

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

28th January 2020

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2 INTRODUCTION

2.1 Purpose of document

We are writing on behalf of Greatham Parish Council to object to the planning application for the Liss Forest Nursery Site (ref: SDNP/18/06111/FUL). We set out our objections in the sections below and appendices.

2.2 Summary

Greatham Parish Council does not object to development on this site, consistent with SD73 of the South Downs Local Plan. We believe the development has the potential to be an outstanding development that enhances both Greatham and the South Downs National Park.

Whilst recognising that the revised planning application is a substantial improvement on the previous submission, we believe that there are still elements that require improvement, and for those reasons we are objecting.

The reasons are laid out in the following sections of the document, but in summary, they are:

- **Consultation:** The process of consultation with the village has been inadequate both in quantity and quality of interaction.
- **Density:** The density and overall number of houses proposed for the site is reduced, but still too high based on settlement pattern and character of the village
- **Amenities:** The number of houses proposed has a detrimental impact on related amenities of parking, traffic congestion, integration with the community, provision of open spaces and related hard standing, impact on the village hall and village school.
- **Design:** The design of the houses themselves are not in keeping with a landscape led approach and the character of the village. Local materials are not being deployed and the site itself whilst an improvement, has little local character at all.

This is a once in a generation opportunity for Greatham to have a development of outstanding quality and design. Unfortunately, this plan still falls short of that aspiration.

2.3 Comparison of objections

Objections	Objected to in 2019	Objected to in 2020
Affordable Housing	✓	✓
Amenities	✓	
Community Engagement	✓	✓
Community Integration	✓	✓
Construction	✓	✓
Density	✓	✓
Design	✓	✓
Developer Claims	✓	
Electric Vehicles	✓	✓
Flood Risk	✓	✓
Goat Path	✓	✓
Housing Ratios	✓	
Historical Settlement Pattern	✓	✓
Layout	✓	
Materials	✓	✓
Open Spaces	✓	
Parking	✓	✓
Sustainability	✓	✓
Traffic	✓	✓
Pumping Station	✓	
Shop	✓	
Views	✓	✓

3 SD73: PART OF THE SOUTH DOWNS LOCAL PLAN

Within the South Downs Local Plan this site is referred to as SD73. It is shown as suitable for 35-40 houses and a shop. The current application is for 40 houses without a shop

We have used the Local Plan to help us form our response. We believe that there are a number of ways in which the revised plan improves on the original plan, but there are still elements that require additional change. The improvements are:

1. The development density now does decrease away from Petersfield Road, in a manner more consistent with the historic settlement plan.
2. The shop has now been removed from the plan.
3. The number of houses has decreased from 48 to 40.

However, there are still issues that:

1. The application does not enhance the setting and
2. Makes insufficient use of local building materials to reinforce local distinctiveness.

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.*

Note: Bolding is ours

4 OBJECTIONS

4.1 AFFORDABLE HOUSING

This is an example of a proposed affordable house:



Plot 35
Type 3B

This is the proposed distribution of affordable housing:



Whilst we note that the issues we had raised previously regarding the linear layout of Greatham have been in part addressed, we still see that the affordable housing has:

- has bland exterior design
- has poorly designed parking

4.2 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 does not represent the current application. For that reason, we cannot say that the community has been engaged.

In July 2019, representatives from the Parish Council were invited by Turley planning and Cove homes to walk with them around the nursery site. This was a positive discussion which covered many of the issues we had previously raised.

In August 2019, representatives from the Parish Council were invited to a planning discussion between the developer and SDNPA. Again, this was a very productive discussion. At that time a hand drawn layout was as far as the redesign had proceeded.

Following on from that we were anticipating a sequence of engagements between the residents, the Parish Council, SDNPA and the developer. This have not happened, and in fact there has been no further engagement since August.

4.3 COMMUNITY INTEGRATION

Previously, we were concerned that the residents of such a large estate may form their own community rather than integrate with current residents of Greatham. We recognise that the changed layout will address some of those concerns.

We would like the front of the site to be open onto Petersfield Road ie no fencing or other physical barrier. It is not clear from the plans how the West side of the development integrates with Petersfield Road and this needs to be dealt with sensitively. We also appreciate that the design of the open space to link with public spaces on the other side of Petersfield road is also an improvement on the previous design. However, we are concerned that the residents will have to pay for the upkeep of the open space in perpetuity, and would like the developer to consider gifting the land to the village before permission is granted.

The planning documents do not contain a graphic of the street scene from Petersfield Road and we would to see a version of this.

4.4 CONSTRUCTION

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

We remain 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.

4.5 DENSITY

Whilst we recognise that the number of houses in the application represents a reduction, there are still issues that reducing numbers further would alleviate:

- 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
- A road layout which more closely resembles a rural community
- A more integrated community
- Less pressure on a heavily trafficked area of Petersfield Road
- Reduce the number of people travelling out of the village to amenities we no longer have.

We still have considerable concern that the houses on the north side of the site will overlook residences in Bakers Field reducing their privacy. The developer initially said they would provide a side elevation to Bakers Field thereby protecting neighbours privacy but this has not been included.

4.6 DESIGN

Whilst again we recognise that there have been significant improvements to the design of the houses, there are still elements that are out of keeping with the village and the South Downs, and could be found in a development anywhere in the country; they do not contribute to the 'local distinctiveness'.



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

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. In addition, the flint shown is not a local material. Ironstone would be much more in keeping.

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.

4.7 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. Currently, there are considerable distances between houses and parking spaces so causing difficulties to charge vehicles in the future.

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.

4.8 FLOOD RISK

The amount of hardstanding on the site has been reduced but is still significant. 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 have been made aware of current groundwater flooding issues in Bakers Field and would want measures to be put in place so that this situation is not made worse.

We would also 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.*

4.9 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.

4.10 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. This application is a significant improvement on the previous version, but we would like to see further enhancements to move parking away from Petersfield Road and retain more of a gap to Bakers Field

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 parks 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.

4.11 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 as opposed to flint 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 joints 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 discussion.

4.12 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:

- Inline parking is incredibly frustrating with families who are constantly on the go.
- 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.
- Parking spaces are distanced from some houses, so residents are likely to park in the road outside their home.
- There are 8 visitor parking spots for 40 houses. This is insufficient.

The effect of cars parking in the road:

- Difficulty of access and manoeuvring for residents and visitors
- Emergency services and large goods vehicles may not be able to get access
- Parking may overflow to Petersfield Road, causing traffic problems

- 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.

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.

4.13 SUSTAINABILITY

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

We would ask that the scheme considers using non fossil fuel heating systems to comply with SD48.

SD45: Green Infrastructure

In accordance with SD45 we would ask that green infrastructure is integrated into the built form of the development by inclusion of green roofs.

4.14 TRAFFIC

If each house in this development has two cars, then this site will add 80 cars to Greatham. There are already concerns about the level of traffic through Greatham. The number 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.

4.15 VIEWS

The views from Petersfield Road and across from Deal Farm have been improved but we would like to see more done to protect the views across the site in line with policy.

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.

Additional note:

We would ask that consideration is given to the siting of the pedestrian path next to the entrance to site as ideally this would align with a potential new pedestrian access to the village hall opposite.