

31 May 2022
Delivered by email

Richard Ferguson
South Downs National Park Authority
South Downs Centre
North Street
Midhurst
West Sussex
GU29 9DH

Ref: COVR3001

Dear Richard,

SDNP/21/04848/FUL: LISS FOREST NURSERY, PETERSFIELD ROAD, GREATHAM, LISS, GU33 6HA – REVISED SUBMISSION DOCUMENTS AND RESPONSE TO CASE OFFICER COMMENTS

We have been carefully considering your response dated 18th February 2022 to our Design and Landscape Rebuttal, as well as other concerns that have been raised, and would now wish to submit revised plans for this application. Below we set out the changes we have made and also where we have sought to retain particular features along with the justification for this. A table setting out the drawing numbers for the revised plans that are being submitted has been included at Appendix 1.

LAYOUT

In order to accommodate Electric Vehicle Charging Points (EVCPs) to all plots the parking spaces for Plots 5, 6, 31, 33, 36 and 37 have been moved slightly forward.

As per your request to simplify the use of materials in the proposed roadway around the site, the section of road between Plots 11 and 15 will now use the same material as is used for the rest of the roadway.

In your response to the Design and Landscape Rebuttal you suggested incorporating an additional build out into the road at the swale that is opposite Plot 29. Our highways consultant has assessed the feasibility of this by reviewing vehicle tracking for larger vehicles such as refuse collection lorries. They have concluded that a build out cannot be accommodated in this location due to the proximity of the bend as shown in the extract of the vehicle tracking drawing below.

The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830 turley.co.uk



MATERIALS

We agree that the proposals need to sufficiently speak of Greatham through the use of locally distinctive materials. However, we consider that only a proportionate number of the proposed dwellings should use ironstone in line with our analysis of the wider village that only a limited number of dwellings feature ironstone. To that end the following plots have now had their proposed materials changed:

- Plot 6 has changed from painted brick to brick;
- Plot 23 has changed from brick to ironstone;
- Plot 24 has changed from painted brick to brick;
- Plot 28 has changed from render to ironstone;

We note that you have requested that the side elevations of Plot 1 should be entirely ironstone. Whilst this has been achieved on the south-east elevation, it is only possible to use ironstone on the first floor of the north-west elevation. This is due to the gaps on the ground floor between the edge of the elevation, the bay window and the chimney not being of sufficient width to incorporate ironstone and the brick border.

We also note your suggestion that Plots 21 and 22 should be ironstone but we are concerned this would give rise to an uncharacteristic run of dwellings all using the same material, which is not characteristic of Greatham and would not appear as organic in the street scene. This is in line with previous discussions had with yourself and other Officers where you sought for us to provide variation in the street scene to replicate the characteristic organic growth of the village. Consequently, Plots 21 and 22 have been retained as white painted brick to ensure a more organic and varied street scene.

BOUNDARY TREATMENTS

The close board fences that were previously proposed between Plots 9 and 10, Plots 15 and 28 and Plots 31 and 32 have now been changed to 1.8 metre high brick walls as these formed the larger gaps between the proposed dwellings. We do not however consider it to be appropriate to provide brick walls in the street facing gaps between all the dwellings as this would appear oppressive in the street scene and would make the built form overly dominant.

SUSTAINABLE DRAINAGE SYSTEMS

Our drainage consultant has been liaising closely with the LLFA at Hampshire County Council to resolve their concerns. They were able to speak directly with Sarah Reghif of the LLFA to clarify the drainage proposals that were set out in the drainage technical note which was issued to you in November 2021. This was followed up with an e-mail from our drainage consultant dated 23rd February 2022 that set out these clarifications in writing to which you were kept in copy. Sarah subsequently issued you with a revised response on behalf of the LLFA, dated 8th March 2022, confirming the required level of detail had been provided to allow permission to be granted and further details could be secured by condition.

This confirms that the approach to drainage in the proposed development is acceptable and this issue is considered to be resolved. We would be grateful if you could place Sarah's revised response, dated 8th March 2022, on the application webpage.

PARKING

As mentioned previously the parking spaces for Plots 5, 6, 31, 33, 36 and 37 have been moved slightly further forward in order to better accommodate Electric Vehicle Charging Points (EVCPs).

The Parking Plan has been updated to show the location of the EVCP for each plot. The Proposed Development is therefore in accordance with Policy SD22 of the South Downs Local Plan which requires development proposals, wherever feasible, to provide electric vehicle charging facilities.

SUSTAINABILITY

A revised Sustainability Statement has been prepared for this application and is enclosed with this letter.

To reiterate, the Applicant's starting point is the requirements of the Local Plan. The SDNPA has implied that it is necessary or a requirement that the scheme provide for passive house standards or green roofs for example in order to achieve the Local Plan policy requirements. The Applicant has consistently adopted the reasonable position that the SPD either imposes additional requirements (over and above the Local Plan), or is being applied by the SDNPA as a strict tool to achieve the requirements of the Local Plan.

Energy Efficiency

With regard to energy efficiency, we note that Policy SD48(2)(i) requires a 19% carbon dioxide reduction improvement against Part L (2013) through the energy efficiency of the building. The Sustainability Statement which accompanies this submission shows that energy efficiency measures used in the proposed dwellings will achieve a reduction of 9,946 kg-CO₂/year from a baseline of 70,119 kg-CO₂/year, which is equivalent to a 13.99% reduction. This reduction can be delivered by maximising insulation performance, ventilation systems, controlled fittings and air tightness levels whilst still maintaining the Applicant's standard construction details, structural engineering calculations and supply chain agreements. Any additional improvements toward the 19% from fabric will mean fundamental redesign/changes to standard approved construction details, house type drawings, structural engineering calculations, sub-contract agreements and supply chain agreements.

The Sustainability Statement sets out the range of highly efficient fabric, ventilation and heating systems that will be provided in the Proposed Development along with low energy lighting and an air-tight build. These features will deliver a CO2 reduction of 13.99% against the baseline. When combined with zero-carbon technologies, either in the form of photovoltaic panels or Air Source Heat Pumps, these will provide further CO2 reductions and will ensure the Proposed Development reduces its carbon dioxide emissions by at least 39% compared to the standard which is set within Part L1a of the Building Regulations (2013). This meets the overall ambition of the Sustainable Construction SPD to achieve CO2 reductions of at least 39% to mitigate the impacts of climate change.

In any event, the proposals significantly exceed requirement in Policy SD48(2)(i) for 19% carbon dioxide reduction improvement against Part L (2013) but through a combination of energy efficiency of the building and other measures. Otherwise, any additional improvements toward the 19% purely from a fabric first approach will mean fundamental redesign/changes to standard approved construction details, house type drawings, structural engineering calculations, sub-contract agreements and supply chain agreements

Passive House Standards

We note that the Sustainable Construction SPD seeks the provision of 10% of dwellings to passive house standards as this is considered to be a way of ensuring that CO2 reductions are met. The SDNPA has implied that this measure arises because Policy SD48(3) requires all development to demonstrate proportionately how it addresses climate change through the on-site use of zero and/or low carbon technologies and that this is clearly separate from Policy SD48(2)(i) which requires a 19% CO2 reduction via energy efficiency.

The Applicant's position is that the requirement for Passive House standards is an additional requirement imposed by the SPD which goes well beyond the requirement of Policy SD48. Part 3 of the Policy does not indicate any requirement that schemes should include Passive House standards. The Applicant therefore considers that carbon reductions being delivered through a combination of energy efficiency and zero carbon technology measures which meet the ambitions of the SPD, and if Air Source Heat Pumps are used would substantially exceed it, achieves the requirement of Policy SD48(3) to proportionally demonstrate how the Proposed Development would mitigate the impacts of climate change.

To further mitigate the impacts of climate change and respond to the shift in electric vehicle usage every dwelling will have access to an Electric Vehicle Charging Point.

Waste and Recycling

Each dwelling will be provided with general waste and recycling bins for use in kerbside collection in line with East Hampshire District Council's approach to domestic waste collection. Space is provided in each kitchen for individual kitchen bins to allow for the separate collection of general and recyclable waste by residents. To reduce waste during the construction process the Applicant will be adhering to the waste hierarchy. Measures to achieve this include:

- Ensure the accurate specification of materials and volumes.
- Recycle and re-use waste generated on site.
- Arrange take back schemes with suppliers.
- Instruct a licensed waste contractor to segregate site waste for recycling.

'Green' Materials

The Applicant will be looking to use greener materials where these are available and would not further reduce the viability of the scheme. This includes seeking to specify 'A+' or 'A' rated materials using the online BRE Green Guide to Housing Specification, with all materials rated at least 'E'. Peat and natural weathered limestone will be avoided in the specification of buildings and landscaping. Timber used in the development will be from sustainable sources such as those that are Grown in Britain or FSC accredited. Where possible locally sourced materials will be used that are from renewable sources or are recycled such as the use of secondary aggregates.

Water Efficiency

To save water, water efficiency measures will be used to ensure that mains water consumption will not exceed 110 litres per person per dwelling per day.

Multi-Functional SuDS and Green Roofs

In order to adapt to the impacts of climate change the Proposed Development incorporates a multi-functional SuDS system. Not only does the system attenuate surface water reducing the risk of flooding during heavy rainfall but it also provides landscape and biodiversity benefits. The existing level of tree cover on the Site which is concentrated around the site boundaries is being retained and will furthermore be enhanced through additional planting as part of the Proposed Development. The landscape design used in the Proposed Development has considered the impacts of climate change and will incorporate drought tolerant species to reduce the need for watering in grounds maintenance.

The SDNPA has indicated that Policy SD48(3) requires all development to demonstrate proportionately how they address climate change adaptation through sustainable design and that green roofs, where appropriate, contribute to this. The Applicant's position is that there is no reference in the text of Policy SD48 which requires the provision of green roofs and nor is there any requirement in the Local Plan for 10% (or any other figure) green coverage. However they do arise as an additional requirement in the SPD.

Green roofs have been used where appropriate to do so on the roofs of car barns and will provide 5.43% coverage. Given the local character and appearance of the area and of the site itself, it is not considered appropriate to provide further green roof coverage than this. We would also highlight that the requirement for green roofs is introduced in the Sustainable Construction SPD as means of adapting to climate change but is not a specific requirement of Policy SD48. As a further point it must be reiterated that the Proposed Development will result in a significant reduction in the amount of hardstanding on the Site from 1.27ha to 0.86ha, equivalent to a 32.3% reduction. This decrease will enable additional soft landscaping to be delivered providing multiple benefits including greater levels of rainfall interception and improved biodiversity. The level of green roof coverage proposed along with the proposed reduction in hardstanding and the other climate change adaptation measures listed here are considered to be a proportionate response and to climate change adaptation in line with the requirement of Policy SD48.

Sustainability Summary

The following table provides a brief outline of the various measures which have been sought by the SDNPA, whether the requirement is contained in the Local Plan or the SPD and the Applicant's response.

Requirement / Comment	Origin of Requirement		Response
	Local Plan	SPD	
Energy efficiency: 19% carbon dioxide reduction improvement against Part L (2013) through the energy efficiency of the building	SD48(2)(i)	Paragraph 2.1	See commentary above – A minimum reduction of 39% will be achieved through a combination of fabric first and other measures.
Water: Total mains consumption of no more than 110 litres per person per day. Note: SDNPA previously commented that internal mains water consumption should not exceed 105 litres/person/day	SD48(2)(ii)	Paragraph 2.65	See commentary above – achieved. SDNPA has advised: "For clarity, the 105 referred to here doesn't take into account external water use (eg. garden watering) which is an extra 5L per day in the methodology. So as long as the

			overall figure of 110L isn't exceeded the scheme would accord with SD48."
No rainwater harvesting measures shown on plans	-	Paragraph 2.68	The SPD only notes that rainwater harvesting is encouraged as an additional measure beyond the installation of water saving fittings and appliances and is therefore not a requirement
At least 10% of the units need to be passive house certified	-	Paragraph 2.54	There is no requirement in the Local Plan for 10% of the dwellings to be passive house certified. This is an additional requirement in the SPD, not the Local Plan.
All dwellings need to have EV charge point unless this is not feasible.	SD22	Paragraph 2.59	Notwithstanding our previous comments on this point, this letter confirms that Electric Vehicle Charging Points (EVCPs) to all plots are provided.
Materials - the response states that the sustainability report covers all "these points" except the option of Grown in Britain timber has not been explored.	-	Paragraph 2.91	Notwithstanding the fact that we are unable to identify such a requirement in the Local Plan, this is plainly a matter which could be subject to a planning condition if the relevant tests were satisfied and is addressed elsewhere in this letter.
Waste: Construction waste measures via Site Waste Management Plan and internal kitchen segregated waste	-	Paragraphs 2.77 and 2.81	Notwithstanding the fact that we are unable to identify such a requirement in the Local Plan, this is plainly a topic which could be subject to a planning condition if the relevant tests were satisfied. However any condition must be enforceable – in our view a condition regarding internal kitchen segregated waste would not be enforceable.
Adapting to Climate Change Maximise opportunities for multi-functional SuDS and at least 10% roof area green roof.	-	Paragraph 2.97	There is no requirement in the Local Plan for 10% of the roof area to be provided as green roofs. This is an additional requirement in the SPD, not the Local Plan. This scheme provides for 5.43% coverage by green roofs.

CONCLUSIONS

The changes which have been incorporated into the Proposed Development and are submitted here are considered to be reasonable and effective in addressing the comments you made in responding to our Design and Landscape Rebuttal.

The layout and appearance of the scheme speaks to the local character of Greatham and will deliver a high quality design. Issues around the proposed SuDS system have been resolved to the satisfaction of the LLFA at Hampshire County Council. A variety of measures have been incorporated to ensure the Proposed Development will be highly sustainable and mitigates and adapts to the impacts of climate change thereby meeting the requirements of Policy SD48.

Consequently, the Proposed Development is considered to be compliant with the policies of the South Downs Local Plan and should be granted planning permission without delay.

Yours sincerely



David Murray-Cox
Director



Appendix 1: Schedule of Revised Submission Documents

Original Submission Report Reference	Revised Submission Report Reference	Document Title	Document Author
Reports and Forms			
	N/A	Cover Letter	Turley
	N/A	Application Form for Full Planning Permission	Turley
	N/A	CIL Additional Information Form	Turley
September 2021	N/A	Planning Statement	Turley
Rev C – September 2021	N/A	Design & Access Statement	Carlton Design Partnership
	N/A	Ecosystem Services Statement	Ecological Planning and Research
SEC/cs/ESS- 3693/- 16 th September 2021	SEC/cs/ESS- 3693/- 17 th May 2022	Energy & Sustainability Statement	Southern Energy Consultants
C795-DOC01-FRA Issue 4	N/A	Flood Risk Assessment and Drainage Strategy	PFA
C795-FN06	N/A	File Note Dealing with LLFA Comments dated 19 October 2021	PFA
COVE21437aia-amsD	N/A	Arboricultural Impact Assessment and Method Statement	ACD Environmental
096.0004/NTS/2	N/A	Transport Statement	Paul Basham Associates
17/36 – 2D	N/A	Ecological Impact Assessment	Ecological Planning and Research
871.1 Rev 04	N/A	Landscape and Visual Appraisal	Hankinson Duckett Associates
PN1999/2021	N/A	Heritage Desk Based Assessment	Orion Heritage
LP01457 Rev 3	N/A	Phase I Desk Study, Site Reconnaissance and Phase II Site Investigation Report	Leap Environmental

Original Submission Report Reference	Revised Submission Report Reference	Document Title	Document Author
0904-DFL-LIA-001 Rev G	N/A	Lighting Impact Assessment	Designs for Lighting
SA – 5824/5	N/A	Environmental Noise Impact Assessment	Sound Advice Acoustics
September 2021	N/A	Financial Viability Statement	Turley
N/A	31/05/2022	Viability Review Response	CBRE

Drawing Number	Original Submission Report Revision	Revised Submission Drawing Revision	Drawing Title
Site Plans			
150715/LP	-	N/A	Location Plan
150715/SL37/01	Rev 3	Rev 4	Site Layout
150715/SL37/08/CSL	Rev G	Rev H	Coloured Site Layout
150715/SL37/03/DT	Rev G	Rev H	Dwelling Types Plan
150715/SL37/09/EP	Rev D	Rev E	Enclosures Plan
150715/SL37/12/HCP	Rev B	Rev C	Existing / Proposed Hardstanding Comparison
150715/SL37/07/MP	Rev N	Rev P	Materials Plan
150715/SL37/05/PP	Rev H	Rev J	Parking Plan
150715/SL37/11/SP	Rev B	Rev C	Potential Solar Panel Positions
150715/SL37/10/PA	Rev C	Rev D	Private Areas Plan
150715/SL37/06/RP	Rev H	Rev J	Refuse Plan
150715/SL37/02/SH	Rev H	Rev J	Storey Heights Plan
150715/SL37/04/TP	Rev H	Rev J	Tenure Plan
0904-DFL-LSD-001	Rev G	N/A	Horizontal Illuminance Plan
Elevations and Floor Plans			

Drawing Number	Original Submission Report Revision	Revised Submission Drawing Revision	Drawing Title
150715/37/HT/ROM_VYN/EL	Rev D	N/A	The Romsey & Vyne (A) – Stone & Brick Elevations
150715/37/HT/ROM_VYN/FP	Rev C	N/A	The Romsey & Vyne (A) Plans
150715/37/HT/VYN-T/EL	Rev E	N/A	The Vyne (B) – Tile Elevations
150715/37/HT/VYN-PB/EL	Rev E	N/A	The Vyne (B) – Painted Brick Elevations
150715/37/HT/VYN/FP	Rev E	N/A	The Vyne (B) Plans
150715/37/HT/VYN-D/EL	Rev D	Rev F	The Vyne (A) – Detached – Stone Elevations
150715/37/HT/VYN-D/FP	Rev B	N/A	The Vyne (A) – Detached Plans
150715/37/HT/VYN_LON_VYN/EL	Rev D	Rev F	The Vyne (C), Longstock & Vyne (A) Elevations – Painted Brick and Brick
150715/37/HT/VYN_LON_VYN/FP	Rev C	N/A	The Vyne (C), Longstock & Vyne (A) Plans
150715/37/HT/LON/EL	Rev C	N/A	The Longstock – Semi – Brick & Tile Elevations
150715/37/HT/LON/FP	Rev B	N/A	The Longstock – Semi Plans
150715/37/HT/LON_VYN_LON/EL	Rev C	N/A	The Longstock, Vyne (A) & Longstock – Brick & Tile - Elevations
150715/37/HT/LON_VYN_LON/FP	Rev C	N/A	The Longstock, Vyne (A) & Longstock Plans
150715/37/HT/LON_VYN/EL	Rev G	N/A	The Longstock & Vyne (C) – Stone Elevations
150715/37/HT/LON_VYN/FP	Rev E	N/A	The Longstock & Vyne (C) Plans

Drawing Number	Original Submission Report Revision	Revised Submission Drawing Revision	Drawing Title
150715/37/HT/PEM/EL	Rev E	N/A	The Pemberley (A) – Tile & Brick Elevations
150715/37/HT/PEM/FP	Rev D	N/A	The Pemberley (A) Plans
150715/37/HT/HOU/EL	Rev C	Rev E	The Houghton Elevations – Brick
150715/37/HT/HOU/FP	Rev B	N/A	The Houghton Plans
150715/37/HT/DEA-D/EL	Rev D	N/A	The Dean – Detached – Brick Elevations
150715/37/HT/DEA/FP	Rev B	N/A	The Dean – Detached Plans
150715/37/HT/DEA-S/EL	Rev C	N/A	The Dean – Semi – Brick & Tile Elevations
150715/37/HT/DEA-S/FP	Rev B	N/A	The Dean – Semi Plans
150715/37/HT/DEA_PEM/EL	Rev D	N/A	The Dean/Pemberley (B) – Brick & Tile Elevations
150715/37/HT/DEA_PEM/FP	Rev C	N/A	The Dean/Pemberley (B) Plans
150715/37/HT/HYD/EL	Rev D	N/A	The Hyde – Stone Elevations
150715/37/HT/HYD/FP	Rev B	N/A	The Hyde Plans
150715/37/HT/OAK/EL	Rev C	N/A	The Oakleigh – Brick Elevations
150715/37/HT/OAK/FP	Rev B	N/A	The Oakleigh Plans
150715/37/HT/ALV/EL	Rev D	N/A	The Alverstoke – Brick & Tile Elevations
150715/37/HT/ALV/FP	Rev E	N/A	The Alverstoke Plans
150715/37/HT/AVI-I/EL	Rev D	N/A	The Avington – Ironstone Elevations
150715/37/HT/AVI-I/FP	Rev B	N/A	The Avington – Ironstone Plans
150715/37/HT/AVI/EL	Rev B	N/A	The Avington – Brick Elevations
150715/37/HT/AVI/FP	Rev D	N/A	The Avington Plans

Drawing Number	Original Submission Report Revision	Revised Submission Drawing Revision	Drawing Title
150715/37/HT/HIL/EL	Rev C	N/A	The Hillier – Brick & Tile Elevations
150715/37/HT/HIL/FP	Rev B	N/A	The Hillier Plans
150715/37/HT/HIL-H/EL	Rev D	N/A	The Hillier – Hipped – Brick & Tile Elevations
150715/37/HT/HIL-H/FP	-	N/A	The Hillier – Hipped Plans
150715/37/HT/ORM-T/EL	Rev C	N/A	The Ormeley – Render Elevations
150715/37/HT/ORM-I/EL	-	Rev A	The Ormeley – Stone Elevations
150715/37/HT/ORM/FP	Rev B	N/A	The Ormeley Plans
150715/37/HT/ORM-DG/EL	Rev C	Rev D	The Ormeley – Double Gable – Stone – Elevations
150715/37/HT/ORM-DG/FP	Rev C	N/A	The Ormeley – Double Gable Plans
150715/37/AB/SG1/EP	Rev B	N/A	Single Garage Elevations & Plan
150715/37/AB/SCP1/EP	-	N/A	Single Car Port 1 Elevations & Plan
150715/37/AB/DCP1/EP	Rev B	N/A	Double Car Port 2 Variant Elevations & Plan
150715/37/AB/DCP1-G/EP	-	N/A	Green Roof Double Carport Elevations & Plan
150715/37/AB/SCP1-G/EP	-	N/A	Green Roof Single Carport Elevations & Plan
150715/37/AB/SUB/EP	Rev A	N/A	Substation Elevations & Plan
Street Scenes			
150715/37/CSS	Rev D	Rev E	Coloured Street Scenes

