky items.
- 6.34 A key component of the garden centre is the restaurant. These are crucial to the commercial success of modern garden centres and represent roughly 22 - 25% of the total sales. Restaurants in garden centres have become meeting areas for the local communities. The local disabled charities and residential homes regularly use garden centres as good places to visit for outings as they are wheelchair friendly, have a restaurant and good toilet facilities.
- 6.35 The servery is open from 9am to 5pm and serves breakfast, coffee, lunch, tea. 50% of the restaurant business is in hot drinks and cakes/biscuits. For the dining area to work effectively, there needs to be two large clearing stations. There is also a private dining area/meeting room which is regularly used by the community for various functions. To allow sufficient space for wheelchairs, there needs to be a minimum of 1.35 sqm space per restaurant cover and there will be 470 covers proposed in the restaurant. There is also a small terrace area for outside seating in the summer.

- 6.36 It can be seen the Area Schedule at Appendix 1, that the largest increase in area proposed, compared with both the existing and 2018 approved scheme, is in the amount of external, covered plant area. These covered areas are in the delivery area, where bedding plants are stored before being transferred into the retail area (120 sqm), and the external plant sales area. This protective canopy is a critical component for the garden centre business as the plants need to be protected from wind, rain and sunshine. Without this, plants would be damaged, and the horticultural reputation of the business would be damaged too. Plants need to be kept in premium condition.
- 6.37 These external areas are maintained for twelve months of the years, and customers still visit in the winter months for winter bedding plants, Christmas trees and other products that need to be kept outside. The covered area is also giving protection for customers whilst shopping in this area.
- 6.38 The massing of the proposed garden centre reflects that of Haskins Snowhill, which is a successful model that is also located in a sensitive location (Green Belt). The proposed garden centre will be a single storey; the proposed eaves height is 4m and the ridge is 6.4m. The ridge of the garden centre sits below that of the Birdworld Entrance Building and the Play Barn which are at 8 metres.
- 6.39 The DAS contains images of the Snowhill Garden Centre, which opened in March 2020, and is similar in design and appearance to the application proposal.

Sustainability and BREEAM

- 6.40 At the early design stage, the design team carried out a passive design analysis of the proposed building to identify opportunities for the implementation of passive design solutions that reduce demands for energy consuming building services. The passive design credit is achieved when the building uses passive design measures to reduce building energy consumption and associated carbon emissions and minimise reliance on active building services systems.
- 6.41 Based on the modelling conducted, the results show that the proposed Haskins Forest Lodge Garden Centre meets the criteria with a 60% reduction in building CO₂ emission rate (BER) for the proposed building over the standard notional building
- 6.42 The design team also assessed the feasibility of incorporating Low or Zero Carbon (LZC) technologies into the proposed new garden centre. This was to guide the project team's decision-making regarding the selection of LZC technologies and to ensure that all crucial considerations are addressed. The primary drivers for opting for LZC technologies are compliance with Part L regulations, adherence to Planning Policy and achieving an overall BREEAM Excellent rating.

6.43 The LZC report concludes that Air Source Heat Pumps, coupled with roof-mounted solar photovoltaic panels, are the most fitting LZC technologies for integration into the proposed development.

6.44 The proposed development is set to achieve a BREEAM 'Excellent' rating in accordance with EHDC's 'Climate Change and Sustainable Construction Supplementary Planning Document – April 2022'.

Employment

6.45 The table below summarises the existing and proposed number of jobs.

Existing Employment

	Birdworld	Haskins
Full time	24	37
Part time	45	65
FTE	53	64

Proposed Employment

Full time	30	43
Part time	50	114
FTE	65	91

Retail Matters

6.46 The Retail Assessment undertaken by Alder King assessed the proposal against the two retail policy tests set out in the Development Plan and the NPPF:

- a) The sequential approach to site selection; and
- b) Retail impact on existing defined centres (impact on centre vitality and viability and in-centre investment).

a) Sequential Approach to Site Selection

The statement demonstrates that there is a clear locational, specific need for the proposed development at the existing Garden Centre and Birdworld site. Furthermore, both the Birdworld and the Garden Centre elements of the proposal are intrinsically linked and the scheme will not progress without them both coming forward together.

The retail statement has provided a sequential site assessment for the garden centre element of the proposed scheme in line with planning policy. The assessment demonstrates that there are no suitable or available sequentially preferable sites in Farnham Town Centre, Alton Town Centre, Aldershot Town Centre or the existing/emerging Whitehill and Bordon Local/Town Centre.

Accordingly, it is concluded that the proposed development passes the sequential test requirements set out in the NPPF and the Local Plan.

b) Retail Impact

The proposal involves a reduction in overall garden centre retail floorspace and therefore it is considered not necessary to undertake an assessment of retail impact. The proposal also involves a significant reduction in retail floorspace in comparison to the previously consented 2018 Garden Centre redevelopment scheme. Notwithstanding this, in order to provide a robust assessment, their statement has provided a proportionate assessment of the potential retail impact of the proposal.

This impact assessment demonstrates that the proposed garden centre redevelopment will not adversely impact any existing, committed or planned public and private investment within Farnham, Whitehall Bordon, Alton or Aldershot town centres nor the vitality and viability of Farnham, Whitehall & Bordon, Aldershot or Alton town centres.

7. Conclusions

- 7.1 Birdworld and Haskins Garden Centre are proposing a re-development/enhancement of their existing sites which represents a substantial investment in the future of both local businesses.
- 7.2 The main objective for Birdworld is to ensure a profitable, secure future by creating a leisure destination that has unique and repeatable year-round offers and experiences, for all ages. The ongoing support of the Garden Centre business will remain important, and it too requires new investment to maintain its position as a key business and employer in the area.
- 7.3 The proposal for Birdworld includes re-shaping the site, utilising redundant areas and improving the overall visitor experience with the introduction of the Play Barn and an Outdoor Adventure Play Area. The ongoing breeding and conservation programmes at Birdworld will continue as well as the focus on education.
- 7.4 The Forest Lodge Garden Centre needs to be updated to allow it to function properly as a modern garden centre. The existing building fabric is tired and does not meet modern standards for a sustainable and energy efficient building. The new development is set to achieve a BREEAM Excellent rating in accordance with EHDC's Climate Change and Sustainable Construction SPD.
- 7.5 The context of the site, and its relationship to the South Downs National Park and the adjoining Alice Holt ancient woodland, means that careful consideration has had to be given to the scheme setting. A well thought through and considered landscaping scheme has been proposed that respects the sites' location, the ancient woodland at the rear and the TPO trees on the site.
- 7.6 The new roundabout from the A325 into both operations will deliver a range of associated benefits for all road users by improving the safety on this part of the A325. This is something that was warmly received by everyone at the Public Consultation event. There will also be improvements to the footpath network and the existing bus stops.
- 7.7 The Drainage Strategy for the site, through the SUDS attenuation scheme, will significantly reduce the peak flows from the site and reduce flooding to the surrounding areas and roads. This is something that concerns the local residents and was raised through the Consultation process.
- 7.8 Residential amenity, particularly along the boundary to the houses in Gravel Hill, has been carefully looked at. The cross sections of this boundary contained in the DAS, show how this has been achieved with landscaping and other boundary treatment.

- 7.9 10% Biodiversity Net Gain is now required through the Environment Act 2021. The assessment of the proposals that form part of this re-development show that there will be a net gain for habitats of 12.36%, as well as a net gain in hedgerows of 27.41% and 74.65% for watercourses.
- 7.10 The Retail Assessment of the Garden Centre has shown that the scale of development proposed would not result in a detrimental impact on the District's centres. It has also been demonstrated, that in line with the sequential approach required, there are no other suitable sites within the locality which could accommodate the development proposal.
- 7.11 Aside from the SPD on Climate Change and Sustainable Construction, and the very recent publication of the new Draft Local Plan, local planning policy has not changed since the previous approvals were given on this site for schemes with larger retail floor footprints.
- 7.12 Accordingly, and in line with the advice within the NPPF, planning permission should be granted for this re-development which delivers many benefits on all fronts for the local community and the wider region.

Appendix 1 - Schedule of Areas (Rev F).

Rev F _2024.01.22

Birdworld and Forest Lodge Garden Centre Comparison of the Existing, Planning Approved and Proposed Schemes

	Existing	Approved	Proposed
BIRDWORLD			
Entrance Building	-	3530	755
Play Barn	-	-	1577
Living Collection and Aviaries	-	-	302
Conservation and Breeding Aviaries	-	-	242
Service Yard Shelter	-	-	210
Existing Buildings Retained	3585	1829	2080
Existing Aviaries and Enclosures Retained	3216	2427	2287
	6801	7786	7453
Total demolition		2545	2434
GARDEN CENTRE			
Internal Sales	1604	4930	2810
Covered Plant Sales	1489	1799	3630
Covered Plant Goods In	-	-	120
Front of House	257	455	483
Restaurant	609	762	1036
Warehouse	341	304	614
BoH	215	458	602
	4515	8708	9295
Total excluding covered plant sales/ goods in	3026	6909	5545
Total external plant sales	3905	3725	2267
Total demolition		343	4515
GARDEN STYLE			
Office and Staff Facilities	123		
Retail Sales Information Chalet	28		
Tractor/Fork Lift Shed & Storage	25		
Polytunnel Structure	717	-	-
	893	893	

Total external plant sales	6886	6052	-
Total demolition			893

RESIDENTIAL DEVELOPMENT			
Buildings	-	864	-
		864	

TOTAL AREA (sq.m)	12209	18251	16748
Total excluding covered plant sales	10720	16452	12998

Total external plant sales	10791	9777	2267
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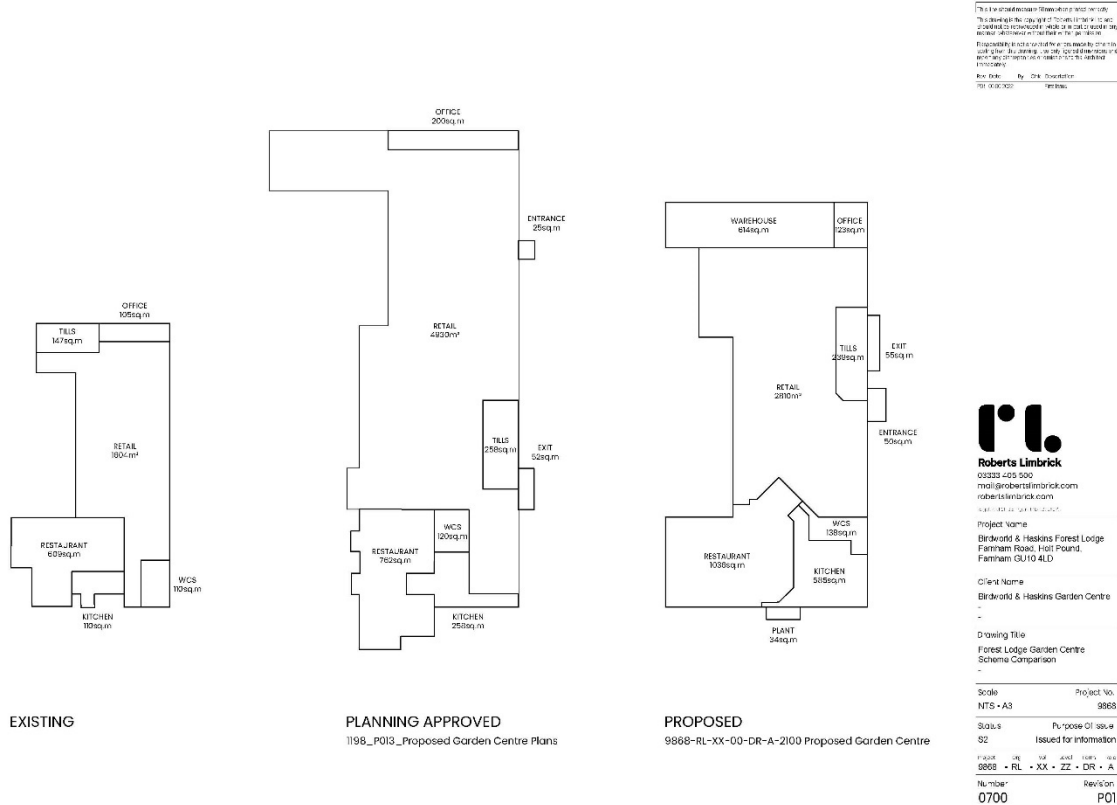
PARKING SPACES

Birdworld	271	613	418
Garden Centre	291	390	422
Garden Style	20	20	-
	582	1023	840

TOTAL SITE AREA

Birdworld	74%	64%	64%
Garden Centre (inc. Garden Style)	26%	32%	36%
Proposed Housing	-	4%	-

Appendix 2 - Forest Lodge Garden Centre Comparison Layout Plan.



Appendix 3 - Note of Pre-Application Meeting with EHDC on 11th July 2023.

Birdworld and Haskins - Forest Lodge. Pre-Application Meeting Note - 11/07/23

Attendees:

East Hampshire DC – Nick Upton and Sabah Halli
Haskins – Warren Haskins and Julian Winfield
Birdworld – Matt Hill
Roberts Limbrick (architects) – David Billingham
MDA Planning – Mary Davidson

1) Presentation:

The revised proposals, with updates on discussions with HCC Highways regarding the proposed roundabout, were presented and the review of the Birdworld operation. It was noted that the Garden Centre had many operational issues to resolve, and the buildings were coming to the end of their useful life. If Birdworld was going to survive as a viable business, then it would need to have a wider appeal and create repeatability for the local community. The first phase of the Birdworld improvements would see an outdoor adventure play area installed and an indoor Play Barn to create year-round appeal.

The location of the service route running on the back of the site was explained and that the buffer area to the Alice Holt ancient woodland respected. There are no buildings in this zone.

2) Comments received:

Overall, the Officers were positive about the new scheme. NU was pleased to see that the residential element of the previous scheme had been removed as this had been a contentious issue on the previous application. The improvements to Birdworld would be supported in the Local Plan (Tourism CP9:- *'Development will be permitted.....where it retains and enhances existing tourism facilities, visitor attractions.'*

On Highways, NU asked would the new roundabout be out of character and too dominant in this locality? MH – the roundabout would allow the opportunity for landscaping on it. It would also be a control to slow traffic on this busy section of the A325, which was a major issue at the last application.

Would there be good access for non-car modes of transport? MH - yes, there will be focused routes linking to the existing footpaths as well as bus stop improvements. NU and SH welcomed this.

Part of the site does fall in the National Park, but EHDC will be the determining authority. However, there is a Dark Sky policy for the National Park therefore information on the lighting for the scheme will be required. It was noted that apart from a few late nights in the run up to Xmas for the garden centre, then both operations would close at 6pm.

The area schedule and car parking figures were discussed, and it was noted that the overall number of car parking has reduced between this scheme and the approved by over 100 spaces. There is little difference on the garden centre areas. Haskins focus more on plant and

garden product sales therefore the external and covered plant areas are greater than in the permitted scheme.

SH emphasised the importance of Birdworld as tourism destination within the District and that it is essential that any scheme keeps Birdworld operating at all times. Phasing of the development will need to reflect that.

3) The Planning Application

SH advised that the previous applicants had requested the complex phasing structure for the planning permission to allow for the expansion of Forest Lodge, Birdworld works, and highway improvements. SH advised that a more simpler phased development would be welcomed.

The question on whether a hybrid application (part outline for Birdworld and detailed on the Garden Centre) was the appropriate planning route. Based on what we had presented, it would seem that the full planning application could be submitted, which would make it simpler in terms of the planning conditions and presentation to members.

MD said that we would hope to submit the application in November which would mean that the consultants would need to be agreeing the scope of their supporting information with EHDC Officers in August/September. It would be helpful to have the appropriate contact details for the following: Ecology/BNG; Trees and Landscaping; Energy (the 'Green Team'); Drainage and Design.

SH advised that the Forestry Commission be contacted with regard to drainage.

SH suggested that the applicant consider that Planning Committee report from the previous consent as that will provide a good understanding of the issues raised last time.

4) Public Consultation

It is proposed to have a public consultation event at Birdworld in September. MD enquired whether the members would like to have their own briefing beforehand. NU explained that they used to have member's meetings on larger applications, but this had now stopped.

Appendix 4 - South Down National Park letter 12 Dec 2023



Birdworld and Haskins Garden Centre

Our Ref:
Contact Officer:
Tel. No.:

SDNP/23/04974/ADJAUS
Nat Belderson
01730 814810

12th December 2023

Dear Sir/Madam,

Neighbouring Authority Consultation

Applicant Name: Birdworld and Haskins Garden Centre

Proposal: Adjoining Authority Consultation - New Birdworld and Haskins Garden Centre Entrance.

Address: Birdworld & Haskins Garden Centre, , Holt Pound, , Farnham, Surrey, , GU10 4LD,

Thank you for your correspondence received 23 November 2023, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

- **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.
- **Duty:** To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The National Park's comments on the development are as follows:

The SDNPA recognises that Birdworld is a long-established visitor attraction in the area and that the adjacent garden centre has also been in operation for a long time. The combined sites lie immediately outside of the SDNP, the boundary of which largely wraps around them. The applicant should therefore be made aware of Paragraph 176 of the NPPF:
"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. 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 these designated areas should be limited, **while development within their settings should be sensitively located and designed to avoid adverse impacts on the designated areas.**"

A development of the scale proposed will need to be informed by an assessment of how the site contributes to the setting of the SDNP, what adverse impacts (both direct and indirect) can be

South Downs National Park Authority, South Downs Centre, Midhurst, GU29 9DH
Tel: 01730 814810 Email: planning@southdowns.gov.uk
ADADJZ

avoided and what opportunities there are to conserve and enhance that setting. This is not purely limited to landscape and visual impacts and consideration will need to be given to the ecological sensitivities of the surrounding area. Holt Pound Inclosure is a Site of Importance for Nature Conservation and is also Ancient Woodland (with the area nearest to the site being semi-natural). The proposals indicate that a 15m AW buffer zone for exclusion of new development is proposed, and we would recommend that the District Council seeks arboricultural advice as to whether this is a sufficient buffer in this case. As part of the redevelopment of the Birdworld element, we would encourage consideration of additional opportunities to cover education about conservation of local native bird species.

The proposals include alterations to traffic management in the area, including a new roundabout. The site is largely well enclosed except for the existing frontages for Birdworld and the Garden Centre where they are accessed from the A325 Farnham Road. The experience of users entering the SNDP should be taken into account as part of the proposals and the road alterations and associated signage, etc, should be designed to avoid an urban appearance. There may be an opportunity for more locally sensitive roadside tree planting in place of the comparatively open existing entrances.

The applicants should also be made aware that the roundabout and red line boundary on the southwest side of the A325 fall within the SDNP and outside of the planning jurisdiction of East Hampshire District Council. The applicants are therefore advised to approach the SDNPA for pre-application advice with regard to this element. Although the general principle of bus and footpath connections may be supportable, the loss of roadside hedge and other vegetation is likely to be a concern for the SDNPA.

The inclusion of surface water attenuation (SuDS) to reduce peak flows from the site and reduce flooding risk to the surrounding areas is welcomed in principle. We welcome the intention to design in biodiversity improvements into these SuDS, and would draw attention to the Cira SuDS Manual, which sets out four pillars that SuDS should be designed to achieve:

1. Benefit wildlife
2. Function through the storage of flood water
3. Clean water and improve water quality
4. Provide positive amenity benefits.

We also welcome the intention for the new buildings to achieve BREEAM 5 star ratings.

The South Downs National Park is a designated International Dark Sky Reserve and dark skies and tranquillity are two of the National Park's Special Qualities that need to be protected from harmful development. Paragraph 185(c) of the NPPF 2021 outlines that development should limit the impact of light pollution on intrinsically dark landscapes and nature conservation.

Given the proximity to the SDNP/IDSR boundary and the inclusion of glazed structures in the garden centre and areas of external lighting including car parks, the proposals will need to demonstrate a sensitive approach to lighting which conforms the Institute of Lighting Professionals for lighting in environmental zones, and tries to achieve zero upwards light spill in all respects. An external lighting scheme should also take into account the biodiversity sensitivities of the site and not disturb or harm wildlife. Further information/advice on sensitive lighting can be found in the SDNPA's Dark Skies Technical Advice Note which is available via the following link

<https://www.southdowns.gov.uk/wp-content/uploads/2021/06/DNS-TAN-2021-Main-Document-External-Lighting.pdf>

Yours faithfully

TIM SLANEY
Director of Planning
South Downs National Park Authority

Contact Officer