



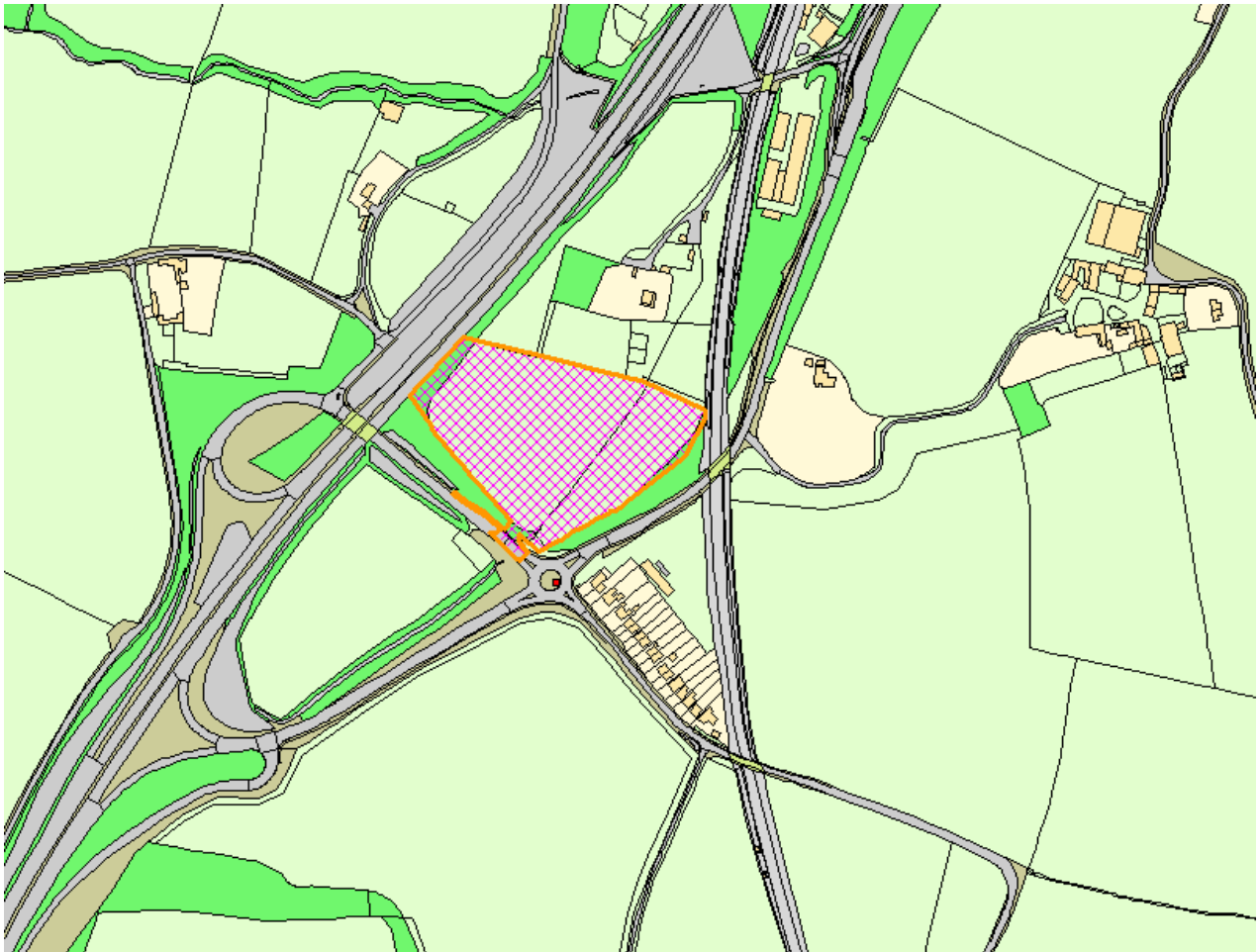
**Agenda Item 6**  
**Report PC23/24-29**

Report to **Planning Committee**  
Date **11 April 2024**  
By **Director of Planning**  
Application Number **SDNP/23/04270/OUT**  
Applicant **Amberleigh Projects Limited**  
Application **Outline planning application for the construction of a hotel (Use Class C1) and a cycle centre (mix of flexible Use Class E(a)(b)(c)) with all matters reserved except for access from B2070.**  
Address **North-East of A3 Northbound Interchange, Petersfield, Hampshire**

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**Recommendation:** **That planning permission be refused for the reasons set out in paragraph 10 of this report**

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### **Executive Summary**

The application site is a 2.5 hectare agricultural field to the south of Petersfield, next to the A3 and one of its junctions. The application seeks outline permission for the erection of a hotel, cycle centre and cafe, parking, new access, access road, drainage basin and associated works and landscaping. All matters would be reserved except for access which would be determined.

The need for additional tourist accommodation within the National Park is acknowledged.

The key considerations are:

- 1) Noting the outline nature of the proposal, the proposals would not conserve and enhance the National Park landscape. The quantum and nature of the development would erode the character and perception of the landscape, changing it from rural to peri-urban – the landscape interface between town and countryside. The development would be harmful in landscape terms.
- 2) Insufficient information has been provided regarding the management of surface water.
- 3) Insufficient information has been provided with regard to the provision of a safe and suitable access, highways safety or addressing a reliance on private cars and sustainable transport provision.
- 4) Insufficient information has been provided to ascertain how the proposal would impact the existing rights of way network, in particular how Footpath FP39 would be affected.

The application is before Members due to the scale and nature of the development, the level of local interest, and the policy issues it raises.

## 1. Site Description

- 1.1. The application site comprises an area of undeveloped agricultural land, of approximately 2.5 hectares, used for occasional grazing. The site is largely bound by trees and hedgerow, although the south-western boundary is more open.
- 1.2. The site is situated to the north-east of the A3 northbound interchange and north / north-west of the B2070, at its junction with Greenway Lane. The A3 trunk road runs adjacent to the north-western boundary. The Portsmouth to London trainline runs adjacent to the eastern boundary.
- 1.3. The site slopes from north-west to south, with a change in level of approximately 6 meters. To the north of the site is a farmstead known as Maple Durham.
- 1.4. Buriton Footpath 39 (FP39) runs northeast from the B2070 through the site and beyond to a point just west of the railway line where it terminates close to Buriton Footpaths 38b and 503.
- 1.5. The sites lies outside of any settlement boundary, with its entrance onto the B2070 approximately 3.5km/2.2 miles from the town centre of Petersfield and 1.3km/0.8 miles from the village of Buriton.

## 2. Relevant Planning History

- 2.1. The following is the most relevant planning history pertaining to the site:
  - **SDNP/22/04038/SCREEN** EIA Screening Request for a proposed hotel (up to 100 beds), cycle centre and new access junction from B2070 including all associated infrastructure such as storage facilities, car parking, cycle parking, new landscaping and planting - on land to the north of the B2070, at Greenway Lane, near Buriton. **EIA Not Required 08/09/2022.**
- 2.2. The following applications are of relevance which was adjacent to the site (to the south), known as 'Recharge':
  - **SDNP/21/06431/FUL** Change of use and redevelopment of the site to provide a recharge centre for electrically powered vehicles, with control and battery room and secure area for the delivery and storage of Bio Gas. Up to 60 eco-lodges (Use Class C1), and engineering work to create an earth sheltered block comprising up to 1,330m<sup>2</sup> of tunnel floor space for a flexible mix of uses within classes C1 and E(a)(b)(c). The formation of a two-way entrance off the B2070, the laying of a perimeter vehicular access road, with link roads, cycle tracks, and areas of hardstanding to provide up to 127 parking spaces. Engineering work for the purpose of landscaping and operations to install drainage infrastructure. **Planning Permission granted on appeal 29/03/2023.**

## 3. Proposal

- 3.1. The application, in summary, seeks OUTLINE permission for the following development:

- the creation of a new access onto the B2070
- the construction of a hotel (Use Class C1)
- the construction of a cycle centre (mix of flexible Use Class E(a)(b)(c)) and café
- The provision of parking and overflow parking spaces
- Infrastructure access roads, paths and a cycling circuit
- the construction of a drainage basin
- associated landscaping

with all matters reserved except for access from the B2070.

- 3.2. Reserved matters in this case (to be determined at a later date) are:

- **Appearance** - the aspects of a building or place within the development which determines the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture;
- **Scale** - means the height, width and length of each building proposed within the

development in relation to its surroundings;

- **Layout** - the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development; and,
- **Landscaping** - the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated.

- 3.3. Turning to access, the application proposes to create a new vehicular access from the B2070 which would be located approximately 20 meters further north-west along the B2070. This would require the relocation of the existing bus stop layby.
- 3.4. Although the application is made in outline, the applicant has provided indicative plans to demonstrate a possible layout and form of the buildings and associated infrastructure. (*Officer note: although outline applications may ask for all matters to be reserved, the applicant has to provide certain parameters of development including heights of buildings and other information.*)
- 3.5. During the course of the application, the applicant provided an amended suite of documents for consideration. This does not alter the outline nature of the proposal.

#### 4. Consultations

##### 4.1. Petersfield Town Council: Objection.

- Development is unsuitable for Petersfield.
- Impact on the gateway to Petersfield would be severe and would potentially affect the sustainability of the town and the economic viability of the town centre.
- Location is considered to be unsuitable for an out-of-town retail leisure development and doesn't align with Petersfield Neighbourhood Plan policies in respect of hotel locations.
- Development would severely impact on the strategic gap between Petersfield and Buriton and raise the real risk of the creation in the future of a linear development between the two communities which would be totally inappropriate for the National Park, contrary to policies within the Petersfield Neighbourhood Plan and have a seriously detrimental effect on the local communities.

##### 4.2. Buriton Parish Council: Objection.

- Highways access and safety concerns.
- Visitor accommodation, adverse effects on the local economy and the issue of 'need'.
- Adverse effects on landscape character, countryside and nature.
- Dark Night Skies and Tranquillity.
- Site has very different set of circumstances to the ReCharge One site which is surrounded by roads on all sides.
- Parking spaces being proposed (particularly only 9 at the cycling centre) seem low.
- Relocation of the bus stop is unfortunate and is another adverse effect of this proposal.

##### 4.3. Dark Skies: Comments

- In principle the external lighting design is acceptable but requires a full assessment on design.
- There are additional concerns over the extent and impact of glazing.
- There is at least a minor impact on dark skies which could be improved by further mitigation and design.

##### 4.4. SDNPA Design Officer: Objection.

- Proposed access point does not respond positively to the site's constraints and opportunities and would be urbanising. Negative impact exacerbated by tree and hedgerow

removal.

- Location adjacent to a widening of the road (bus stop/lay-by), an existing field access, opposite another vehicular access and pavement (Recharge), street lighting and a roundabout, expected culvert of the ditch, markings, kerbs, signage, etc. would significantly and negatively affect the rural character of the area.
- Large-scale tourism accommodation development located outside of any settlement, away from services and facilities that would support its sustainable operation. Most visitors and staff would have to access by private car, resulting in an unsustainable location for a development of this intensity.
- Not an attractive destination for visitors who wish to experience the National Park's special qualities and alternative locations in Petersfield would be more appropriate and accessible.
- The development will cause a negative impact on both landscape character and perceptual qualities, especially in views.
- Not landscape-led as the principle and intensity of development proposed conflict with the landscape character that the SDLP expects to be conserved and enhanced.
- Additional vehicle movements during day, noise and lighting at night and associated large car parking requirement associated with the scale and nature of this proposal, together with the buildings themselves, would likely harm to the current rural character.
- The masterplan relies on screening the development with existing and proposed tree planting.
- Whilst development should be well integrated in the landscape, screening the development highlights how alien it would be in this context and the need for hiding it from views.
- Development would cause irreversible impacts on landscape character, creating visual harm in the National Park.

4.5. **HCC Landscape Officer:** Objection.

- Proposals would have an irreversible impact on the landscape character of the site, introducing urbanising elements into a rural setting outside of a settlement boundary.
- Would potentially remove some of the park's best, most versatile soils.
- Would erode the established settlement patterns relating to coalescence of development.
- Would increase activity which would adversely impact the perceptual qualities of this gateway to the National Park.
- Would cause detriment to one of the special qualities of the park, its breathtaking views.

4.6. **SDNPA Sustainable Economy and Tourism Officer:** Comments.

- This is a proportionally significant increase in accommodation supply for Petersfield, which may be required in the high season, and less so in the low season.
- The data is inconclusive on the need for additional supply beyond already proposed developments, though in principle would support priority 4 of the SDNPA economic profile.

4.7. **Sustainable Construction Consultant:** Comments.

- Insufficient information submitted. Advice provided with regard to the details design.

4.8. **County Ecologist:** No objection, subject to conditions and the advice set out in this report.

4.9. **Lead Local Flood Authority:** Holding objection.

- All development is to be located in the areas of lowest flood risk.
- Calculations should be provided for a lined bioretention area at this stage, rather than for a system that allows partial infiltration.

- Without full infiltration testing and winter groundwater monitoring results to inform the design, the bioretention area should be modelled as lined and the calculations adjusted to suit.
- Once this has been done, the requirements for a partial infiltration strategy could be conditioned. If infiltration is found to be viable, a full infiltration drainage strategy should then be considered. The water company may have comments relating to the positioning of the bioretention area over a foul sewer.

4.10. **Highway Authority:** Holding objection.

- Requires the following additional information in order to address a number of outstanding matters in relation to the proposal:
- Provision of visibility splays for the internal pedestrian and cycle route;
- Assessment of the proposed cycle routes;
- Provision of a full list of matters regarding the site access which do not conform to standard;
- Engagement with the Highway Authority to address the access constraints for the site;
- Consideration towards the phasing of the works should the site receive planning permission;
- Provision of visibility splays at the existing roundabout crossing provision with a right turning vehicle waiting to enter the site;
- Relocation of the tactile crossing point within the site access so that it is on the desire line for pedestrians;
- Confirmation regarding the location of the speed surveys;
- Re-evaluation of the RSA I once a full list of departures regarding the site access have been identified;
- Further clarity regarding the parking provision and how it is considered sufficient given the intended use of the site;
- Further information regarding the trip generation for both sites to ensure that a robust assessment has been undertaken;
- Provision of an operational plan setting out the proposed use of the cycle centre to provide a future control mechanism for the use of the site;
- Junction modelling at the site access and potential junction modelling of the B2070/Greenway Lane roundabout upon receipt of additional information concerning the trip generation; and an updated Travel Plan.

4.11. **County Rights of Way Officer:** Further information and clarification required.

- The legal line of FP39 deviates slightly from what appears to be the used route of the footpath through the site. The route of the PROW as shown on the Definitive Map must be safe and convenient for public access at all times, with no obstruction of the route.
- In this instance, the cycle centre, as shown in multiple plans, appears to be proposed to be built on top of the legal line of FP39 and the southern access to the PROW, opposite the pedestrian crossing point of the B2070, appears to be unusable due to overgrown vegetation.
- The applicant must either change their design plans to accommodate the legally defined route of the PROW or apply for an order to divert it west onto the used route.
- Further information is required regarding the intended cycle use of the PROW and whether any upgrades will be required.

4.12. **County Drainage Officer:** No objection, in principle.

4.13. **Environmental Health Officer – Noise Control:** No objection, subject to conditions.

- 4.14. **Environmental Health Officer – Pollution:** No objection, subject to conditions.
- 4.15. **Arboricultural Officer:** No comments received.
- 4.16. **National Highways:** No objection.
- 4.17. **Natural England:** No objection.
- 4.18. **Southern Water:** Comments.
  - Concern raised regarding the siting of development over an existing public foul sewer, which would not be acceptable. The exact position of the public apparatus must be determined on site by the applicant before the layout of the proposed development is finalised.

**5. Representations:**

- 5.1. 35 letters of objection, (from 30 addresses, including CPRE Hampshire, Friends of the South Downs, a Town Councillor and a Ward Member), raising the following concerns:

Principle of Development, Policy, Location

- Size and scope of development are in contradiction to the National Park's objective of conserving and enhancing the natural beauty of the area.
- Better locations for hotels which would still serve the South Downs but would be in a location in keeping with the development.
- Development would set a precedent for more development along other slip roads in the National Park.
- Developers will attempt to use the precedent of Recharge and The Hotel as a 'toehold' to construct yet another 'anomalous' building proposal.
- At the Public Inquiry for Recharge, the Inspector made it clear that that site was a special case.
- An outline application does not allow for the quality of the design to be judged.
- The land around Buriton Cross is not allocated for development.
- Proposal would irreversibly alter the character of the area.
- No justification for converting a peaceful corner of the South Downs.
- Would diminish the geographical independence of Weston, Buriton and Petersfield.
- The proposal defeats the point of a Local Plan.
- There is no benefit to cultural heritage.
- Direct conflict with National Park purposes, NPPF, Policy SD25 of Local Plan and Corporate policies of South Downs.
- Proposal does not respect heritage of the area.
- This is clearly a Main Town Centre Use in an out of centre location so a sequential test is needed.
- The submitted sequential test shows no flexibility of format.
- Does not come within any of the exceptions in which development can still be permitted even though it is located outside the settlement boundary.

Landscape

- Fails to adopt a landscape led approach.
- Fails to conserve and enhance landscape character.
- Fails to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- Fails to preserve the visual integrity, identity and scenic quality of the National Park.

- Completely out of place in views of the Downs and National Park.
- Would be highly visible from Butser Hill.
- Plans highlight the increasing creep of development along The Causeway.
- Site should be kept as green space within a National Park.
- This site differs to that opposite as it is not bound by the trunk road.
- The same arguments cannot be made for the location of this site as the one opposite.
- No mention of the Local Landscape Character Assessment.
- Ignores the importance of gaps between settlements.
- Danger of urbanising the gateway to the National Park instead of promoting the beautiful countryside people have come to see.

#### Design, layout

- Rooflights should be avoided as the use of blackout blinds is neglected over time.
- No connection between the somewhat scant suggestions for detailed design and any architectural or design criteria dictated by the village, its heritage, its potential of even its own Village Design Statement.
- Amounts to overdevelopment.
- There is no mention of the Buriton Village Design Statement.
- More road signs, pavements and roadside paraphernalia would be unacceptable.

#### Highways, traffic, access

- Proposal will exacerbate traffic congestion at the roundabout.
- Concerns re, safety at the junction and roundabout.
- Unfamiliar users of the local highways, adding to danger.
- Junction and slip roads would need to be upgraded.
- If the bus stop is moved towards the bridge it will obstruct the view when turning out of Weston Lane.

#### Rights of way, cycling

- The surfacing of the footpath needs to be continued at the southern end to the back of footway and at the northern end to the field boundary.
- At the southern end the existing field gate arrangement will no longer be needed so this structure needs to be removed and replaced with a kissing gate.
- Proposed development will negatively impact cycle network in the area.
- The existing cycleway structure is completely inadequate to deal with further traffic.
- Proposal will be dangerous for cyclists and walkers.
- To join nearly every footpath walkers will need to walk along roads with no pavements and press themselves into the hedge to let traffic pass.
- Concerns that the footpath across the site could be made into a bridleway.
- The reference to a cycling centre is little more than a cynical attempt to appear eco-friendly.

#### Trees and biodiversity

- Loss of habitats for bats, birds and wildlife.
- At a time when we are trying to create and protect favourable habitats putting in place



anything that potentially damages sensitive environments must not be permitted.

- Interruption of wildlife corridor.

#### Environment

- Will lead to additional light pollution further reducing the dark skies in this sensitive location and Dark Skies Reserve.
- Potential adverse effects on the Hampshire Astronomical Group Observatory, including its ongoing viability.
- Fails to conserve and enhance the intrinsic qualities of the dark night skies.
- Would result in significant environmental harm to this green field site.
- Noise disturbance to neighbouring occupiers and wider area.

#### Need for development

- The proposed use would compete with the 60 eco lodges opposite the site.
- There is no requirement for a hotel or another bike shop in this location.
- Negative impact on local businesses, including an Asset of Community Value.
- It would not create jobs, it would just replace jobs lost at businesses forced to close.
- Such development should be located in the town centre which is served by sustainable forms of transport.
- There is no demonstrable need for my cycle hire / duplication of similar facilities.
- Incorrect to say that the hotel will support local businesses when there is a bar within the hotel itself.
- It is likely that people will use to hotel on journeys through the area which will not benefit local businesses.
- The business would be disproportionately large in relation to the rest of the visitor facilities.

#### Sustainability

- The hotel does not have the eco credentials as presented.

#### Other

- The hotel could be used for weddings which would have a negative impact on the area.
- Concerns re. impact of power to Maple Durham house.
- The applicant has not offered to meet local residents, therefore questioning the usefulness of their consultation exercise.

5.1 No letters of support from third parties have been received.

### **6. Submissions in support**

6.1. In addition to the submission documents, and during the course of the application, the applicant has written to the Authority making the following (summarised) comments in support of the proposed development:

- The Case Officer recognised the need and economic benefit for the use but that the landscape consultee's objections would override these benefits. *[Officer note: the applicant is referring to a meeting with officers held early in the application process].*
- The revised submission has been redesigned on a landscape-led basis, seeking to address the landscape comments.
- The proposal has 'health and wellbeing benefits' as well as a BNG increase of 58%.
- The 'Recharge One' appeal Inspector commented on the relative qualities of this particular

area of the Park.

- The SDNP Local Plan recognises the frequent shortages in visitor accommodation in the National Park, highlighting the need for hotel accommodation at Petersfield.
- Been preparing this application for over 18 months and have spent a considerable amount of time on stakeholder engagement.
- Cannot understand why more time cannot be granted to enable additional work on the submission.
- Providing an 80 Bed Hotel, something that both SDNP and EHDC have been trying to secure near Petersfield for some 10 to 15 years and we have several main operators, who are keen to occupy the Hotel.
- We have been discussing The Cycling Centre with both local operators and Rutland Cycles, who are keen to set up community cycling clubs.
- The Local Plan allows for new build outside the settlement boundary for Tourism and Leisure use where certain criteria can be met.
- No other site has been promoted or put forward, with the exception of a small-scale extension to the 'Red Lion' which was refused permission.
- This location is a 'gateway' location within SDNP, located close to some of the largest tourist attractions within East Hampshire; Queen Elizabeth Country Park, Butser Ancient Farm, South Downs Way, Shipwrights Way and with an established transport network, and with a bus stop outside the site.
- Doctors are encouraging people to 'get outdoors' which this scheme would support.
- A Public Exhibition was well-attended by local people and was supported by Petersfield Business Community and the Hampshire Chamber of Commerce.
- Petersfield Town Council have provided their support, requesting the inclusion of a tourism desk for visitor information. *(Officer Note: This may have been part of verbal communication between the applicant and the Town Council, but the representation from the Town Council is clear in its objection to the scheme).*
- Owing to the recent appeal decision for 'Recharge One', the proposal would provide a synergy with the long-standing requirement for a Hotel in this area.
- The 'Recharge One' site was considered to make little contribution to the special qualities of the National Park or its reasons for being designated as such.

## 7. Planning Policy Context

- 7.1. Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory development plan is the **South Downs Local Plan 2014-2033 adopted July 2019**. The planning policy context including the development plan policies and other material considerations considered relevant to this application are set out below.

### National Park Purposes

- 7.2. The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage,
- 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, greater weight shall be given to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in a National Park, whereby conservation takes precedence. There is also a duty upon the Local Planning Authority to foster the economic and social wellbeing of the local community in pursuit of these purposes.

National Planning Policy Framework:

7.3. The following sections of the **National Planning Policy Framework (NPPF)** are of particular relevance to this application:

- NPPF09 – Promoting Sustainable Transport
- NPPF11 – Making effective use of land
- NPPF12 - Achieving well-designed and beautiful places
- NPPF15 - Conserving and enhancing the natural environment

Development Plan Policies

7.4. The following policies of the South Downs Local Plan (SDLP) are considered of particular relevance to this application and these policies are considered to be compliant with the NPPF:

- SD4: Landscape Character
- SD8: Dark Night Skies
- SD19: Transport and Accessibility
- SD23: Sustainable Tourism
- SD25: Development Strategy

South Downs Partnership Management Plan (2020-2025)

7.5. The **South Downs Partnership Management Plan, as amended for 2020-2025** sets out a Vision, Outcomes, Priorities and a Delivery Framework for the National Park over the next five years. The priorities of most relevance to this development proposal are:

- Policy 1
- Policy 3
- Policy 29
- Policy 37
- Policy 41
- Policy 50

Other Relevant Policy Documents (including SPDs and TANs)

- SDNPA Design Guide SPD (Jul 2022)
- SDNPA Parking SPD (Apr 2021)
- SDNPA Sustainable Construction SPD (Aug 2020)
- SDNPA Biodiversity TAN (Jan 2022)
- SDNPA Dark Skies TAN (May 2021)
- SDNPA Ecosystem Services TAN

**8. Planning Assessment**

8.1. The main issues for consideration with regard to this application are:

Principle of development

8.2. Development plan policies and in particular the NPPF places 'great weight' on conserving the landscape and the scenic beauty of national parks, which have the highest status of protection. This is in line with the statutory First Purpose of a National Park, which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.

8.3. Policy SD1 encourages a presumption in favour of sustainable development where development proposals accord with other relevant policies in the South Downs Local Plan and the National

Park's statutory purposes.

- 8.4. Policy SD1 provides an overarching context for considering the proposals. It outlines that where proposals accord with other relevant SDLP policies the SDNPA will take a positive approach that reflects the presumption in favour of sustainable development. Furthermore, it re-enforces the 'Sandford Principle' of giving primacy to the First Purpose in decision making where there is a conflict between the two Purposes.
- 8.5. Importantly, SD1 outlines that planning permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park unless, exceptionally:
  - a) The benefits of the proposals demonstrably outweigh the great weight to be attached to those interests; and
  - b) there is substantial compliance with other relevant policies in the Development Plan.
- 8.6. It is considered that neither of the above exceptional circumstances are met with this proposal.
- 8.7. Policy SD25 only permits development in a countryside location in certain exceptional circumstances and where proposals comply with other relevant policies and the context of the broad area. This policy is a key starting point from which to assess the principle of development. As outlined in the assessment below, the proposals do not comply with other relevant policies cited in the issues raised, including landscape considerations. Furthermore, the proposals cannot be justified through the exception criteria of SD25(2)(a)-(d), insofar as (a) it is not an allocated site for the proposed use; (b), there is not an essential need for a countryside location; criterion (c) is not relevant; and (d)) the site is not previously developed land nor would the proposals conserve and enhance the special qualities of the National Park.
- 8.8. In summary, the application site is distant from the defined urban area of Petersfield and the proposals do not meet any of the exceptions in SD1 and SD25 which might support the development in this location.

Sustainable Tourism, Compliance with SD23 and location of development

- 8.9. The findings of the South Downs National Park Visitor Accommodation Review 2014 indicated that there is a lack of tourist accommodation across the National Park. Policy 43 of the South Downs Partnership Management Plan (SDPMP) (2020-25) supports the development and maintenance of appropriate recreation and tourism facilities and visitor hubs in and around the National Park. It is also noteworthy to highlight that whilst the site is outside of the Petersfield Neighbourhood Plan area, its policy does acknowledge the need for additional hotel accommodation in Petersfield but directs this to within or close to the town centre rather than locations such as the current application site.
- 8.10. Policy SD23 sets out that development proposals for visitor accommodation, visitor attractions and recreation facilities will be permitted where it is demonstrated that:
  - a) The proposals will provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities;
  - b) The design and location of the development minimises the need for travel by private car and encourages access and/or subsequent travel by sustainable means, including public transport, walking, cycling or horse riding;
  - c) Development proposals will not detract from the experience of visitors or adversely affect the character, historical significance, appearance or amenity of the area;
  - d) Development proposals make use of existing buildings, and, if no suitable existing buildings are available, the design of any new buildings are sensitive to the character and setting;
  - e) Ancillary facilities are not disproportionately large in relation to the rest of the visitor facilities;
  - f) Any proposal does not have an adverse impact on the vitality and viability of town or village centres or assets of community value; and

- g) Where proposals are located outside settlement policy boundaries, they:
1. Positively contribute to the natural beauty, wildlife and cultural heritage of the National Park; and
  2. Are closely associated with other attractions/established tourism uses, including the public rights of way network; or
  3. Are part of farm diversification schemes or endorsed Whole Estate Plans.

- 8.11. Policy SD23 continues to say that development proposals, on their own or cumulatively with other development uses, must not prejudice or disadvantage people's enjoyment of other existing and appropriate tourism and recreation activities. Development proposals that generate significant additional pressure upon the surrounding rights of way network will be required to mitigate these impacts.
- 8.12. It is acknowledged that SD23 supports a year round visitor economy. However, as will be outlined in the assessment below, the proposals do not accord with either individual SD23 criteria, nor achieve substantial compliance with the policy as a whole. On this basis, the proposals are unacceptable in principle under this policy.

The need for the development

- 8.13. The applicant has provided an 'Economic Benefits Assessment' in support of the application. Their findings are summarised as follows:
- The creation of 111 temporary jobs during the estimated 18-month build phase, supporting the wider economy. An estimated £11.7million gross value added.
  - Once operational, the creation of 58 full-time equivalent jobs on site, generating up to £1.2million in GVA per annum once operational. Overnight visitors to the proposed development are estimated to spend £2.1million per annum, with day visitors spending £1million.
  - The proposed development would support the long-term recovery of the tourism sector, post-Covid19, within Petersfield and the National Park.
  - The proposal would boost domestic tourism, particularly in the South East.
  - The proposal would support employment in key sector within the National Park.
  - The proposed cycle centre would encourage cycling as a form of exercise, positively contributing to the health and wellbeing of the local population and to the visitors to the development which in turn would have economic benefits estimated to be £30million per annum.
- 8.14. The SDNPA Sustainable Tourism and Economy (STE) Officer has reviewed the application and the submitted information. It is noted that the visitor economy is a vital part of the economy of the South Downs National Park and helps to maintain the character and appearance of the National Park through its contribution to the local economy. It is strongly connected to the land-based and food and drink sectors. The SDNP visitor economy consists of 860 businesses providing employment for 9,440 staff, which represents 10.57% of the business population and 17.01% of employment.
- 8.15. It is considered that holiday accommodation is under-represented within the SDNP visitor economy and that more must be done to encourage a greater number of overnight stays which inject spending into the local economy. The Local Plan identifies gaps in accommodation provision, particularly in Petersfield and along the South Downs Way. The submitted information suggests the current provision of beds in the Greater Petersfield area of 172 beds. The submitted 'Economic Benefits Statement' states that research on hotel demand shows that if occupancy is above 70%, it is an indicator that additional bedspaces are needed. With UK hotel occupancy being above 70% in 2022 and as of July 2023 it was 84%, this suggests that additional hotel bedspaces will be needed in Petersfield if it is experiencing trends similar to those seen at a UK level.

- 8.16. The STE Officer notes that the recently approved (at appeal) 'Recharge' scheme will provide 40-60 eco-lodges in the immediate vicinity. The proposed hotel would provide a further 81 rooms, meaning a combined 121-141 rooms vs the 172 baseline. It is considered that this is a proportionally significant increase in accommodation supply for Petersfield, which may be required in the high season, but less so in the low season. The local data is inconclusive on the need for additional supply beyond the already proposed developments. As such, the STE Officer considers that whilst the principle of the proposal is supported by Priority 4 of the SDNPA economic profile there is no overriding evidence that there is a requirement for additional accommodation in this location over and above what is already provided/consented.

Sustainable transport and impact on rights of way network

- 8.17. As noted above, SD23(1)(b) sets out that the design and location of the development should minimise the need for travel by private car and encourages access and/or subsequent travel by sustainable means. The STE Officer recognises that the Cycle Centre would, in principle, encourage sustainable transport and would increase the proportion of journeys made within the National Park by non-motorised means.
- 8.18. It is noted that there are a number of cycle routes nearby, the suitability of which should be considered as a key enabler to the success of the Cycle Centre. It is further noted, however, that there is the possibility of duplication as there are existing facilities at Queen Elizabeth Country Park, in Petersfield town (Retail and Repair) and at the planned 'Recharge' site (e-bike charging points). However, a greater range of choice and cycle destinations and hire options along a key gateway route could encourage a greater volume of non-motorised journeys within the National Park. On this basis, whilst Officers are supportive of additional cycle provision within the National Park, there is no evidence of an overriding need for the provision in this location.
- 8.19. Further, it is noted that owing to the site's separation from the town centre and its proximity to the A3 trunk road, it is likely that the most visitors to the hotel will arrive via private car which would not encourage sustainable transport. A large car park would be included as part of the proposal making it easy for car users to choose this location.

Impact on vitality and viability of town or village centres or assets of community value

- 8.20. Officers note the concerns raised by third parties regarding the negative impact of the proposal on alternative accommodation provision in Petersfield and in Buriton, in particular. SD23(1)(f) sets out that proposals should not have an adverse impact on the vitality and viability of town or village centres or assets of community value. It is noted that The Nest Hotel and The Five Bells in Buriton are both registered as assets of community value. The submitted '*Economic Benefits Assessment*' has not addressed this matter. Given the lack of overriding need for additional accommodation in this area, the proposal could result in a negative impact on the local assets.
- 8.21. It is acknowledged that there could be economic benefits that arise from the proposed development, both in the short and long term, as estimated by the Applicant in paragraph 8.14. However, there may also be negative impacts on existing community assets that may lose business to this alternative provision. The Neighbourhood Plan specifically refers to a need within Petersfield Town Centre, when the application site is 3.5km from the town centre. As above, whilst the proposal may address an overarching need for accommodation within the National Park, it does not address an identified need within the town centre nor has it been evidenced that the proposal is needed over and above the existing and consented schemes in the immediate vicinity of the site.

The need in the proposed location

- 8.22. Noting the Neighbourhood Plan's cited desire for town centre tourist accommodation, including the identification of two sites for this purpose – the Festival Hall and the Red Lion area, the applicant has provided a '*Town Centre Sequential Test Assessment*'. This seeks to address national and local policy requirements in respect of assessing the suitability of the application site for the provision of a hotel in this location, with due regard to alternative sites that are they consider to be suitable and available within a reasonable and defined search area.
- 8.23. This assessment has sought to examine other potential alternative locations for the development

and has considered the relevant merits of each in terms of their suitability to accommodate the proposed development and flexibility in format and scale. The assessment's authors have concluded that all identified alternative sites are not suitable for the development as proposed. They are of the view that the application site therefore represents the most sequentially preferable location for the proposed development.

- 8.24. The applicant cites the SDNPA's need for additional tourism accommodation and the key objective of improving sustainable travel including facilities for cyclists and walkers within the National Park. Officers acknowledge that both stated aims are correct. However, as set out elsewhere in this report, the application site is 3.5km from the town centre and is not within immediately close proximity or accessibility of the South Downs Way, therefore outside of the identified local area of need. As such, and notwithstanding the local bus service, owing to the proposal's location adjacent to the A3 trunk road, the proposal would likely result in a reliance on private vehicles to arrive at the development. Whilst cycle hire would be provided on the site which is beneficial to sustainable travel aims, a number of alternative providers have been identified within the town centre and at nearby Queen Elizabeth Country Park, as such there is no overriding justification for further cycle provision in this location to off-set the likely modes of transport to reach the site.

Awareness, understanding and enjoyment

- 8.25. SD23(1)(a) seeks to provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities. Whilst the applicant cites comments from Petersfield Town Council (made to them) requesting the inclusion of a tourism desk for visitor information at the application site, there is nothing in the current proposal regarding this provision. Petersfield Town Council did not refer to this in their letter of objection to the Authority during the assessment of this application, and indeed raised objection to the proposed development.
- 8.26. It is recognised that the proposal would include the Cycle Centre, sited adjacent to local cycleways and footpaths, thus providing recreational opportunities. However, as noted by the STE Officer, there are a number of alternative providers in relatively close proximity to the site that already offer these opportunities. Therefore, whilst the proposal would add to this which is a benefit of the scheme, there is no overriding need for it, over and above the existing provision within the local area. Therefore, the current proposal does not further the goals of Policy SD23.
- 8.27. In addition, the introduction of the development would altogether alter the experience of users of Public Footpath FP39 which runs across the site, who can currently enjoy a rural, countryside experience. Whilst the experience may well be enjoyable, it would not result in a heightened awareness or understanding of the National Park owing to the altered experience of the rights of way network. This is discussed further below.

Summary

- 8.28. Policy SD23 seeks to foster the responsible and sustainable delivery of tourism and recreation development within the National Park. As set out within the report, there is an identified need for tourist accommodation within the National Park. Notwithstanding this, it has not been demonstrated that there is an overriding need for this development in this location, nor, importantly, has it been demonstrated that the need should outweigh the harm identified in this assessment. There are identified benefits of the scheme, however these benefits are already met elsewhere, in existing facilities and those recently approved. Owing to its location adjacent to the A3 and distance from Petersfield Town Centre, visitors would likely visit by private car which does not promote sustainable transport. Concern is raised regarding the impact on local businesses, including 2 assets of community value. As such, the proposal would not comply with Policy SD23 of the SDLP.

Landscape Impacts

- 8.29. Policy SD4 sets out that development proposals will only be permitted where they conserve and enhance landscape character.
- 8.30. As noted in the site description, the application site is an undeveloped agricultural field. The County Landscape Officer notes that the field forms part of a general sweep of countryside which

flows down from the Chalk Scarp towards the Weald over the Greensand Terrace. The site forms part of the separation this landscape affords between the South Downs escarpment and the main local settlement, the market town of Petersfield.

- 8.31. Although the area is bisected by the A3 trunk road and the Portsmouth-London railway line, the character of the application site remains rural. It is in the gateway to Petersfield and is considered to make a positive contribution to the wider landscape character.
- 8.32. The County Landscape Officer recognises that a key consideration of the impact of the proposed development are the views from the landmark location of Butser Hill. In the *'View Characterisation and Analysis Report LUC 2015'*, the views from the steep scarp slope looking north across the Rother Valley to the Greensand Hills are described as *'breathtaking'*. As such, they are noted in the first of the National Park's Special Qualities. One of several points states that the views reveal *'the way that farming has shaped the landscape (through the field patterns and contrast between enclosed farmland in the valley and enclosed sheep grazed downs or woodland on the scarp), and the distinctive settlement pattern of settled valleys and spring line villages at the foot of the scarp'*. The study also notes that potential threats to the view *'result from developments that affect the iconic habitats, disrupt field patterns, change the distinctive settlement pattern of small historic villages, or form intrusive new developments within the view either by day or night'*.
- 8.33. It is noted that whilst there may not be any rare or unusual landscape elements within the application site, those that do exist are representative and typical of the locality. The submitted LVIA acknowledges that the development proposals would change the site character due to the irreversible change of almost 15% of the site to built form and hard surfacing. The County Landscape Officer disagrees with the LVIA's statement that *'while there would be change, the proposed development would not alter the essential value of the site and the surrounding landscape as countryside. The character of the proposed uses would still be countryside'*. It is considered that by virtue of the intensification of use, the conversion to hard standing and the introduction of considerable built form, the site's nature and character will change to peri-urban, or an urban-rural interface.
- 8.34. It is considered that distant views, particularly from open access land on Butser Hill, flow down the scarp slope and into the mosaic landscape of the greensand terrace before continuing out to the Weald and beyond. Although partly screened by boundary vegetation, there remains intervisibility between the site and Butser Hill. Built form on this site is likely to be visible above the existing vegetation particularly in winter. The County Landscape Officer considers that any coalescence of built form in this location should be resisted in this Gateway location, if the quality of the Park's *'breathtaking views'* are to be conserved.
- 8.35. In allowing the appeal on the adjacent 'Recharge' site, the Inspector recognised that the view from Butser Hill in the direction of the site was a 'pleasant one', but not without built form. He concluded that the development would be seen in this context and that 'Recharge' would become a part of the diminishing level of development that is experienced with distance from Petersfield. The Inspector concluded that this would be harmful noting that there would be minor localised landscape and visual impacts from the proposal to which great weight was attached, given the location of the site within the National Park. However, as discussed in detail below, other benefits of the proposal were seen to outweigh this harm when the Inspector made his decision.
- 8.36. The County Landscape Officer considers that the current proposals represent an *'unacceptable erosion of this area's landscape character, altering the nature of scattered development which is currently subservient to its rural setting'*. The development would contribute to the coalescence of development between the row of properties in Greenway Lane, Maple Durham House to the north and the adjacent Buriton Business Park. This, together with 'Recharge' to the south would likely lead to an unacceptable consolidation of development and the loss of the area's intrinsic rural qualities.
- 8.37. With this in mind, Officers are acutely aware of the cumulative impact of development in this area. Whilst 'Recharge' is not yet under construction, after receiving permission the developer quickly sought to vary and discharge a number of conditions which indicate that there is a reasonable likelihood of the development going ahead. On this basis, Officers are concerned of



the impact of the cumulative development on views from Butser Hill and from the wider surrounding area. Any additional built form in this area would alter the perception of 'diminishing development' as recognised by the 'Recharge' Inspector, rather would create a collection of developments which would erode the existing countryside character and distinctive settlement pattern.

- 8.38. It is also considered that the perceptual quality of the site will alter, with the busyness of usage associated with the hotel and cycle hub, during both day and night. The experience of users of the public right of way would alter. There would be additional vehicle movements within the site, noise, pollution and visual intrusion. All these aspects would harmfully affect the character of the site and immediate area, and how it is experienced.
- 8.39. It is acknowledged that the application is in outline form, and whilst an indicative design and layout have been included within the original and amended submissions, the proposed design and layout are not known. However, as set out above, the principle of development in this location and of the required size, scale and spread of development (in order to accommodate the proposed 80-bed hotel, café, cycle centre, the large number of parking spaces, access, infrastructure, roads, paths, drainage etc.) would have a detrimental impact on the environment. Officers consider that the proposed development could not be moderated to avoid such an impact given the quantum of development sought.
- 8.40. The proposal would, therefore, fail to conserve landscape character for the reasons above and, as such, would conflict with Policy SD4. Policy SD5 also requires development to integrate with, respect and sympathetically complement the landscape character (criterion (a)) and contribute to a sense of place through its relationship to adjoining buildings, spaces and landscape features including historic settlement pattern (criterion (c)) which this proposal would not do.
- 8.41. Furthermore, for the reasons above the proposals would also conflict with SD23. Most notably in regard to landscape considerations, its criterion (c) whereby the proposals would detract from the experience of visitors and the area and, most notably, criterion (g)(i) which requires proposals in countryside locations to positively contribute to the natural beauty, wildlife and cultural heritage of the National Park.

Other matters

Comparisons with 'Recharge' SDNP/21/06431/FUL

- 8.42. The comparisons to the consented (at appeal) scheme opposite the application site are noted. Officers consider it important to discuss these comparisons and provide an assessment of the current application in light of this.
- 8.43. In allowing the appeal, the Inspector described the appeal site as being '*an island piece of land*' and entirely separate from the wider landscape. The Inspector recognised that the appeal site was '*dominated by the surrounding road infrastructure and embankments*' and '*left over after the introduction of the trunk road*'. There were considered to be specific characteristics of the appeal site which divorced it from the surrounding land and landscape.
- 8.44. In comparison to the adjacent '*island*' site, the County Landscape Officer highlights the '*markedly open nature*' of the south-eastern corner of the current application site which ensures that the site not only has intervisibility with the surrounding landscape but '*reads*' as part of it. This is the distinct difference with the current application site in comparison to the appeal site, which is considered to be not '*entirely separate*' to the wider landscape (like the appeal site) but part and parcel of it and the perception of it.
- 8.45. Further, the Inspector recognised the '*clear and obvious advantages arising from the scheme in combating climate change, an objective of both national and local policy*'. The Inspector also recognised that the scheme would be wholly off-grid, utilising biogas and solar panels to power the entire development using renewable sources. The Inspector also considered the benefits of the scheme's utilisation of waste methane from local farms and using this to heat the development. Thus, the countryside location was required for the development.
- 8.46. It is recognised that there is a need for additional tourist accommodation and that the Authority seeks to encourage sustainable travel, however there is a lack of overriding evidence that

(especially in light of the allowed appeal) additional accommodation is needed in this countryside location. Further, the provision of cycle hire is a recognised benefit however the proposal would likely be accessed initially by private car which is undoubtedly less-sustainable than a town centre location served by trains and other public transport. Therefore, the proposal does not seek to address an objective of both national and local policy, namely combating climate change. As such, the same justification applied by the Inspector to outweigh the identified landscape harm cannot be applied here.

- 8.47. Similarly, the Inspector placed great weight on the ‘*minor localised landscape and visual impacts*’... ‘*given the location within the National Park*’. However, substantial weight was given to the ‘*numerous benefits*’ of electric vehicle charging points of various types, tourist accommodation, the ‘*contemporary*’ and ‘*novel*’ energy efficiency as well as the economic benefits of the farm shop. This then was considered by the Inspector to outweigh the landscape harm and visual impacts.
- 8.48. It is evident that there were very specific reasons why the Inspector considered that that particular site stood apart from the wider landscape and why that particular development provided specific and unique benefits to the local, national and international climate change agenda.
- 8.49. In addressing the comparison to the allowed ‘Recharge’ scheme, the County Landscape Officer refers the Inspector’s descriptions of a site ‘*entirely surrounded by highways and dense wooded boundaries*’; a site that had lost its relationship with the wider landscape. The County Landscape Officer considers that the same cannot be said about the current application site which relates clearly to the adjacent countryside and has glimpsed long distance views of Butser Hill.
- 8.50. In the ‘Recharge’ decision, the Inspector refers to the visibility of the scheme being ‘*limited*’ owing to existing and proposed boundary treatment. He refers to views into the site from the adjacent bus stop would be made by bus-stop users and passersby, not by people wishing to appreciate the view. The same cannot be said for the current site, not least as a public right of way runs through the site providing direct views and appreciation of its character.
- 8.51. It is acknowledged that the current application is in outline form, with only access to be determined. However, Officers consider that in order to accommodate the proposed 80-bed hotel, café, cycle centre, the large number of parking spaces, access, infrastructure, roads, paths, drainage etc. there would be an undoubted and significant urbanisation of the existing undeveloped, green field – however it is laid out or designed. The indicative plans provided demonstrate that the introduction of the proposed elements would undoubtedly alter the character of the site and the immediate area.
- 8.52. Further, whilst there are benefits to the proposal as set out throughout this report, the benefits are not considered to be in any way so exceptional such as to set aside the associated harm to the landscape character and natural beauty of the National Park. As set out above, greater weight should be given to conserving and enhancing the natural beauty of the National Park, the first statutory purpose of the SDNP designation.

Access, Highways, Rights of Way and Parking

- 8.53. Policies SD19 and SD22 seek to promote sustainable modes of transport, and parking provision that is appropriate to the site’s needs and accessibility to facilities and services, and of a location, scale and design that reflects its context. Policy SD21 promotes the safety and amenity of all road users and safe, direct walking and cycling routes.

Highway and access

- 8.54. At 3.5km/2.2miles from Petersfield Town Centre, it is highly likely that the users of the hotel and Cycle Centre would arrive by private car. The proposed development is located to the east of the A3 and northwest of Buriton in East Hampshire. The site is bordered to the west and south by the B2070 which is subject to the national speed limit.
- 8.55. Of significant relevance is the recent granting of permission (at appeal) for the ‘Recharge’ development (SDNP/21/06431/FUL). This development is directly opposite the current application site and would be accessed via a bellmouth junction and right turn lane. As such, the current proposal needs to be considered in light of that decision and the cumulative impact of

both developments.

- 8.56. The applicant has provided a Transport Assessment and Framework Travel Plan to address the highway implications of the proposed development, alongside supporting site layout plans. The Highway Authority have reviewed the submitted information as well as additional information submitted during the course of the application.
- 8.57. The site access is proposed via a new bellmouth junction and right turn lane on the B2070. To inform the visibility requirements from the site access, the application was submitted with the same speed survey data was used to inform the 'Recharge' application which is more than 2 years old. The applicant provided updated speed data, however the Highway Authority note that it is unclear where the surveys were taken and what the conditions were at the time. As such, the information is insufficient. In addition, the separation distance between the proposed access and that approved for 'Recharge' is a concern which was flagged by the safety auditor. It is not clear why this was accepted by the auditor and clarification is required. The current proposal would require a departure from standard and the Highways Authority is not currently able to confirm if the principle of the departure is acceptable, based on the current submission.
- 8.58. With regard to likely trip generation, the Highways Authority has identified higher trip rates than those submitted by the applicant. The Highway Authority consider that the assessment presented by the applicant is not representative of potential traffic generation from the site and should therefore be re-run. In addition, the Highway Authority questions the trip rate data provided for the Cycle Centre and considers that further research and justification is required.
- 8.59. No visibility splays have been provided for pedestrians and cyclists using the existing crossing provision at the roundabout. Due to the proximity of the proposed access, there is a risk that right turning vehicles would obstruct the intervisibility between eastbound vehicles on the B2070 and those crossing northbound. Sight lines should be provided to ensure appropriate intervisibility can be maintained. The crossing of the proposed access is set back significantly within the junction increasing the walking distances for those wishing to access the bus stops. The crossing provision should be placed on the design line. Due to the crossing distance this may require the provision of a pedestrian refuge island.
- 8.60. The Highway Authority considers that the proposal has not considered the consented 'Recharge' scheme and fails to recognise the permitted access arrangements for that site.
- 8.61. In summary, insufficient information has been provided to demonstrate that the proposal would provide a safe and suitable access and would not have a detrimental impact on the operational safety of the Highway network.

Parking

- 8.62. The indicative plans show that 81 car parking spaces would be provided for the hotel, which includes 30 overflow spaces. This accords with the SDNP's adopted parking standards for the hotel element of the proposal.
- 8.63. However, some concern is raised regarding the proposed parking provision for the Cycle Centre. Currently, 9 spaces are proposed. The Highway Authority are of the view that this has not been justified given the potential take-up of cycle hire.

Cycle networks

- 8.64. National cycle route 222 can be accessed to the southwest of the site via the shared use facilities available on the southern side of B2070, providing a route into Queen Elizabeth Country Park. The Shipwrights Way also runs to the east of the site, providing cyclists with a route to towns and villages throughout East Hampshire. The Highway Authority considers that, given the nature of the development, these cycle routes are likely to be well utilised by visitors to the cycle centre. As a result, the applicant was asked to engage with Sustrans to understand whether there are any improvements in the area which are required to increase the accessibility and quality of the cycle routes. The updated submission makes reference to attempts to contact Sustrans, although no response was received. A presumption has therefore been made that the route is fit for purpose, which is not agreed by the Highway Authority. No details of the routes proposed to be advertised as safe and suitable for cycle hire users have been presented; however, there are

clear deficits in the immediate infrastructure. In the absence of this evidence base, the Highway Authority are not satisfied that there are appropriate routes suitable for all cycle hire users to utilise the off-road cycling network or visitors to the proposed hotel.

- 8.65. In summary, the application fails to fully consider safe and suitable sustainable transport provision.

Rights of Way and pedestrian access

- 8.66. Buriton Footpath 39 (FP39) runs northeast from the B2070 through the site and beyond to a point just west of the railway line where it terminates close to Buriton Footpaths 38b and 503. The HCC Countryside Planning Officer has reviewed the proposals and has raised a number of concerns and points of clarification.
- 8.67. The legal line of FP39 deviates slightly from what appears to be the used route on the ground. The route of the PROW as shown on the Definitive Map must be safe and convenient for public access at all times, with no obstruction of the route. Noting the outline nature of the proposal, the indicative plans position the proposed cycle centre on top of the legal line of FP39 and the southern access appears to be unusable due to overgrown vegetation. The applicant would need to either ensure that the proposed development is re-sited or they should apply to divert the legally defined route. Officers are satisfied that these matters could be addressed at reserved matters stage.
- 8.68. The HCC Countryside Planning Officer is supportive of the concept of active travel and welcomes the applicant's desire to accommodate this within the site. However, it is unclear what status the applicant proposes the cycle access to have and this may require an upgrade of the footpath to a bridleway which has a number of implications which cannot be determined owing to insufficient and unclear information. It is also not known if the footpath would be upgraded, whether it would be segregated from other users, whether planting would be incorporated close to the route and how a possible bridleway use would be accommodated on site.
- 8.69. The outline nature of the proposal is acknowledged; however it is not clear what the applicant's intentions are for the right of way and insufficient information has been provided as noted above. This information is required in order to determine the acceptability of the proposal in principle, before the detailed reserved matters can be considered, in the event of outline approval. This is matter that was also flagged by the CHA who also raise concerns regarding pedestrian access to and from the site, including potential visitors to the Cycle Centre from the 'Recharge' site opposite, particularly given the proposed re-siting of the bus stop. The application does not consider how this would be achieved safely and appropriately.

Pedestrian access to the site is achieved via a 1.8m wide footway on the northern side of the B2070. This footway links to the wider existing provision via the Greenway Lane roundabout. A shared use pedestrian and cycle route runs across the roundabout towards Petersfield which is proposed to be extended as part of the site access works to connect to the proposed pedestrian and cycle access point to the site. It is considered that the existing infrastructure is insufficient to support the proposed demands and the level of improvements set out are insufficient to overcome the deficits to the existing level of service. *Summary on access, parking and PROW*

- 8.70. Additional information has been provided during the course of the application, however a number of matters remain outstanding or unanswered. In light of this, it is considered that insufficient information has been provided to demonstrate that the proposal would provide a safe and suitable access and would not have a detrimental impact on the operational safety of the Highway network. Further, the proposal does not provide safe or suitable opportunities to reduce the reliance on the private car. In addition, the implications to the local public right of way network are unclear and have not been clearly demonstrated.
- 8.71. On the basis of the above, the proposed development would fail to accord with Policies SD19, SD21, SD22 and SD5(1)(j).

Flooding and drainage

- 8.72. Policy SD50 (Sustainable Drainage Systems or 'SuDS') supports development proposals that ensure against the increase of surface water run-off, taking account of climate change. Furthermore, Policy SD49 states that proposals should seek to reduce the impact and extent of

flooding.

- 8.73. Policy NEP8 of the PNP sets out that all developments in areas liable to flooding must adequately address potential flooding risk in accordance with advice in the NPPF.

Foul Drainage

- 8.74. Southern Water have raised concern regarding the proximity of the proposed development on an existing public foul sewer that crosses the site, noting that the exact position of the public apparatus must be known before the layout of the proposed development is finalised. No development or tree planting should be carried out within 3 meters of the external edge of the sewer without consent and no soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of public or adoptable gravity sewers.
- 8.75. Owing to the outline nature of the proposal, Officers are satisfied that all development, plating and surface water conveying features could be sited at suitable distances from the sewer, subject to all other considerations. No concern is therefore raised on this basis.

Surface Water Drainage

- 8.76. The LLFA have reviewed the proposal and note that whilst the site is within Flood Zone I, there are parts of the site at an elevated risk of flooding from surface water. They note that the indicative location of the Cycle Centre should be relocated to an area at a lower risk of flooding.
- 8.77. It is noted that surface water runoff from the site is to be attenuated and discharged at a restricted rate to an adjacent watercourse. The proposed bioretention area is to be unlined and an assumed infiltration rate has been applied to the model. Without full infiltration testing and winter groundwater monitoring results to inform the design, the bioretention area should be modelled as lined and the calculations adjusted to suit. As noted above, Southern Water have concerns relating to the positioning of the bioretention area over a foul sewer. The LLFA require Calculations should be provided for a lined bioretention area at this stage, rather than for a system that allows partial infiltration.
- 8.78. The outline nature of the proposal is acknowledged, however this matter is considered to be an 'in principle' issue and the Authority must be satisfied that surface water can be managed appropriately. At this stage, insufficient information has been provided to enable a conclusion to be reached regarding the satisfactory management of surface water. The proposal therefore conflicts with Policies SD49 and SD50 of the SDLP and NEP8 of the PNP.

Impact on Local Amenity

- 8.79. Policy SD5 k) requires proposals to have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.
- 8.80. It is noted that the proposals would generate additional noise and disturbance, alone and in combination with the adjacent 'Recharge' development. There would be additional traffic and activity, adding to the existing road noise from the A3.
- 8.81. With regard to Noise, the Environmental Health Officer has not raised an objection. The submitted 'Noise and Vibration Assessment' indicates that activities at the development site including noise from deliveries and use of the car park are not expected to result in a significant adverse impact at receptors. Noise impacts from construction activities are expected to be at the Lowest Observed Adverse Effect Level and therefore acceptable.
- 8.82. With regard to Pollution, the Environmental Health Officer has not raised an objection. The submitted 'Air Quality Assessment' reports the potential for dust during the construction phase which could be controlled by mitigation measures. Air quality impacts during the operational phase of the development resulting from an increase in road traffic to and from the development are estimated to be negligible. Conditions are recommended in the event of an approval.
- 8.83. The site is also a good distance from Buriton and properties on the southern defined edge of Petersfield on The Causeway. Overall, given the location of the site, it is not considered that there would be significant impact to justify a refusal in regard to private residential amenities.

Ecology, ecosystems services and biodiversity net gain

- 8.84. Policies SD2, SD9, SD11 and SD45 support proposals that conserve and enhance biodiversity, trees and woodland, and green infrastructure; retain, protect and enhance features of biodiversity and supporting habitat, and identify and incorporate net gains for biodiversity and green infrastructure.
- 8.85. The application is supported by a suite of ecological surveys and reports that have been reviewed by the County Ecologist. With regard to the access, the survey work and mitigation proposed is considered to be sufficient. There is potential for nesting birds and dormouse to be present, therefore, a mitigation licence will be required from Natural England for dormouse prior to the commencement of the access and precautionary measures for nesting birds are recommended. The County Ecologist agrees with these measures and providing these are implemented there are no outstanding concerns with regard to the access. A condition is recommended should members be minded to approve.
- 8.86. With regard to biodiversity net gain, the application was made prior to the commencement of mandatory biodiversity net gain. However, the Biodiversity TAN requires a minimum of 10% net gain in biodiversity. The submitted 'Biodiversity Net Gain Assessment' sets out that the proposed development could achieve more than 10% net gain in biodiversity on site sufficient to meet the expectations of Policy SD9 and the TAN.
- 8.87. The County Landscape Officer notes that there does not appear to be an assessment of the effect of the proposal on the soils resource. It is considered that if the site has agricultural grade 3a soils then the value of the soil production will be lost. This is not supported by Policy SD2 which states at g) that development should protect the best and most versatile soils.
- 8.88. Owing to the outline nature of the proposal, with layout and landscaping as reserved matters, the ecological and biodiversity implications would be revisited and determined at reserved matters stage in the event of outline approval. However, it has not been demonstrated that the proposal would not conflict with Policy SD2.

Dark Skies

- 8.89. Policy SD8 requires proposals to take all opportunities to reduce light pollution and ensure that the measured and observed sky quality in the surrounding area is not affected. The site falls within the E1a buffer zone of the South Downs Dark Sky Reserve and within a few kilometres of the core to the south. The core consistently measures sky quality above 20.5 magnitudes per arc second<sup>2</sup> which is indicative of a dark sky experience where key astronomical objects are visible to the naked eye. Recent measurements show that conditions immediately surrounding the site (within 500m) will consistently measure 20.5 and above, improving towards the open countryside. As such there is a risk that any development in this area has the potential to erode sky quality conditions.
- 8.90. Officers note the concerns raised by third parties regarding the potential impact to the Dark Night Skies and in particular the potential impact on the Hampshire Astronomical Group Observatory.
- 8.91. The Dark Skies consultant raises concern regarding the indicative rooflights and glazing proposed. It would be preferred if the use of rooflights was avoided in the first instance before the consideration of automated black-out blinds. These design features could present a significant impact both in terms of landscape visual impact and the generation of sky glow. It would be preferable to constrain the glazing to minimise this impact with particular care to position internal luminaires away from glazing to reduce direct visibility and intensity sources.
- 8.92. In principle, the external lighting strategy is acceptable but a full assessment would be required at reserved matters stage. Recognising the outline nature of the proposal, it is considered that the concerns raised could be addressed at reserved matters stage and would not warrant the recommendation of refusal on this basis alone.

Sustainable Construction

- 8.93. The Authority's Sustainable Construction consultant has reviewed the submitted information and

considered that further clarification is required in relation to the buildings' BREEAM ratings, SBEM assessments, water calculations, details of charging points and details of green roofs.

- 8.94. Noting the outline nature of the proposal which seeks to establish the acceptability of the principle of the proposal, it is recognised that much of the required information would relate to the detailed design of the development which would be for future consideration at reserved matters stage, should permission be granted.
- 8.95. On this basis, it is considered that a final design could come forward at Reserved Matters stage that could accord with Policy SD48.

#### Trees

- 8.96. Policy SD11 sets out that proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands. Development proposals that affect trees, hedgerows and woodland must demonstrate that they have been informed by a full site survey, including an Ecological Survey, Arboricultural Method Statement and associated Tree Protection Plan, and include a management plan.
- 8.97. It is noted that the site currently benefits from trees and hedgerow on the boundaries.
- 8.98. Owing to the outline nature of the proposal, with all matters except access reserved for future determination, the layout and scale of the proposed buildings are not known. However, the indicative plans provided show that sufficient space exists within the site to ensure that built form and hard surfaces are sited away from the vegetated boundaries such as to avoid harm to root protection areas. Officers are therefore satisfied that this is a matter that could be addressed at reserved matters stage, should Members choose to grant permission.

### **9. Conclusion**

- 9.1. For the reasons set out within the above report, the proposals would not conserve and enhance the National Park landscape. Whilst in outline form, the quantum of development would erode the character and perception of the landscape, changing it from rural to peri-urban.
- 9.2. The comparisons to the recently allowed 'Recharge' scheme are noted, the specific circumstances for that decision are explored above. It is clear that, in granting the appeal, the contribution of the scheme to local and national policy objectives weighed heavily in its favour. Whilst there are acknowledged benefits of the current proposal, as set out throughout this report, it has not been demonstrated that there is an overriding need for this development in this location such as to set aside the identified harms.
- 9.3. Insufficient information has been provided with regard to the management of surface water. Likewise, insufficient information has been provided with regard to the provision of a safe and suitable access, highway safety or with regard to addressing a reliance on private cars given the site's location 3.5km from the town centre. Further, insufficient information has been provided with regard to how the proposal would impact or alter the existing rights of way network.
- 9.4. The NPPF outlines overarching economic, social and environmental objectives to sustainable development. In these respects, the scheme would deliver new tourism development which would have social and economic benefits. These include attracting visitors to the National Park to enjoy it and support health and wellbeing, whilst contributing to the local and wider economy in regard to supporting shops, services and facilities. Environmentally, the scheme would, however, have disbenefits and a negative impact in regard to the reasons outlined in the assessment. For those reasons, these are not outweighed by the social and economic benefits within the planning balance,
- 9.5. The application has been assessed against the Development Plan, the Neighbourhood Plan, the NPPF, the purposes of the National Park and duty as well as the other material considerations as set out in this report. The proposals are considered to represent unsustainable development and would be contrary to the first purpose of the National Park. Whilst merits of the scheme have been acknowledged, there are no material considerations of sufficient weight to recommend the grant of planning permission.

**10. Reason for Recommendation and Conditions/Reasons for refusal**

10.1. The recommendation is to refuse planning permission for the following reasons:

1. The proposed development would fail to conserve and enhance the National Park Landscape. Recognising the outline nature of the proposal, the proposed quantum of development is considered to significantly harm the existing rural landscape character of the site and its surroundings and result in a peri-urban form of development that would not sensitively integrate with the local landscape character. Consequently, the proposals fail to make a positive contribution to the overall character and appearance of the area and the site itself which contributes to this character and the special qualities of the National Park. The proposals are, therefore, contrary to policies SD1, SD2, SD4, SD5, SD6, SD7, SD9, SD23 of the South Downs Local Plan 2019, the National Planning Policy Framework 2023, and the Statutory First Purpose of a National Park.
2. Insufficient information has been provided to demonstrate that surface water can be managed successfully thus having an unacceptable impact on the water management network. The proposal therefore fails to accord with Policies SD49 and SD50 of the South Downs Local Plan 2019.
3. Insufficient information has been provided to demonstrate that the proposal would provide a safe and suitable access and would not have a detrimental impact on the operational safety of the Highway network and provide suitable opportunities to reduce the reliance of the private car in accordance with paragraph 115, 116 and 117 of NPPF. Insufficient consideration has been given to safe and suitable sustainable transport provision. The proposals would therefore be contrary to Policies SD19, SD21 and SD22 of the South Downs Local Plan 2019.
4. Insufficient information has been provided to demonstrate that the proposal would not adversely impact the existing rights of way network, (in particular how Footpath FP39 would be affected). On the basis of the above, the proposed development would fail to accord with Policies SD19, SD21 and SD22 of the South Downs Local Plan 2019.

**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.

**MIKE HUGHES**

**Director of Planning (Interim)**

**South Downs National Park Authority**

Contact Officer: Philippa Smyth

Tel: 01730 819296

Email: [philippa.smyth@southdowns.gov.uk](mailto:philippa.smyth@southdowns.gov.uk)

Appendices: 1. Information concerning consideration of applications before committee



SDNPA Consultees: Director of Planning (Interim), Legal Services

Background Documents: [All planning application plans, supporting documents, consultations and third party responses](#)

[National Planning Policy Framework \(2023\)](#)

[South Downs Local Plan \(2014-33\)](#)

[Petersfield Neighbourhood Plan](#)

[South Downs National Park Partnership Management Plan \(2020-25\)](#)

[SDNPA Biodiversity TAN \(Jan 2022\)](#)

[SDNPA Corporate Plan \(2020-25\)](#)

[SDNPA Dark Skies TAN \(May 2021\)](#)

[SDNPA Design Guide SPD \(July 2022\)](#)

[SDNPA Ecosystem Services TAN](#)

[SDNPA Parking SPD \(Apr 2021\)](#)

[SDNPA Sustainable Construction SPD \(Aug 2020\)](#)

