

# **South Downs Local Plan Examination**

Position Statement on behalf of Cove for  
Matters 10 & 11 in relation to Greatham and  
the Land at Petersfield Road Allocation (SD73)

November 2018

**Turley**

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# 1. Introduction

- 1.1 This Position Statement has been prepared by Turley on behalf of our client Cove in relation to Matters 10 & 11 of the South Downs Local Plan Examination with specific regards to Greatham and the Land at Petersfield Road allocation (SD73). Cove hold a development interest in the land that forms the Land at Petersfield Road allocation and have been working with the landowners to promote it for residential development.
- 1.2 Turley previously submitted representations to the South Downs Local Plan Pre-Submission (the Regulation 19) consultation held in 2017 by the South Downs National Park Authority (SDNPA). These representations were given the ID number 126. The representations identified several concerns in respect of the emerging Local Plan including:
- The capacity of the Petersfield Road allocation had been incorrectly calculated which would result in underutilisation of the site; and
  - There is insufficient flexibility in the policy to allow for other appropriate uses on the site.
- 1.3 This Position Statement builds on our previous representations to address the matters raised by the Inspector and provides an update on Cove progress in delivering the allocation.

## 2. Response to Inspector's Questions and Our Position

### Matter 10 – Issues Relating to Specific Settlements

***Matters which affect the soundness of the Plan in relation to a whole settlement, including with reference to any suggested MMs.***

***For each settlement issues may typically include:***

- a) whether the settlement boundary is appropriately defined,***
- b) whether Local Green Spaces are appropriately designated,***
- c) the relationship of the provisions of the Plan for the settlement in relation to the relevant Local Neighbourhood Plan,***
- d) whether appropriate protection is provided for 'niche' interests.***

- 2.1 With the South Downs Local Plan allocating the Land at Petersfield Road for residential development it is appropriate to revisit the Greatham settlement boundary. The Land at Petersfield Road allocation provides a logical infill between two separate parts of the Greatham settlement boundary helping to join up these two parts of the village thereby making a cohesive whole. Given the South Downs Local Plan proposes to amend the Greatham settlement boundary to include the allocation we consider that it has been appropriately defined.
- 2.2 A Neighbourhood Plan is not currently being prepared for the village of Greatham and its wider civil parish meaning it is entirely appropriate for the South Downs Local Plan to make provisions for Greatham in terms of its development strategy and any associated allocations. This will ensure that at the local scale Greatham is able to meet its growth needs.

### Matter 11 – Issues Relating to Individual Sites

***Matters which affect the soundness of the Plan in relation to its Strategic Site Policies SD56-57 and its individual Allocation Policies SD58 to SD96, including their stated criteria for the development or redevelopment of the sites, the physical extent of the sites, their potential planning effects and any suggested MMs to the policies.***

- 2.3 As identified in our representations we consider the Land at Petersfield Road allocation to be unsound in its current form on the grounds it under utilises the site contrary to paragraph 17 of the NPPF (2012) since it does not make the best and most efficient use of suitable and available previously developed land.
- 2.4 Since we submitted our representations to the Pre-Submission Local Plan a detailed development scheme for the Land at Petersfield Road site has been devised and this has now been submitted to the SDNPA for determination in the form of a full planning

application. The scheme proposes the development of 46 dwellings (including affordable homes) and a shop, alterations to existing access onto Petersfield Road, hard and soft landscaping, drainage and all other associated development works. A copy of the site layout for these proposals, submitted as part of the planning application, is included at Appendix 1.

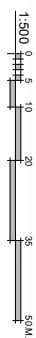
- 2.5 The proposed scheme is the result of substantial design work, analysis and consultation. A thorough assessment of the context of Land at Petersfield Road in terms of its location, character and landscape setting as well as developing a clear understanding of the historical evolution of Greatham and its character as well as that of the nearby village of Liss ensured an appreciation of what is unique about the site and Greatham. From this a number of key lessons have been learned which have then been incorporated into the proposed scheme. For example to ensure the proposed development merges into the surrounding countryside the overall envelope of built form was shrunk in comparison to earlier development iterations with a greater amount of open space fronting the countryside edge and Petersfield Road. Green corridors in the proposed development provide a connection to and views of the open countryside in keeping with the character of the local area.
- 2.6 The dwellings in the proposed scheme have been incorporated into the layout utilising these key development principles. In considering the mix of dwellings a range of sizes from one to five bedrooms have been included to deliver on the ambition of the NPPF 2012 paragraph 50 of creating inclusive and mixed communities. The proposed dwellings are of various types ranging from detached and semi-detached to short terraces of three or four dwellings which are reminiscent of the terraces of worker cottages which can be found in Greatham and also in Liss.
- 2.7 The dwellings are incorporated into the layout by deploying the key development principles. By utilising a variety of sizes and types the design-led approach to the proposed development has demonstrated that the Land at Petersfield Road can comfortably accommodate 46 dwellings. This is equivalent to a density of 19.6 dwellings per hectare which is appropriate for a rural location and is actually of lower density than can be found elsewhere in Greatham such as on Longmoor Road and Benhams Lane. Policy SD73 as currently worded proposes 35 to 40 dwellings, which is equivalent to a density of 14.9 to 17.0 dwellings per hectare. The proposed development which has been submitted for planning represents a small increase against the suggested number of dwellings in Policy SD73 but given the level of design work involved we consider presents a more realistic approach to the development of the site better balancing the need for new homes in the National Park whilst still protecting the surrounding countryside. In providing 46 dwellings there has also been opportunity to provide more smaller dwellings since the lower number of dwellings proposed by SDNPA would have skewed the housing mix towards the provision of larger homes.
- 2.8 We therefore propose that Policy SD73 be subject to a Main Modification changing it so that it is allocated for the development of circa 46 dwellings. This would ensure the site can deliver on its potential as demonstrated through the extensive design work carried out in support of the planning application and allows for adequate flexibility in the number of dwellings to be delivered.

- 2.9 In our representations to the Pre-Submission Local Plan we commented on the potential for issues regarding the viability of the shop proposed in Policy SD73. Whilst the planning application submitted for the Land at Petersfield Road site does include proposals for a shop it may be the case in the future that the shop is not viable and may need to be changed to an alternative use. Should this be the case, to ensure there is sufficient flexibility in the policy to deliver an alternative use the restriction not allowing any other uses should be removed through a Main Modification. This restriction could be replaced with an assertion that alternative proposals to a shop will be determined on a case by case basis and will be approved where they are considered an appropriate use.

### 3. Conclusions

- 3.1 Whilst we are supportive of the principle in allocating Land at Petersfield Road for development the emerging Local Plan in its current form has not sufficiently addressed the site's development potential resulting in an unnecessary suppression of the number of homes it could potentially deliver.
- 3.2 A planning application has now been submitted demonstrating that by using a landscape-led design approach as required by the SDNPA the site can comfortably accommodate 46 dwellings of a range of type and tenure. Thereby this slight increase to the number of dwellings proposed by the SDNPA contributes to the National Park's housing need including its need for smaller dwellings whilst still conserving the surrounding character and setting. In recognising the extensive design work carried out in the preparation of the planning application a Main Modification to increase the number of dwellings allocated by Policy SD73 to 46 dwellings is proposed.
- 3.3 The wording of Policy SD73 restricting uses other than residential and a convenience style store is not considered flexible enough should the proposed store be found unviable. If it is unviable, the store could be replaced by other uses that would be assessed on a case-by-case basis and it is proposed that this be incorporated into Policy SD73 through a Main Modification.

**Appendix 1: Planning Application Submission  
Site Layout (Drawing No.  
150715/SL46/CSL)**



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