

## PI app SDNP/16/02217/FUL

### Demolition of coach house, erection of temporary teaching and boarding accommodation, St Cuthmans, Stedham

These are the comments of the South Downs Society, the national park society for the South Downs National Park.

An earlier planning application at St Cuthmans for school buildings to provide for over 300 pupils was refused in December 2013 by the South Downs National Park Authority on the grounds that:

*“This proposal is for a major development within an isolated and tranquil area of the South Downs National Park outside the settlement boundary with access along narrow country lanes and across a private drive.....having regard to the presumption against major development within national parks it has not been satisfactorily demonstrated that there is no scope to meet the need outside the South Downs National Park or that the harm to landscape character from the extent, scale and nature of the proposals from the development both in use and whilst under construction can be moderated.”*

It appears that this clear refusal has not deterred the applicant from sustaining its overall plans and the same target pupil numbers are still being pursued, albeit in stages. No justification has been brought forward in response to the principle for refusal set out above.

#### **The planning policy context**

The applicant’s design and access statement sets out the **statutory planning framework**, against which the current proposal **fails**.

**The National Planning Policy Framework (NPPF)** states that great weight should be given to conserving landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty (AONBs) which have the highest status of protection in relation to landscape and scenic beauty.

Regarding transport and access, NPPF Policy 32 states that “all developments which generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment Plan and decisions should take account of whether...safe and suitable access to the site can be achieved for all people...” We do not consider that safe and suitable access could be provided, as “improvement” works to the single track road would not be acceptable in this sensitive landscape.

The loss of wildlife and cultural heritage are important considerations...and should be given great weight in NPs and AONBs (NPPF Policy 115.)

NPPF Policy 116 states: *Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:*

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

A location within the park may be attractive to the applicants and meet their needs but it has not been demonstrated that the need can only be met within the national park. The location is poorly served in terms of access and the use of this site for significant school expansion is in conflict with the overriding purpose of national park designation, the conservation and enhancement of the special qualities of its landscape—which, in line with the Sandford Principle, must take precedence over the purpose of promoting understanding and enjoyment where the two are in conflict.

**The 1999 Chichester District Local Plan First Review** remains the adopted local plan against which the application must be assessed. This Society contends that the proposal is in conflict with the following extant policies within the local plan:

*Policy RE (Rural Area)1: Development in the Rural Area generally (which restricts development outside settlement policy areas).*

*Policy RE4: Areas of Outstanding Natural Beauty: Chichester Harbour and Sussex Downs: Protection of landscape and character (which opposes any development harmful to the visual quality or distinctive character, other than in “compelling” circumstances).*

*Policy RE15: Major institutions (which opposes any proposal for development or redevelopment of a “major institution” in the rural area which would have unacceptable effects on the site or its surroundings).*

Since 2011 the **South Downs National Park Authority** has been the planning authority responsible for this area. The authority has, since the determination of this application, adopted a **statutory management plan** for the whole of the park and commenced work on a **statutory parkwide local plan** which will derive in part from that management plan. This work will eventually replace the provisions of the Chichester Local Plan *inter alia*.

The **Partnership Management Plan** includes the following policies, with which the current application is in conflict:

*Policy 3: Protect and enhance tranquillity and dark night skies.*

*Policy 40: Manage the highway network and its infrastructure to integrate it more effectively into the landscape and reduce the impact of traffic on communities and visitors.*

### **National park local plan**

The national park authority has consulted widely on **preferred options** for the local plan and is in the process of refining its policies before a further round of engagement on its pre-submission draft. The current proposals are *inter alia* in conflict with the following draft policies:

SD6: Design: By submitting an application for temporary accommodation the applicant has made no attempt to meet normal standards of design, let alone those required within a national park. With the proposed temporary buildings being unsatisfactory in appearance in this location, and there being no proposed end date, there is no meeting of design requirements. The application should be determined on the basis of their continuing presence.

SD8: Relative tranquillity: Conflict from visual impact, light pollution and noise.

SD9: Dark night skies: With the confirmation of Dark Skies Reserve status for the national park, this draft policy has acquired greater weight. The current level of school activity is already polluting by dint of the excessive use of floodlighting.

SD11: Historic environment: Demolition of the coach house, which plays its part in the historic, listed assemblage at St Cuthmans and the setting of the main house, and its proposed replacement by undistinguished temporary buildings, is in conflict with the requirement to respect, protect and enhance this historic asset.

SD18: Transport and accessibility: The proposed increase in capacity at the school will generate increased traffic from pupils (the coaches), teaching and other staff, parents, deliveries and services along rural lanes quite unsuitable for the purpose, in conflict with point 1 and points 4 a and b of SD18.

### **Conclusion**

The application is in clear conflict with national and local planning policy and the provisions of the adopted statutory park management plan and should be **refused**.