

Agenda Item 7
Report PC20/21-35

Report to	Planning Committee
Date	11 March 2021
By	Director of Planning
Local Authority	East Hampshire District Council
Application Number	SDNP/18/06111/FUL
Applicant	Cove Construction Ltd
Application	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.
Address	Liss Forest Nursery, Petersfield Road, Greatham, GU33 6HA

Recommendation: That planning permission be refused for the reasons as set out in Paragraph 10.1 of the report.

Executive Summary

The application site is a horticultural nursery in the northern part of Greatham. It is a large site in the context of the size of the village and is surrounded by development on three sides, whilst its south east boundary defines the edge of the village. It is allocated for residential redevelopment in policy SD71 of the South Downs Local Plan 2019 for 35-40 dwellings and associated open space and a new shop is also supported.

The application has been the subject of lengthy discussions with the Applicant regarding the design of the scheme and Greatham Parish Council have also been involved in some of these discussions to a limited extent. The scheme has subsequently been re-designed from 46 dwellings to 37 and a shop has been omitted. The layout and architecture has been revised as part of this process. Whilst improvements have been made to the scheme, it is not sufficiently landscape-led and proposes an overly suburban character which would not give sufficient regard to the local context to instil local distinctiveness or a sense of place. A reason for refusal on design grounds is therefore proposed.

The latest submission proposes a 48.6% affordable housing contribution (18 dwellings) which are predominantly no.2 and no.3 bed properties. However, officers have very recently been verbally advised by the Applicant that this contribution may not be achievable and that the scheme's viability is being re-assessed. In the absence of justifying why a minimum target of 50% cannot be met a reason for refusal is proposed.

The site is within the proximity of Wealden Heaths Phase II Special Protection Area (SPA) and Woolmer Forest Special Area of Conservation (SAC). Under The Conservation of Habitats and Species Regulations 2017 (as amended), it has been determined that the scheme would have a likely significant effect in regard to increased recreational disturbance from new residential development and Natural England have objected for this reason. In the absence of suitable mitigation being secured for this impact, which could be a financial contribution towards suitable alternative natural green space for example, a reason for refusal is recommended.

A fourth reason for refusal is recommended on the basis of not having secured various S106 requirements including contributions towards highways, securing the public open space, and a permissive path through the open space between Petersfield Road and the south east corner of the site to join up with the adjacent public right of way.

The application is placed before committee due to the scale of the development, the policy considerations and design issues, and the level of local interest.

1. Site Description

- 1.1 Greatham is situated to the west of the Longmoor MOD camp and is surrounded by a patchwork of enclosed fields and woodland. The village mainly comprises detached dwellings situated along Petersfield Road, but there is some development 'in depth' which extends away from the main road such as Bakers Field immediately north of the application site. The village has a conservation area, which is approximately 115m south of the site, and a variety of listed buildings. There is a primary school and village hall close to the application site. Greatham has good access to the main A3 via its road links at the north and south ends of the village.
- 1.2 Overall, there is an eclectic mix of styles, ages, forms and detailing of properties within the village. Within street scenes, properties exhibit varied building lines and setbacks from roads as well as varying degrees of prominence due to differing boundary treatments and planting (or lack of). A notable feature is front facing gables and porches and the use of red brick. Ironstone is a material seen in properties and boundary walls of older properties. There is also a variety of architectural brickwork detailing, materials and finishes.
- 1.3 The application site lies within the northern part of Greatham. It comprises of a horticultural nursery with various large greenhouses, poly tunnels, storage areas, and hardstanding. It has an access onto Petersfield Road adjacent to a telephone exchange building and a primary school. The site gradually slopes downwards towards its north east corner and it is predominantly on higher ground to Petersfield Road and a grassed bank runs along the roadside site boundary and from the road greenhouses can be seen. On the opposite side of Petersfield Road is a listed farmhouse (Deal Farm), other dwellings and the village hall and playground. The site is also on higher ground to Bakers Field. There is a detached bungalow on site associated with the Nursery.
- 1.4 The site is bordered by a mix of fencing, hedging and trees, including an area of mature trees at its south west edge which are subject to a group TPO. The rear gardens of properties on Bakers Field define its north east boundary. Within the field south east of the site is a public right of way.
- 1.5 The Wealden Heaths Phase II Special Protection Area (SPA) and Woolmer Forest Special Area of Conservation (SAC) are north east of the site. The Longmoor MOD camp is also designated as a Site of Special Scientific Interest.

2. Relevant Planning History

- 2.1 SDNP/18/01316/SCREEN: Screening Opinion sought in relation to residential development up to 55 dwellings. Decision issued 28.03.2018; Environmental Impact Assessment (EIA) not required.
- 2.2 SDNP/17/05087/PRE: Redevelopment of the site with different options; (1) 39 dwellings plus a care home; (2) 65 dwellings including flats; and (3) 59 dwellings. Advice provided 23.01.2018 and a summary is below:
 - Loss of a business use in favour of housing being considered through Local Plan process.
 - Need to demonstrate that the scheme meets emerging policies and specifically the allocation policy.
 - Considered major development in NPPF terms.
 - Provision of care home contrary to policy.
 - All 3 development options were an unacceptable scale of development.
 - Proposals for a shop need to be given consideration.

- Appropriate housing mix required.
- Policy compliant affordable housing provision required.
- A landscape-led and eco-systems services approach required.
- Sense of place within the scheme needs to be achieved through layout, public realm, scale, appearance, architecture and materials.
- A contemporary architectural approach may be acceptable.
- Encourage use of Design Review Panel, once evidence base has been progressed.

3. Proposal

3.1 The proposals have been subject to significant amendments over the course of the application. Originally, the application proposed 46 dwellings, with a shop, and the current proposals are for 37 dwellings with no shop and the following housing mix.

Dwelling size	Market	Affordable	Total
1 bed		2	2
2 bed	4	10	14
3 bed	5	6	11
4 bed	7	-	7
5 bed	3	-	3
Total	19	18	37

3.2 The formal submission proposes 18 affordable dwellings which would comprise of 14 affordable rented and 4 shared ownership properties. They would equate to a 48.6% affordable housing contribution. However, following very recent discussions with the Applicant it is uncertain as to whether this provision would be achievable (please see paragraph 8.19 below).

Proposed layout

3.3 The siting of the existing access would be retained and upgraded with a new bell mouth junction to accommodate the development. The area of protected trees adjacent to the access would be retained. The dwellings would be set back within the site in a predominantly perimeter block layout with public open space around the periphery. The dwellings would face outwards onto an internal circular road and the open space, with rear gardens backing onto each other. A smaller area of open space is also proposed to link the open space on the south east side of the site and the central area of dwellings referred to above.

3.4 The dwellings within the perimeter block would be semi-detached and link-detached properties on the north west side, facing Petersfield Road, which would be a denser street frontage in comparison to the opposite south eastern side where there would be a row of larger detached properties. Within this perimeter arrangement, a central area of dwellings is also proposed which would face onto a shared surface and new landscaping.

3.5 The internal road would have a varied width and curvature around the site to try to achieve a more rural character and manage vehicle speeds. The main access into the site would have a more engineered character.

3.6 A row of 9 dwellings are proposed along the north east site boundary. They would face onto the circular road with rear gardens extending up to proposed planting along the site boundary and the rear gardens of Bakers Field beyond. An underground pumping station for foul water drainage infrastructure is proposed in the north east corner of the site, which would have its own grasscrete surfaced access through the open space.

Parking

- 3.7 A total of 82 car parking spaces are proposed, including 7 visitor spaces. There would be 2 off street spaces per dwelling on average. These would be arranged as tandem parking alongside the semi-detached and link detached properties, whilst driveways for the detached properties would be wide enough for cars to park side by side. Single garages are proposed with some of the dwellings whilst others would have car ports which would link dwellings together. The visitor spaces would be provided within the internal road.

The dwellings

- 3.8 A generally traditional style of architecture is proposed within a 2 storey development. There would be a mix of gabled and hipped roofs, including front projecting gables with varied detailing through the use of materials and for certain properties more ornate eaves. They would have comparable ridge heights throughout the scheme and variations in height are largely due to the ground levels.
- 3.9 Elevations would exhibit a range of porches and architectural detailing of projecting courses of brickwork, brick window cills and arches above, quoining, and bay windows. Trellis work either on porches or bay windows is proposed. Window styles also vary between dwelling typologies. Chimneys are proposed on all dwellings and these vary between being on top of ridges and external stacks on side elevations. Attached single garages would have pitched roofs and be set back from front elevations. Similarly, car ports between the link detached properties would have pitched roofs and be set back also.
- 3.10 Red brick would be the predominant facing material. More prominent buildings would be finished in a painted brick or render and certain properties would have some sandstone facades of varying extents and locations. The upper parts of certain front facing gables would have tile hanging. Roofs would be tiled.

Sustainable Construction

- 3.11 The energy efficiency of the dwellings has not been specified but a fabric first approach to sustainable construction and low carbon materials is proposed. It has been requested that energy efficiency measures are addressed via a condition, whereby more detailed design for the dwellings can be undertaken. Each dwelling is proposed to include measures to reduce water consumption to a level which meets policy SD48.
- 3.12 Illustrative locations for solar PV panels have been provided although it is unclear whether this would meet a target of 20% renewables given the final energy efficiency of the dwellings is unknown. Electric vehicle charging points would be fitted to all dwellings.

Drainage

- 3.13 Foul drainage would converge on the new pumping station which in turn would be connected to a mains sewer. Surface water would be managed via a piped system to the Suds basin and a grate system and some swales would be created. Some isolated rain water gardens are proposed alongside the internal road.

4. Consultations

- 4.1 A re-consultation exercise for the latest scheme under consideration was undertaken in November and December 2020. The following consultee responses have been received. Where relevant, previous consultee's comments from the earlier iterations of the scheme are included in the summaries below.
- 4.2 **Arboriculture:** No objection, subject to condition.
- 4.3 **Archaeology (HCC):** No objection.
- 4.4 **Drainage Engineer (EHDC):** No objection, subject to conditions.
- 4.5 **Greatham Parish Council:** Objection for the following reasons:
- No objection in principle to residential development.
 - Acknowledge significant improvements have been made.

- An outstanding scheme can be achieved, but these proposals fall short of this aspiration.
 - Inadequate consultation with the Village.
 - Don't object to the loss of the shop.
 - Housing numbers too high based on settlement pattern and character of the village.
 - Less dwellings would reduce traffic and commuting, access to services.
 - Number of dwellings detrimental to village parking, traffic, integration with community, insufficient provision of open spaces, impact on the village hall parking and school.
 - Further improvements along proposed Petersfield Road frontage needed; dwellings very evenly distributed in contrast to historical settlement pattern.
 - Strong frontage to Petersfield Road with varying density away from the road required.
 - Extent of hardstanding; more landscaping would reduce excess surface water run-off.
 - Must ensure sufficient surface water drainage scheme which is maintained.
 - Design of dwellings not in keeping with the character of the village.
 - Lack of clarity on materials and, consequently, how the development would fit in with Greatham; these need to reflect local character (eg. Malmstone or Ironstone).
 - Concern about overflow parking into the village hall car park.
 - Views from Petersfield Road and Deal Farm have been improved but better protection of views across the site needed.
 - Impact from construction phase upon the village and school need to be considered.
 - The 'Goat Path' should be preserved.
 - Uncertainty regarding planting and its purpose adjacent to Barkers Field.
 - Open space could include small informal play equipment or street furniture.
 - Residents would pay for upkeep of open space, ownership by Parish Council preferred.
- Parking, access and traffic
- Location of access close to school entrance and traffic calming area could create problems at peak times, hazardous to children walking to school and road users.
 - Limited visibility from the access.
 - Poorly designed parking provision; tandem parking not supported and will lead to on-street parking with inherent problems, insufficient visitor parking.
 - Width of internal road too narrow and needs to better resemble a rural design.
 - Contribution to improving pedestrian crossing required.
 - Cycle routes to Liss (Shipwright's Way and bridleways) need improving.
 - Sustainability
 - Wish to see a fossil fuel free development and maximise use of solar panels.
 - Dwellings should include battery storage so as solar energy can be stored.
 - Rainwater capture should be used in water consumption (eg toilet flushing) of the dwellings and would help to reduce any increased surface water run-off and flood risk.
 - More information on energy efficiency required.
 - Support electric charging points.

4.6 **Ecology:** No objection, subject to condition.

4.7 **Environmental Health (pollution):** No objection, subject to conditions.

4.8 **Environmental Health (contamination):** No objection, subject to conditions.

4.9 **Environment Agency:** No response received.

4.10 **Historic Buildings Officer:** No objection.

- 4.11 **Highways Authority:** No objection, subject to conditions and a financial contribution of £75,000 being secured via a S106 Legal Agreement.
- Contribution would go towards improving more sustainable travel infrastructure, such as cycle infrastructure towards Liss railway Station, bus service infrastructure, and improving pedestrian crossings.
- 4.12 **Housing (EHDC):** Objection.
- One additional affordable dwelling required to meet minimum 50% provision.
 - Distribution of affordable dwellings within the scheme acceptable.
 - Proposed tenure of affordable housing acceptable.
 - Given low local need identified, S106 should include cascade to cover the East Hampshire district.
- 4.13 **Landscape and Design (SDNPA) (joint response):** Objection
- Layout and design of dwellings
- Number of units driving a uniformity in the layout; further distinctiveness through varied roof orientations and forms, set back distances from the street and use of different (locally characteristic) front boundaries required.
 - ‘Anywhere’ architecture; development does not sufficiently integrate with Greatham’s character or contribute to local distinctiveness.
 - Siting of dwellings do not recreate an organic and loose countryside edge character, with repeated similar units in a line.
 - Building frontages and their treatment would create a suburban feel, uncharacteristic of Greatham or the countryside edge.
 - Monotonous street scene fronting Petersfield Road; 3 of the same house typology, similar roof lines and spacing.
 - Streetscene facing eastwards too regimented.
 - Central area needs to include more varied dwellings.
 - Simple road design needed to respect rural/edge of settlement character.
 - Use of materials tokenistic and lack authenticity; sandstone would make the scheme more locally characteristic and needs to be better employed.
 - External lighting needs to be low level.
 - Pump house too prominent in the street scene.
 - Sheds should not be visible from the public realm and be bespoke.
- Landscaping & drainage
- Success of green infrastructure is subject to detailed design.
 - Opportunities for rear hedged garden boundaries are missed.
 - Less units may enable a better drainage strategy and secure multiple benefits.
 - Surface water drainage relies too much on underground pipes and Suds pond.
 - Insufficient provision of green roofs, rain gardens and swales.
 - SuDs pond could appear too uniform.
- Sustainability
- Sustainable Construction SPD requirements not met.
 - Lack of green roofs and rainwater harvesting.
- Positive attributes
- Broad principles of the layout supported.
 - Lack of pavements.

- Open space provision.
- Parking is well integrated.
- Corner buildings within the scheme address public realm on two sides.
- Chimneys locally characteristic.
- Hedging and picket fencing a positive boundary feature but other boundaries of close boarded fence seen in the public realm unacceptable.

4.14 **Lead Flood Authority (HCC):** No objection, subject to condition.

4.15 **Natural England:** Objection.

- Mitigation towards increased recreational pressure upon designated sites required. A proportionate financial contribution towards a local project for recreation enhancements would be an acceptable approach.

4.16 **Portsmouth Water:** Response received, no comments.

4.17 **Public Rights of Way (HCC):** Objection

- A financial contribution towards improvements to Greatham footpath no.10 and existing network (i.e. new surfacing) required, given likely increased footfall generated by the development.

4.18 **Southern Water:** No objection.

5. Representations

5.1 163 objections and 1 supportive response have been received. These raise the following considerations:

Objections

- Concerns of local community not addressed and lack of engagement.
- Greatham does not require a large housing allocation.
- No facilities that would benefit the village.
- Capacity of health services.
- Mixed views on needing/not requiring a shop (majority against provision)
- Impact on the local economy in relation to loss of the Nursery.

Scale & design

- Overdevelopment of the site and insufficient open space.
- Layout and architecture too suburban and not in keeping with village and rural character.
- Not sensitive to the National Park (not landscape-led); development also too visible.
- Design of dwellings too uniform with token attention to Greatham architecture.
- Materials inappropriate; need more ironstone or malmstone.
- Dwellings need to be designed for home working and have fibre broadband.
- Layout inward looking, development closed off from the village, including its open space.
- Un adopted roads could provide feeling of exclusivity.
- Scheme needs better feeling of security through more overlooked areas.
- Needs to be more inclusive rather appearing like a gated communities or residents preferring to be isolated; better integration with community required.
- Layout does not respect relationship with Bakers Field.
- Needs a central greenspace as a community space and development frontage which can relate to the village hall to help create a centre.
- Additional pedestrian access at north west corner needed.
- Gardens are too small.

- Views from Deal Farm towards Butser Hill not properly considered.
 - Sensitive approach to street lighting required.
- Housing mix and affordable Housing
- Inappropriate mix – does not comply with SD27 and local need.
 - Affordable housing includes too many of the smaller properties.
 - Market housing includes too many larger properties.
 - Affordable houses need to be indistinguishable from the open market properties.

Landscape

- More tree planting/landscaping, open space, and a reduction in hardstanding required.
- Planting strip alongside Bakers Field rear gardens lacks any purpose.
- Native trees, hedging and grassland need to be considered; more detail required.

Parking & access

- Limited parking for residents and visitors.
- Poor relationship between the access and the school; hazardous to highway safety including children and parents walking to school and visibility.
- Second vehicular access required.
- Parking obtrusive, should be disguised in streetscene, tandem parking not supported.
- Proposed access inadequate and narrow internal road proposed.
- Concern of overflow parking onto Petersfield Road and village hall car park.
- Visitor spaces as laybys inappropriate.
- Second pedestrian access onto Petersfield Road needed to improve permeability.

Drainage

- Pumping station should be further away from Bakers Field; potential noise impact.
- Site has poor drainage and flooding of Bakers Field rear gardens will be exacerbated.

Amenity

- Impact from increased traffic; Petersfield Road already busy.
- Harmful overlooking, loss of privacy, and light pollution towards Bakers Field properties.
- Impact on views from Bakers Field properties.

Sustainability

- Development needs to be fit for the future; needs to be a carbon neutral scheme.
- Passive house dwellings required.
- Solar panels and electric charging points on all dwellings required.
- Bus services need to be improved.

Other

- Impact on Bakers Field properties during construction.
- Wish to see mixed use development to reduce the need to travel for work.

Support

- Support new affordable housing for young families to make village more sustainable.

5.2 **CPRE:** Objection (no response to latest revised plans).

- Accept principle of development but concern regarding intensity and design.
- Intensity of development and cramped appearance and sensitive layout required.
- More sensitive design of dwellings required to conserve and enhance the setting of the conservation area, locally listed buildings, appropriate materials.

6. Planning Policy Context

6.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The relevant statutory Development Plan comprises of the South Downs Local Plan (SDLP) 2014-2033 and the adopted Hampshire Minerals and Waste Plan (2013). The relevant policies are set out in section 7 below.

6.2 The SDNPA designated the Greatham Neighbourhood Plan area on 12 June 2019. Since then, no draft Plan has been published for consultation and as such there are no emerging policies to consider.

National Park Purposes

6.3 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.

If there is a conflict between these two purposes, the first purpose should be given greater weight. There is also a duty in pursuing National Park purposes to foster the economic and social wellbeing of the local community.

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 24 July 2018 and revised in February 2019. The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 172 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.

National Planning Policy Framework (NPPF) 2019

6.5 The National Planning Policy Framework has been considered as a whole. The following NPPF sections have been considered in the assessment of this application:

- Achieving sustainable development
- Requiring good design
- Delivering a supply of homes
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment
- Achieving well designed places
- Promoting sustainable transport
- Meeting the challenge of climate change, flooding and coastal change.

Relationship of the Development Plan to the NPPF and Circular 2010

6.6 The development plan policies listed below have been assessed for their compliance with the NPPF and are considered to be compliant with it.

Major development

6.7 In the 2017 pre-application advice, it was advised that this would be a major scheme for the purposes of the NPPF. However, the SDNPA's formal opinion now is that the proposed development does not constitute major development for the purposes of the NPPF and policy SD3 (Major Development) of the SDLP given its location and lack of significant adverse effect upon the National Park area.

6.8 The scheme is within a Local Plan allocated site for new residential development. Its two storey nature, the siting, scale and design of the dwellings, landscape scheme, and the site's context of being enclosed by development on 3 sides would result in the scheme not having

a significant adverse impact on the purposes for which the area has been designated or defined.

The South Downs National Park Partnership Management Plan 2020-2025

- 6.9 Environment Act 1995 requires National Parks to produce a Management Plan setting out strategic management objectives to deliver the National Park Purposes and Duty. National Planning Policy Guidance (NPPG) states that Management Plans “contribute to setting the strategic context for development” and “are material considerations in making decisions on individual planning applications.” The South Downs Partnership Management Plan as amended for 2020-2025 on 19 December 2019, sets out a Vision, Outcomes, Policies and a Delivery Framework for the National Park over the next five years. The relevant policies include: 1,5, 9, 10, and 50.

Legislation for Heritage Assets

- 6.10 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states “in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 6.11 Section 72 of the Town and Country Planning (Listed Buildings and Conservation Area) Act 1990 relates to conservation areas. It requires “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.” The Site is not within the Greatham Conservation Area but consideration in regard to any impact is considered in section 8 below.

Environmental Impact Assessment

- 6.12 Paragraph 3.3 summarises that a previous screening opinion for a larger form of development did not require an EIA. The application has been subject to screening and it has been concluded that the scheme does not constitute EIA development for reasons of its scale, use, character and design and environmental considerations associated with the site.

Other material planning considerations

- 6.13 The following are relevant considerations:
- Adopted Sustainable Construction SPD
 - Adopted Affordable Housing SPD
 - Draft Parking SPD (second draft currently undergoing public consultation)
 - Ecosystems Services Technical Advice Note

7. Planning Policy

- 7.1 Whilst the South Downs Local Plan must be read as a whole, the following policies are particularly relevant:
- SD1: Sustainable Development
 - SD2: Ecosystems Services
 - SD4: Landscape Character
 - SD5: Design
 - SD8: Dark Night Skies
 - SD9: Biodiversity and Geodiversity
 - SD10: International Sites
 - SD11: Trees, Woodland and Hedgerows
 - SD12: Historic Environment
 - SD13: Listed Buildings
 - SD16: Archaeology

- SD17: Protection of the Water Environment
- SD19: Transport and Accessibility
- SD22: Parking Provision
- SD25: Development Strategy
- SD26: Supply of Homes
- SD27: Mix of Homes
- SD28: Affordable Homes
- SD45: Green Infrastructure
- SD48: Climate Change and Sustainable Use of Resources
- SD49: Flood Risk Management
- SD50: Sustainable Drainage Systems
- SD71: Allocation Policy – Land at Petersfield Road, Greatham

7.2 The following policy of the Hampshire Minerals and Waste Plan (2013) is relevant:

- Policy 15: Safeguarding minerals

8. Planning Assessment

8.1 The application site is allocated for residential development in policy SD71 of the SDLP. The principle of development is therefore established. Policy SD71 prescribes a range of 35-40 dwellings, associated open space, and that a shop would be permitted, with suitable parking. Criteria (2) and (3) of SD71 outline a range of requirements for new development which include aspects of design, heritage considerations, flood risk, landscape and ecology. These are addressed where relevant in the assessment below alongside other policy considerations.

8.2 Greatham is a small village which generally has a linear settlement pattern with development along Petersfield Road where there is a 'loose knit' character of dwellings and other buildings south of the site. The application site, in contrast, has development in depth away from the road and beyond the linear settlement pattern, albeit Bakers Field immediately to the north also extends away from Petersfield Road.

8.3 The scheme under consideration is the third (including original) formal submission within this application. There has been good engagement with the Applicant and their project team, along with some limited engagement with the Parish Council. This has enabled certain parameters for the scheme to be developed, from the perimeter block layout to architectural detailing.

8.4 Officers acknowledge the improvements that have been made and the following main positive attributes of the design are summarised below.

- Broad principles of the layout supported.
- Layout would provide a transition in the density of development through the site (policy SD71).
- Would retain the existing access (policy SD71).
- Open space provision (location and amount) (policy SD7).
- Housing mix
- Parking strategy is generally well integrated into the scheme.
- Principles of green infrastructure within the layout (albeit concern regarding garden boundary treatments and GI success is subject to the more detailed design).
- Architectural detailing – eg. chimneys, porches, gable and eaves detailing, window details particularly glazing bars (albeit use of timber not confirmed).

8.5 However, importantly, it is not considered that the scheme has sufficiently progressed enough to create a locally distinctive development that would complement the character of Greatham. The reasons for this conclusion are outlined further below.

- 8.6 The dwellings are a typical traditional style of design but they are akin to more modern schemes where there is often a consistent approach to typologies in terms of footprints and building forms. Within individual elevations there are features which reflect the character of Greatham, however, the proposed street scenes do not create a good varied character and consequently this has not resulted in a sufficiently bespoke scheme.
- 8.7 For example, the proposed street scene facing Petersfield Road includes three large houses that are virtually identical, roofs throughout the street scene are of an overall similar form and height and dwellings are similarly spaced out. This produces quite a repetitive street scene. Additionally, on the opposite side of the perimeter block the large detached dwellings proposed to overlook the open space are all of a similar form, layout and orientation which, again, creates a less characterful street scene even if different materials were to be employed between these dwellings.
- 8.8 Overall, throughout the scheme dwellings would unacceptably be sited in a somewhat uniform and consistent layout in terms of building lines, orientations, and general separation distances. Street scenes with differing roof forms, orientation of properties and heights that are influenced by the positive local vernacular would, for instance, create a more locally distinctive character.
- 8.9 All of these aspects combined result in a scheme that doesn't sufficiently reflect the positive and eclectic mix and style of properties in Greatham which should be achieved. The layout has quite a uniform rhythm in how dwellings are sited, for instance, and as a result it is less of an organic approach that reflects the more positive characteristics of Greatham (described in paragraph 1.2 above).
- 8.10 The use of materials is also a concern in regard to achieving a locally distinctive scheme. Red brick is a predominant material which is considered appropriate. The proposed stonework is considered however somewhat tokenistic in its extent and how it would be employed within elevations throughout the scheme, whereby it wouldn't contribute to enhancing local distinctiveness. This type of material would need to be more extensively used than the proposed piecemeal approach. Whilst materials can, generally, be conditioned these would need to be agreed in accordance with the plans and as such any significant changes to the layouts or elevations at a later stage has the potential to alter its character beyond that presented now.
- 8.11 Regarding the road layout, attempts have been made to create a less engineered approach through varied widths, shared surfaces and landscaping closer to its edges in order to create a rural character. The lack of pavements is positive and the provision of separated pedestrian paths within open space is also supported. However, designed-in traffic calming and an engineered character of the area at the end of the main access from Petersfield Road and on the south eastern side of the perimeter block do not create a good street scene character. Furthermore, an approach of managing vehicles speeds through design as advocated in 'Roads in the South Downs' has not been followed. In addition, material changes near to the main access are atypical of rural settlements and would appear too suburban in this rural context.
- 8.12 The scheme incorporates a good amount of public open space and green infrastructure which would link through the centre of the site. The north east boundary in comparison would be defined by less planting, however, this could be considered further via appropriate condition(s). Tree planting could also enhance biodiversity, manage surface water and improve the amenity of the public realm including as a focal features in views through the site. The landscape scheme, overall, has the potential for net biodiversity gain subject to conditions concerning these details. Garden frontages however need to be re-considered in accordance with SDNPA Design and Landscape consultee advice to be acceptable.
- 8.13 In conclusion, the dwellings adopt a traditional form of architecture but the variety of house typologies, their siting and orientation and forms, as well as the use of materials have not resulted in a scheme that would create a sufficiently positive contribution to the character and appearance of the area.

- 8.14 A shop was included in the originally submitted scheme but it has been omitted. It was removed in response to local views concerning its viability and discussion with the Parish Council, on balance, its exclusion is considered acceptable. It is not an absolute requirement of SD71, rather, one is acceptable in principle were it to be proposed.

Sustainable Construction

- 8.15 Discussions have taken place on matters of sustainable construction and the Applicant has confirmed that the water efficiency measures required in SD48 would be met, but has requested that the energy efficiency standards be conditioned on the basis that further design work would be required to achieve this requirement.
- 8.16 A plan detailing positions of solar PV panels on roofs has been provided and the 20% energy requirement from renewables could potentially be met and this could be further conditioned if Permission was granted. The introduction of high quality well designed panels on roofs would not significantly detract from the scheme and area. Electric vehicle charging points are proposed for all dwellings which is supported.
- 8.17 The consideration of green roofs has been raised with the Applicant, however, none have been proposed. The application was originally submitted well before the Sustainable Construction SPD was adopted and other progressive measures responsive to climate change, albeit the latest plans post-date its adoption. In light of the measures above, officers consider that the requirements of SD48 could be met and secured via conditions and consequently have not raised sustainability matters as a reason for refusal.

Housing Mix

- 8.18 Policy SD27 requires predominantly 2 and 3 bed dwellings for open market and affordable dwellings. 68% of the proposed dwellings are 2 and 3 beds which is supported and a smaller proportion (27%) are 4 and 5 bed properties. The proposed mix is acceptable as whilst a notable percentage of larger dwellings is proposed this would help to deliver affordable housing and to achieve a transition in density through the scheme as required in SD71.

Affordable Housing

- 8.19 Further to paragraph 3.2 above, it has recently been verbally advised to officers that there are viability concerns with providing the affordable housing provision outlined in the latest submission, and that the scheme is undergoing further viability assessment work. At present, no information has been provided to justify that the minimum 50% contribution required by policy SD28 isn't achievable and given the uncertainty a reason for refusal is currently recommended. Members will be updated in regard to any further discussions with the Applicant and their planning agents.

Access and parking arrangements

- 8.20 Policy SD71 requires the existing access to be retained and make improvements to accommodate the development. The Highway Authority does not object on highway safety grounds to the use of the existing access and the proposed works. Local concerns have been raised about conflict with the school, however, given consultee advice and the proposed design the access arrangements are acceptable. Furthermore, relocating the access further north would have implications for the character of the area given the notable change in levels between the site and the road.
- 8.21 A key issue for the scheme is the amount of proposed residential parking. Many representations raise concern about overspill parking and on-street parking within the scheme. The proposed 82 spaces would be an acceptable provision in terms of the SDNPA's draft Parking SPD requirements, which can be given some weight due to its more advanced stage of preparation, and having considered local concerns and the views of the Highways Authority. The strategy for accommodating off street parking between and adjacent to dwellings and the visitor parking is also an acceptable design approach.
- 8.22 Concerns have also been raised in regard to additional traffic on Petersfield Road, however, the number of dwellings is within the range advocated in SD71 and the housing mix is acceptable.

8.23 Policy SD71 also requires a pedestrian route from Petersfield Road to the PROW east of the site. This has been provided within the layout which is acceptable. The PROW abuts the site boundary in third party land and so it would be important to secure the path with any S106 Agreement. The County Council public rights of way team have requested a financial contribution towards the public rights of way network and specifically improvements to the footpath adjacent to the site. Currently, the SDNPA's CIL regime includes CIL towards the public rights of way network and in this regard I would not be appropriate to seek a contribution for its general maintenance and improvement and a more specific contribution towards the adjacent footpath within a S106 would not be required to make the development acceptable in planning terms.

Ecosystems services

8.24 In addition to SD2, SD71 requires the scheme to have a positive impact on ecosystems services. SD71 specifically requires development to protect and enhance existing trees and this is achieved in the scheme particularly with the retention of protected trees adjacent to the access. Through a detailed landscape design and open space provision, the proposals could meet a range of criteria in SD2 to accord with this policy, subject to condition. These could include:

- Better and more joined up habitats through the landscape scheme to enhance biodiversity.
- Manage and mitigate the risk of surface flooding.
- Increase the ability to store carbon through new planting.
- Improve opportunities for people's health and wellbeing with increased open space and better access to the countryside.

Ecology

8.25 Policy SD9 requires proposals to demonstrate that they have identified and incorporated opportunities for net gains in biodiversity. The County ecologist has not raised any concerns. Net gain could be achieved through the landscape scheme primarily through the breadth and extent of new planting and how it joins together and connects to the site's surroundings, subject to detailed design, to benefit a broad range of protected and unprotected species. The different environments between the Suds basin, swales, other areas of open space and gardens also all provide for a variety species. Therefore, no concerns are raised in regard to net gain and safeguarding protected species.

8.26 Pollution

Policy SD71 requires a scheme not to cause demonstrable harm to ground water resources. Consultees have not raised concerns in this regard, subject to conditions.

Flood risk and drainage

8.27 Policy SD71 requires suitable measures to avoid increases in localised flooding. No objections have been received from specialist consultees in these regards. Residents of Bakers Field have raised concern about existing surface water flooding of their rear gardens from run-off from the site. The current site has expanses of hardstanding which would contribute to this. In contrast the proposals include a drainage strategy and areas of open space to alleviate this concern. The Lead Flood Authority has not raised an objection regarding flood risk.

8.28 Concern has been raised from SDNPA design and landscape officers that the means of managing surface water could be more sustainable and aspects like green roofs, further swales and rainwater gardens could be employed. The Applicant contends that the ground conditions cause limitations to the drainage scheme which result in the need to pipe water to the SuDs basin for instance. The drainage engineer has not objected to the scheme, as proposed, however, there could be potential for further improvements to be made in regard to a landscape approach to managing surface water. On balance, the surface water drainage scheme could be developed further but a specific reason for refusal is not proposed.

8.29 The drainage engineer and Southern Water have not raised an objection in principle to the foul water drainage scheme, subject to conditions.

Impacts upon neighbouring amenities

8.30 The third party representations have raised concerns about a variety of impacts and consultee advice on drainage and flood risk for example has satisfied officers that those concerns have been addressed. The predominant concerns about parking are also addressed above.

8.31 The proposed layout involves dwellings which would back onto Bakers Field. Given the siting of the proposed dwellings, distances from existing properties and potential new boundary planting, whilst there is a difference in levels whereby the proposed dwellings would be on higher ground there would not be any significantly harmful impact upon their amenity to justify a reason for refusal.

8.32 The scheme would also not have an unacceptable impact upon residential properties on the opposite side of Petersfield Road given the distances involved and particularly as the proposed dwellings would be set back within the site.

8.33 Once constructed, the dwellings and open space would not have a significant impact upon the adjacent school and concerns about the proposed access have been addressed above.

Cultural Heritage

8.34 Policy SD71 requires the setting of heritage assets to be conserved and enhanced. The site is opposite a grade II listed farmhouse (Deal Farm) and the conservation area is located approximately 115m south of the site. Given the distances from these heritage assets, intervening topography, vegetation and other development it is not considered that the scheme would cause harm to their setting. The SDNPA's conservation officer has not raised any concerns. It is debatable as to whether the scheme would in fact be within the setting of these assets but enhancements to their setting would arise from the loss of the existing greenhouses, the laying out of the proposed public open space and siting development further back from Petersfield Road compared to the greenhouses.

The Conservation of Habitats and Species Regulations 2017

8.35 To fulfil the requirements under the Habitats Regulations (2017), officers are required to assess the likely significant effects of development on the European protected sites. Whilst it is an allocated site, given its proximity to the SPA and SAC the proposals aren't immune from these considerations. The legislation requires mitigation for recreational impacts associated with residential development so as not to adversely affect the integrity of these sites.

8.36 Following an Appropriate Assessment, the residential scheme has the potential for likely significant effects upon the SPA from recreational pressures, which would need to be mitigated. Natural England has objected due to a lack of mitigation being secured but have suggested that this could be in the form of an off-site contribution towards an appropriate scheme, such as the provision and management of suitable alternative natural greenspace. No such mitigation, has, however, been agreed or secured and therefore a reason for refusal is justified on this basis.

Minerals (silica sand)

8.37 The site lies within a minerals safeguarding area for silica sand as defined in the Hampshire Minerals and Waste Plan (2013). Policy 15 seeks to safeguard mineral resources within the area but permits development provided it would not be appropriate to extract them, hinder their possible extraction, sterilise them or the merits of the development outweighs the need to safeguard them. In this instance, the site is allocated for residential development on a previously developed site whereby the merits of its re-development outweigh safeguarded resources. If planning permission was granted, a suitable condition could be included to investigate such a resource and an appropriate way forward.

Community Infrastructure Levy (CIL)

- 8.38 The scheme would be CIL liable as new residential development is proposed. However, it is possible that existing buildings on site could offset some of this liability in certain circumstances within the CIL regulations.

9. Conclusion

- 9.1 The proposed development is acceptable in principle insofar as the site is allocated for housing and public open space. The assessment outlined in this report has concluded that that there are concerns in regard to the specific siting of the dwellings within the broad perimeter layout and their architecture and use of materials. The scheme meets many of the criteria in SD71, however, for the reasons above it does not accord with policies SD4 and SD5 on design specifically and consequently is not considered to be sustainable development.
- 9.2 The scheme also does not accord with SD28 insofar as it falls short of the 50% affordable housing requirement and there is uncertainty as to whether the currently proposed provision could be delivered.
- 9.3 The scheme also does not secure appropriate mitigation in regard to impacts upon European designated sites and therefore is contrary to SD10 and the Habitats Regulations (2017) (as amended). Other requirements in regard to a S106 Agreement have also been outlined in a fourth reason for refusal.

10. Reason for Recommendation and Conditions

- 10.1 It is recommended to refuse planning permission for the following reasons:
- 1) The proposals fail to adopt a landscape-led approach whereby the layout, in particular the siting of dwellings in a uniform approach within streetscenes, and the design of the proposed dwellings including the use of materials have not been satisfactorily informed by the surrounding built character, the settlement pattern, and the site's edge of village location. Consequently, an unacceptable suburban development is proposed which does not contribute to local distinctiveness and sense of place and would not result in a positive contribution to the overall character and appearance of the area and National Park landscape. The proposed development is therefore contrary to policies SD1, SD4, SD5 and SD71 of the South Downs Local Plan 2019, the National Planning Policy Framework 2019 and National Park Purposes and Statutory duty of a National Park Authority.
 - 2) 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 Authority.
 - 3) 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).
 - 4) In the absence of a completed S106 Legal Agreement to secure the following:
 - Measures to secure the public open space requirements of the development;
 - An on-site affordable housing contribution of 50% of dwellings;
 - Financial contribution and measures to support sustainable modes of transport.

- 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.

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. Equality Act 2010

13.1 Due regard has been taken of the South Downs National Park Authority's equality duty as contained within the Equality 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.

TIM SLANEY

Director of Planning

South Downs National Park Authority

Contact Officer: Richard Ferguson

Tel: 01730 819268

email: richard.ferguson@southdowns.gov.uk

Appendices I. Site Location Map

SDNPA Legal Services, Development Manager.

Consultees

Background Documents All planning application plans, supporting documents, consultation and third party responses

<https://planningpublicaccess.southdowns.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

South Downs National Park Partnership Management Plan 2019

South Downs Integrated Landscape Character Assessment 2005 and 2011

<https://www.southdowns.gov.uk/planning/planning-advice/landscape/>

South Downs Local Plan 2019

https://www.southdowns.gov.uk/planning/south-downs-local-plan_2019/

Ecosystems Services Technical Advice Note

<https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/technical-advice-notes-tans/>

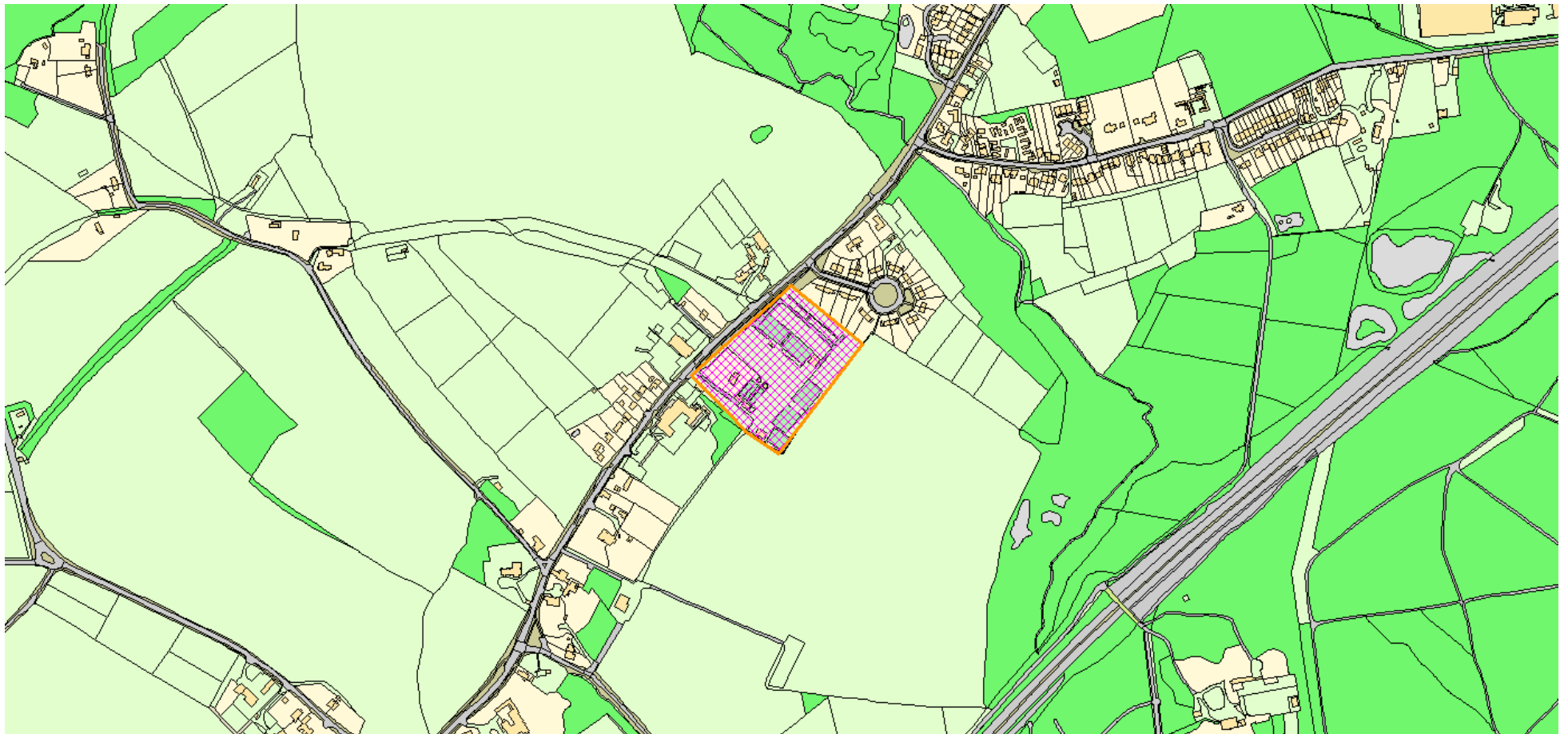
Sustainable Construction SPD

<https://www.southdowns.gov.uk/meeting/planning-committee-13-august-2020/>

Affordable Housing SPD

<https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/affordable-housing-spd/>

Site Location Map



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. South Downs National Park Authority, Licence No. 100050083 (2012) (Not to scale).