



BURITON PARISH COUNCIL

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Ms S Robinson
Planning Department
South Downs National Park Authority
South Downs Centre
Midhurst, GU29 9DH

By email: Sabrina.Robinson@southdowns.gov.uk
and planning@southdowns.gov.uk

Dear Ms Robinson

SDNP/21/02014/FUL: application for ten new residential dwellings (with associated vehicular and pedestrian access, car parking, cycle storage and landscaping) on land at Greenway Lane, Buriton

Thank you for allowing the Parish Council to have a short extension of time to submit comments on this application.

For a small community like Buriton, building ten new houses on a greenfield site on the edge of the village is quite a major application – something that probably only happens once every 20+ years. The Parish Council has, therefore, been keen to ensure that it could gather and consider comments from residents.

It is unfortunate that the application is being considered at a time when Parish Councils (like all Local Authorities) are no longer able to continue to hold ‘virtual meetings’ but nor are we yet able to hold face to face meetings because of the Covid restrictions. The Council has, however, had the foresight to set up a special scheme of delegation so that I, as Clerk, can make this submission.

We would normally have arranged some sort of ‘exhibition’ in our village hall so that people could look at the plans without needing access to a computer which, given the demographics of this parish, can be an issue. Instead, we arranged an outdoor meeting for the public on 17 May (the first day that the “rule of six” was abolished for outdoor gatherings). Points made to Parish Councillors at that event are covered in the comments below.

Introductory points

It is noted that this site is a policy allocation for 8-10 houses in the South Downs Local Plan which was approved after a public enquiry held in 2018. The Parish Council understands, therefore, that the principle of development on this site has already been established and agreed.

Nevertheless, Buriton is a particularly attractive village, in a beautiful setting in the country’s newest National Park. To be allowed to build new houses in any National Park should be a privilege and it is hoped



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that the South Downs Park Authority will scrutinise this planning application carefully to make sure that an exemplary development emerges – bringing pride and prestige for the landowner, the developer, the National Park Authority and the local community.

In this context, there are a number of positive aspects of the proposed designs that can be welcomed including:

- The provision of at least four affordable homes – as long as these are mainly rental properties for local people in perpetuity
- The provision of hedging with trees all around the site so as to provide a transition between the new housing and the countryside but also between existing houses in Glebe Road and the new development so as to provide a soft setting and amenity protection for residents
- The arrangement of the new housing so that they do not ‘turn their backs’ on the countryside and the extra green space at the site entrance
- The hedging with trees along the approaches to the village from the west. This is an edge-of-village location and it will be vital that these trees and hedges mature to provide a soft, landscaped edge and an attractive approach from the north and west as well as an acceptable transition to the existing houses further east
- An acceptable mix of housing styles and materials.

Notwithstanding the above, the Parish Council will expect the South Downs NPA to pay very close attention to all submissions made by parishioners (and by local groups) and to the detailed contents of the Buriton Village Design Statement as well as taking account of all the points made in this letter.

Important points for consideration

There are a number of important points that the SDNPA must take into account whilst considering this application, seeking amendments and imposing planning conditions where necessary.

These can be grouped under the following headings:

- Car parking arrangements
- Compliance with SDNPA Local Plan Policy SD62
- The affordable housing
- Sustainability issues
- Biodiversity and landscaping issues
- Dark skies issues
- Highways issues
- Water, surface water and waste water issues
- Disruption during construction.

Car parking arrangements

There are concerns about the amount of parking spaces within the site and this will be very crucial as there is no other on-street parking available in the vicinity. There are already parking problems in the nearby Glebe Road area and any verge parking on Greenway Lane would be unacceptable and unsafe. It is noted that the planning application states that it complies with Local Plan policies but we would wish the planning authority to look at this very carefully and to think about adverse implications that could result.

There is only an occasional weekday bus service serving the village with only one destination (Petersfield) where there is no coordination with other public transport services. Realistically there will, therefore, be



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great reliance on private cars and so adequate car parking spaces for residents and visitors must be provided within the development.

We note, from the new SDNPA Parking SPD, that paragraph 7.38 of the Local Plan states that any room in a proposed dwelling that is not a main reception room, kitchen, bathroom or WC, and has dimensions that allow for a single bed, will be counted as a bedroom (including studies and additional reception rooms) and we would wish SDNPA to look at this situation very closely in case extra parking spaces are justified on this site.

We also note the following points from the new SPD:

- “the output from the parking calculator is a starting point and a guide for determining parking provision on a residential site” and that “decision makers will still need to exercise judgement in determining parking provision ...”
- “the decision making process will also include other information such as parking conditions in the local area ...” and that “all applicants will need to demonstrate an understanding of current parking demand in the local area as part of ensuring the scheme will avoid additional on street parking.”
- “layouts should avoid the use of ‘tandem parking’ in providing spaces at a development”
- the new SPD explains that the SDNPA can “seek a smaller quantum of development on the site.”

Without some changes the Parish Council can foresee overspill parking along Greenway Lane and Glebe Road, which can lead to road safety problems and unnecessary conflict between villagers.

Finally, on parking, we trust that the planning authority will ensure that all the garages being provided will be constructed to ensure that modern (wide) cars can fit into them.

Compliance with SDNPA Local Plan Policy SD62

There are two significant conflicts with the specific policy in the South Downs Local Plan (SD62) which relates to this particular housing site:

- It is specified that the layout must not include opportunities to provide further vehicular access into adjacent fields. But the proposed design does not appear to adhere to this as access further north could be obtained relatively easily from the proposed layout.
- The Local Plan also says that opportunities should be taken to create a new footpath between the site and the railway bridge on Greenway Lane (to provide road safety benefits and enhance the local Rights of Way network). This is something which the Parish Council has supported since the site was allocated for housing by SDNPA in 2018 and it is disappointing that the path is not included in the proposals.

The affordable housing

It is noted that 4 affordable homes are proposed which is the minimum number required to comply with SDNPA Local Plan Policy SD28. It is understood that all four will be available for local people (people with a recognised connection to Buriton), in perpetuity, with at least 3 of the 4 being available for rent and one potentially available for shared ownership. Whilst this contribution of four new affordable homes for people with an appropriate local connection is welcomed, the Parish Council would make the following comments:

- Paragraph 7.62 of the Local Plan states that “Local connections will be determined by the Authority, parish council and relevant housing authority ...” and the Parish Council would wish to ensure that it is involved in this process (so as to help ensure that local benefits are maximised) and requests that this is covered by a Planning Condition if permission is granted



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- The Parish Council would also want to be confident that the sizes of the new affordable homes (the numbers of bedrooms) are adequately tailored to the needs of people with a local connection to Buriton who are on the Housing Register. It is not clear to the Parish Council whether the developer has taken this into account. Has the proposed provision been based on any recent housing needs analysis? The Parish Council would wish all four new affordable homes to be occupied by people with a proper connection to the parish.

Sustainability issues

The Parish Council is keen to see that all the new buildings will be built to the highest sustainability standards (including inbuilt renewable energy, insulation standards and grey water recycling etc) so that the properties are not only affordable to rent but also to occupy.

It is felt that this site could be an exemplar for the National Park Authority in so many ways.

It is pleasing to note that all the new homes will have solar panels and air source heat pumps (with one being built to Passive House standards) and that they will all have electric car charging points. But, if the Planning Authority feels that extra efforts can and should be made, then the Parish Council would support that approach: low water use; no plastic windows, doors, fascias etc; provision of compost bins etc.

A number of people, including residents in nearby Glebe Road, have asked about noise levels from the air source heat pumps (ten of them concentrated in quite a small area). It is notable that the applicant's own assessment (page 6 of the Sustainability Assessment) says that: "Careful consideration should be given to consider neighbouring properties as ASHP's can generate some noise and can be considered a nuisance by neighbouring properties. This can be overcome by siting the heat pumps away from nearby properties or conducting environmental noise surveys to establish acceptable levels and locations for the heat pumps".

We have asked the Mapledean Projects team about this matter but unfortunately they have not been able to provide any examples of similar developments in other places nor any other reassurances on this matter. It will, therefore, be important for SDNPA to only agree to proposals which ensure that there is no disruption to anyone at any time of day or night.

There is also uncertainty about bin collection arrangements and it will be important that any communal collection point is well-sited and is not an eyesore visible from the main road.

Finally, in this section, it is not clear to the Parish Council to what extent recycled, or recyclable materials, are being used nor whether they are sourced locally but we trust that SDNPA will scrutinise such matters closely.

Biodiversity and landscaping issues

It is felt that the proposals could make a greater contribution to biodiversity – particularly as this parish has been selected as a pilot location (one of only six in Hampshire) to boost conditions for important pollinators. The Parish Council has suggested to the Mapledean Projects team that each of the new dwellings should have 'bee bricks' built in from the outset – as has been done in a small development elsewhere in the parish within the last year (see photographs at the end of this letter) but unfortunately this request has been rejected. Instead, the developers state that they will be providing planting within the site which should be beneficial to pollinators. This, however, completely misses the point that help for pollinators is required all year round (including places to lay eggs and hibernate) and any exemplary new housing development should be looking to provide this sort of assistance given the context of the current nature crisis. Bee bricks can be used in place of a standard brick to create valuable habitat conditions for solitary bees. Each bee brick contains cavities in which solitary bees can lay their eggs before sealing the



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entrance with mud and chewed-up vegetation. They should be located in warm, sunny positions – preferably south-facing. It is disappointing that the Mapledean Projects team has declined to add this simple enhancement into their overall scheme but it is now hoped that SDNPA will include this matter in a suitable Planning Condition (if permission is granted).

Similarly, the developers should be encouraged to install some Swift Nesting Bricks as these migrating birds have gradually suffered from advances in building regulations. With less cracks and crevices in modern buildings, their populations have been dwindling for many years as suitable nesting sites have become scarcer. Swift Bricks have been developed to take the place of a single brick which can be easily installed during bricklaying within the eaves of each house or (as swifts need height to take off) on the wall under the eaves. We hope that Mapledean Projects might be willing to add this simple enhancement into each house but, if not, then we feel that SDNPA should include the matter in a suitable Planning Condition.

It is pleasing to see the removal of the Lawson Cypress and replanting with native species but there are fears for the White Poplar, which has been marked as low quality and of limited value.

The Parish Council has studied the “Outline Plant Schedule and Specification” and, in general, welcomes the contents warmly. It is noted, however, that the ‘small print’ says that the schedule “is by no means exhaustive and provides an indicative selection of species and cultivars considered suitable for delivering the Landscape Design Objectives.” There were a number of more inappropriate species in the equivalent schedule at Pre-App stage (including things like *Photinia × fraseri* ‘Red Robin’ and *Griselinia littoralis* which now seem to be standard planting in all new housing schemes – anywhere in the country). But such bright colours etc do not relate to the local environment in Buriton. As our professional adviser has observed, such species simply remind him of supermarket car parks and Oxford science parks! Whilst it is appreciated that residents can plant whatever they want in their front or back gardens, it must surely be better to start with the most appropriate native plants rather than planting (and thereby encouraging) less appropriate species? It will, therefore, be very important for SDNPA to ensure that (with one exception noted below) the Plant Schedule and Specification that accompanies this application is carried forward and implemented – presumably through a well worded Planning Condition.

The only shortcoming in the Schedule and Specification is the inclusion of grasses, which are currently in vogue. These do well when maintained but invariably end up looking drab. More pollinators are sought to enhance the community’s efforts on this issue and it is hoped that the Schedule can be adjusted accordingly.

The Parish Council understands that the management of the landscaping and all the hedgerows will be arranged by a ‘resident owned management company’ but we are unclear how this will work for the socially rented properties.

Dark skies issues

As highlighted in a recent SDNPA ‘webinar’ on the topic (21st April 2021), the parish of Buriton is a vital ‘pinch point’ in the Core Area of the International Dark Skies Reserve. The Parish Council is, therefore, pleased to see only limited amounts of external lighting being proposed.

There are, however, still additional opportunities to reduce light spillage and pollution which should be introduced into the scheme as part of any planning permission so as to protect this vital area from a gradual ‘death by a thousand cuts’:

- All the large areas of glazing (French doors etc) should be of ‘low transmittance glass’. This is now a common Planning Condition included by East Hampshire District Council on smaller developments elsewhere in the parish (sometimes with auto-timed blinds) and must, therefore, be carried forward into this larger development. We have asked the Mapledean Projects team about this matter but unfortunately they have not agreed to make this minor adjustment within their application so the



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Parish Council trusts that the National Park Authority will include it in an appropriate Planning Condition

- No additional external lighting should be allowed on any of the new houses without explicit planning permission
- Permitted development rights which permit rooflights should also be removed from each of the new houses
- It is noted that the application says that it will adopt the curfew hours of the village's current street lights. The Parish Council is not sure who will 'control' the street lighting that is included in the application as we understand that the County Council as Highway Authority is not intending to adopt the internal road system. But, for the avoidance of doubt, the bespoke lighting scheme for curfew hours etc (as agreed with Hampshire County Council some years ago) specifies that all the lights are dimmed from 11pm until 5am and that they are off completely between 1am and 4am. A Planning Condition may be required to ensure that the new lights adopt the same lighting arrangements (hours, amount of dimming etc) as in the rest of the village.

Highways issues

The highway junction with Greenway Lane should not be over-engineered with unnecessary visibility splays, intrusive urban kerbing, white lines or any road signs. Such clutter has largely been removed from the village in recent years as the result of a design study by Ben Hamilton-Baillie in 2008. The SDNPA document 'Roads in the South Downs' should be strictly followed and Section P2 of the Buriton Village Design Statement is also very clear on this matter stating that any changes to local roads and lanes "should maintain the rural nature of the parish and avoid standardisation and urbanisation resulting from installation of inappropriate surfaces, kerbs or street furniture." There is no kerbing along Greenway Lane at present and it would be very easy to spoil the local character by introducing something inappropriate. Unfortunately there are no details of this matter in the Transport Assessment other than stating that the access is to take the form of a 'private verge crossing'. We have asked the Mapledean Projects team for more details but unfortunately none have been provided. It will, therefore, be important for SDNPA to impose a Planning Condition (if permission is granted) to ensure that no out-of-character features are introduced because small details can have quite significant unintentional adverse effects.

The access to the new housing site lies just outside the current 30mph speed limit and the development therefore offers the opportunity to extend this limit further north-west – to include this new junction – with the addition of a new 'rumble strip' across Greenway Lane in a style similar to those already installed in a number of places on approaches into the village. The traffic speed data suggests that this would be beneficial and this should also be part of a Planning Condition added to any grant of planning permission.

Water, surface water and waste water issues

There are concerns about adverse effects of lower water pressures or reduced supplies in other parts of the parish due to this new development. The issue of the adequacy of water supplies to the village is a very important and long-standing issue as there have been problems with the adequacy of water pressure due to the fact that the village is served by a single mains pipe which crosses the railway line at Greenway Lane. This matter has been raised with the Mapledean Projects team but unfortunately no reassurance has been provided other than to say that this will be a matter for a local water company (either Southern Water or South East Water) to address. It will, therefore, be crucially important for SDNPA to obtain a clear guarantee from the appropriate water companies that there will be no adverse effects – including on outlying farms which rely on reliable water supplies throughout the year.

Similarly, the provision for waste water / sewerage must also have adequate capacity. The planning application suggests that a pump may be required to connect with the existing sewage system but



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information from elsewhere in the village suggests that such pumps fail regularly and result in ongoing expense for residents. It will, therefore, be important for SDNPA to ensure that no similar problems are brought about by permitting this development.

There are queries, too, about the adequacy of the Sustainable Drainage proposals – particularly in the context of climate change, high water tables and experiences of flooding elsewhere in the village. The local geology in this part of the village is not permeable and there are fears that all the new development could exacerbate existing run-off with water flooding into other parts of the community and, in winter conditions, freezing on local roads.

Disruption during construction

There are concerns about noise and other disruptions (dust etc) during construction and it will be important for SDNPA to impose a detailed Construction Management Plan as a Planning Condition to control the hours of operation, no weekend working, levels of noise permitted etc so as to help minimise any disruption that may be caused.

Concluding remarks

The Parish Council hopes that all the above points are helpful in the consideration of this significant planning application in such a sensitive location.

As noted above, it is hoped that this site can be an exemplary development in many ways – bringing pride and prestige for the landowner, the developer, the National Park Authority and the local community. But this will still require some amendments with the imposition of a number of planning conditions by SDNPA.

In addition to addressing a number of important issues (including (a) resolving the car parking situation, (b) considering the two points relating to compliance with Local Plan Policy SD62 and (c) ensuring that the sizes of the new affordable homes (the numbers of bedrooms) are adequately tailored to the needs of people with a local connection to Buriton), the Parish Council would wish to see suitable Planning Conditions to cover:

- Formal Parish Council involvement in the determination of the 'local connections' criteria for all the affordable dwellings
- A requirement that each of the new dwellings should incorporate at least one 'bee brick' and one 'swift nesting box' to create important conditions for these vital species
- Detailed control over the schedule and specification of planting / landscaping so as to retain the good proposals and prevent the substitution, during implementation, of less appropriate species
- The installation of 'low transmittance glass' in all large areas of glazing (French doors etc) as is now commonly required by East Hampshire District Council on smaller developments elsewhere in the parish (sometimes with auto-timed blinds)
- A requirement that no additional external lighting should be allowed on any of the new houses without explicit planning permission
- The removal of Permitted Development rights so as to prevent the installation of rooflights in any of the new dwellings without explicit planning permission
- A requirement that the proposed lighting scheme in the new development adheres to the same lighting arrangements (hours, amount of dimming etc) as in the rest of the village
- Detailed control of highways matters at the junction with Greenway Lane so as to ensure that no out-of-character features are introduced



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- The extension of the current 30mph speed limit zone to include the new junction with the addition of a new 'rumble strip' across Greenway Lane in a style similar to those already installed in a number of places on approaches into the village
- Adequate water, surface water and waste water arrangements
- A detailed Construction Management Plan.

Photographs of 'bee bricks' installed in a small new development elsewhere in the parish very recently are shown below.

Yours sincerely

Petra Norris
Clerk to Buriton Parish Council

