



BURITON PARISH COUNCIL

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Richard Ferguson
Development Management Department
South Downs National Park Authority
South Downs Centre
Midhurst, GU29 9DH

By email:

Richard.Ferguson@southdowns.gov.uk; Planning@southdowns.gov.uk

Dear Mr Ferguson

SDNP/21/06431/FUL: Change of use and redevelopment of site to provide a recharge centre for electrically powered vehicles, with control and battery room and secure area for the delivery and storage of Bio Gas; up to 60 eco-lodges (Use Class C1), and engineering work to create an earth sheltered block comprising up to 1,330m² for a flexible mix of uses within classes C1 and E(a)(b)(c); the formation of a two-way entrance off the B2070, the laying of a perimeter vehicular access road, with link roads, cycle tracks, and areas of hardstanding to provide up to 127 parking spaces; and engineering work for the purpose of landscaping and operations to install drainage infrastructure at land north of A3 Junction, The Causeway, Buriton, Hampshire

Buriton Parish Council recognises that while Covid-19 has shaken us all, threats posed by global warming and the crises affecting nature have not gone away. The Council is, therefore, continuing to pursue a number of initiatives to improve the local environment for wildlife, to promote greater awareness and understanding of nature more widely (including biodiversity loss) and to address climate change and sustainable living.

The Parish Council has, therefore, some interest in some of the stated aims of this 'Recharge Centre' but, having considered this large and complex application, feels that it must **object** in strong terms to the proposals because of fears about the siting, location and massing which are felt to be entirely inappropriate in the country's newest National Park.

The proposals appear to be contrary to many aspects of national and local planning policies – including local design and landscape guidance produced by this community and adopted by SDNPA as a formal Supplementary Planning Document.

The choice of location beyond settlement boundaries would be an undesirable intrusion of development into the countryside, eroding the uninterrupted countryside that exists below the scarp slope of the downs in this very special National Park.



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Given the scale and complexity of the application, the local community is very dependent on a wide range of technical specialists scrutinising these proposals carefully, thoroughly and independently so as to conserve, enhance and protect the local environment. These will include officers at East Hampshire District Council, Hampshire County Council and the South Downs National Park Authority as well as others at organisations such as the Environment Agency, Natural England, Historic England, Highways England and the relevant Water Companies.

We note the following issues, in particular, and ask that each is considered carefully:

- the proposals appear to be contrary to the main purpose of the South Downs National Park Authority and to other Policies in the South Downs Local Plan including at least SD1, SD2, SD3, SD4, SD5, SD6, SD7, SD8, SD9, SD19, SD20, SD23, SD25 and SD38
- the development will be very visible from the Open Access slopes of Butser Hill and elsewhere: although the applicants claim that it is barely possible to see the grass surface of the existing paddock from some vantage points, the development of scores of lodge buildings (each approximately 5 metres tall) will be visible from many directions
- in May 2015 an application for a single stable barn building (SDNP/15/01003/FUL) was refused on this site as “by virtue of its siting, design, size, scale and bulk it would be an undesirable intrusion of development into the countryside which would be harmful to its intrinsic character and undeveloped nature and would fail to accord with the first purpose of the National Park.” The proposal therefore failed to comply with a number of local plan policies
- that building would have been just over 5m high and the decision noted that “the size would not easily assimilate within the countryside setting” and stated clearly that “the site is prominent in wider elevated views including from the north side of Butser Hill and close to the OS marked viewpoint.” The decision also noted that “a proliferation of parked vehicles and equine equipment would be a further detriment to views” and that “the land is set against the backdrop of Butser Hill”
- a subsequent, amended application (SDNP/15/02943/FUL) reduced the height of the proposed barn to become a small single story building (3.5m tall) and re-located it to reduce its visibility from wider elevated views etc. Only with these changes was the application approved
- surely the fact that one barn building was refused so recently because of its adverse effects on the landscape until it was reduced in height (and hidden within the site) should mean that this much larger current proposal is also unacceptable?
- those previous applications also noted that “according to EHDC mapping there is a spring located at the western end of the site, linked to an open ditch / watercourse along the southern edge of the site. This must be maintained and protected.” Concern was expressed about “the large volume of run-off which would be generated by the stable block during a major rainfall event” and that this “must be controlled on site and not increase flood risk elsewhere”. It was also noted that “the land falls towards the eastern boundary of the site and there is a ditch that runs along this boundary adjacent to a water course. Adequate pollution prevention measures must be included.” All these issues will need to be addressed very carefully in this current application
- the application does not refer to the recent decision (SDNP/20/01535/FUL) to extend public access for walking, cycling etc to the whole of the current Butser Quarry site which is to be restored to natural downland and become an extension to the Queen Elizabeth Country Park within the next few years. Views of the proposed lodges, the belvedere viewpoint and parking areas etc would all be very visible from this new nearby recreational countryside area
- the landscape character assessments for the area (both for the National Park and for the parish of Buriton) warn about adverse effects of large glazed areas reflecting sunlight when viewed from higher ground to the south (the scarp slope of the downs). We note that the proposals include a long transparent acoustic screen as well as all the photovoltaic materials on all the lodges and we fear that these elements will be particularly visible and distracting in the landscape whenever the sun is shining



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- there are similar concerns about potential effects on Dark Night Skies in this crucial 'pinch-point' location in the International Dark Skies Reserve and, with scores of lodges encouraging external dining and seating on outdoor balconies, it is anticipated that lodge doors will commonly be open with light spill and pollution adding to other visible intrusion from the site; even if there were to be low transmittance glass throughout. It is doubted that any system of curfews would be practical or enforceable
- the size of this development and the number of vehicles and people in such a small area will inevitably bring more noise pollution and loss of amenity to the local area
- the parish of Buriton has produced a Village Design Statement (including a detailed Local Landscape Character Assessment) which has been updated and adopted by SDNPA as a formal Supplementary Planning Document as recently 2019. Many aspects are relevant to this application including the extracts from SDILCA cited in the introductory chapter, details in Appendices and guidelines in each of the main sections of the VDS: Landscape Setting (particularly OS1 and LS1, LS2, LS4, LS5, LS8 and LS11); Settlement Pattern (particularly SP1, SP2, SP3 and SP7); and Dark Night Skies & Tranquillity (particularly T1, T2 and T3 but also P7 and P9). There are also cautionary words about new buildings in the countryside in section B4(b)
- the community also has concerns about additional road signs, clutter and paraphernalia in the area around the site as well as within the site itself. The community has undertaken decluttering initiatives with the removal of dozens of signs in recent years and fears that this proposed development could bring retrograde changes
- the additional traffic movements to and from the site could also bring significant problems: both the slip-roads onto the A3 (both northbound and southbound) are seeing increasing numbers of accidents in recent years with the length and visibility of the north-bound on-slip being significantly sub-standard in a location where two lanes of speeding traffic are descending swiftly from the Butser cutting
- there are concerns, too, about any increases in movements into or out of the popular village of Buriton (whether this were to be by vehicles, cyclists or pedestrians) as Greenway Lane has a series of blind bends, it is beyond the 30mph speed limit and it has no footways nor any grass verges to act as refuges. If permitted, it should be a condition of the development that an off-road footway (or path for both cyclists and walkers) must be provided along the full length of Greenway Lane including over the dangerous railway bridge
- the Parish Council is worried about potential adverse effects on both the village pubs which each rely on the provision of accommodation as part of their offer – and there are other local farm-house B&B establishments which could also suffer. These establishments are part of the character of the local community, they provide employment within the village and they have played vital roles during the Covid pandemic. There does not appear to have been any assessment of potential damage done to the local community, which could be irreversible
- Parish Councillors felt that many of the ideas, systems and technologies being proposed for this site are relatively unknown, conceptual, untried and untested – including ongoing viability. There are fears that, should planning permission be granted for this ambitious scheme (and the principle of development in this location be permitted) aspects of it may subsequently need to be changed – resulting in a very different development with unforeseen adverse effects
- a rural location in a National Park should not be the place to test out hypothetical technologies at the expense of local communities
- amongst these uncertainties are future supplies of local farm manure. The number of dairy herds in this parish has reduced significantly in recent years and so the durability of this idea may be questionable. It is also unclear from the application how 'local' the suppliers are intended to be (and, therefore, whether or not there will be any benefit at all to any farmers in this parish). The farmer who is a Councillor on the Parish Council reports that he has had no approach whatsoever from the applicants about this project
- the water treatment system appears to be inadequate for so many lodges



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- there is also the issue of setting a precedent by allowing development on this site which is a long way outside any Settlement Policy Boundaries. Pressure could subsequently be brought to bear on other nearby fields and open spaces – or on a wide range of other sites elsewhere in the National Park. It is felt that in one of the country's most protected landscapes, such a precedent would be very unwise.

In places, the application appears to suggest that a site is needed to enable users of the A3 to stop, pause and enjoy the countryside. The Parish Council would point out that the adjacent Queen Elizabeth Country Park already provides all those opportunities.

If the requirement is for a charging station somewhere along the A3 then it is felt that (a) in accordance with national planning guidance, sites outside the protected landscape of a National Park should be fully explored first and (b) nearby locations (such as the junction for Petersfield, less than two miles to the north) could be more advantageous and appropriate as they could add to existing facilities there and bring multiple economic and social benefits to a market town.

A countryside location such as is currently being proposed would bring few, if any, benefits to the local community but could, instead, bring a wide range of adverse effects as summarised above.

We trust that these comments are helpful to you in your deliberations on this matter.

Yours sincerely

Petra Norris
Clerk to Buriton Parish Council