

Greatham Parish Council: Response to planning application SDNP/21/04848/FUL

27th October 2021

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2 Introduction

2.1 Purpose of document

Greatham Parish Council **objects** to the planning application for the Liss Forest Nursery Site (ref: SDNP/21/04848/FUL) and sets out our objections in the sections below.

2.2 Summary

Greatham Parish Council does not object in principle to development on this site, which is consistent with SD71 of the South Downs Local Plan. We believe the development has the potential to be an outstanding development that enhances both Greatham and the South Downs National Park.

Whilst recognising that the revised planning application is an improvement on previous submissions, we believe that there are still elements that require improvement, and for those reasons we are objecting.

The reasons are laid out in the following sections of the document, but in summary, they are:

- **Consultation:** The process of consultation with the village has been inadequate both in quantity and quality of interaction. Most importantly, no action has been taken as a result of any comments from residents.
- **Density:** The density and overall number of houses proposed for the site is still too high based on settlement pattern and character of the village.
- **Amenities:** The number of houses proposed has a detrimental impact on related amenities of parking, traffic congestion, integration with the community, provision of open spaces and related hard standing, impact on the village hall and village school.

This is now the fourth submission by this developer on this site that we have commented on, and once again the community and the parish council have a sense of disappointment that an opportunity has been lost.

This is a once in a generation opportunity for Greatham and the South Downs to have a development of outstanding quality and design that integrates well with the community and provides a template for good design in Greatham and elsewhere. Unfortunately, this plan lacks sufficient ambition and still falls short of that aspiration.

2.3 Comparison of objections

The table below compares the principal areas of comment between our submissions in 2019, 2020, early in 2021 and now. We have added some comments on additional areas of concern in the application.

Objections	Objected to in January 2019	Objected to in January 2020	Objected to in December 2020	Objected to in October 2021
Affordable Housing	✓	✓	✓	✓
Amenities	✓			
Community Engagement	✓	✓	✓	✓
Community Integration	✓	✓	✓	✓
Construction	✓	✓	✓	
Contribution				✓
Density	✓	✓	✓	✓
Design	✓	✓	✓	✓
Developer Claims	✓			
Ecology				✓
Electric Vehicles	✓	✓		✓
Flood Risk	✓	✓	✓	✓

Goat Path	✓	✓		
Housing Ratios	✓			✓
Historical Settlement Pattern	✓	✓	✓	✓
Layout	✓			
Materials	✓	✓	✓	✓
Major Development NEW				✓
Open Spaces	✓		✓	
Parking	✓	✓	✓	✓
Pumping Station	✓			
Shop				✓
Sustainability	✓	✓	✓	✓
Traffic	✓	✓	✓	✓
Views	✓	✓	✓	✓

3 SD71: Part of the South Downs local plan

Within the South Downs Local Plan this site is referred to as SD71. It is shown as suitable for 35-40 houses and a shop. The current application is for 37 houses without a shop.

We have used the Local Plan to help us form our response. We believe that there are a number of ways in which the revised plan improves on the original plan, but there are still elements that require additional change. The improvements are:

1. The materials used in the application, for example red brick, red-tile hanging and ironstone, better reflect the character of Greatham.
2. The design of houses is more varied and includes features from around Greatham, helping to make the proposal more unique and characterful
3. The layout of the houses is less grid-like

However, there remain issues that we will go into in this document.

At this point of overview, the key issue we'd like to highlight is the lack of community engagement. There are a variety of aspects to the development, including:

- Community Integration
- Design
- Materials

that we feel are starting to be positive aspects of the proposed development.

However, we as a Parish Council are not in a position to discuss with residents, for example, how the various kinds of gable ends are appropriate to the character of Greatham. We strongly feel that this is something that should be picked up by the developer, perhaps in conjunction with the SDNPA, in public consultation.

We believe it is the job of the developer to 'win over' the community in these and many other aspects of the proposal.

Allocation Policy SD71: Land at Petersfield Road, Greatham

1. Land at Petersfield Road, Greatham is allocated for the development of 35 to 40 residential dwellings (Class C3 Use) and associated open space. Development for a Class A1 (Shop) unit with a net sales floorspace up to a maximum of 280m² with suitable vehicular parking for customers will also be permitted. Planning permission will not be granted for any other uses. Detailed proposals that meet the following site specific development requirements will be permitted:

2. The site specific development requirements are:

- a) Development proposals should provide clear transition in form and layout with a reduced build intensity from Petersfield Road east towards the open countryside;
- b) Development proposals should conserve and enhance the setting of local heritage assets including the Greatham Conservation Area and Local Listed Buildings and use local building materials to reinforce local distinctiveness (which may include sandstones);
- c) Provide suitable mitigation towards the Wealden Heaths SPA, which should be informed by a Project-level HRA;
- d) Provide suitable mitigation measures to avoid increases in localised surface water flooding; e) Demonstrate no significant harm to be caused to groundwater resources;
- f) Retain the existing vehicular access and, where identified as necessary to provide safe access and egress, improvements to both the vehicular access and to off-site highways;
- g) Provide a publicly accessible off-road pedestrian route from Petersfield Road to the existing PRow to the east of the allocation site; 214 SOUTH DOWNS LOCAL PLAN: ADOPTED 2 JULY 2019 (2014–33)
- h) Provision of a significant area of public open space within the site which provides for a transition between the development and the countryside; and
- i) Retain and enhance existing mature trees and site boundaries and new site boundaries appropriate to the local landscape.

3. In order for the development to have an overall positive impact on the ability of the natural environment to contribute to ecosystem services, development proposals must address the following: a) Protect and enhance trees within the site where possible, and where trees are lost, provide at least the equivalent in new tree planting on site. Trees on the site boundary should be retained and new tree planting should be undertaken; and b) New planting should be suitable for pollinating species

4 Objections

4.1 Affordable housing

We are glad to see this passage in the Planning Statement about the design of the affordable homes:

6.17 The affordable units are well integrated into the layout of the site forming two separate clusters that can be readily taken on by a Registered Provider yet are indistinguishable from the surrounding market dwellings and will be built to the same high quality thus meeting the requirements of paragraph 3 of Policy SD28.

However, the applicant also says in their Design & Access Statement:

Viability testing has established that to provide a policy compliant level of 50% affordable housing as part of the proposals would be unviable. A total of eight affordable housing units will be provided which will be for shared ownership. This means that 21.6% of the proposed dwellings will be affordable which is the maximum provision that can be viably delivered on site.

The applicant says they justify this position in a Financial Viability Statement, but this document is not on the Planning Portal. Greatham Parish Council are unable to see how this allocation of affordable housing is consistent with SD28.

In response we would like to quote the Decision Notice of the previous planning application:

It has not been satisfactorily demonstrated that the proposed development cannot deliver the provision of 50% on-site affordable housing. The proposals are therefore contrary to policy SD28 of the South Downs Local Plan 2019, the National Planning Policy Framework 2019, adopted Affordable Housing Supplementary Planning Document (2020), the English National Parks and the Broads: UK Government Vision and Circular 2010 and statutory duty of a National Park.

And Mark Barnett, Housing Development EHDC has commented on this application (19th October 2021):

Date: 19th October 2021
To: Richard Ferguson
From: David Lindsay
Proposal: Development of 37 dwellings (including affordable homes), alterations to existing access onto Petersfield Road, hard and soft landscaping, drainage and all other associated development works

Site Address: Liss Forest Nursery Petersfield Road Greatham Liss GU33 6HA

Case Number: SDNP/21/04848/FUL

The application makes provision for 8 affordable dwellings, comprising of 2no. 1 beds, 4 no. 2 beds and 2no. 3 beds. This falls short of the 50% affordable housing requirement confirmed in policy SD28 of the SDNPA Local Plan.

The tenure of all 8 of the affordable homes are proposed as shared ownership. This is not acceptable and does not comply with policy, where a minimum of 75% of the affordable provision must be an affordable rented tenure.

Below are the housing need figures for East Hampshire (taken from our Hampshire Home Choice housing register)

1 bed: 850

2 bed: 437

3 bed: 212

4 bed: 90

Total: 1589

Included within these figures are applicants who have a local connection with the parish of Greatham (live, work or have family there). Local connections will be assessed in a cascade manner: to include the needs of the relevant settlement; then the parish; and then the wider area including nearby settlements and parishes within the National Park, as necessary. This is to ensure that private funding can be secured to procure the affordable homes. The numbers of applicants with this local connection with Greatham is currently:

1 bed: 9

2 bed: 3

3 bed: 1

4 bed: 1

Total: 14

Although the local need is low, there remains a substantial need within the SDNP for affordable housing. The applicant has confirmed they are unable to meet the affordable housing policies outlined within SD28 and have provided a financial viability statement. Although I have not had sight of the statement, I would recommend the case officer instructs the District Valuer or a property consultant to scrutinise this to ensure affordable housing is maximised on the site.

The affordable homes are situated in two clusters in the northern area of the site. Due to the small number proposed, this is acceptable, however, If the applicant was to provide the policy number of affordable homes, then I would expect them to be dispersed throughout the site.

I have been unable to determine the size of the affordable homes, however, the expectation is for each dwelling to meet or exceed the Nationally Described Space Standards.

The application in its current form fails to meet the affordable housing policies set out in policy SD28. I object to this application and recommend the viability statement is scrutinised before finalising the affordable housing scheme.

Dave Lindsay
Housing Enabling Officer

4.2 Community engagement

This development will have a huge impact on the village of Greatham. It will increase the number of houses in the village by some 10%. Residents are greatly concerned that the development should be in keeping and integrate well with the village.

The developer says in the Design & Access Statement:

“SDNPA, Greatham Parish Council, Neighbours and all other statutory consultees have been thoroughly consulted throughout this extensive process of design-review-design. Through these consultations and various redesigns, these finalised proposals address all the issues raised.

The Parish Council and residents in Greatham have not been consulted on this application, nor does this proposal address all the issues we have raised to date.

The last interaction with the developer was a presentation to the Parish Council during a council meeting in December 2020, which failed to answer many of our questions. It was also a Zoom meeting (due to Covid 19 restrictions) and, as such, only 10 members of the public attended.

Prior to that was a public exhibition on July 17th 2018, which was for a very different application with 50 houses.

Greatham residents rely on us as a Parish Council to help guide them through large and complex planning applications. This is a large planning application for the village, and we would like to have seen a public consultation allowing residents the opportunity to view the plans in detail before having to submit comments. The timescales allowed in this instance have been very short.

On a positive note, we feel that with regard to design and materials the proposal is starting to reflect the character of Greatham. As such, rather than the Parish Council discussing with residents about whether a kind of gable is or isn't in the style of Greatham, we'd like to suggest the next step is for the developer to hold a proper public consultation to gather feedback on the new designs.

During this consultation, the idea of a 'community hub' could be explored - a building specially designed to serve the community through various uses: cafe, shop, library etc., rather than a shop with limited means of generating revenue and designed as two houses.

4.3 Community integration

As discussed in the section on Community Engagement, we feel the design of the proposal has improved and that the next step should be for the developer to do a public consultation to explain how the proposal integrates with the rest of the community.

We do remain concerned that having a management company look after so much of the site, in particular the unadopted roads and public areas, will make the residents feel like they are living in a separate and cut-off area of the village, rather than be included in it. A potential solution to this will be discussed in the section on Open Spaces.

4.4 Construction

We are glad to see a Construction Plan referenced in the Planning Statement:

- “A Construction Environmental Management Plan (CEMP), secured via planning condition, will expand on the impact avoidance and mitigation measures including the use of tree protection fencing during works around site boundaries in order to prevent accidental damage to boundary habitats. The CEMP will also set out specific actions to protect any bats on the site including directing lighting away from roost access points and avoiding construction outside of daylight hours.

As discussed in previous responses, we request that construction vehicles are not permitted to drive through the village at school drop-off and pick-up times.

We would also ask that work on site is limited so as not to cause noise annoyance during evenings/weekends to neighbouring properties.

Construction vehicles should not use the Village Hall car park for parking as this car park is used extensively by school parents and users of the village hall and recreation ground.

4.5 Contribution

The decision notice for the previous application included as a reason for rejection (bolding ours):

4. In the absence of a completed S106 Legal Agreement to secure the following:
- o Measures to secure the public open space requirements of the development;
 - o An on-site affordable housing contribution of 50% of dwellings;
 - o Financial contribution and measures to support sustainable modes of transport.**
 - o A permissive path between Petersfield Road and the eastern site boundary for improved accessibility to the adjacent Public Right of Way.

The proposals fail to mitigate against its direct impacts and does not satisfy policies SD1, SD19, SD20, SD28 and SD71 of the South Downs Local Plan 2019, National Park Purposes and statutory duty of a National Park.

We object to this planning application as it does not include a completed S106 Legal Agreement.

The developer has not proposed financial contributions towards village amenities, such as footpaths, in order to mitigate the effects of 37 new houses in Greatham.

We note that Hampshire County Council's Economy Transport and environment Department have commented that a condition of the application should be:

Section 106

-£75000 toward multi-modal access to Liss Rail Station and improvements to bus infrastructure and routes to existing provision

Greatham Parish council would propose that this funding is used to improve off-road walking and cycling routes to our nearest amenities and transport links in Liss. This could take the form of a new cycleway/bridleway linking footpath G10 directly from the back of the site with bridleway G11 where it crosses the A3. This would provide a much more direct off-road route to Liss which avoids the dangers of the Ham Barn roundabout or Forest Road and would improve amenity for all villagers.

We would like to see the redevelopment of the road access to the site include an improved crossing point to access the village hall more safely when approaching from the North of the village. The crossing is currently very informal and quite dangerous with poor visibility of approaching cars for pedestrians. The additional traffic from the site will make the situation worse.

4.6 Density

Whilst we recognise that the number of houses in the application represents a reduction, there are still issues that reducing numbers further would alleviate:

- Residents would be able to have side-by-side parking next to their own home. This would reduce neighbourly disputes, negate the need to park on the road and free up visitor parking. It would help prevent parking from spilling over into Petersfield Road or the village hall car park
- Less hardstanding and more softscaping which would also alleviate water management pressures
- A more integrated community
- Less pressure on local wildlife and ecosystems such as the Wealden Heaths special protection area.
- Less pressure on a heavily trafficked area of Petersfield Road
- Reduce the number of people travelling out of the village to access amenities that are not present in the village.
- Better provision of green spaces between houses which is a common feature in Greatham.

We are particularly concerned about the density of the North-East quadrant of the proposal. Garden plots and parking provision in this area seem particularly problematic and we believe that this will cause real difficulties for residents of that part of the development.

4.7 Design

We are glad that the design of houses is starting to better reflect the character of Greatham. We now ask that the developer conducts a public consultation to put their reasoning for the design and materials of the site to residents in order to get feedback from the people who live in the village.

To aid this process we would like to see photographs of the style of houses proposed in situ. We have not seen sight lines or schematics of roof lines.

Strategic Policy SD5: Design

1. Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area. The following design principles should be adopted as appropriate:

- a) Integrate with, respect and sympathetically complement the landscape character by ensuring development proposals are demonstrably informed by an assessment of the landscape context;
- b) Achieve effective and high quality routes for people and wildlife, taking opportunities to connect green infrastructure;
- c) **Contribute to local distinctiveness and sense of place through its relationship to adjoining buildings, spaces and landscape features, including historic settlement pattern.**
- d) Create high-quality, clearly defined public and private spaces within the public realm;
- e) Incorporate hard and soft landscape treatment which takes opportunities to connect to the wider landscape, enhances green infrastructure, and is consistent with local character;
- f) **Utilise architectural design which is appropriate and sympathetic to its setting** in terms of height, massing, density, roof form, materials, night and day visibility, elevational and, where relevant, vernacular detailing;
- g) Provide high quality, secure, accessible, and where possible, integrated storage for general and recycling waste, heating fuel, and transport related equipment;
- h) Provide high quality outdoor amenity space appropriate to the needs of its occupiers or users;
- i) Ensure development proposals are durable, sustainable and adaptable over time, and provide sufficient internal space to meet the needs of a range of users;
- j) Give regard to improving safety and perceptions of safety, and be inclusive and accessible for all; and
- k) Have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.

4.8 Ecology

The applicant explains in their Planning Statement why they haven't done a Habitat Regulations Assessment:

6.31 There are three nearby ecological sites of international importance including the Wealden Heaths Phase II SPA. These sites have been identified as being vulnerable to increases in recreational pressure created from additional housing construction. This includes recreational disturbance from any future occupiers who may own a dog and may potentially exercise their dog around these ecologically important sites. There would also be additional pressure from any extra noise and light generated during the construction phase. There is also the potential that future occupiers may own cats which increase predation on local wildlife populations.

6.32 These pressures will need to be mitigated. The proposed development will therefore need to provide impact avoidance either in the form of Suitable Alternative Natural Greenspace (SANG), Strategic Access Management and Monitoring (SAMM) or Wealden Heaths Infrastructure Project (WHIP). The Applicants are aware that the SDNPA would have been required to demonstrate that these pressures could be mitigated during the Plan-making stage and the allocation of this site so they welcome the SDNPA's clarification as to how it expects this to occur. This is particularly the case given that for the previously refused scheme, during the determination process the Case Officer had suggested a mitigation scheme would be available but never went onto provide confirmation of SDNPA's approach to this matter.

6.33 Once this is confirmed by the SDNPA and a solution is formally agreed then a full Habitats Regulations Assessment (HRA) will be prepared.

6.34 Once the agreed solution has been implemented there should be no net increase in recreational pressure on the Wealden Heaths Phase II SPA and consequently no adverse effect on the integrity of any internationally designated site, either from the proposed development or in combination with other proposals. Consequently, the proposed development would comply with Policy SD10.

While the decision on the previous application stated:

The application site is within the proximity of important designated ecological areas of the Wealden Heaths Phase II Special Protection Area (SPA) and the Woolmer Forest Special Area of Conservation (SAC). Having regard to the Local Planning Authority's statutory duties under The Conservation of Habitats and Species Regulations 2017 (as amended), the proposed development would result in a net increase in residential accommodation and consequently a likely significant effect would occur upon these designated areas due to increased recreational pressures. In the absence of suitable mitigation measures being secured, the proposals are contrary to policies SD1, SD10 and SD71 of the South Downs Local Plan 2019, the National Planning Policy Framework 2019 and the First Purpose of a National Park, and The Conservation of Habitats and Species Regulations 2017 (as amended).

We therefore object to this proposal because it hasn't provided either a Habitats Assessment or suitable mitigation measures.

4.9 Electric vehicles

Many countries have announced that they will be banning the sale of internal combustion engines in the upcoming decades. In the near future it is likely that many people in this country will predominantly be using electric cars. The take up of electric cars is strongly influenced by the provision of suitable places to charge them.

For this reason, we believe it is essential that there is at least one electric car charging point per household directly connected to the domestic electricity supply rather than a 3rd party charging service.

The applicant says that there will be an electric charging point per house where possible which we believe lacks ambition and should not be accepted by the planning authority. Viability is impacted when the parking space is separated by a considerable distance from the home it belongs to. The parking layout should be adjusted to reflect this.

This is another argument for a lower density of housing on the site, to allow parking next to homes, which would be a positive in other regards and would also allow charging points at every household.

SD48: Climate Change and Sustainable Use of Resources

1. The Authority will encourage all new development to incorporate sustainable design features, as appropriate to the scale and type of development.

2. All development proposals will be required to achieve the minimum standards as set out below unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable:

Residential:

- i. Energy efficiency: 19% carbon dioxide reduction improvement against Part L (2013)93 through the energy efficiency of the building and;
- ii. Water: Total mains Consumption of no more than 110 litres per person per day.

Non-Residential and Multi-residential

- i. Major: BREEAM Excellent

3. All development proposals, including retrofitting, will be required to demonstrate, proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.

4. Major development proposals should also include an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site.

4.10 Flood risk

The amount of hardstanding on the site has been reduced but is still significant.

We very much encourage the SDNPA to make sure drainage on this site is sufficient so that it will not cause additional problems to surrounding residents who already encounter flooding problems.

In accordance with SD49, item 3, the body responsible for maintenance in perpetuity should be identified.

SD49: Flood Risk Management

1. Development proposals will be permitted that seek to reduce the impact and extent of all types of flooding through:

a) Steering development away from areas of flood risk as identified by the Environment Agency and the Strategic Flood Risk Assessment and directing development to Flood Zone 1, wherever possible. Development in areas of flood risk will, where relevant, be required to meet the national Sequential and Exception tests;

b) Not increasing the risk of flooding elsewhere and, wherever possible, reducing overall flood risk;

c) Flood protection, mitigation and adaptation measures necessary and appropriate to the specific requirements of the proposal, the development site and other areas potentially impacted; and

d) Ensuring that the integrity of coastal and river flood defences are not undermined.

2. Development proposals should, where required by national policy and guidance, be accompanied by a site specific Flood Risk Assessment (FRA).

3. Proposed flood protection, mitigation and adaptation measures should be supported with a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance in perpetuity.

SD50: Sustainable Drainage Systems

1. Development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change.

2. Proposals for major development* will be permitted where they provide suitable sustainable drainage systems, unless it is demonstrated to be inappropriate. All other development proposals must provide give priority to the use of suitable sustainable drainage systems where required by the Lead Local Flood Authority (LLFA).

3. Sustainable drainage systems, where feasible, must support the provision of open space, public amenity areas and enhancing biodiversity and other public benefits as appropriate.

4. Where sustainable drainage systems are provided, arrangements must be put in place for their whole life management and maintenance.

* major development as defined in the Town and Country Planning (Development Procedure) (England) Order 2015.

4.11 Goat path

There is a steep grass slope between the boundary of the site and Petersfield Road. Part way up the slope is a 'goat path' enjoyed by generations of Greatham children walking to and from school. The slope has many primroses, which are a joy in spring and residents have recently seeded it with a wide array of wildflowers.

We want to highlight these features to make sure they are preserved.

4.12 Housing ratio

The applicant says in the Planning Statement (bolding ours):

In order to meet National Park Purpose 1, the layout of the site has been guided by a landscape-led approach which necessitates a clear reduction in density and built form across the site between Petersfield Road and the countryside edge. **To achieve this larger, more-spaced out dwellings are used towards the eastern part of the site and the countryside edge hence there are a greater number of 4 and 5 bedroom properties that would normally be expected under Policy SD27.** However, in line with Policy SD27 there remains a focus on delivering 2 and 3 bedroom units. Delivery of some smaller 1 bedroom units as well as the aforementioned 4 and 5 bedroom units will ensure there is diversity in the mix of properties available from the proposed development and that an inclusive and varied community is delivered. **Such management of the housing mix, necessitated by the landscape-led approach, was also taken in the previously refused scheme and had been accepted by the Case Officer, hence housing mix was not identified as a reason for refusal on that application. It is therefore considered appropriate to continue with such a housing mix in this new application.**

This says that the Case Officer was happy with the previous housing ratio in order to achieve a landscape-design.

We would like to highlight this reasoning to the Case Officer again in this application.

4.13 Historical settlement pattern

In our response to the previous application we said:

- This application is a significant improvement on the previous version, but we would like to see further enhancements to the frontage with Petersfield Road.
- The layout of this proposal is very evenly distributed, whereas the historical settlement pattern for Greatham is much more 'lumpy'. An increased strong frontage to Petersfield Road and varying the density away from the road would help with this.

As with our comments on design, we are glad the layout and frontage to Petersfield Road is starting to reflect the character of Greatham (we recognise the layout is based on a suggestion by the SDNPA).

However, we don't feel the developer has gone back to the drawing board in terms of layout. The planning officer previously suggested they should do this.

We now ask that the developer do a public consultation to put their reasoning to residents, to get feedback from the people who live in the village.

Strategic Policy SD4: Landscape Character

1. Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:
 - a) They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
 - b) The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape;
 - c) They will safeguard the experiential and amenity qualities of the landscape;
 - d) Where planting is considered appropriate, it is consistent with local character, enhances biodiversity, contributes to the delivery of green infrastructure and uses native species, unless there are appropriate and justified reasons to select non-native species; and
2. Where development proposals are within designed landscapes, or the setting of designed landscapes, (including historic parkscapes and those on the Historic England Register of Historic Parks and Gardens) they should be based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.
- 3. The settlement pattern and individual identity of settlements and the integrity of predominantly open and undeveloped land between settlements will not be undermined.**
4. Green and blue corridors will be safeguarded. Development proposals should identify and take opportunities to create and connect green and blue corridors.
5. The restoration of landscapes where either natural or cultural heritage features have been lost or degraded will be supported where it contributes positively to landscape character.

4.14 Materials

The Materials and Appearance section of the Design & Access Statement says:

The architectural vernacular draws from Greatham and adjacent settlements combining their elements of style with locally evident forms. This approach being supported by the SDNPA Officers.

Building forms vary significantly throughout the site. While being of comparable footprint, the varied use of Barn Hip, hipped, gable ended, gable projections, gables over windows, dropped eaves and double gable fronts, along with varied fenestration, porch style and material use, ensures each building has a uniqueness along the street.

Window styles are a variety of larger and smaller types with varied use of glazing bars.

Porches are of hipped, lean-to and open gable fronted forms, largely supported on posts, with a significant use of trelliswork Bay windows have similar roof variations. Exposed timbers to gable fronts, scalloped and simpler bargeboards are applied.

Façade details vary, with plinth level and window cill level string courses, quoin work and brick cills. Each building now has at least one Chimney, with some larger properties having external chimney stacks.

Red brick is the most utilised material. Prominent buildings are finished in light painted brick or render, with focal buildings having ironstone facades with red brick quoining. The upper parts of some gables are finished in tile hanging with significant use of club tiles. Roofs to dwellings and garages are proposed to be red tile or slate tile, with green roofs to some car ports.

We appreciate the improvement this has brought to the development, and the mix of ironstone, red brick and white painted brick is reflective of the character of Greatham.

However, the Design & Access Statement says:

The final selection of building materials / hard & soft landscape specification will be secured by condition.

We would like to see samples before any approval is granted. For example, the red brick in the colour illustrations looks attractive, but is only described as 'red brick', leaving open the potential for the final house to look very different.

We are concerned to see some references to the use of PVCu windows and doors which we do not feel are appropriate for use in new developments in the National Park as they are not traditional, in-keeping or sustainable.

There are only five green roofs on carport roofs. We feel this is a token gesture.

4.15 Major development

The site has been classified as a major development by the SDNPA and therefore is subject to the requirements of core policy SD3. (Bolding ours)

Core Policy SD3: Major Development

In determining what constitutes major development the National Park Authority will consider whether the development, including temporary events should they be deemed to constitute development, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park. The potential for significant adverse impact on the National Park will include the consideration of both the impact of cumulative development and the individual characteristics of each proposal and its context.

Planning permission will be refused for major developments in the National Park 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.

If it is considered that exceptional circumstances exist and development would be in the public interest, **all opportunities to conserve and enhance the special qualities** should be sought. Development proposals should be sustainable as measured against the following factors:

- **Zero Carbon**
- **Zero Waste**
- **Sustainable Transport**
- **Sustainable Materials**
- **Sustainable Water**
- **Land Use and Wildlife**
- **Culture and Community**
- **Health and Wellbeing**

GPC are wholly in support of the bulleted list in SD3 but we feel that the designs as currently presented do the absolute minimum possible to address these points rather than taking “all opportunities to conserve and enhance the special qualities,” of the National Park.

4.16 Open spaces

1) The open space neighbouring Petersfield Road could be a space for small informal play equipment or street furniture and we would encourage the use of this area in this way. To quote the developer from the Q&A between the developer and Parish Council on December 20th:

Greatham Parish Council: There is a green space north of the bell mouth junction and this could be an opportunity to open up the front of the site. The plans show informal play equipment in this area and we believe this area is really important in terms of placemaking.

Developer: This area is deemed as green space but there are constraints due to trees in this area. There is not a lot of space for play equipment but there is space for a bench or similar. Landscape drawings still need to be submitted but street furniture would probably be allowed. Standard practice is for landscape features to be a condition of planning so it is normal for these plans to be discussed later in the application process.

We would like the developer, through consultation, to make this area more interesting and inviting, into more a 'place' in Greatham, than by doing more than adding just a bench. Its proximity to the school means that informal play equipment such as boulders or logs would be well used.

2) Regarding the north-eastern boundary of the site, the Site Location & Designations document says:

A landscape gap of 2m shall be retained between the rear of existing housing at Bakers Field and the boundary of new housing. The buffer shall soften views of new housing from existing dwellings.

The existing boundary hedgerow shall be retained and supplemented with new tree planting where necessary. The area shall be maintained by a management company in common with other areas of public open space. A fence shall demarcate this area with the rear gardens of new dwellings.

We would like assurances that the gap between the development and the rear of Bakers Field properties will be planted with native planting, and not, for example, laurel.

We would also like to raise the issue of the gap with Bakers Field as something for the SDNPA to consider as we are not clear of its purpose.

3) We are concerned that the new residents will have to pay for the upkeep of the open space in perpetuity, and the effect this arrangement would have on the village. We would like to have a discussion regarding its ownership and maintenance before permission is granted. The Parish Council wish to be consulted on whether they or the District Council could take ownership of these parts of the site, in order to include them in a joined up policy regarding the whole village.

4) And, two additional points from the decision to reject the previous application (bolding ours):

4. In the absence of a completed S106 Legal Agreement to secure the following:

- o Measures to secure the public open space requirements of the development;**
- o An on-site affordable housing contribution of 50% of dwellings;
- o Financial contribution and measures to support sustainable modes of transport.
- o A permissive path between Petersfield Road and the eastern site boundary for improved accessibility to the adjacent Public Right of Way.**

The proposals fail to mitigate against its direct impacts and does not satisfy policies SD1, SD19, SD20, SD28 and SD71 of the South Downs Local Plan 2019, National Park Purposes and statutory duty of a National Park.

4.17 Parking

The majority of the parking is still inline, there are few visitor parking places and the roads are narrower than the previous application, which may cause displacement parking on Petersfield Road or the Village Hall car park which we are keen to avoid.

There are 8 visitor spaces and 3 unallocated spaces for 37 houses.

In the entire north-east half of the site, where the majority of the housing is, there are 3 visitor parking spaces and 1 unallocated space.

At our meeting with the developer in December 2020, when asked about the very likely parking on the road that would result from this combination of factors (in a design very similar to this one), the developer said that residents would 'police' each other to make sure they didn't block the road. We believe this strategy to be a risk and would prefer to see a well developed parking strategy for the site with sufficient visitor parking.

The reason given by the developer for inline parking was that one of the requirements of the South Downs National Park was to minimise the frontage of the houses being dominated by cars.

However, the parking SPD adopted by the SDNPA says (bolding ours):

SDNPA Planning SPD

https://www.southdowns.gov.uk/wp-content/uploads/2021/04/Appendix-2_Parking-SPD_Accessible.pdf

3.8 The following are points that need to be considered when designing a scheme to meet the requirements of SDLP policy SD5. The design should also take into account the guidance in all the Supplementary Planning Documents (SPDs) and Technical Advice Notes (TANs), in particular the forthcoming Design SPD and the Dark Night Skies TAN:

- All parking design to be landscape led with layouts and materials responding to the landscape character of the place.
- All parking provision should be durable, sustainable and adaptable over time to meet the needs of a range of users.
- Car parking should be well integrated and the result must not be a public realm dominated by cars, hard standing and associated clutter.
- Car parking areas and cycle parking should maximise opportunities for enhancing green infrastructure and sustainable drainage.
- **Development layouts and detailed design should minimise the opportunities for anti-social car parking on pavements and green spaces.**
- **Layouts should avoid the use of “tandem parking” in providing spaces at a development**
- All residential parking should be safe, accessible for all and overlooked with good natural surveillance from nearby buildings and the public realm.
- Natural surveillance within and without, should not be obscured by planting within the parking area or at the periphery.

- To facilitate natural surveillance during the hours of darkness the lighting of parking areas should follow all the relevant technical guidance.
- Where appropriate, access/egress to parking areas should be regulated with a single point of entry/exit, and to that end, depending on the site characteristics, enclosed within a robust boundary treatment between 1m and 1.8m high.
- Cycle storage for residents and users of non-residential buildings should be safe and convenient to use, secure and sheltered from the elements with good natural surveillance from the nearby buildings and the public realm.
- Wherever possible, cycle parking for residential development should be within the curtilage of the dwelling

Likewise, the reason given by the developer for narrow roads was that it was a requirement of the South Downs National Park in order to make a place feel rural.

We struggle to believe it is the recommendation of the South Downs National Park that to minimise the impact of the car in large rural developments, the majority of parking should be inline and the roads be narrow, when the effect is bound to be the opposite - the car will dominate because there will be so many parked alongside and clogging up the central arterial road.

We would like to repeat our points from our previous comment:

- Greatham has poor public transport links so the majority of houses on this site are likely to have two cars. Parking provisions are very poorly designed in this application and will result in cars parking in the road.
- Reasons why cars will park in the road:
- Inline parking is incredibly frustrating with families who are constantly on the go.
- Homes that have visitor parking next to their homes will use it to avoid blocking in their spouse so visitors will be forced to park in the road.
- Parking spaces are distanced from some houses, so residents are likely to park in the road outside their home.
- There are 8 visitor spaces and 3 unallocated spaces for 37 houses. This is insufficient.

The effect of cars parking in the road:

- Difficulty of access and manoeuvring for residents and visitors
- Emergency services and large goods vehicles may not be able to get access
- Parking may overflow to Petersfield Road, causing traffic problems
- Parking may overflow to the neighbouring Village Hall car park, which is already being used by parents from the school as an overflow car park. If the Village Hall car park is used in this way, it will directly and negatively impact the amenity of the village.

We are also concerned about the use of inline parking in the cul-de-sacs on site, and how difficult that may make parking in those areas.

As a Parish Council we started with the belief, and we have come back to the belief, that the original assessment of the site, when the SDNPA said there could be 35-40 houses on the site is simply too many. We want good quality development in Greatham and we look forward to houses on this site, but time and again we find lines have been crossed in trying to make this number of houses work.

SD22: Parking Provision

1. Development proposals for new, extended or re-located public parking will be permitted provided that they are located in or adjacent to the settlements listed in Policy SD25:

Development Strategy, or have a strong functional link to an established cultural heritage, wildlife or landscape visitor attraction, provided that:

- a) There is evidence that overriding traffic management or recreation management benefits can be achieved; and
- b) It is a component of a strategic traffic management scheme which gives precedence to sustainable transport; and
- c) The site is close to and easily accessible from main roads by appropriate routes, and well connected to the Public Rights of Way network.

2. Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the relevant adopted parking standards for the locality. Wherever feasible, electric vehicle charging facilities must also be provided.

3. All new private and public parking provision will:

- a) Be of a location, scale and design that reflects its context;
- b) Incorporate appropriate sustainable drainage systems.

4. All new public parking provision will comply with the following:

- a) **Wherever feasible, electric vehicle charging facilities must be provided.** Where located with potential for onward travel by mobility scooter, this should include charging facilities for such scooters;
- b) Where located with good accessibility to the bridleway network, include provision for horse box parking.

4.18 Shop

Greatham Parish Council has not previously objected strongly to the lack of a shop in this proposal however it is something residents often talk to us about and which was also discussed in the SDNPA planning committee's review of the previous application. We therefore feel it is important to explain our reasoning.

To be clear: the village would like a successful and sustainable shop, community hub or cafe but it must have the best possible chance of succeeding as a business.

Previous iterations of the application have included a shop but its' design was markedly similar to surrounding semi-detached housing. The Parish Council felt that embracing a shop of that design would lead to a business set up to fail so that it could be converted into two more houses in a development which we already felt had too high a density.

As a Parish Council our primary concern is for the success of such a business. We do not want to see another failed shop in the village and are concerned that a half-hearted venture would result in such a failure. Therefore, we would like the developer to show us:

- Details of a business plan for a commercial venture that ensure its success. This could include measures such as a peppercorn rent with the site management company taking a percentage of profits in place of rent.
- A custom-designed building that looks appropriate to its nature and surroundings and has a frontage to the road to encourage passing trade.
- Excellent parking

This should be done in public consultation taking into account feedback from residents. The sites proximity to the school and the very high level of foot traffic at school drop off and pickup times make this one of the best locations in the village for a shop. If combined properly with other draws such as informal play equipment, green space and outdoor seating a business could be made to work here.

We have come to believe that it is the developer's responsibility, according to SD71, to pick up the idea of a shop on the site with enthusiasm.

4.19 Sustainability

The development proposals do now contain a considered energy and sustainability statement which we welcome. However, rather than seeking to do everything possible to reduce the lifetime environmental impact of buildings which may occupy the site for hundreds of years its main purpose seems to be to show the minimum possible amount that can be done to satisfy current regulations (which may well become more stringent before this development is built). GPC regard this as an opportunity missed and hugely lacking in ambition.

We strongly urge the SDNPA to insist on better.

With a looming ban on new gas boilers GPC believe that this development should be 100% fossil fuel free. It should seek to incorporate the maximum possible amount of solar PV generation rather than a bare minimum. All opportunities to super-insulate homes should be taken and GPC would welcome at least a proportion of homes being built to passive haus standards.

Waste water heat recovery should be included to further improve the SAP score and save more energy.

We would also like to see rainwater capture for house usage (toilet flushing etc.) for the purposes of sustainability and to help with 'not increasing the risk of flooding elsewhere' as mentioned in SD49 and to prevent a 'net increase in surface water run-off' in SD50.

The following policies are relevant:

SD2: Ecosystem Services

1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:
 - a) Sustainably manage land and water environments;
 - b) Protect and provide more, better and joined up natural habitats;
 - c) Conserve water resources and improve water quality;
 - d) Manage and mitigate the risk of flooding;
 - e) Improve the National Park's resilience to, and mitigation of, climate change;** f) Increase the ability to store carbon through new planting or other means;
 - g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land;
 - h) Support the sustainable production and use of food, forestry and raw materials;
 - i) Reduce levels of pollution;**
 - j) Improve opportunities for peoples' health and wellbeing; and
 - k) Provide opportunities for access to the natural and cultural resources which contribute to the special qualities.

Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services.

SD51: Renewable Energy

1. Development proposals for renewable energy schemes, except those specifically addressed in criterion 2, that contribute towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park will be permitted

where it is demonstrated through suitable site specific analysis that the proposal:

- a) Makes provision for the removal of the facilities and reinstatement of the site, should it cease to be operational;
- b) Ensures existing public access is not impeded; and
- c) Does not result in the loss in use of Grades 1, 2 or 3a agricultural land. 2.

Development proposals for small-scale individual wind turbines and freestanding solar arrays serving individual properties or small groups of properties will be permitted

where: a) They are suitably sited and screened and clearly associated with the buildings or properties that they are intended to serve;

b) They are appropriate in scale to the property being served; and

c) There is no unacceptable adverse impact on local amenity or conflict with public safety.

SD49: Flood Risk Management

1. Development proposals will be permitted that seek to reduce the impact and extent of all types of flooding through:

a) Steering development away from areas of flood risk as identified by the Environment Agency and the Strategic Flood Risk Assessment and directing development to Flood Zone 1, wherever possible. Development in areas of flood risk will, where relevant, be required to meet the national Sequential and Exception tests;

b) Not increasing the risk of flooding elsewhere and, wherever possible, reducing overall flood risk;

c) Flood protection, mitigation and adaptation measures necessary and appropriate to the specific requirements of the proposal, the development site and other areas potentially impacted; and

d) Ensuring that the integrity of coastal and river flood defences are not undermined.

2. Development proposals should, where required by national policy and guidance, be accompanied by a site specific Flood Risk Assessment (FRA).

3. Proposed flood protection, mitigation and adaptation measures should be supported with a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance in perpetuity

SD50: Sustainable Drainage Systems

1. Development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change. 2. Proposals for major development* will be permitted where they provide suitable sustainable drainage systems, unless it is demonstrated to be inappropriate. All other development proposals must provide give priority to the use of suitable sustainable drainage systems where required by the Lead Local Flood Authority (LLFA). 3. Sustainable drainage systems, where feasible, must support the provision of open space, public amenity areas and enhancing biodiversity and other public benefits as appropriate. 4. Where sustainable drainage systems are provided, arrangements must be put in place for their whole life management and maintenance.

* major development as defined in the Town and Country Planning (Development Procedure) (England) Order 2015.

SD48: Climate Change and Sustainable Use of Resources

1. The Authority will encourage all new development to incorporate sustainable design features, as appropriate to the scale and type of development.
2. All development proposals will be required to achieve the minimum standards as set out below unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable:

Residential:

i. Energy efficiency:

19% carbon dioxide reduction improvement against Part L (2013)93 through the energy efficiency of the building and;

ii. Water: Total mains Consumption of no more than 110 litres per person per day.

Non-Residential and Multi-residential:

i. Major: BREEAM Very Good Excellent

3. All development proposals, including retrofitting, will be required to demonstrate, proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.

4. Major development proposals should also include an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site

4.20 Traffic

If each house in this development has two cars, then this site will add 74 cars to Greatham. There are already concerns about the number of journeys and level of traffic through Greatham. The number of cars passing through the village at peak times has been highlighted to the Parish Council at many different meetings (peak times meaning commuter rush hour and school start and finish times).

Furthermore, the access point to this site is also very close to a school entrance and traffic calming area. The siting of the access point and the increased traffic could make commuter rush-hour times and school pick-up times very difficult in this area.

There are additional concerns about limited visibility for cars pulling out on to Petersfield Road.

Many school children walk to school passing this site. Having a large amount of traffic coming in and out of the site will introduce hazards to their walk to school. This also needs to be taken into account during the construction phase.

We are concerned that the access point to this site could become a hazard for school children, pedestrians and motorists. GPC would request that a crossing at the access road that gives priority to pedestrians on Petersfield Road is included in the designs.

We would also like the developer to contribute financially to improved pedestrian crossing across Petersfield Road in order to connect the development to the village hall and improve, rather than degrade the amenity of Greatham, creating a stronger sense of place around the village hall, school, and new development, and increasing the human scale at the heart of Greatham.

Hampshire Highways have already indicated to the parish council that substantial changes would need to be made to the road layout and a feasibility study would be required.

Furthermore, the transport plan included with the application suggests that people should cycle between Greatham and Liss. The most direct route is via Forest Road which is unlit, has many blind corners and barely has enough space for two vehicles to pass each other on the bends. Encouraging cycling through this route without the provision of a cycle path will increase the likelihood of accidents.

Bridleway 11 from Greatham to Liss Forest forms part of the Shipwright's Way and is an option for safe cycling to Liss. However, the bridleway surfaces would need to be improved to make them a viable option. We would ask that the SDNPA consider upgrading this bridleway as part of the Transport Plan and linking it more directly with footpath G10 which directly passes the East of the site.

4.21 Views

The current application has a small number of illustrations of what the proposed development will look like from various points around the village. We would like to see more, not least from the perspective of Bakers Field residents, as we requested in December 2020, but have not yet received.

Given SD71 has been designated as a major development by the SDNPA we also request that a study based on Zone of Theoretical Visibility (ZTV) data is done to assess this site. From more viewpoints within the village and from the various footpaths which it is visible from.

Strategic Policy SD6: Safeguarding Views, note 5.38:

“For large scale applications, it is recommended that digital Zone of Theoretical Visibility (ZTV) data is used to determine potential visibility in the surrounding landscape and to demonstrate areas of zero visibility, based on topography.”

Policies we believe are relevant on the subject of views are:

Strategic Policy SD6: Safeguarding Views

- 1. Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views** and views of key landmarks within the National Park.
2. Development proposals will be permitted that conserve and enhance the following view types and patterns identified in the Viewshed Characterisation Study:
 - a) Landmark views to and from viewpoints and tourism and recreational destinations;
 - b) Views from publically accessible areas which are within, to and from settlements which contribute to the viewers' enjoyment of the National Park;
 - c) Views from public rights of way, open access land and other publically accessible areas; and
 - d) Views which include or otherwise relate to specific features relevant to the National Park and its special qualities, such as key landmarks including those identified in Appendix 2 of the Viewshed Characterisation and Analysis Study, heritage assets (either in view or the view from) and biodiversity features.
3. Development proposals will be permitted provided they conserve and enhance sequential views, and do not result in adverse cumulative impacts within views.

Strategic Policy SD12: Historic Environment

1. Development proposals will only be permitted where they conserve and enhance the historic environment, including through the safeguarding of heritage assets and their setting.

2. Applicants will be required to provide a Heritage Statement sufficient to allow an informed assessment of the impact of the proposed development on the significance of the heritage asset(s).

3. Development proposals which affect heritage assets (whether designated or non designated) or their setting will be determined with regard to the significance of the asset, including the long-term conservation and enhancement of that asset.

4. Development proposals will be permitted where they enhance or better reveal the significance of heritage assets, particularly where they are considered to be at risk of irreversible harm or loss.

5. Development proposals which appropriately re-use redundant or under-used heritage assets with the optimal viable use, which secures their long-term conservation and enhancement, including of their setting, will be supported.

6. Development proposals for enabling development that would otherwise conflict with other planning policies but which would secure the future conservation of a heritage asset will be permitted provided:

- a) The proposals will not materially harm the heritage values of the asset or its setting;
- b) It can be demonstrated that alternative solutions have failed;
- c) The proposed development is the minimum necessary to protect the significance of the heritage asset;
- d) It meets the tests and criteria set out in Historic England guidance Enabling Development and the Conservation of Significant Places⁵⁰ (or guidance superseding it);
- e) It is subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development; and
- f) It enables public appreciation of the saved heritage asset.

Regarding the listed building Deal Farm:

Development Management Policy SD13: Listed Buildings

1. Development proposals which affect a listed building or its setting will only be permitted and listed building consent granted where:

a) They preserve and enhance the significance of the listed building and its setting by demonstrating that unnecessary loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided; or b) Harm to the significance of the listed building or its setting is considered to be outweighed by public benefits by the Authority, when appropriate mitigation measures will be expected, including archaeological investigation (including a written report) or recording.

2. Development proposals will be refused planning permission and / or listed building consent where they cause substantial harm to a listed building or its setting