

Planning Statement in support of a Full Planning Application

Land North of Lagnersh House
Lower Bognor Road
Lagness
Chichester
West Sussex
PO20 1LW

Change of use of land from agricultural to recreational use for the siting of 10 holiday lodges for seasonal use (1 March-30 September) with associated groundworks, landscaping including retention of earth bund.

On behalf of Mr Tony Castle

1.0 Introduction

- 1.1 This planning statement has been prepared in support of a full planning application for the change of use of land from agricultural to recreational use for the siting of 10 holiday lodges for seasonal use (1 March-30 September) with associated groundworks, landscaping including retention of earth bund, at Land North of Lagnersh House, Lower Bognor Road, Lagness, Chichester, West Sussex, PO20 1LW. The lodges would be static caravans for holiday use only.
- 1.2 The statement will consider the relevant local and national planning policies, together with the supporting documents, to justify the development in planning terms.

2.0 The Site

- 2.1 The application site comprises a predominantly grassed area of approximately 2.16 hectares extending north from Lagnersh House and accessed from the northern side of Lower Bognor Road. The site is largely flat and sits slightly lower than the road. It includes areas of hardstanding associated with the established access and with touring caravans from previous uses, together with a planted earth bund. The northern, western and eastern boundaries are defined by an established, species-rich native hedgerow with an associated bank and ditch, interspersed with semi-mature trees. The southern boundary is partly enclosed by fencing and landscaping and is open to access, and a Public Right of Way (PAG/133/2) runs along the western boundary.
- 2.2 To the immediate south of the site are four mobile homes in residential occupation and, beyond these, three dwellings. The surrounding character is rural, with arable farmland on all sides. Lagnersh House (a Grade II Listed Building, formerly the farmhouse of Stacker's Farm) lies to the south, together with its associated barn, granary and stable block/cart shed, which are considered to be curtilage listed, and the converted Lagnersh Barn is treated as a non-designated heritage asset. An aerial image of the site is shown below in **Figure 1**.



- 2.3 The site lies outside the Built-Up Area Boundary, in the open countryside, and within a designated Strategic Gap between settlements. It falls within Pagham Harbour Zone B (within 400m – 5km of the Pagham Harbour Special Protection Area and Ramsar Site) and is provisionally classified as Grade 1/2 agricultural land. It lies within the setting of the Grade II Listed Lagnersh Farmhouse and the curtilage-listed farmstead group, and is within an Archaeological Notification Area (ANA DWS8450 – Bronze Age to Roman settlement site, historic farmsteads and Royal Observer Corps features). Having reviewed the Environment Agency Flood Risk maps, the whole of the site lies within Flood Zone 1, with a low surface water flood risk, although the area is recorded as having high groundwater levels.

3.0 Planning Policy Framework

- 3.1 For this application, the only relevant local and national planning policies are those concerning the principle of development in the countryside, tourism and the rural economy, gaps between settlements, design and the character of the area, the historic environment and archaeology, highways and rights of way, residential amenity, light pollution, water supply, flooding and drainage, and biodiversity and ecology.
- 3.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that if regard is to be had to the Development Plan for any determination to be made under the Planning Acts, then that determination must be made in accordance with ‘the Plan’ unless material considerations indicate otherwise.

3.3 The Arun Local Plan 2011–2031 (adopted 18 July 2018)

The Development Plan comprises the Arun Local Plan 2011–2031 (adopted 18 July 2018), the West Sussex County Council Waste and Minerals Plans, the South Inshore and South Offshore Marine Plan, and any made Neighbourhood Development Plans. There is no Pagham Neighbourhood Plan to consider, the emerging plan having been withdrawn in September 2020. The policies of the Arun Local Plan of most relevance are:

C SP1 (Countryside) – permits development in the countryside in defined circumstances, including where it accords with other policies referring to a specific type of development.

SD SP3 (Gaps Between Settlements) – permits development that does not undermine the physical or visual separation of settlements or compromise the integrity of the gap.

TOU DM1 (Tourism related development) – supports small-scale holiday accommodation outside the BUAB relating to quiet, informal recreation and enjoyment of the countryside, where compatible and sensitively designed.

D DM1 (Aspects of form and design quality) and QE SP1 (Quality of the Environment) – require good design, the protection of character, and the avoidance of significant harm to amenity.

HER SP1 (The Historic Environment), HER DM1 (Listed Buildings) and HER DM6 (Archaeology) – protect designated and non-designated heritage assets, their settings, and sites of archaeological interest.

ENV DM1, ENV DM2 (Pagham Harbour) and ENV DM5 (Development and biodiversity) – protect designated sites and require development to achieve a net gain in biodiversity.

T SP1 and T DM1 (Transport / Sustainable Travel and PRow) – require safe access, appropriate parking and the protection of public rights of way.

SO DM1 (Soils) – resists development of Best and Most Versatile agricultural land unless the need outweighs the need to protect it.

QE DM2 (Light pollution), W DM1 (Water supply and quality) and W DM3 (Sustainable drainage) – control lighting impacts and require adequate water supply, foul drainage and sustainable surface water drainage.

3.4 The National Planning Policy Framework 2024 (NPPF)

The National Planning Policy Framework 2024 (NPPF) contains the Government's planning policies for England and is a material consideration. The most relevant policies are set out below.

Section 2 – Achieving sustainable development

Paragraphs 7 and 8 set out the objective of achieving sustainable development through the economic, social and environmental dimensions.

Paragraph 11 establishes the presumption in favour of sustainable development, which for decision-taking, means approving development that accords with an up-to-date development plan without delay.

Section 6 – Building a strong, competitive economy

Paragraph 88 requires planning decisions to enable the sustainable growth and expansion of all types of business in rural areas.

Paragraph 89 provides that planning decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside, including supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities. This provides clear national support for the proposal.

Section 9 – Promoting sustainable transport

Paragraph 115 requires, among other things, that safe and suitable access can be achieved for all users and that development allows for the efficient delivery of goods and access by service and emergency vehicles.

Section 12 – Achieving well-designed places

Paragraph 135 requires development to function well, be visually attractive, be sympathetic to local character and the landscape setting, and to provide a high standard of amenity for existing and future users.

Section 14 – Meeting the challenge of climate change, flooding and coastal change

The site lies wholly within Flood Zone 1, where development is directed in the first instance and where the sequential and exception tests are not engaged. The NPPF requires sustainable drainage to be incorporated as appropriate to the scale of development.

Section 15 – Conserving and enhancing the natural environment

Paragraph 187 requires planning decisions to contribute to and enhance the natural environment, to protect and recover priority habitats and species, and to pursue measurable net gains for biodiversity. Habitat sites such as the Pagham Harbour SPA are afforded the highest level of protection through the Conservation of Habitats and Species Regulations 2017 (as amended).

Section 16 – Conserving and enhancing the historic environment

Paragraph 212 sets out that great weight is to be given to the conservation of designated heritage assets and their settings.

Paragraph 215 sets out that where a proposal would lead to less than substantial harm to the significance of a designated heritage asset, that harm is to be weighed against the public benefits of the proposal.

Paragraph 216 sets out that the effect on the significance of a non-designated heritage asset is a matter of balanced judgement

3.5 Supplementary and National Guidance.

Other relevant documents include the Arun District Design Guide SPD (January 2021), the National Design Guide and national Planning Practice Guidance.

4.0 Proposal

- 4.1 Full planning permission is sought for the change of use of land from agricultural to recreational use for the siting of 10 holiday lodges for seasonal use (1 March-30 September) with associated groundworks, landscaping including retention of earth bund. The lodges would be used for holiday accommodation only and would not be occupied by any person as their sole or main place of residence; this can be secured by condition.
- 4.2 The lodges would be sited along the eastern part of the field and served by a permeable access drive with individual parking to each plot and a 16.7m turning area at the northern end, enabling vehicles to enter and leave the site in forward gear. Each lodge would have a relatively small/standard footprint, be of low-profile, single-storey appearance and finished in timber cladding. As static caravans, the lodges require no foundations and would sit on permeable surfacing. The remainder of the field would be retained as grass and wildflower meadow, with new native hedging defining the plots and a planted earth bund retained. Foul drainage would be directed to the existing klargester on the site, and surface water would discharge to a soakaway. The arrangement is shown on the Proposed Block Plan.
- 4.3 The principle of recreational/holiday use of the site is already established by the extant campsite permission under ref: P/27/24/PL. As set out below, the applicant offers to surrender that permission and to forgo permitted development holiday uses through the accompanying legal agreement and condition.

5.0 Planning Appraisal

Principle of Development

- 5.1 The site lies outside the Built-Up Area Boundary and is therefore within the countryside for the purposes of the Local Plan. Policy C SP1 permits development in the countryside where it accords with other policies referring to a specific type of development, and Policy TOU DM1 provides that holiday accommodation outside the BUAB can be acceptable where it is small in scale, relates to the quiet enjoyment of the countryside, and is sensitively designed. The proposal is small in scale (10 lodges within an existing, approved recreational site), is seasonal, provides tourist accommodation supporting enjoyment of the surrounding countryside, and is well screened and confined to one part of the field. It therefore accords with Policy TOU DM1 and, in turn, with Policy C SP1.
- 5.2 This is further reinforced at the national level by Section 6 of the NPPF, in particular paragraph 89, which requires planning decisions to enable sustainable rural tourism and leisure developments that respect the character of the countryside. The proposal directly responds to that objective.
- 5.3 The site is within a Strategic Gap, where Policy SD SP3 permits development that does not undermine the separation of settlements or compromise the integrity of the gap. The limited built form, confined to the eastern edge of the field and well screened by existing built form

and landscaping, would not affect the coalescence or perceived separation of settlements. There is no material conflict with Policy SD SP3.

- 5.4 The acceptability in principle of recreational/holiday use of the site is already established by the extant permission P/27/24/PL. The current proposal is considered to build upon that established principle, substituting a lower-density, better-landscaped and ecologically enhanced scheme for the more transient and potentially more intensive campsite use, which is to be surrendered and secured through a unilateral undertaking. On this basis, the principle of development is therefore acceptable as the proposal accords with the relevant local and national planning policies.

Agricultural Land

- 5.5 The Defra Agricultural Land Classification provisional dataset suggests the land is likely to fall within Grades 1 or 2 and constitutes Best and Most Versatile agricultural land. Policy SO DM1 resists the use of such land for non-agricultural development unless the need outweighs the need to protect it in the long term.
- 5.6 In this case, it is considered that the harm is very limited in terms of agricultural land. The land is not in agricultural production at present, given that it is heavily modified amenity grassland managed for caravan and tent pitches, assessed as being in poor ecological condition in the submitted Biodiversity Net Gain Assessment. Moreover, the Council's historical aerial photography (noted in the officer report for P/27/24/PL) shows no evidence of crop use at this site. The lodges, being static caravans, require no foundations and are removable. The development footprint is small, uses permeable surfacing, and the majority of the field is retained as grass and meadow, so the long-term capacity of the soil is not materially harmed. Set against this limited harm, the proposal delivers economic and tourism benefits, as evidenced under the previous application, where the Council's Economic Development officer supported small-scale tourist accommodation at this site and measurable biodiversity gains. Consistent with the Council's conclusion on P/27/24/PL and with appeal decisions such as Clays Farm, Yapton, any conflict with Policy SO DM1 is outweighed and would not provide a sustainable basis for refusal.

Highways, Parking and Public Rights of Way

- 5.7 Policy T SP1 requires safe access and appropriate parking, and Policy T DM1 protects public rights of way. Access would be taken from the existing point onto Lower Bognor Road. Under the previous application ref: P/27/24/PL, WSCC Highways did not object and recommended no conditions, noting no recorded accidents within five years at the junction, no apparent visibility concerns, that the intensification could be accommodated by the local highway network, and that there was sufficient space within the site for parking. There is no reason why the same conclusions cannot be drawn on this proposal, given the lesser number of recreational/holiday units in comparison.
- 5.8 The proposed 10 lodges would generate substantially fewer units than the extant campsite permission, which allows up to 50 tents, motorhomes and touring caravans at any one time,

and holiday lodge use typically involves longer stays and a lower frequency of vehicle movements than a high-turnover campsite. Individual parking is provided to each plot, with a 16.7m turning area allowing vehicles to enter and leave in forward gear. Public Right of Way PAG/133/2 runs along the western boundary, well away from the eastern lodge area, and would not be obstructed. The previous guidance provided by the WSCC Public Rights of Way team can be secured by informative. In this instance, there is no conflict with Policies T SP1 or T DM1.

Fire Access

- 5.9 Policy T SP1 and Policy D DM1 (applying the Arun Design Guide) require suitable access for emergency vehicles, reflecting paragraph 117 of the NPPF. Fire access was resolved on P/27/24/PL: on P/80/23/PL the WSCC Fire Officer visited the site and was satisfied that access could be achieved, with fire engines able to turn on site and leave in forward gear, subject to the provision of a water supply tank for firefighting. The proposal provides a hardened, maintainable access drive and a 16.7m turning area consistent with that assessment, and a condition requiring the provision and retention of a firefighting water supply tank can be imposed as agreed before. As such, there is no conflict with the relevant policies.

Landscape and Character

- 5.10 Policy D DM1 requires development to reflect or improve on the character of the area, and Policy TOU DM1 requires tourist development to be sensitively designed to minimise impact on the countryside.
- 5.11 The site is well contained by the retained perimeter hedgerow and trees on its northern, western and eastern boundaries. The lodges would be confined to the site's eastern edge, with the wider field retained as grass and wildflower meadow, and with new native hedging and a planted earth bund to be retained, providing further screening of the lodges and any associated domestic paraphernalia. The lodges are of relatively small footprint, low profile and single-storey appearance, timber-clad, and set on permeable surfacing with soft edges. As set out in the Design and Access Statement, the combination of scale, siting and dense existing and proposed vegetation means the lodges would not be readily visible from the public realm or in the context of the neighbouring heritage assets.
- 5.12 It is acknowledged that static lodges represent a more constant presence on the land than a transient campsite. However, the lodges are fewer in number than the up-to-50 units permitted by the extant permission and are confined to a single edge of the field rather than dispersed across it. When considered together with the comprehensive landscaping package and the surrender of the campsite use, the proposal would not cause significant harm to the character or appearance of the countryside, and accords with Policies D DM1, TOU DM1 and QE SP1.

Impact on Heritage Assets

- 5.13 Lagnersh Farmhouse is a Grade II Listed Building, located approximately 155m to the south. The associated barn, granary and stable block/cart shed are considered to be curtilage listed, and the converted Lagnersh Barn is a non-designated heritage asset. Policy HER SP1 affords these assets and their settings protection appropriate to their significance. Policy HER DM1 requires proposals to protect and, where possible, enhance the setting of Listed Buildings; and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the setting of a Listed Building.
- 5.14 The submitted Heritage Statement concludes that the proposal would preserve the setting and special interest of the listed and curtilage-listed buildings and would cause no harm to the non-designated heritage asset. The lodges would be screened by mature trees and dense hedging, would not be visible from or experienced in the context of the listed group, and would not alter the historic field pattern. This is consistent with the Council's position across the previous applications, including the Conservation Officer's advice that there would be no harm to the Grade II Listed house due to the distance involved, and the Council's conclusion that vehicle movements past Lagnersh Barn did not provide a sustainable basis for refusal.
- 5.15 No harm to the significance of any heritage asset is therefore identified, the statutory duty under Section 66(1) is satisfied, and there is no conflict with Policies HER SP1 or HER DM1. Insofar as any limited and/or less than substantial harm to setting was identified, the public benefits of the scheme, being the economic and tourism benefits, the biodiversity net gain, and the betterment achieved by the surrender of the campsite use, would clearly outweigh it for the purposes of paragraphs 215 and 216 of the NPPF.

Archaeology

- 5.16 The site lies within the red Archaeological Notification Area DWS8450, where there is potential for buried archaeological remains. Policy HER DM6 provides that permission will only be granted where it can be demonstrated that the development will not be harmful to the archaeological interest. The lodges are static caravans requiring no foundations, and groundworks would be limited to the access, parking and landscaping. The risk to any buried archaeology is therefore low and can be controlled by a condition requiring that any new groundworks below 300mm in depth be subject to observation by a qualified archaeologist, with any discoveries recorded and reported to the LPA, as imposed on P/27/24/PL. There is no conflict with Policy HER DM6

Impact on Living Conditions of Neighbours/Future Occupiers

- 5.17 Policy D DM1 requires minimal impact on the occupiers of nearby property. Policy QE SP1 requires that development not significantly harm residential amenity. Paragraph 135 of the NPPF requires a high standard of amenity.

- 5.18 The nearest residential properties lie at least 115m to the south, and the lodges would be set towards the eastern edge of the field. Given that separation and the intervening screening, the lodges themselves would give rise to no material concerns in terms of overlooking, overbearing impact or noise.
- 5.19 The principal amenity consideration, as on the previous applications, relates to the use of the shared access past Lagnersh Barn, where vehicle movements have been said to affect privacy and to give rise to noise and fumes. It is acknowledged that a seven-month lodge use could increase amenity impact relative to a 60-day campsite by reason of its longer season. That consideration must, however, be weighed against the following matters.
- 5.20 The proposal involves far fewer units (10 lodges) than the up-to-50 units permitted by the extant campsite, and the longer-stay nature of holiday lodge occupation is likely to reduce the frequency and peak intensity of vehicle movements relative to a high-turnover campsite
- 5.21 The accompanying legal agreement would secure the surrender of the campsite permission, removing the right to bring up to 50 tents, motorhomes and touring caravans onto the land for 60 consecutive days
- 5.22 The applicant accepts a condition removing permitted development rights so as to prevent other or further holiday uses of the land, providing certainty against intensification.
- 5.23 The access-related matters previously raised are bound up with land ownership and on-drive parking arrangements that are not capable of being controlled through the planning system.
- 5.24 Furthermore, a Noise Impact Assessment by Veas Acoustics has been carried out and submitted with this application, concluding as follows:

"A detailed environmental noise survey was undertaken over a seven-day period to characterise the baseline acoustic environment. The dominant noise sources were identified as road traffic on Lower Bognor Road, local wildlife, and sporadic vehicle movements on the site access road. The measured ambient sound levels represent a typical rural context with low to moderate background noise levels.

The assessment predicted that during the lawful 60-day camping period, vehicle access noise contributes to cumulative daytime and night-time noise levels of 55dB LAeq,16hr and 52 dB LAeq,8hr respectively at the nearest receptor. The proposed lodge use is predicted to reduce access-related noise by approximately 7 dB during this period, resulting in a cumulative noise level that is broadly consistent with, or lower than, the existing ambient environment. However, outside the camping season the cumulative noise levels would remain below those experienced during the lawful camping use.

Given the assessed noise climate and proposed operational scenario, no specific mitigation or operational controls beyond the existing site management are considered necessary. The reduction in vehicle movements during the key camping season relative to the lawful

permission, and the fact that increases outside this period remain below the highest baseline levels, support the conclusion that noise impact will not be materially worsened.

In summary, the proposed development is deemed acceptable from an acoustic perspective in the context of relevant national and local planning policy, including Arun District Council's requirements. The development does not give rise to significant adverse noise effects and will not materially diminish the amenity of nearby residents or future occupants, subject to compliance with the submitted operational assumptions."

- 5.25 Taken together, these material considerations, including the submitted NIA, and with the benefit of the legal agreement and conditions, the residual effect on neighbouring amenity is acceptable and would not provide a sustainable basis for refusal. Future occupiers of the lodges would enjoy a high standard of amenity, with generous, well-spaced plots and a rural outlook, and a condition restricting occupation to holiday use only would ensure the development does not become a permanent residential use. The proposal accords with Policies D DM1 and QE SP1 and with paragraph 135 of the NPPF.

Light Pollution

- 5.26 Policy QE DM2 provides that outdoor lighting should not adversely affect neighbouring uses or the wider landscape. No permanent external lighting is proposed. Any future lighting can be controlled by condition requiring prior approval of details designed in accordance with Institution of Lighting Professionals guidance (GN01) and Bat Conservation Trust (2023) guidance, as considered previously, a warm white spectrum below 2700K, no UV component, downward direction with no upward tilt, minimised column heights and short-timer motion sensors – protecting both residential amenity and the bat populations using the boundary habitats, and preserving the dark, rural character of the area. There is no conflict with Policy QE DM2

Water Supply

- 5.27 Policy W DM1 requires that development provide sufficient water supplies. The site has an existing supply, and the modest additional demand associated with 10 seasonal lodges can be met. Southern Water raised no objection on P/27/24/PL. There is no conflict with Policy W DM1.

Flooding and Surface Water Drainage

- 5.28 The whole of the site lies within Flood Zone 1 and is therefore at low risk of river and sea flooding. Surface water would be managed by soakaway, with permeable surfacing used for the access and parking areas, providing a sustainable drainage approach consistent with Policy W DM3.
- 5.29 It is recognised that, unlike the approved campsite, which involved no physical development, this proposal introduces lodges, hardstanding and access works in an area recorded as having high groundwater levels, and that the Lead Local Flood Authority (WSSCC) previously objected

to the campsite application in the absence of a Flood Risk Assessment and Drainage Strategy. A Flood Risk Assessment/Drainage Strategy by Ecological Initiatives has been submitted with this application for consultation with the Lead Local Flood Authority. It is anticipated that, upon receipt of their comments and any conditions required, the proposal would accord with Policy W DM3 and there would be no sustainable drainage objection.

Foul Drainage

- 5.30 Policy W DM1 requires that adequate foul drainage capacity exists or can be provided. Foul drainage from the lodges would be directed to the existing klargester package treatment plant on the site, and Southern Water raised no objection on P/27/24/PL. On that basis, provision for foul drainage has been made, and there is no conflict with Policy W DM1.

Biodiversity and Ecology

- 5.31 The Policies ENV DM1, ENV DM2 and ENV DM5, together with the Environment Act 2021, protect designated sites and habitats and require development to achieve a net gain in biodiversity. The application is supported by a Preliminary Ecological Assessment and a Biodiversity Net Gain Assessment.
- 5.32 The Preliminary Ecological Assessment confirms that there are no nationally designated statutory sites within 2km and that Pagham Harbour SPA and Ramsar Site lie approximately 3.8km to the south-west. The buildings on site offer negligible bat roost potential, while the perimeter hedgerow, ditch and trees offer high-value commuting and foraging habitat. The boundary features have the potential to support hazel dormouse and, in the case of the ditch network, water vole; the foot of the hedgerow and the ruderal areas have the potential to support slow worm and grass snake; and badger may forage on site, although no setts were found within 30m of the proposed pitch area. Great crested newt is not considered to be a constraint. The recommended avoidance and mitigation measures can be secured by condition.
- 5.33 The Biodiversity Net Gain Assessment, prepared using the Small Sites Statutory Biodiversity Metric, demonstrates that the scheme would deliver the required mandatory net gains in biodiversity.
- 5.34 In respect of the Pagham Harbour SPA and Ramsar Site, the site lies within Zone B and a Habitats Regulations Assessment will be required. The Preliminary Ecological Assessment concludes that, given the distance involved and the small predicted increase in local visitor numbers, there is no pathway to, or likely significant effect upon, the qualifying features. Recreational disturbance would in any event be mitigated through the accompanying legal agreement. With these measures secured, the proposal accords with Policies ENV DM1, ENV DM2 and ENV DM5 and delivers a measurable biodiversity benefit.

Planning Obligations and the Legal Agreement

- 5.35 The proposal is supported by a legal agreement, in the form of a Unilateral Undertaking, securing on implementation the surrender/rescinding of the extant campsite permission P/27/24/PL and the agreed Pagham Harbour mitigation. In addition, the applicant accepts a condition removing permitted development rights to prevent other or further holiday uses of the land. These obligations are central to the planning balance, as the surrender of P/27/24/PL removes the ability to operate a campsite of up to 50 transient units for 60 consecutive days, with its own visual and amenity effects, and replaces it with a smaller, fixed and comprehensively landscaped scheme, while the removal of permitted development holiday rights provides lasting certainty against intensification. The obligations are considered to meet the tests in the NPPF and the Community Infrastructure Levy Regulations, being necessary, directly related to the development, and fairly and reasonably related in scale and kind.

6.0 Conclusion

- 6.1 In conclusion, the principle of holiday/recreational use of this land is established by the extant permission and supported by Policies C SP1, TOU DM1 and SD SP3, and by the national support for sustainable rural tourism in Section 6 of the NPPF. The proposal preserves the setting and significance of the nearby heritage assets, satisfying the Section 66(1) duty and Policies HER SP1 and HER DM1, safeguards any buried archaeology by condition in accordance with Policy HER DM6, provides safe access, parking and fire access in accordance with Policies T SP1, T DM1 and D DM1, and protects the public right of way, and would not give rise to unacceptable harm to landscape character or to residential amenity, in accordance with Policies D DM1, QE SP1 and QE DM2.
- 6.2 Water supply, foul drainage and surface water drainage can be satisfactorily mitigated in accordance with Policies W DM1 and W DM3. The scheme delivers a biodiversity net gain in accordance with Policy ENV DM5 and the Environment Act 2021, with no adverse effect on the Pagham Harbour SPA. The limited conflict with Policy SO DM1, arising from the very modest and reversible use of land that is not in agricultural production, is clearly outweighed in this instance.
- 6.3 Several material considerations weigh firmly in favour of the grant of permission, namely the surrender of the more intensive and transient campsite permission, the removal of permitted development holiday rights and the certainty this provides, the measurable biodiversity net gain, the economic and tourism benefits supporting the rural economy, and the high-quality landscaping and screening. Where it might be considered that the lodge use marginally increases amenity impact relative to the campsite, that consideration is comfortably outweighed by this package of benefits and controls and by the betterment that the proposal secures.
- 6.4 It is considered that the proposal represents a sustainable form of development that accords with the development plan as a whole, and with the NPPF. It is therefore

respectfully requested that planning permission be granted, subject to the agreement of the submitted unilateral undertaking and any conditions recommended by the LPA.