Executive Summary

This application is in outline with only access to be considered. The proposal is for a continuing care retirement community (CRCC) on a 3ha parcel of undeveloped land to the east of Harrier Way, adjacent to the settlement boundary of Petersfield. The indicative layout plans and supporting documents describe a maximum of 148 units split over an H-shaped community hub building and 4 blocks. The application also seeks the heights of the individual buildings to be agreed.

The application is for major development within the National Park, the only exceptional circumstance that has been submitted to justify the application is the critical need for such accommodation. The applicants have submitted details to demonstrate that there is an unmet need for extra care accommodation within Petersfield and surrounding catchment area of 337 by 2015. It is argued that meeting this need is in the public interest.

Policy CP12 of the Joint Core Strategy relates to housing and extra care provision for the elderly and notes that the needs of ageing population will be met though the allocation of sites within or adjoining existing settlements and/or the granting of planning permission. The draft Petersfield Neighbourhood Plan allocates the application site for 48 dwellings to meet the needs of an ageing population (rising to 84 dwellings if ecological constraints met). Policy CP19 which relates to development in the countryside and CP20 which relates to landscape both have presumptions against development in the countryside outside of settlements and outline that within the SDNP the pursuit of the purposes will be paramount. The proposal would result in a detrimental impact upon the established landscape character of this sensitive site and would harm the rural character and setting of this part of the town and would neither conserve nor enhance the natural beauty of the SDNP.

This application is reported to committee due to the level of public interest and comments received from Petersfield Town Council.

1. Site Description

1.1 The site is a 3.2ha parcel of land on the eastern side of Harrier Way outside of the settlement boundary of Petersfield. To the north of the site is the Taro Leisure Centre and East Hants District Council Offices. Harrier Way to the west of the site marks the extent of the defined settlement boundary. The residential properties adjacent to the application site are predominantly two storey. To the south and east is open countryside and a sewage works is located further to the east of the site. The site is undeveloped and consists of open...
The site is recorded on Historic Landscape Character maps and is shown as the last remnants of the eastern extent of Heath Common which historically included a significant amount of land to the west of the site and included Heath Pond which remains today. The site is within the Rother Farmland and Heath Mosaic character area as set out in the South Downs Integrated Landscape Character Assessment (SDILCA). As set out in the SDILCA the area is slightly elevated, flat topped plateau which stands as an 'island' amongst the low lying farmland and given its edge of settlement location is likely to be susceptible to development pressure.

The western part of the site running along Harrier Way is mapped as a Lowland Dry Acid Grassland priority habitat which is characteristic of the area and of ecological value. The northern part of the site is designated as a Deciduous Woodland BAP priority habitat. The site has a group TPO along its northern boundary.

The constraints map also highlight that a gas pipe runs across part of the site to the north. The site is also in an area of surface water flood risk. The route of the Serpent Trail long-distance path passes to the north of the site. There is a bus stop to the north west of the site.

### Relevant Planning History

2.1 None relevant to this site.

### Proposal

3.1 The application is in outline, with only the means of access and heights of the buildings for consideration with all other matters reserved. The application proposes a Continuing Care Retirement Community (CCRC) which would contain a maximum of 148 units on the site. This would be split to provide 73 assisted living units which would be split over four separate blocks and a 75 unit community hub at the northern end of the site of which would comprise 36 bed care home and 39 independent living units.

Continuing Care Retirement Communities provide specialised housing for older people and provide an all embracing comprehensive alternative to both sheltered housing and residential care to meet a range of care needs depending on individuals circumstances. In such developments basic and extra care can be provided directly in residents’ homes, typically up to a prescribed number of hours per week to enable residents to live reasonably independently for longer. Some key features distinguish them from traditional care homes and sheltered housing:

- A person has their own front door
- Self contained flats or bungalows with design features and equipment/technology to help maintain independence and provide a safe environment
- Provision of an appropriate package of care in the person home for each resident
- Catering facilities with one or two meals available each day
- 24 hour care staff and support available on site
- A more comprehensive range of communal facilities than sheltered accommodation – restaurant, lounges, activity room, library, health suite, consultation rooms etc.
- Staff offices/facilities and domestic support services (e.g. help with cleaning, shopping etc.)
- Specialist equipment e.g. assisted bathing hoists, laundry, charging/storage facilities for wheelchairs
- Social and leisure facilities/activities
- Mobility and access assistance.

3.3 The proposed 36 care bed home would provide 100% single accommodation with each bedroom equipped with a wetroom. The other 112 extra care units would be designed for varying degrees of dependency of older people who need care. The care community would
provide care to residents of all dependency levels. The extra care unit would cater to older people with lower dependency levels than the care beds. These units create an environment that allow people with care need to maintain their independence for as long as possible. The CCRC offers a combination of independence and security of lifestyle within a socially active and supportive community, whereby older people are able to continue to live in their own space, supported by a comprehensive and flexible network of personnel care services and activities.

3.4 The submitted plans show the creation of two vehicle and pedestrian access points from Harrier Way into the site. One vehicle access would be diagonally opposite (to the south) the entrance to Durford Road and this would serve the Care hub and 40 assisted living units. The other vehicle access would be diagonally opposite (to the south) the entrance to Wheatear Drive and would serve 33 assisted living units.

3.5 An illustrative layout plan and elevations have been submitted with the application to indicate how the quantum of development could be accommodated on the site. However, layout and matters of appearance and landscaping would be subject to a separate reserved matters application, should outline consent be granted. The applicant has indicated that the development would be delivered in two phases.

3.6 The illustrative plan shows a three storey H-shaped building as the community hub to the north of the site with a height range between 12.8-15.5m. It is understood that the scale and layout of this building is fundamental to how a CCRC functions. The blocks to the south of this hub are depicted as two/three storey buildings of maximum height range of 10.7m to 13m for blocks 1-3 and 11.5-13m for block 4. Plans have also been submitted showing the range of building widths with a horizontal deviation of between 0.5m -2m for each building. The proposal also includes an energy centre adjacent to the community hub with a height range of 5.8-6.4m. The applicant has stated that the blocks would reach code level 3, whilst the community hub would be Breeam Very Good. The energy centre would provide the heating for the entire development. To meet 10% of the energy demand it is proposed to install 225m² of south facing photovoltaic panels on the flat roof area of the H-shaped hub building.

3.7 The development would all be run and operated by Anchor 2020, which is a registered not for profit charity. The freeholds of all units would be retained by the operator. The tenure of accommodation would range from lease purchase, rental to the standard arrangements of care home occupation. This allows the operator to control who resides on site and maintain the original purpose. To live there persons would have to be above the age of 60 and be a person assessed as needing care. Qualification would lead to a mandatory care package of a minimum 1.5 hours per week of personal care and support assistance. The only exception would be a spouse who would live with a qualifying partner. The proposal would include extensive communal areas for treatment, socialising, community events, activities and therapy. Access to the facilities on the site would also be possible for those in the wider community.

3.8 The applicants have indicated that the development would create employment with 120 employees made up of 55 full time employees and 80 part time shift workers. A maximum of 30 staff would be on site at peak times.

3.9 The proposal would include 83 parking spaces, with internal buggy transport and a minibus for external travel.

4. **Consultations**

4.1 **Natural England:** No objection:
- The proposal is unlikely to affect any statutorily protected sites
- Natural England defer to the SDNPA for comments regarding location and wider landscape setting and whether or not it would impact significantly on the purposes of designation,
- We have not assessed the application for impacts on protected species.
4.2 **County Highways:** No objection subject to conditions and legal agreement to secure the following package of mitigation:

- Transport Contribution of £145,590 towards more sustainable travel choices. The contribution would be used to fund local access schemes including improvements to pedestrian and cycle facilities,
- Implementation of Revised Travel Plan
- Payment of the Travel Plan Approval and Monitoring Fees
- Provision of a surety mechanism to ensure implementation of the Travel Plan
- Implementation of the access proposals as shown in figures 4.1 and 4.2 of the Transport Statement

4.3 **County Ecologist:** No objection following additional information/clarification being submitted and subject to conditions.

- The potential for impacts on the River Rother SINC
- Content that sufficient justification has been given to conclude that tree-roosting bats are not likely to occur
- The site is of local importance for bird species associated with scrub and woodland – serious effort must be made to minimise the impact from the near total loss of the existing habitat.
- There is verbal commitment from a local country park to accommodate translocated reptiles from the site – details of these could be provided at reserved matters stage.

4.4 **County Archaeologist:** No objection subject to conditions to secure archaeological works and made the following comments:

- A significant element of the sites archaeological potential relates to early prehistoric activity on the edge of the heath by the water course. Such sites are small in scale. The evaluation strategy will need to recognise this.

4.5 **Hampshire Strategic Commissioning Manager Extra Care:**

- In terms of need for both extra-care and residential care accommodation the standard indicator of need is the number of places per 1000 of the O/75 population.
- Details from the Elderly Accommodation Counsel (EAC) indicate that in 2010 the provision in East Hants for Nursing Homes was that East Hants had 392 nursing care beds and 675 residential care beds representing 47 and 81 beds per 1000 respectively. The average for Hampshire (including Southampton & Portsmouth) was 37 and 57 respectively.
- For the provision of extra care places we have adopted a target of achieving 25 places per 1000 of the O/75 population. For East Hants that gives a requirement in 2015 of 232 based on an O/75 population of 11,600.

4.6 **District Landscape Officer:** Landscape objection

- Development is outside the settlement policy boundary and would intrude into SDNP in an area that currently forms a strong landscape buffer to the built up area.
- The LVIA predicts a major impact on local views close to the site and various mitigation measures are proposed.
- Do not agree with conclusion that the SDNP and its special qualities will not be adversely harmed by the development of this site.

4.7 **District Housing Officer:** No objection:

- The C2 use class would not generate an affordable housing contribution,
- If proposal is deemed to fall within C3 then the full affordable housing requirements would be required.

4.8 **District Economic Development Officer:** No objection

4.9 **District Drainage Officer:** No objection in principle subject to conditions for satisfactory drainage systems for both foul and surface water.
4.10 **District Environmental Health Pollution Officer:** No objection in terms of air quality and noise subject to conditions.
- Applicant should consider moving the energy centre away from Harrier Way to ensure no impact on nearby existing properties.

4.11 **District Environmental Health Contamination Officer:** No objection subject to conditions for further contamination reports.

4.12 **Petersfield Town Council:** Support the application in principle, but are concerned that this is an outline development and also the height of the blocks would be out of keeping with other buildings in the area.

4.13 **SDNPA Landscape Officer:** Objection on the following grounds
- Inappropriate size and scale of proposal in sensitive location
- Layout which is detrimental to local character
- Impact of institutional style development on the settlement edge.

4.14 **SDNPA Design Officer:** Objection. Although this is an outline application with all matters reserved except access, the submitted material gives an indication of how the applicant would seek to deliver this facility within the site area. Object on following grounds:
- Overdevelopment through building form, size, height and quantity
- Dominance of car movements, parking and engineered hard landscape
- Uncharacteristic settlement edge condition
- Uncharacteristic and poor quality streetscape
- Uncharacteristic building types.

4.15 **Hampshire Police Crime Prevention Design Advisor:**
- Proposed development has a high level of connectively and permeability both of these attributes increase the vulnerability of the development to crime and anti-social behaviour. Recommend reducing the number of pedestrian accesses and providing an area of defensible space.
- Appropriate boundary treatment along Harrier Way required.
- Appropriate level of lighting should be provided through the development

5. **Representations**

5.1 1 third-party representation has been received supporting the proposal. The representation raised the following issues:
- Total support, the proposal offers the perfect solution for later years – independent living but with knowledge that support, help and care available,
- Would free up family sized homes
- Trees bounding Harrier Way would screen the development and within the complex there would be excellent landscaping
- The development would enhance the site
- Petersfield needs this development

5.2 1 third-party representation has been received neither objecting to nor supporting the proposal. The representation raised the following issues:
- Not opposed to the scheme in principle but are opposed to the proposed height of the main building,
- Any permission should only be given on the condition that no building is over 2 storeys high.

5.3 8 third-party representations have been received objecting to the proposal. The representations raised the following issues:
- The number of dwellings on the site is higher than suggested by the PNP
- Loss of outlook and privacy
- 3 storey buildings with dormer windows is out of keeping
- Very substantial building, disproportionately large for what is a semi-rural, edge of town location
- Scale and design not in accordance with draft PNP
- Inadequate parking
- Loss of boundary hedge and trees that front Harrier Way,
- Poor visibility from access roads,
- Lack of integration between residents of care community and local residents,
- Lack of detail on energy conservation
- Incursion into the rural surroundings of Petersfield beyond developed boundary of Harrier Way
- Would create a dangerous precedent
- Disagree with Transport Statement – fails to take full account of existing traffic flows
- No plans to relocate wildlife on the site
- No connection to off road cycle/pedestrian routes that exist
- Site liable to flooding and suffers from poor drainage

5.4 Ward Cllr Julie Butler:
- In principle do not have problem with the concept and attended first consultation event
- Having now reviewed application details, it would appear things have changed: more units, three storey buildings; two entrances. Indeed overall site plan looks much bigger.
- Now proposing removal of trees and no replacement
- Three storeys does not fit with the surrounding area
- Concern with height and scale of this development.

6. Planning Policy Context

6.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory development plan in this area is the East Hampshire Joint Core Strategy (JCS) 2014 and the saved policies of the East Hampshire District Local Plan: Second Review (2006)

National Park Purposes

6.2 The two statutory purposes of the SDNP designation are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of their areas;
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

6.3 If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social well being of the local community in pursuit of these purposes.

National Planning Policy Framework and Circular 2010

6.4 Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was issued and came into effect on 27 March 2012. The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 115 that great weight should be given to conserving landscape and scenic beauty in the national parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight in National Parks.

6.5 Paragraph 116 of the NPPF follows on by stating that:
“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

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

6.6 It should be noted there are two limbs to the criteria outlined above relating to ‘exceptional circumstance’ and the ‘public interest’. Both have to be satisfied if major development is to be considered acceptable within the National Park.

6.7 On 6 March 2014, the Government published National Planning Practice Guidance (PPG) notes to accompany the NPPF. These guidance notes are a material consideration in the assessment of this application. Paragraph 021 states that “the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under occupied.”

6.8 The development plan policies listed below have been assessed for their compliance with the NPPF and are considered to be complaint with the NPPF. Saved policy H13 of the East Hants Local Plan Second Review 2006 relates to accommodation of the elderly. The policy partial conflicts with policy CP12 of the Joint Core Strategy. Policy H13 does not allow new elderly accommodation outside of settlement boundaries. The Joint Core Strategy policy being the more up-to-date and recently adopted takes precedence.

The South Downs Partnership Management Plan

6.9 The South Downs Partnership Management Plan (SDPMP) was adopted on 3 December 2013. It sets out a Vision and long term Outcomes for the National Park, as well as 5 year Policies and a continually updated Delivery Framework. The SDPMP is a material consideration in planning applications and has some weight pending adoption of the SDNP Local Plan. The relevant polices are: Policy 1 – conserve and enhance natural beauty and special qualities; Policy 3 – dark skies; Policy 5 – priority species; Policy 48 – social and economic well-being; Policy 50 – housing and other development and policy 56 – energy efficiency.

7. Planning Policy

7.1 The relevant policies of the East Hampshire Joint Core Strategy (JCS) 2014 are:

CP1 – Presumption in favour of sustainable development
CP2 – Spatial Strategy
CP10 – Spatial Strategy for Housing
CP11 – Housing Tenure, Type and Mix
CP12 – Housing and Extra Care Provision for the Elderly
CP19 – Development in the Countryside
CP20 – Landscape
CP21 – Biodiversity
CP24 – Sustainable Construction
CP28 – Green Infrastructure
CP29 – Design
CP31 – Transport
7.2 The following saved policies of the East Hampshire District Local Plan: Second Review (2006) are relevant to this application:
HE17 – Archaeology and Ancient Monuments
T2 – Public Transport Provision and Improvement
T3 – Pedestrians and Cyclists
P7 – Contaminated Land
H13 – Accommodation for the Elderly and Rest and Nursing Homes

7.3 The draft Petersfield Neighbourhood Plan ('the PNP') has been through various public consultation exercises since September 2011. On Monday 19 January 2015 Petersfield Town Council submitted the Petersfield Neighbourhood Plan (PNP) to the SDNPA. The SDNPA are now required to publish the plan for 6 weeks and invite representations, which will be sent to an independent examiner for consideration. However the PNP is yet to be subjected to independent scrutiny by an examiner. The outcome of that process is unknown. It is likely there may well be additional modifications made to the PNP and it might change in the future. It will be made after a community referendum. In accordance with paragraph 216 of the National Planning Policy Framework, limited weight can be given to the PNP in the context of this application. (This is the approach taken by the Inspector at the recent appeal at Land north of Sussex Road, Petersfield APP/Y9507/A/14/2218678 and Causeway Farm, Petersfield APP/Y9507/A/14/2217804).

7.4 The draft Petersfield Neighbourhood Plan refers to the site as ‘H8 – Durford Road’ and allocates the site for housing to meet the needs of an ageing population with a suggested 48 dwellings at an approximate 15 dph. The allocation notes that the site is ecologically sensitive and recognises that parts of the site may not be developable due to ecological constraints. The draft PNP indicates that if ecological constraints have been met then a maximum 28dph (equivalent to 84 dwellings) could be provided on the site.

7.5 Petersfield Town Design Statement (October 2010) confirms that the land is within area 25 countryside within the Petersfield Parish Boundary and states that land to the east of Petersfield is flat farmland which runs almost uninterrupted to the Heath. The River Rother skirts Penns Place and forms a natural edge to the town. The document at 7.8.4 outlines the need to retain links to the countryside to ensure the town’s unique setting is protected and to respect current settlement boundaries and that any new development on the edge of the boundary is related to its landscape and views into and out of the surrounding countryside.

8. Planning Assessment

8.1 This is an application for major development within the SDNP. Paragraph 116 of the NPF advises that for major development within a designated area, planning permission should be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest. These are two key tests which have to be satisfied. Consideration of such applications should also 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.

8.2 It is considered there are two public interests pertinent to this particular proposal. Firstly, the conservation and enhancement of the National Park which is the SDNPA’s primary obligation to protect that public interest in accordance with its two statutory purposes. The second public interest under consideration here is meeting an identified need for extra care housing for an ageing population within this part of the National Park.

8.3 The site lies outside of any settlement policy area as set out in local and national policy. The application is not allocated within the local plan for residential development (care/elderly or
and there is a policy presumption against such proposals because the site lies in a countryside location where development is normally restricted to that which needs, and is compatible with, a countryside location as set out in policy CP19 of the Joint Core Strategy.

8.4 The draft Petersfield Neighbourhood Plan does allocate this site under emerging allocation H8 – Durford Road for housing to meet the needs of an ageing population with a suggested 48 dwellings at an approximate 15 dph. The emerging document notes that the site is ecologically sensitive and recognises that parts of the site may not be developable due to ecological constraints. If ecological constraints have been met then a maximum 28dph (equivalent to 84 dwellings) could be provided on the site. As set out in the recent appeal decision for Land north of Sussex Road (APP/Y9507/A/14/2218678) at paragraph 10 of the Inspectors report he made the following comments in relation to the PNP he stated “However, it is yet to be subjected to independent scrutiny by an examiner. The outcome of that process is unknown. There may well be additional modifications made to the PNP and it might change in the future. It will be made after a community referendum. In accordance with paragraph 216 of the National Planning Policy Framework, I attach limited weight to the PNP in the context of this appeal”. A similar position was taken by the Inspector in the Causeway Farm decision (APP/Y9507/A/14/2217804). This situation remains as such only limited weight can be attached to this emerging plan in the consideration of this application. This said the plan has been consulted on extensively and shows the direction of travel and has a specific draft allocation relating to the application site, as such to ignore the conclusions of the PNP would be contrary to the localism and community-led planning agenda.

8.5 Policy CP12 of the Joint Core Strategy relates specifically to housing and extra care provision for elderly persons. This policy outlines that the allocation of sufficient sites and/or the granting of planning permission will provide for such accommodation, including CCRC and retirement villages to meet the needs of the ageing population provided that the proposed sites and development are in locations to suit the needs of the elderly. The supporting text of the policy goes on to state “it will be necessary to allocate sites in locations usually within or adjoining existing settlements and which are suitable to meet the needs of the elderly in the Local Plan: Allocations, SDNP Local Plan or Neighbourhood Plan”. As outlined above the draft Petersfield Neighbourhood Plan allocates the site for development but at present the document has limited weight. The development is required to be assessed in the context of the NPPF, specifically paragraph 115-116 and the relevant policies of the JCS, including CP19 and CP20. National Park Authorities are not obliged as a matter of national planning policy to meet objectively assessed needs in full where to do so would give rise to conflict with the policies set out in paragraphs 115 and 116 of the NPPF. They should meet needs only in so far as that which are consistent with those restrictive policies.

8.6 In principle the development would be acceptable provided the tests set out at paragraph 115-116 of the NPPF are met as well as other relevant polices in the JCS and material considerations.

8.7 The application is supported by a needs assessment for Petersfield and surrounding area. This document outlines that the extra care accommodation need in 2015 will be 337 places (rising to 418 places if planned supply does not emerge) in the market catchment area for Petersfield. This is higher than the figure given by Hampshire County Council of 232 places, but regardless of which figure is used there is clearly an unmet need for extra care accommodation within Petersfield. This is also consistent with evidence submitted to the JCS which showed that the population of the district is ageing, with elderly one person and couple households likely to make up 75-85% of household growth over the plan period. Given this and recent government policy promoting the need to provide care for older people in their own homes, there does appear to be a clear need for accommodation of this kind. There is however nothing exceptional about this need. Any public interest associated with meeting this need does not outweigh the SDNPA’s primary objective to conserve and enhance the National Park in accordance with the two statutory purposes.

8.8 The SDNPA also has a duty in pursuit of the purpose to seek to foster the social and economic well-being of the community. The development would help meet a need for
accommodation for older persons and allow them to retain a degree of independence. As outlined in policy CP12 when elderly persons move to specialised accommodation it frequently results in larger houses being released for families.

8.9 Consideration of the development on the local economy is set out within the first bullet point of paragraph 116. It is recognised that the development may have the potential for a contribution to the local economy by providing employment opportunities. However given the SDNPA’s first and second purpose as a National Park, it is considered the proposal would not positively contribute to such a degree as to tip the balance of the wider considerations in this case. The benefit of the current proposal to the local economy carries only limited weight.

**Cost of and scope for Developing Elsewhere**

8.10 There are currently no allocated sites within the town to meet the need. The applicants have not looked to locate the development outside of the National Park as this would not meet the identified need in Petersfield. The applicants have submitted a sequential assessment of other sites which identifies the only alternative site is land south of Paddock Way, this site being a greenfield site was excluded from the PNP and is not currently available. In addition to this Hampshire County Council have indicated that the former Bulmer House site within Petersfield (which is also allocated within the draft PNP under site H12) is likely to come forward for redevelopment to provide affordable extra care, but in itself that site would not meet the identified need.

8.11 The applicants suggest that to build a viable C2 based CCRC would not be possible without an increased number of units over that in the draft PNP policy. The applicant also makes the point that the PNP envisages up to 84 dwellings whereas the current proposal includes 36 of the proposed units as one-bed rooms in the care home hub building. Notwithstanding this the quantum of development is still greater than envisaged in the draft PNP and as outlined below would have an adverse impact on the landscape. The application is absent of any cost analysis or viability details to demonstrate a lesser scheme than 148 units would not be viable on this greenfield site. Viability information has been requested and the applicant has indicated that they will be providing this to demonstrate the inability to reduce the proposal’s numbers.

**Impact on the Environment, Landscape and Recreational Opportunities.**

8.12 Policy CP19, development in the countryside, states that the approach to sustainable development in the countryside is to operate a policy of general restraint in order to protect the countryside for its own sake. Within the SDNP part of the EHDC area the pursuit of National Park purposes will be paramount. Policy CP20 states that new development will be required to conserve and enhance the natural beauty of the SDNP and its setting, and protect and enhance local distinctiveness. Criterion (b) of Policy CP29, design, seeks to ensure that new development takes particular account of the setting and context of the SDNP.

8.13 The site is located within the Rother Farmland and Heath Mosaic landscape type. The historic landscape character assessment classifies the site as an early 15th–17th century enclosure and is a remnant of the former Heath. The remaining Heath Common to the west is a SNCI and has a significant collection of bronze age burial mounds. As outlined by the County Archaeologist the application site has the potential to have archaeological deposits. The SDNP Landscape Officer considered that it follows that the site forms a remnant part of these historic and biodiversity landscape feature and is sensitive to development and that allocation of the site through the PNP for a smaller number of dwellings was seen as a process by which the land could be brought into management with improved public access.

8.14 The indicative layout of the proposed development does appear to broadly reflect the sketch plan associated with allocation H8 within the draft PNP, however the proposed development is far in excess of the 48 dwellings proposed in the draft PNP. Notwithstanding the PNP, back in 2004 the EHDC Local Plan Inspector considered whether or not the site should be allocated for development. The Inspector at that time considered
that Harrier Way provided a clearly defined and suitable edge to the built up area and that development in this area would break out from this boundary and into the clearly visible rural setting of the town. Clearly, things have moved on since 2004; various circumstances have changed including the national planning policy framework and guidance, the JCS and the National Park designation. However, the previous Local Plan Inspector’s comments of the landscape and visual characteristics of the site are still relevant today. This is because the landscape surrounding the site has not dramatically changed. Although the PNP allocates parts of the site for development, specifically to meet the needs of elderly persons, the lower density is such to reflect the sensitive of the location outside of the settlement and the potential to bring the site under management and enhance wildlife.

8.15 The quantum of development proposed would result in significant harmful impact on the settlement edge and surrounding landscape and townscape character. The size of the buildings required as shown with the indicative plans and proposed heights would be incongruous with the adjacent housing development and would appear dominating and overbearing and be likely to have detrimental landscape impact on the surrounding open landscape beyond the settlement edge. This view is supported by the applicants LVIA which outlines that the development would have local, short distance visual impacts from around the site, including from the Serpent Trail which passes along the northern boundary. Landscaping is a reserved matter; however the applicant has indicated that the development would invest in the strengthening of planting on site particularly on the boundaries.

8.16 The proposal to develop the site for extra care purposes outside the settlement boundary, in the manner, height and scale proposed would result in a scheme which would encroach into this part of the countryside. The development would visually harm the rural character and setting of this part of the town and have a detrimental impact upon the established landscape character of this sensitive site and would fail to conserve or enhance the natural beauty of this part of the SDNP, to which great weight needs to be given and, accordingly, it would conflict with the statutory purposes of the National Park. The proposal would also be in conflict with JCS Policies CP19, CP20, CP21, CP28 and CP29.

Design

8.17 Although the application is in outline with all matters reserved apart from access, the submitted material gives an indication of how the applicants would seek to deliver the development. The applicant has requested that certain parameters in relation to the built form are agreed at the outline stage. The indicative layout has sought to reflect the sketch layout contained in the draft PNP. The SDNPA Design Officer has objected to the proposed development commenting that the development would be of a quite different scale and type to the neighbouring residential development. The existing natural edge to Petersfield would be replaced by a highly formalised institutional environment. The location of large development blocks at the edge of the settlement is contrary to the expected town edge condition where development would normally be of a smaller scale with a more subtle relationship with the countryside and that the development would not take account of the setting and context of the SDNP.

8.18 Having regard to the quantum of development, form, size, height, bulk and institutional layout of the buildings required would result in an uncharacteristic form and layout which would be visible from the surrounding countryside and detrimental to the local character, the settlement edge and setting and context of this part of the town and SDNP contrary to policies CP19, CP20 and CP29.

Highways

8.19 The County Highway Authority have confirmed that the proposed accesses would achieve acceptable visibility splays. Following the submission of further information the Highway Authority have also confirmed that the development would not have a significant impact upon the operation of road junctions in the immediate vicinity of the proposed development. On the basis of the Transport Statement they are also satisfied that the impact of the development on the local transport network has been appropriately quantified and assessed and that any impact can be mitigated through planning conditions and a legal
agreement to secure a transport contribution of £145,590, a revised Travel Plan and monitoring fee. The contribution is required to provide more sustainable travel choices and to manage growing travel demands in a sustainable way. The contribution would be used to fund local access schemes including improvements to pedestrian and cycle facilities.

8.20 The applicants have submitted a draft Framework Travel Plan for the CRCC. The County Highway Authority have confirmed that the Travel Plan needs some refinement, however this could be covered through the legal agreement if the application were to be approved.

Impact on wildlife

8.21 The site is of local importance for bird species associated with scrub and woodland. Indeed one of two red-listed bird species are present on the site – song thrush – which relies on dense woody vegetation within which to nest. The County Ecologist has commented that serious effort must be made to minimise the impact from the near total loss of the existing habitat. The County Ecologist has also commented that the site has potential to support protected species and has recommended a condition to ensure ecological mitigation, compensation and enhancement measures to be submitted at the reserved matters stage.

8.22 Policy H8 of the PNP which relates specifically to this site notes that the site is ecologically sensitive and requires careful consideration of biodiversity issues. It follows that this would include those set out with policy CP21 of the JCS which relates to biodiversity. The site is known to be remnant of the former heath with parts of the site being BAP priority habitat for lowland dry acid grassland and deciduous woodland. The applicant claims that the site has never had acid grassland on it and no record exists. The site clear has potential for conservation and enhancement of biodiversity. The lower density within policy H8 of the PNP reflects the fact that not all the site may be developable due to ecological constraints. The SDNPA are not content that ecological constraints have been met or full opportunities for enhancement realised. Even if ecological constraints were satisfied the level of development proposed still far exceeds the maximum density envisaged in the draft allocation H8 of the PNP and for the reasons outlined elsewhere in this report would cause harm and be contrary to the statutory purposes of designation.

Trees

8.23 The northern boundary of the site is covered by a Tree Preservation Order which covers a line of 13 mature oaks which would be retained. The submitted tree survey indicates that to achieve the development it would be necessary to fell or coppice or partially remove 20 low quality trees. Many of the trees to be retained would require minor surgery to permit construction, access or for amenity reasons. Although the layout is not for approval the tree survey appears to have been completed on the basis of the submitted layout and outlines that the root protection area of the trees would not be harmed and no specialist foundations would be required. Provided the TPO trees are protected and acceptable replacement landscaping secured at the reserve matter stage the principle of development would be acceptable in regard to trees.

Flooding

8.24 The site is located in Flood Zone 1 (low probability of flooding) and there is no record of historic flooding issues affecting the site. However, the site is bordered by a watercourse and also split north/south by another watercourse taking flows from the residential area to the west. The EA mapping held by EHDC indicates that a narrow strip along the SE boundary is susceptible to surface water flooding. Subject to mitigation measures to be agreed at a reserve matters stage the development would not give rise to flood risk.

Contributions

8.25 For this scale of development a contribution would be required for highway infrastructure improvements towards sustainable travel. A contribution would also be required for Travel Plan monitoring. The proposed transport contribution is in line with the three tests as set out in the Community Infrastructure Levy (CIL) 122 regulations, it will help fund local measures to accommodate the additional demands generated by the development; the contribution is based on the number of trips to be generated by the development, the
quantity of units; likely impact on the existing network and will provide local improvements that link the site to the wider transport network. The applicant has confirmed that they would provide the highway contribution. These contributions and measures would normally be secured through a S106 agreement if planning permission were to be granted.

8.26 The emerging PNP also outlines that an affordable housing contribution would be required but no evidence has been provided to support this. The SDNPA’s draft CIL charging regime outlines that this sort of development (C2) would attract zero CIL charge.

8.27 Other issues raised by consultees and those making representations would be addressed at the reserve matter stage or through conditions if outline consent were to be granted.

9. Conclusion

9.1 The application is for major development within the SDNP outside of a defined settlement boundary. There are no exceptional circumstance, or public interest, to justify planning permission for this major development. The need for such elderly accommodation has been demonstrated and it is accepted that there are not alternative sites outside of the National Park which would meet the need within Petersfield. However the quantum of development proposed would result in a detrimental impact upon the established landscape character of this sensitive site and would harm the rural character and setting of this part of the town and wider area through the introduction of a large, bulky built form across the site in a previously undeveloped setting. Developing the entire site would also fail to recognise the ecological constraints or fully realise opportunities for enhancement. Furthermore although the layout plan provided is indicative at this stage, having regard to the quantum of development, form, size, height, bulk and institutional layout of the buildings required would result in an uncharacteristic form and layout which would be visible from the surrounding countryside and detrimental to the local character and setting of this part of the town.

9.2 The County Highway Authority have confirmed that the proposed accesses would be acceptable and that the development would not give rise to an impact on the local transport network. Matters relating to trees, ecology, archaeology, landscaping and drainage could be addressed at the reserved matters stage.

10. Recommendation and Conditions

10.1 It is recommended that planning permission is refused for the following reasons:

1) The application is for major development outside of the settlement boundary of Petersfield. There are no exceptional circumstance, or public interest, to justify planning permission for this major development at this time. The proposal would result in a detrimental impact upon the established landscape character of this sensitive site and would harm the rural character and setting of this part of the town and wider area through the introduction of a large, bulky built form across the site in a previously undeveloped setting. Furthermore through developing the entire site it has not been demonstrated ecological constraints have been met or fully realised opportunities for enhancement. The development would neither conserve nor enhance the National Park and it special qualities. The development would be contrary to CP1, CP2, CP10, CP11, CP19, CP20, CP21, CP28 of the East Hampshire Joint Core Strategy 2014, the draft Petersfield Neighbourhood Plan, Petersfield Town Design Statement 2010, the SDNP Partnership Management Plan, South Downs Integrated Landscape Character Assessment, the purposes of the National Park, Circular 2010 and NPPF.

2) Although the layout plan provided is indicative the quantum of development, form, size, height, bulk and institutional layout of the buildings required would result in an uncharacteristic form and layout which would be visible from the surrounding countryside and detrimental to the local character, the settlement edge and setting and context of this part of the town and SDNP. The development would be contrary to policies CP19, CP20, CP29 of the East Hampshire Joint Core Strategy 2014 the draft Petersfield Neighbourhood Plan, Petersfield Town Design Statement 2010, the SDNP Partnership Management Plan, South Downs Integrated Landscape Character Assessment, the purposes of the National Park, Circular 2010 and NPPF.
3) Provision has not been made to secure a contribution to provide more sustainable travel choices and to manage growing travel demands in a sustainable way including the following package of mitigation:

- Transport Contribution of £145,590
- Implementation of Revised Travel Plan
- Payment of the Travel Plan Approval and Monitoring Fees
- Provision of a surety mechanism to ensure implementation of the Travel Plan
- Implementation of the access proposals as shown in figures 4.1 and 4.2 of the Transport Statement.

This would be contrary to policy CP31 of the East Hampshire Joint Core Strategy 2014, policies T2 and T3 of the East Hants Local Plan 2006 (as saved), Hampshire CC Transport Contribution policy 2007 and the NPPF.

11. **Crime and Disorder Implication**

11.1 It is considered that the proposal does not raise any crime and disorder implications.

12. **Human Rights Implications**

12.1 This planning application has been considered in light of statute and case law and any interference with an individual’s human rights is considered to be proportionate to the aims sought to be realised.

13 **Equalities Act 2010**

13.1 Due regard, where relevant, has been taken to the South Downs National Park Authority’s equality duty as contained within the Equalities Act 2010.

14 **Proactive Working**

14.1 In reaching this decision the Local Planning Authority has worked with the applicant in a positive and proactive way, in line with the NPPF. Pre-application advice has been given and Officers have worked with the applicant to try and resolve and address matters.

**Tim Slaney**  
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Appendices:  
I. Site Location Map

SDNPA Consultees: Director of Planning & Legal Services.

**Background Documents**

Applicant Documents  
http://planningpublicaccess.southdowns.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NAPD71TUIOK00  
National Planning Policy Framework  
National Planning Practise Guidance  
http://planningguidance.planningportal.gov.uk/  
SDNP Partnership Management Plan  
Southdown Integrated Landscape Assessment
http://www.southdowns.gov.uk/planning/integrated-landscape-character-assessment

East Hants Joint Core Strategy

East Hants Local Plan 2006
http://localplan.easthants.gov.uk/map_index.htm

Petersfield Neighbourhood Plan

Petersfield Town Design Statement
http://petersfield.pbworks.com/f/Petersfield+TDS+Statement+-+Reduced.pdf
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