

**Greatham Parish Council:
Response to the planning application
SDNP/18/06111/FUL**

January 28th 2019

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1. INTRODUCTION

Greatham Parish Council is not opposed to development on this site. We believe it has the potential to have on it an outstanding development that enhances both Greatham and the South Downs National Park.

We do, however, object to this planning application.

This document outlines our objections.

2. SD73: PART OF THE SOUTH DOWNS LOCAL PLAN

The South Downs Local Plan is due to be finalised within the next few months. This site is referred to as SD73 in the Local Plan, which it says is suitable for 35-40 houses and a shop.

Development cannot take place on this site without the Local Plan because it is outside the current Settlement Policy Boundary. If the Local Plan is adopted, the Settlement Policy Boundary will be changed to include the site, and development will be permitted.

Therefore, we believe that the Local Plan should either be used as the guiding document for development on this site, or that there should be no development on this site permitted at all.

We have used the emerging Local Plan to help us form our response. However, the developer has gone against it in these three key areas:

1. At the Local Plan Hearings in 2018 we expressed our approval for the change to the Local Plan which stated that development should decrease away from Petersfield Road. The developer has ignored this and reversed the historic settlement plan for the site, placing the majority of development on the current agricultural land, and open space on the currently developed land.
2. At the Hearings, the developer asked for permission to be able to convert the shop into housing. However, in the Local Plan it says about the shop that 'Planning permission will not be granted for any other uses.'
3. Greatham Parish Council recommended a maximum of 20 houses in our representation to the Local Plan in November 2017. However, the developer has gone beyond the recommended Local Plan figure of 35-40 houses with a total of 46, or 48 if the shop is converted into housing.

We believe that the SDNPA aim to protect, conserve and enhance our local environment. This is the purpose of the Local Plan. Therefore, we would prefer the Local Plan be enforced in full, rather than allow a developer to capitalise on the inherent ambiguities involved in publishing such a wide-scale plan.

Allocation Policy SD73: Land at Petersfield Road, Greatham

1. Land at Petersfield Road, Greatham is allocated for the development of **35 to 40 residential dwellings** (class C3 use) and associated open space. Development for a Class A1 (Shop) unit with a net sales floorspace up to a maximum of 280m² with suitable vehicular parking for customers will also be permitted. **Planning permission will not be granted for any other uses.** Detailed proposals that meet the following site specific development requirements will be permitted:

2. The site specific development requirements are:

- a) **Development proposals should provide clear transition in form and layout with a reduced build intensity from Petersfield Road east towards the open countryside;**
- b) **Development proposals should conserve and enhance the setting of local heritage assets including the Greatham Conservation Area and local Listed Buildings and use local building materials to reinforce local distinctiveness;**
- c) Provide suitable mitigation towards the Wealden Heaths Special Protection Area (SPA), which should be informed by a project-level Habitats Regulations Assessment;
- d) Provide suitable mitigation measures to avoid increases in localised surface water flooding;
- e) Demonstrate no significant harm to be caused to groundwater resources;
- f) Retain the existing vehicular access and, where identified as necessary to provide safe access and egress, improvements to both the vehicular access and to off-site highways;
- g) Provide a publicly accessible off-road pedestrian and cycle route from Petersfield Road to the existing Public Right of Way to the east of the allocation site;
- h) Provision of a significant area of public open space within the site which provides for a transition between the development and the countryside.;
- i) Retain and enhance existing mature trees and site boundaries and new site boundaries appropriate to the local landscape.

3. In order for the development to have an overall positive impact on the ability of the natural environment to contribute to ecosystem services, development proposals must address the following:

- a) Protect and enhance trees within the site where possible, and where trees are lost, provide at least the equivalent in new tree planting on site. Trees on the site boundary should be retained and new tree planting should be undertaken;
- b) New planting should be suitable for pollinating species; and c) be suitable for pollinating species.

3. OBJECTIONS

- The references to 'SD' are from the:
 - **Pre-Submission South Downs Local Plan (SDLP)**
 - We are using 'Local Plan with informal draft track changes Nov 2018'
- When we make references to policies in the Local Plan, the bolding is ours

AFFORDABLE HOUSING

This is an example of a proposed affordable house:



This is the proposed distribution of affordable housing:



In this application, the affordable housing has:

- has bland exterior design
- has poorly designed parking
- has the least good views
- is the furthest from the open spaces but overlooks the SuDS
- Is built as close to the sewage pumping station as regulations allow (due to noise and odour issues)

Open spaces should be for the enjoyment of all.

In this application they are the furthest from affordable housing (which overlook the sewage pump and SuDS basin) and mostly form extended front gardens to the most expensive houses along the south-east boundary facing the countryside.

AMENITIES

We spoke at the Hearings about the decline in services in Greatham since the Site Facilities Assessment in 2015. Our pub, the Greatham Inn, is now up for sale and may be redeveloped into housing. Our already reduced bus services will be reduced even further in March this year.

This highlights why we question the Local Plan's allocation of 35-40 houses on this site.

35-40 should be considered an upper limit and not a starting point for negotiation as this application proposes.

SD1: Sustainable Development

1. When considering development proposals that accord with relevant policies in this Local Plan and with National Park purposes, **the Authority will take a positive approach that reflects the presumption in favour of sustainable development.** It will work with applicants to find solutions to ensure that those development proposals can be approved without delay, unless material planning considerations indicate otherwise.

2. The National Park purposes are

- i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
- ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes. In pursuit of the purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park.

3. When determining any planning application, the Authority will consider the cumulative impacts of development.

4. 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.

COMMUNITY ENGAGEMENT

The current application has not been discussed with residents or the Parish Council. The exhibition on July 17th 2018 was for a 50 home development and did not include a shop.

The exhibition on July 17th 2018 ran from 3pm - 7pm on a weekday. This was very poor timing for a one-off event and denied many the chance to attend.

A feasibility study needs to be done before any decisions are made about a shop and its location.

Greatham Voice invited residents to attend a presentation about the planning application at the Village Hall on 16/1/19. 90 people came to the event which catered to working families and started at 7.30pm. A Powerpoint presentation breaking down the different sections of the application was shown on a large projector screen with a Q&A section afterwards. This event would constitute 'meaningful engagement' and should have been run by the developer.

Cove Homes have not provided "early and meaningful engagement". A "collective vision" has not been built with the community.

COMMUNITY INTEGRATION

We are concerned that the residents of such a large estate may form their own community rather than integrate with current residents of Greatham.

We are very keen to avoid this kind of segregation in the village.

CONSTRUCTION

There has been no study on the effect of site construction on the neighbouring school. We are concerned that long-term noise and dust from site work will negatively affect the learning outcomes of pupils at the school.

We are concerned that large construction vehicles at rush hour times and school pick-up and drop-off times could negatively affect the flow of traffic to this area, which concentrates the school, village hall and traffic calming measure in one spot.

It might be that measures can be taken to minimise these problems. For example, by altering the times that construction vehicles arrive and leave the site.

The developer needs to show how they can minimise disruption.

DENSITY

Fewer houses would allow:

- Residents to have side by side parking next to their own home. This would reduce neighbourly disputes, negate the need to park on the road and free up visitor parking.
- Less hardstanding and more softscaping which would absorb excess runoff
- More communal open spaces

- Views from Petersfield Road will not be blighted
- A road layout which more closely resembles a rural community
- A more integrated community
- Less pressure on a heavily trafficked area of Petersfield Road
- Affordable housing to be distanced from the the sewage pumping station and SuDS
- The boundary zone around the sewage pumping station to be entirely within the site boundary and not encroach on neighbours
- Reduce the number of people travelling out of the village to amenities we no longer have.

DESIGN



The above house is included in the application and is completely out of keeping with the character of Greatham.

The houses in this application could be built anywhere and do not contribute to the 'local distinctiveness'. For example, the horizontal plinth porches do not have any precedent in Greatham. The brickwork in this application is red or red and brown. It would be more in-keeping with Greatham to use decorative brickwork of grey and red. We talk more about this in the section on materials.

Strategic Policy SD5: Design

1. Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area.

The following design principles should be adopted as appropriate:

a) Integrate with, respect and sympathetically complement the landscape character by ensuring development proposals are demonstrably informed by an assessment of the

landscape context;

b) Achieve effective and high quality routes for people and wildlife, taking opportunities to connect green infrastructure;

c) **Contribute to local distinctiveness and sense of place through its relationship to adjoining buildings, spaces and landscape features, including historic settlement pattern.**

d) Create high-quality, clearly defined public and private spaces within the public realm;

e) Incorporate hard and soft landscape treatment which takes opportunities to connect to the wider landscape, enhances green infrastructure, and is consistent with local character;

f) **Utilise architectural design which is appropriate and sympathetic to its setting** in terms of height, massing, density, roof form, materials, night and day visibility, elevational and, where relevant, vernacular detailing;

g) Provide high quality, secure, accessible, and where possible, integrated storage for general and recycling waste, heating fuel, and transport related equipment;

h) Provide high quality outdoor amenity space appropriate to the needs of its occupiers or users;

i) Ensure development proposals are durable, sustainable and adaptable over time, and provide sufficient internal space to meet the needs of a range of users;

j) Give regard to improving safety and perceptions of safety, and be inclusive and accessible for all; and

k) Have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.

DEVELOPER CLAIMS

The developer has claimed:

1) Housing Numbers

The developer has claimed that 47 houses is appropriate on this site due to a mistake made in the original SHLAA assessment.

We do not believe that the Local Plan's allocation of 35-40 houses is based on a mistaken judgement of the size of the site.

2) Contemporary Designs

In their Planning Statement, the developer says:

- "4.10 Following on from consultations and pre-application advice from the Local Planning Authority, whereby criticism of the "Pastiche" approach was then reconsidered, now, the overall feeling and design of the properties is now "of its age" with a contemporary feel."

We do not believe that the SDNPA want housing with contemporary design on this site. We believe that it is the purpose of the Local Plan to produce designs that are in-keeping with the local character.

For example, horizontal plinth porches might have a contemporary feel and be 'of their age', but they are not in keeping with the character of Greatham.

ELECTRIC VEHICLES

Many countries have announced that they will be banning the sale of internal combustion engines in the upcoming decades. Over the next 20 years it is likely that many people in this country will start using electric cars.

For this reason we believe it is essential that parking spaces be next to the houses they serve, so that electric vehicles can be charged from home.

This will be a step in the right direction in the fight against climate change.

SD48: Climate Change and Sustainable Use of Resources

1. The Authority will encourage all new development to incorporate sustainable design features, as appropriate to the scale and type of development.

2. All development proposals will be required to achieve the minimum standards as set out below unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable:

Residential:

- i. Energy efficiency: 19% carbon dioxide reduction improvement against Part L (2013)93 through the energy efficiency of the building and;
- ii. Water: Total mains Consumption of no more than 110 litres per person per day.

Non-Residential and Multi-residential

- i. Major: BREEAM Excellent

3. All development proposals, including retrofitting, will be required to demonstrate, proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.

4. Major development proposals should also include an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site.

FLOOD RISK

There is a large amount of hardstanding on this site. We very much encourage the SDNPA to make sure drainage on this site is sufficient so that it will not cause additional problems to surrounding residents who already encounter flooding problems

We would like to know who will be responsible for ongoing maintenance of flood protection measures.

SD49: Flood Risk Management

1. Development proposals will be permitted that seek to reduce the impact and extent of all types of flooding through:

a) Steering development away from areas of flood risk as identified by the Environment Agency and the Strategic Flood Risk Assessment and directing development to Flood Zone 1, wherever possible. Development in areas of flood risk will, where relevant, be required to meet the national Sequential and Exception tests;

b) Not increasing the risk of flooding elsewhere and, wherever possible, reducing overall flood risk;

c) Flood protection, mitigation and adaptation measures necessary and appropriate to the specific requirements of the proposal, the development site and other areas potentially impacted; and

d) Ensuring that the integrity of coastal and river flood defences are not undermined.

2. Development proposals should, where required by national policy and guidance, be accompanied by a site specific Flood Risk Assessment (FRA).

3. Proposed flood protection, mitigation and adaptation measures should be supported with a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance in perpetuity.

SD50: Sustainable Drainage Systems

1. Development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change.

2. Proposals for major development* will be permitted where they provide suitable sustainable drainage systems, unless it is demonstrated to be inappropriate. All other development proposals must provide give priority to the use of suitable sustainable drainage systems where required by the Lead Local Flood Authority (LLFA).

3. Sustainable drainage systems, where feasible, must support the provision of open space, public amenity areas and enhancing biodiversity and other public benefits as appropriate.

4. Where sustainable drainage systems are provided, arrangements must be put in place for their whole life management and maintenance.

* major development as defined in the Town and Country Planning (Development Procedure) (England) Order 2015.

GOAT PATH

There is a steep grass slope between the boundary of the site and Petersfield Road Part way up the slope is a 'goat path' enjoyed by generations of Greatham children walking to and from school. The slope has many primroses, which are a joy in spring.

We want to highlight these features to make sure they are preserved.

HOUSING RATIOS

We believe the housing ratios for this application are wrong. The share of market-priced 4 & 5 bed housing should be 10% or less of the overall development, rather than the 26% proposed for the site. There should also be at least one 4 bedroom affordable house.

SD27: Mix of homes

1. Planning permission will be granted for residential development that delivers a balanced mix of housing to meet projected future household needs for the local area. Proposals should provide numbers of dwellings of sizes to accord with the relevant broad mix.

a) Proposals for affordable housing delivered as part of a market housing scheme should provide the following approximate mix of units:

1 bedroom dwellings: 35%*

2 bedroom dwellings: 35%

3 bedroom dwellings: 25%

4 bedroom dwellings: 5%

b) Proposals for market housing should provide the following mix of units:

1 bedroom dwellings: at least 10%

2 bedroom dwellings: at least 40%

3 bedroom dwellings: at least 40%

4+ bedroom dwellings: up to 10%

2. Planning permission will be granted for an alternative mix provided that:

a) Robust evidence of local housing need demonstrates that a different mix of dwellings is required to meet local needs; or

b) It is shown that site-specific considerations necessitate a different mix to ensure National

Park Purpose 1 is met.

3. Development proposals will be permitted for residential development that provides flexible and adaptable accommodation to meet the needs of people who are less mobile, or have adult homecare requirements. Development proposals of 5 or more homes will be permitted where it is clearly demonstrated that evidence of local need for older people's or specialist housing is reflected in the types of homes proposed.

*1 bedroom affordable dwellings may be substituted with 2 bedroom affordable dwellings

HISTORICAL SETTLEMENT PATTERN

The historical settlement pattern for this site is developed in the west corner near the access and surrounded by agricultural land. We wish for the historical settlement pattern to be adhered to but this application reverses this pattern, with the majority of the development on the agricultural land.

The proposed development has housing all along Petersfield Road. We do not want to encourage ribbon development and would like to see linear development with areas of housing separated with gaps. We would like a substantial gap to exist between the development and Bakersfield. This would be more in-keeping with the layout of Greatham and allow for views of the countryside from the road and Deal Farm.

Historically, Greatham is formed of two settlements, Greatham and Greatham End, separated by the river. Another reason to have fewer houses on this site is to prevent the two settlements joining up.

Strategic Policy SD4: Landscape Character

1. Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:

- a) They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
- b) The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape;
- c) They will safeguard the experiential and amenity qualities of the landscape;
- d) Where planting is considered appropriate, it is consistent with local character, enhances biodiversity, contributes to the delivery of green infrastructure and uses native species, unless there are appropriate and justified reasons to select non-native species; and

2. Where development proposals are within designed landscapes, or the setting of designed landscapes, (including historic parkscapes and those on the Historic England Register of Historic Parks and Gardens) they should be based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.

3. The settlement pattern and individual identity of settlements and the integrity of predominantly open and undeveloped land between settlements will not be undermined.

4. Green and blue corridors will be safeguarded. Development proposals should identify and take opportunities to create and connect green and blue corridors.

5. The restoration of landscapes where either natural or cultural heritage features have been lost or degraded will be supported where it contributes positively to landscape character.

LAYOUT

The layout of the site is the same as for a suburban cul-de-sac, which is not characteristic of Greatham. Neither the perimeter road around the south-east boundary, nor the internal road structure, is characteristic of Greatham.

The houses near the access point are angled to the road. It would be more in-keeping with the character of Greatham for the houses to be in line or at right angles to it. There are few houses in Greatham that are angled to the road.

Two key elements of housing in Greatham are:

1. Houses are often set-back from the road by irregular amounts, which helps to avoid an overly linear feel to the village
2. Entrances to houses are often offset to the entrances to the houses themselves, which helps to increase a sense of privacy

We don't feel that either of these two points have been incorporated in the proposed designs.

The emerging Local Plan requires housing to decrease in density away from the road. This proposal does not do that.

MATERIALS

The materials used in the site application have taken a step towards the local style, but fall short.

The grey and red decorative brickwork that is characteristic of Greatham is not included in this application.

The use of ironstone in walls would help the site to be more in-keeping with Greatham.

We would like assurances that the materials of the site will be of high-quality. At the Silent Garden development in Liphook, Cove Construction have used 'clip-on flint boards' surrounded by brick. The joins are visible and it looks cheap and short lived. This is not acceptable in a village in a National Park.

We would like the developer to submit samples of materials they intend to use for our approval.

OPEN SPACES

The development does not provide high quality public open space for Greatham residents and their families to enjoy. The open space towards the south-eastern boundary merely forms an extension to the gardens of the most expensive houses.

We are concerned that dog-walkers taking their dogs along the public-right-of-way will park on the open space at the southernmost tip of the site.

We would like to know how the open spaces, in particular the SuDS area, will be maintained.

SD46: Provision and Protection of Open

Space, Sport and Recreational Facilities and Burial Grounds / Cemeteries

1. Residential development will be required to provide open space on site or within proximity to the site, in line with the National Park Authority's adopted standards as set out in Figure 7.8, or their replacements. **Development proposals for open space should demonstrate how they:**

- a) Are of a type determined by the scale and type of development and the needs of the area;
- b) **Are of high quality design which reflects the landscape character and setting;**
- c) **Are safe and accessible for all members of the community; and**
- d) **Include provision for the long-term management and maintenance of any recreation or open space facilities provided.**

2. Development proposals for new buildings that provide local sport and recreational facilities should be located within settlement boundaries as defined on the Policies Map. Outside of

settlement boundaries new buildings for local sport and recreational facilities will be limited to those ancillary to and essential for the use of the land for outdoor sport and recreation. Robust evidence of a sequential search for sites and the ancillary nature of the building will need to be provided and agreed with the Authority. Development proposals for new or improved playing surfaces should be located within or close to settlement boundaries as defined on the Policies Map.

3. Development proposals will be refused where they would result in the loss of open space unless provision of equal or better quantity, quality and accessibility is made in close proximity to the existing open space. Robust evidence must be provided to demonstrate the following:

- a) Alternative provision is available in the vicinity without causing an unreasonable reduction or shortfall in meeting the local need;
- b) It has been demonstrated that the land cannot reasonably be converted to another form of open space provision for which there is an identified deficit; and
- c) The development will provide alternative, sports, recreation or open space facilities, the need for which clearly outweighs the loss of the open space.

4. Development proposals for new cemeteries and burial grounds will be permitted where they are:

- a) Appropriately sited with regard to impact on local amenity;
- b) Designed to make the most of opportunities to improve and/or create new biodiversity, habitats and green infrastructure; and
- c) Will have no adverse impact on groundwater and surface water.

Strategic Policy SD5: Design

1. Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area.

The following design principles should be adopted as appropriate:

- a) Integrate with, respect and sympathetically complement the landscape character by ensuring development proposals are demonstrably informed by an assessment of the landscape context;
- b) Achieve effective and high quality routes for people and wildlife, taking opportunities to connect green infrastructure;
- c) Contribute to local distinctiveness and sense of place through its relationship to adjoining buildings, spaces and landscape features, including historic settlement pattern.
- d) **Create high-quality, clearly defined public and private spaces within the public realm;**
- e) Incorporate hard and soft landscape treatment which takes opportunities to connect to the wider landscape, enhances green infrastructure, and is consistent with local character;

- f) **Utilise architectural design which is appropriate and sympathetic to its setting** in terms of height, massing, density, roof form, materials, night and day visibility, elevational and, where relevant, vernacular detailing;
- g) Provide high quality, secure, accessible, and where possible, integrated storage for general and recycling waste, heating fuel, and transport related equipment;
- h) **Provide high quality outdoor amenity space appropriate to the needs of its occupiers or users;**
- i) Ensure development proposals are durable, sustainable and adaptable over time, and provide sufficient internal space to meet the needs of a range of users;
- j) Give regard to improving safety and perceptions of safety, and be inclusive and accessible for all; and
- k) Have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.

PARKING

Greatham has poor public transport links so the majority of houses on this site will have two cars. Parking provisions are very poorly designed in this application and will result in cars parking in the road.

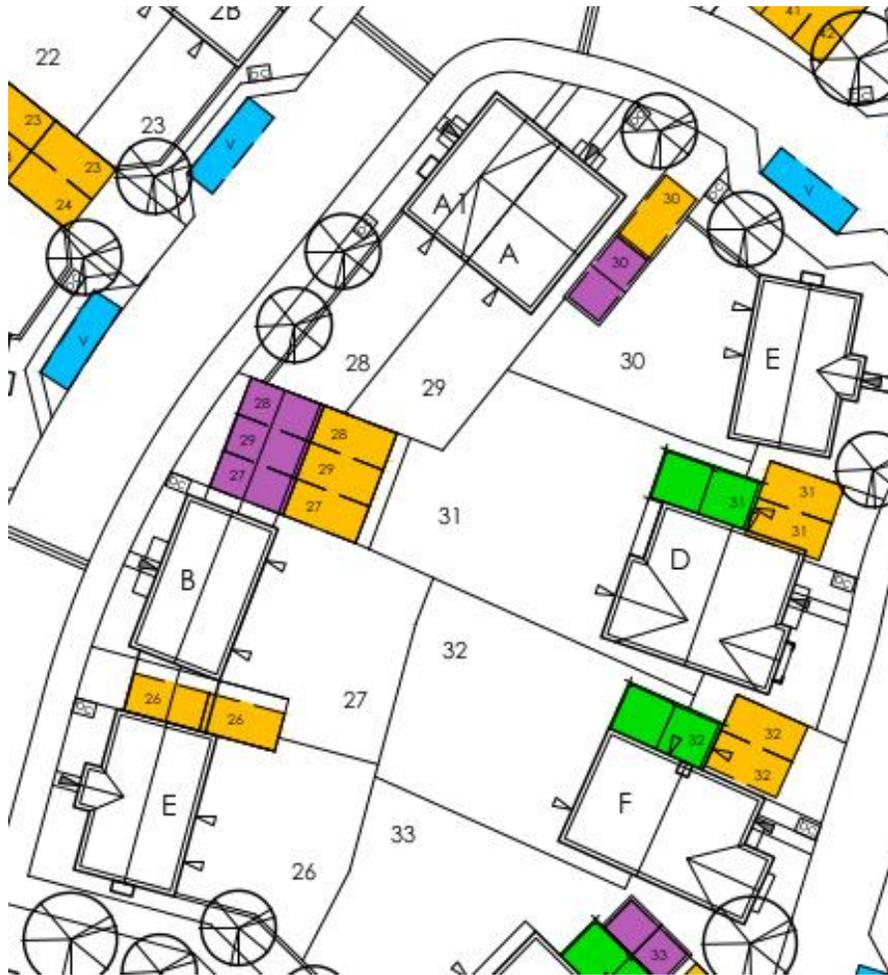
Reasons why cars will park in the road:

1. Inline parking is incredibly frustrating with families who are constantly on the go.
2. Homes that have visitor parking next to their homes will use it to avoid blocking in their spouse so visitors will be forced to park in the road.
3. Parking spaces are distanced from some houses, so residents are likely to park in the road outside their home.
4. There are 10 visitor parking spots for 46 houses. Plot 11 has a visitor parking space bizarrely found in front of their house, which they are likely to use. This means that there is only one visitor parking space for every five houses which will result in on-road parking
5. In a number of places the carport has been placed in front of a regular parking spot which will force cars to park in the road.

The effect of cars parking in the road

1. Difficulty of access and manoeuvring for residents and visitors
2. Emergency services and large goods vehicles may not be able to get access
3. Parking may overflow to Petersfield Road, causing traffic problems
4. Parking may overflow to the neighbouring Village Hall car park, which is already being used by parents from the school as an overflow car park. If the Village Hall car park is used in this way, it will directly and negatively impact the amenity of the village.

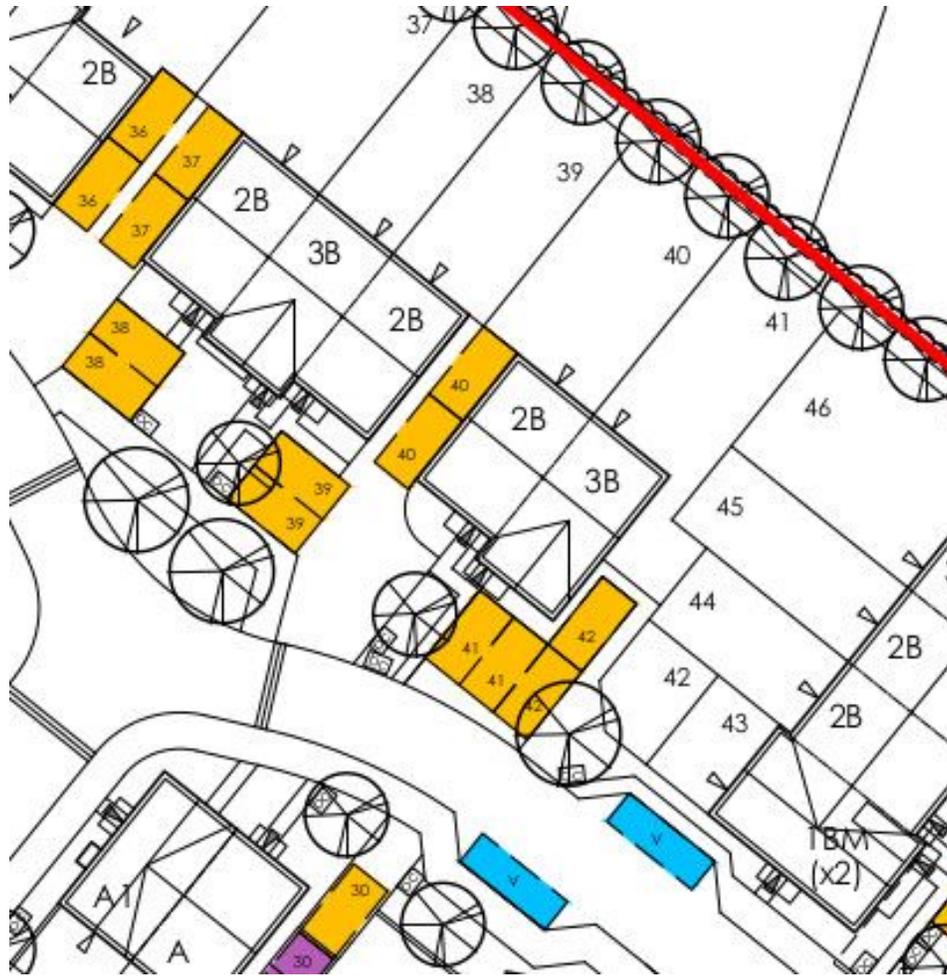
Next we'll look at two parts of the application in detail:



Here we can see an area of six parking spots in the centre of the site comprising of three inline parking spots. Four of the parking spots relate to houses some distance away. This is also the case for the parking for plot 30. This distance will cause difficulties to the elderly and parents who need to get children and shopping from their car to their home.

The parking for plot 30 is found next to the house in plot 29. This is nonsensical.

We find it very unlikely that this area of six parking spots will be used for parking most of the cars designated to it. Instead they will be found in the road, nearer to the owner's house.



At the top here there are three pairs of inline parking spaces that all meet in one area. This will make manoeuvring particularly difficult.

The parking for plot 38 is in front of the house for plot 37. The rearmost parking spot for plot 40 is ridiculously inconvenient.

The residents of plot 42 are much more likely to use the visitor parking post right next to their house than their rearmost inline parking spot which is further away from their house.

SD22: Parking Provision

1. Development proposals for new, extended or re-located public parking will be permitted provided that they are located in or adjacent to the settlements listed in Policy SD25: Development Strategy, or have a strong functional link to an established cultural heritage, wildlife or landscape visitor attraction, provided that:

- a) There is evidence that overriding traffic management or recreation management benefits can be achieved; and
- b) It is a component of a strategic traffic management scheme which gives precedence to sustainable transport; and
- c) The site is close to and easily accessible from main roads by appropriate routes, and well connected to the Public Rights of Way network.

2. Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the relevant adopted parking standards for the locality. Wherever feasible, electric vehicle charging facilities must also be provided.

3. All new private and public parking provision will:

- a) Be of a location, scale and design that reflects its context;
- b) Incorporate appropriate sustainable drainage systems.

4. All new public parking provision will comply with the following:

- a) **Wherever feasible, electric vehicle charging facilities must be provided.** Where located with potential for onward travel by mobility scooter, this should include charging facilities for such scooters;
- b) Where located with good accessibility to the bridleway network, include provision for horse box parking.

PUMPING STATION

It is our understanding that habitable rooms cannot be within 15 metres of the sewage pumping station. The 15m boundary encroaches two gardens at 5 & 6 Bakersfield. These residents should have the quiet enjoyment of their homes and gardens and not suffer as a result of this development from noise and odour issues. This might also impact their ability to sell or extend their homes in the future.

SHOP



The design of the shop is two houses with hoarding attached. It would be financially beneficial to the landlord if the shop were to fail and be converted to two residential units. . Seen in this light the application should be seen as 48 houses rather than 46.

If there is to be a shop we would want it to have a restrictive covenant so that it cannot be converted to housing and must remain as a shop that serves the villages needs (rather than become a retail space that serves mostly those that live outside of the village).

However, it may well be that we conclude, that this is not a good place for a shop as it is too far from the road and is unlikely to attract passing traffic.

We are also sceptical about the viability of a convenience store, run on commercial terms, in Greatham as previous shops have failed. The best opportunity may be a community-run venture in a different location.

It would be a mistake to build a shop here without thorough prior discussion with all stakeholders.

SD52: Shop Fronts

1. Development proposals for new, or changes to, existing shop fronts will be permitted where they:

- a) **Relate well to the building in which they are situated, giving regard to upper floors, in terms of scale, proportion, vertical alignment, architectural style and materials;**
- b) Retain and restore where possible significant historic features of any original shop front;
- c) Are based upon a traditional approach to shop front design;**
- d) Take account of good architectural features of neighbouring shop fronts so that the development will fit in well with the street scene particularly if located within a conservation area or on a listed building; and
- e) Use materials which respect the street scene.

2. If a single shop front is to be created by joining two or more units, it should reflect and show the original divisions that existed, particularly in the case of historic properties.
3. There will be a presumption against internally illuminated signage / logos as well as solid shutters or any other feature which obscures window displays, unless this is a traditional feature of a historic premises.
4. External lighting is only normally appropriate for businesses operating in the evening. If it can not be avoided, it should be kept to a minimum, be discreetly positioned and incorporated into the design.

SUSTAINABILITY

Major developments should be located close to town centres where people can walk or cycle to amenities. This helps to reduce car emissions and prevents suburban creep into the countryside.

SD19: Transport and Accessibility

- 1. Development proposals will be permitted provided that they are located and designed to minimise the need to travel or and promote the use of sustainable modes of transport.**
- 2. Development proposals that are likely to generate a significant number of journeys must be located near existing town and village centres,** public transport routes, main roads and, where relevant, the cycle network. Such developments will be required to provide a transport assessment or transport statement.
3. Development proposals must demonstrate the continued safe and efficient operation of the strategic and local road networks.
4. The following improvements to transport infrastructure will be supported:
 - a) Public transport waiting facilities, particularly those with reliable and accessible information;
 - b) Infrastructure supporting the transfer of freight from road to rail and water;
 - c) Improvements to walking, cycling and bus connectivity at all transport interchanges;
 - d) Improvements to the quality and provision of cycle parking at railway stations and key bus stops.
5. In town and village centres, development will be permitted which appropriately provides for improved footways and cycle routes, cycle parking, and measures to restrict the impact of heavy goods vehicles and other traffic on historic streets.

We would like to see solar panels installed on the houses on this development, in order to 'improve the National Park's resilience to, and mitigation of, climate change' and 'reduce levels

of pollution' as mentioned in SD2, and to help 'contribute towards reducing greenhouse gas emissions' and 'moving towards a carbon neutral National Park' as mentioned in SD51.

SD2: Ecosystem Services

1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:

- a) Sustainably manage land and water environments;
- b) Protect and provide more, better and joined up natural habitats;
- c) Conserve water resources and improve water quality;
- d) Manage and mitigate the risk of flooding;
- e) Improve the National Park's resilience to, and mitigation of, climate change;**
- f) Increase the ability to store carbon through new planting or other means;
- g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land;
- h) Support the sustainable production and use of food, forestry and raw materials;
- i) Reduce levels of pollution;**
- j) Improve opportunities for peoples' health and wellbeing; and
- k) Provide opportunities for access to the natural and cultural resources which contribute to the special qualities.

Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services.

SD51: Renewable Energy

1. **Development proposals for renewable energy schemes, except those specifically addressed in criterion 2, that contribute towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park will be permitted** where it is demonstrated through suitable site specific analysis that the proposal:

- a) Makes provision for the removal of the facilities and reinstatement of the site, should it cease to be operational;
- b) Ensures existing public access is not impeded; and
- c) Does not result in the loss in use of Grades 1, 2 or 3a agricultural land.

2. Development proposals for small-scale individual wind turbines and freestanding solar arrays serving individual properties or small groups of properties will be permitted where:

- a) They are suitably sited and screened and clearly associated with the buildings or properties that they are intended to serve;
- b) They are appropriate in scale to the property being served; and
- c) There is no unacceptable adverse impact on local amenity or conflict with public safety.

We would also like to see rainwater capture for house usage (toilet flushing etc.) for the purposes of sustainability and to help with 'not increasing the risk of flooding elsewhere' as mentioned in SD49 and to prevent a 'net increase in surface water run-off' in SD50.

SD49: Flood Risk Management

1. Development proposals will be permitted that seek to reduce the impact and extent of all types of flooding through:

a) Steering development away from areas of flood risk as identified by the Environment Agency and the Strategic Flood Risk Assessment and directing development to Flood Zone 1, wherever possible. Development in areas of flood risk will, where relevant, be required to meet the national Sequential and Exception tests;

b) Not increasing the risk of flooding elsewhere and, wherever possible, reducing overall flood risk;

c) Flood protection, mitigation and adaptation measures necessary and appropriate to the specific requirements of the proposal, the development site and other areas potentially impacted; and

d) Ensuring that the integrity of coastal and river flood defences are not undermined.

2. Development proposals should, where required by national policy and guidance, be accompanied by a site specific Flood Risk Assessment (FRA).

3. Proposed flood protection, mitigation and adaptation measures should be supported with a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance in perpetuity

SD50: Sustainable Drainage Systems

1. Development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change.

2. Proposals for major development* will be permitted where they provide suitable sustainable drainage systems, unless it is demonstrated to be inappropriate. All other development proposals must provide give priority to the use of suitable sustainable drainage systems where

required by the Lead Local Flood Authority (LLFA).

3. Sustainable drainage systems, where feasible, must support the provision of open space, public amenity areas and enhancing biodiversity and other public benefits as appropriate.

4. Where sustainable drainage systems are provided, arrangements must be put in place for their whole life management and maintenance.

* major development as defined in the Town and Country Planning (Development Procedure) (England) Order 2015.

Finally, given that this is classed as a major development, we are not aware that 'an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site' as outlined in SD48 has been carried out.

SD48: Climate Change and Sustainable Use of Resources

1. The Authority will encourage all new development to incorporate sustainable design features, as appropriate to the scale and type of development.

2. All development proposals will be required to achieve the minimum standards as set out below unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable:

Residential:

i. Energy efficiency:

19% carbon dioxide reduction improvement against Part L (2013)93 through the energy efficiency of the building and;

ii. Water: Total mains Consumption of no more than 110 litres per person per day.

Non-Residential and Multi-residential:

i. Major: BREEAM Very Good Excellent

3. All development proposals, including retrofitting, will be required to demonstrate, proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.

4. Major development proposals should also include an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site

TRAFFIC

If each house in this development has two cars, then this site will add 92 cars to Greatham. Visitors to the shop and delivery vehicles will also add traffic into and out from this site.

There are already concerns about the level of traffic through Greatham. The amount of cars passing through the village at peak times has been highlighted to the parish council at many different meetings (peak times meaning commuter rush hour and school start and finish times).

Furthermore, the access point to this site is also very close to a school entrance and traffic calming area.

The siting of the access point and the increased traffic could make commuter rush-hour times and school pick-up times very difficult in this area.

There are additional concerns about limited visibility for cars pulling out on to Petersfield road.

Many school children walk to school passing this site. Having a large amount of traffic coming in and out of the site will introduce hazards to their walk to school. This also needs to be taken into account during the construction phase.

We are concerned that the access point to this site could become a hazard for school children, pedestrians and motorists.

Furthermore, the transport plan included with the application suggests that people should cycle between Greatham and Liss. The most direct route is through Forest Road which barely has enough space for two vehicles to pass each other on the bends. Encouraging cycling through this route without the provision of a cyclepath will increase the likelihood of accidents.

VIEWS

The view below will directly face Deal Farm, a listed building and one of the most historic buildings in Greatham.



Strategic Policy SD6: Safeguarding Views

1. Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views and views of key landmarks within the National Park.

2. Development proposals will be permitted that conserve and enhance the following view types and patterns identified in the Viewshed Characterisation Study:

- a) Landmark views to and from viewpoints and tourism and recreational destinations;
- b) Views from publically accessible areas which are within, to and from settlements which contribute to the viewers' enjoyment of the National Park;
- c) Views from public rights of way, open access land and other publically accessible areas; and
- d) Views which include or otherwise relate to specific features relevant to the National Park and its special qualities, such as key landmarks including those identified in Appendix 2 of the Viewshed Characterisation and Analysis Study, heritage assets (either in view or the view from) and biodiversity features.

3. Development proposals will be permitted provided they conserve and enhance sequential views, and do not result in adverse cumulative impacts within views.

Strategic Policy SD12: Historic Environment

1. Development proposals will only be permitted where they conserve and enhance the historic environment, including through the safeguarding of heritage assets and their setting.

2. Applicants will be required to provide a Heritage Statement sufficient to allow an informed assessment of the impact of the proposed development on the significance of the heritage asset(s).

3. Development proposals which affect heritage assets (whether designated or non-designated) or their setting will be determined with regard to the significance of the asset, including the long-term conservation and enhancement of that asset.

4. Development proposals will be permitted where they enhance or better reveal the significance of heritage assets, particularly where they are considered to be at risk of irreversible harm or loss.

5. Development proposals which appropriately re-use redundant or under-used heritage assets with the optimal viable use, which secures their long-term conservation and enhancement, including of their setting, will be supported.

6. Development proposals for enabling development that would otherwise conflict with other planning policies but which would secure the future conservation of a heritage asset will be permitted provided:

- a) The proposals will not materially harm the heritage values of the asset or its setting;
- b) It can be demonstrated that alternative solutions have failed;
- c) The proposed development is the minimum necessary to protect the significance of the heritage asset;
- d) It meets the tests and criteria set out in Historic England guidance Enabling Development and the Conservation of Significant Places⁵⁰ (or guidance superseding it);
- e) It is subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development; and f) It enables public appreciation of the saved heritage asset.

Development Management Policy SD13: Listed Buildings

1. Development proposals which affect a listed building or its setting will only be permitted and listed building consent granted where:

a) They preserve and enhance the significance of the listed building and its setting by demonstrating that unnecessary loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided; or b) Harm to the significance of the listed building or its setting is considered to be outweighed by public benefits by the Authority, when appropriate mitigation measures will be expected, including archaeological investigation (including a written report) or recording.

2. Development proposals will be refused planning permission and / or listed building consent where they cause substantial harm to a listed building or its setting

Generally, regarding the views of this whole site, we'd like to quote:

Strategic Policy SD6: Safeguarding Views, note 5.38:

“For large scale applications, **it is recommended that digital Zone of Theoretical Visibility (ZTV) data is used to determine potential visibility in the surrounding landscape** and to demonstrate areas of zero visibility, based on topography.”

Given SD73 has been designated as a major development by the SDNPA we request that a study based on Zone of Theoretical Visibility (ZTV) data is done to assess this site.

Appendix 1: Comments during Parish Council Public Question Time, January 21st 2019

From the minutes of the Parish Council meeting on January 21st 2019:

Many residents were concerned about surface water drainage particularly those living in adjoining properties in Bakers Field who already have problems with flooding. Concerns were also raised about the drainage ditch along the edge of the site and whether the current arrangements would remain in place after the development was built.

A resident felt that the proposed parking was similar to that in Silver Birch Mews which is insufficient for residents' needs.

A resident was concerned about the bank at the front of the site being destroyed as it contained wildflowers such as orchids and primroses.

A number of residents felt that the design was not consistent with what exists in the village today. For example Petersfield Road has a line of houses whereas this development does not.

A number of residents were concerned about the density and layout of the site. One resident felt that the parking areas were too dark and secluded.

Residents strongly felt that the shop was not viable in the proposed position as it would not be seen from the main road. It also looks very like a house in the plans and residents were concerned that it would be easy to convert it back to a house thereby increasing the number of properties by a further two. A resident suggested that part of the Eurotec site could be developed as housing with a shop provided there instead.

Concerns were raised over the pumping station and whether it could cope with the capacity required for 46 new homes.