



9 Sussex Gardens
Petersfield
Hampshire
GU31 4JY

Tel: 07943 536065

Email: buritonparishcouncil@hotmail.co.uk

30 November 2023

Philippa Smyth
Principal Development Management Officer
South Downs Centre
North Street
Midhurst
West Sussex, GU29 9DH

By email: Philippa.Smyth@southdowns.gov.uk; Planning@southdowns.gov.uk

Dear Ms Smyth

SDNP/23/04270/OUT: application for the construction of a hotel and a cycle centre with cafes, restaurants etc; North-East of the A3 Interchange at Buriton, Petersfield, Hampshire

Buriton Parish Council has considered this outline planning application and has resolved to **object** to the proposals on a number of grounds.

The Council feels that the proposals appear to be contrary to National Planning Policy Guidance (NPPF & NPPG) as well as the main purpose of the South Downs National Park Authority and other Policies in the South Downs Local Plan. It is felt that the National Park Authority must apply Policies SD1, SD2, SD3, SD4, SD5, SD6, SD7, SD8, SD9, SD19, SD20, SD23, SD25 and SD38 very strictly.

The Parish Council's objections can be summarised under the following headings:

- 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.

Highways access and safety concerns

The Parish Council and the community at large is very worried about the safety of traffic movements that would be generated by this development, and feels that fatalities will occur.

Adding thousands more traffic movements and turning manoeuvres onto the short stretch of the B2070, which is also effectively part of the slip roads onto/off the northbound A3 with traffic travelling at fast speeds as well as being the sole access to and from the community of Weston, would be very unwise and unsafe.



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In addition, both the slip-roads onto the A3 (both northbound and southbound directions) are seeing increasing numbers of accidents in recent years. The length and visibility of the north-bound 'on-slip' is significantly sub-standard and vehicles have to try to merge into two lanes of speeding traffic which is all descending speedily from the Butser cutting. The south-bound 'on-slip' also sees many accidents as there are often slow moving vehicles beginning to climb the incline to the Butser cutting causing others to change lanes unexpectedly.

Most importantly, neither National Highways nor Hampshire County Highways Authority nor the Police have any records of the many accidents that happen at this junction each year. This has been confirmed recently by the highways authorities who explain that: (1) only 'injury crashes' are recorded (using a Department for Transport process called STATS19); (2) there is no requirement to report 'damage only' incidents either to the relevant highway authority or to the police; only where someone is injured is there a requirement to report the collision; (3) even if the police attend an accident it will only be reported to the highway authorities if injuries are sustained. Many accidents will not be recorded at all.

Traffic data being used in the consideration of this planning application is, therefore, not a thorough indication of accidents, safety or danger. Local knowledge is much more reliable.

More traffic, more walkers and more cyclists would make the situations more dangerous.

There would be thousands of drivers, unfamiliar with the local area, making these risky manoeuvres for the first and only times when they visit.

This proposal does not need to be in this location – and it would be safer for millions of travellers if it wasn't.

Visitor accommodation, effects on the local economy and the issue of 'need'

There is much reliance in this planning application about a statement relating to the South Downs Local Plan which suggests that there is need for visitor accommodation in the Petersfield area and along the South Downs Way at weekends and during the week in the summer.

The source of this suggestion is a report which dates back to 2014: the South Downs Visitor Accommodation Review.

However, since then the Nest Hotel in Buriton has more than doubled the number of rooms it has (now 14) and the Five Bells has added 2. In addition there are the 60+ lodges at the Re-Charge One facility that have been approved recently, adjacent to this proposed site. It is therefore felt that any shortage of accommodation in this area has been provided over the last 9-10 years and that this 'need' no longer exists.

The Planning Authority must take that matter very seriously into account.

In addition, if the 2014 Report was arguing that accommodation is needed in Petersfield (a sustainable location with rail and bus services etc), then approving yet more accommodation outside the town is likely to reduce the chances of anything ever coming forward in the town.



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Locally there are significant fears about adverse effects on The Nest Hotel and The Five Bells which both rely on overnight stays and on providing café and restaurant facilities. The village could be left without any pubs but, as both are registered as Assets of Community Value, the Policy SD23 (f) should carry great weight.

Both these establishments rely on providing accommodation, meals and other services - and, in so doing, provide a healthy number of local jobs which this proposal would threaten. There are also other also local farm-house B&B establishments which could also suffer if this application were to be approved. All these establishments are also part the character of the local community and would be a huge loss.

The South Downs Local Plan stresses that arrangements for visitors should not compromise the special qualities of the area and Local Plan Policy SD23 has a number of very clear stipulations about this matter. Although the policy does allow visitor accommodation and recreational facilities outside Settlement Policy Boundaries, this is only in circumstances where specified criteria can be demonstrated. These include a location which minimises the need for travel by car, and absence of impact on the viability of town or village centres or Assets of Community Value. These criteria are not met here and so the application should be refused.

The applicants argue that this planning application is partly justified on the basis that it will provide a new cycling centre which will encourage sustainable travel. But the cycle centre would duplicate similar facilities nearby (at both the QECP and at two places in Petersfield) and it would not take account of flaws and safety issues with the local active travel infrastructure. The Parish Council is not convinced that the proposed development would encourage sustainable tourism: the site is about 2.5km from the centre of Petersfield and is only served by one bus route. It would be largely dependent on people travelling to it by car.

In addition, the applicants do not adequately explain why this development could not be elsewhere. National Planning Guidance defines the use as a Town Centre use and requires special tests to be applied for other locations. Only if sites in town centres or in edge-of-centre locations are not available (and not expected to become available within a reasonable time period) should out of centre sites (like this one in the parish of Buriton) be considered. In an attempt to prove that there are no suitable sites in Petersfield, the application refers to some other places but dismisses many of them because they are too small for the scale of development proposed. It seems far too simple to be able to dismiss potential sites by deliberately designing a scheme which is too large for any of them! Local knowledge suggests that other areas of the town have the potential to accommodate the scale and format of the proposed development.

A countryside location such as is being proposed would not bring any benefits to the local community but would, instead, bring a wide range of adverse effects as summarised in this letter.

Adverse effects on landscape character, countryside and nature

The Parish Council feels that there will be adverse effects on landscape character with visual harm and is not convinced that the applicants have conducted an adequate 'landscape-led approach'.

The new development would bring a fundamental change to the character, create its own aesthetic and would not be hidden. Visual impacts from the Open Access land on Butser Hill are likely – including from at least one of the popular way-marked trails which now have signed interpretation etc. These impacts would be contrary to the intrinsic landscape character of farmsteads dispersed across a working landscape.



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The Planning Inspector at the ReCharge One Appeal Inquiry concluded that because that facility is due to be entirely encompassed by the A3 trunk and slip roads, it can be judged as being part of the trunk road itself, rather than having reference to the broader landscape through which the road passes. No such argument exists for this proposed hotel. It is entirely outside the curtilage of the trunk road and therefore would have to be considered on the merits of a large new development in open countryside.

The proposal would fill in a second area of the land that directly surrounds the roundabout. This would form a busy urban-style, built-up hub at the roundabout creating a large agglomeration (when added to Re-Charge One) in a countryside location, outside the settlement boundaries of both Buriton and Petersfield.

This scheme should also therefore be classed as overdevelopment: resulting in an unacceptable amount of accommodation and facilities in a very small area of what is currently countryside within the National Park.

This area of land has not been identified as development land in the local plan. For development to take place there has to be an overriding need for it. There is no such justification in this location which is part of the landscape and environment that the SDNPA was specifically set up to conserve and enhance.

The proposal would reduce the gap between Buriton and Petersfield (allied to the creep of residential development along / close to the Causeway (B2070) south of Petersfield) and would adversely affect the rural community of Weston significantly.

The application appears to pay little or no regard to the Buriton Village Design Statement & Local landscape Character Assessment. The local community first produced a Local Landscape Character Assessment / Statement for the parish as long ago as 2009. This has been reviewed regularly and now forms an official part of the Buriton Village Design Statement (Appendix 3). This is a formal Supplementary Planning Document (SPD), adopted by the South Downs National Park Authority in 2017 and re-affirmed by them after the completion of the South Downs Local Plan in 2019. SPDs, adopted by the local planning authority, must carry material weight in the consideration of planning applications and we trust that the SDNPA will do so – as well as having particular regard to any comments submitted by the Buriton Village Design Statement Group.

In addition, at present the site is quiet and benign. But the scale of activity relating to the new development would result in a very busy site, including vehicle movements and lighting etc. This scale of activity, in itself, would adversely change the character and tranquillity of the scene and this should form part of an important reason for refusing the application.

Dark Night Skies and Tranquillity

This particular part of our parish forms a narrow (and therefore crucial) pinch-point in the South Downs International Dark Skies Reserve – between the eastern and western parts of the Core Area. Erosion of this highly sensitive pinch-point would threaten the status of the entire Reserve as neither the eastern nor the western part would be large enough on its own to be awarded the important International status.



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It is notable that the Hampshire Astronomical Society and the Clanfield Observatory has objected and that the National Park's dark skies expert also has concerns. The Hampshire Astronomical group fears material effects on one of the largest Astronomical Observatories in the UK.

And the community has other comments and concerns on this policy area, too:

- Buriton's Recreation Ground is one of only 10 Dark Skies Discovery Sites in the whole of the National Park – a place from where the Milky Way can be seen. But the application site is barely 1km away
- no matter how good the attempts to limit light pollution, there will definitely be a halo glow and the sky quality will be adversely affected
- this is likely to affect the Core Area as well as the buffer area of the Dark Skies Reserve
- the planning authority has refused much more minor applications in the parish on these grounds and that principle must be followed when considering this major development
- places like this are very rare in south east England where development pressures over many decades have already ruined the quality of wonderful dark night skies. Hence, it is even more important to preserve these special qualities in this location
- we feel that this issue affects tranquillity as well as dark skies. Hence SDNPA Policy SD7 (as well as Policy SD8) is relevant
- the tranquillity policy says that "proposals will only be permitted where they conserve and enhance relative tranquillity." These proposals also fail that test.

In addition to all the above points, issues of excess water, drainage etc, which the current field attenuates, have also been raised by parishioners.

It is noticeable that 75% of the respondents to the applicant's consultation exercises (an exhibition held in Petersfield with online/Freepost options) were against this proposal with only 13 responses being in favour.

We trust that all these comments are helpful to you in your deliberations on this application matter and that you will also take all other comments from the local community carefully into account as well.

Yours sincerely

Petra Norris
Clerk to Buriton Parish Council