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22 December 2022

Mrs Karen Wooden
Development Management Officer
South Downs National Park Authority
South Downs Centre,
Midhurst, GU29 9DH

Dear Mrs Wooden

SDNP/22/03543/DCOND: Land at Greenway Lane, Buriton: Discharge of Conditions 3 (Materials), Condition 11 (Hard Landscaping), Condition 12 (Planting Proposals), Condition 14 (External Lighting), Condition 16 (EV Charging Spaces) and Condition 21 (Air Source Heat Pump Noise) of planning approval SDNP/21/02014/FUL.

Thank you for consulting the Parish Council on these applications to discharge planning conditions.

As you will be aware, this new development of 10 homes on a greenfield site at the edge of the village is an allocated site in the South Downs Local Plan. It is therefore expected that it will be an exemplary development and that the highest standards of the SDNPA's Design Guide SPD and the community's detailed Village Design Statement SPD (which were influential in the final scheme which was approved by the SDNPA's Planning Committee) will be upheld and not diluted at this crucial 'discharge of conditions' stage.

Throughout the Pre-App and planning application process (October 2020 to March 2022) Mapledean Projects / Metis Homes and their consultants worked closely with the SDNPA's Design Officer (Mark Waller-Gutierrez), Landscape Officer (Ruth Childs) and others to develop the final scheme. This was an iterative process with important improvements being integrated into the final scheme over time.

It is unfortunate that the company which developed the scheme and obtained the planning permission subsequently sold the site to another developer (Imperial Homes). Much of the detailed local and sympathetic knowledge obtained during the planning process will have inevitably been lost. This means that the consideration of the Discharge of Planning Conditions is likely to need to include added scrutiny.

The fact that a different developer now owns the site should not mean that a deterioration in quality should be accepted.

The Parish Council feels that the new developer's proposals seem to be attempting to change some significant parts of the planning permission which was granted at the National Park's Planning Committee in Midhurst earlier in the year. In particular we have noted:

- some significant changes to building materials and finishes
- completely unacceptable changes to replace virtually all the hedging on the site with 1.8m close boarded fencing
- a completely new lighting scheme with significant adverse effects



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- no net gain of bio-diversity on the site
- some inappropriate, out-of-character planting proposals
- a lack of any reference to provisions for the legally protected Hazel Dormouse
- a large reduction in the amount of permeable materials
- a deterioration in the quality of hard landscaping features
- inadequate information about noise from proposed Air Source Heat Pumps
- a lack of detail on many other important aspects of the development which is due to be part of the discharge of conditions.

It is doubtful whether this scheme (as now re-designed by Imperial Homes) would have received planning permission from the National Park Authority.

The Parish Council also has serious concerns about other matters and we provide details about each of the Conditions (3, 11, 12, 14, 16 and 21) below.

Condition 3: materials and finishes

- a) Throughout the planning application process (January 2021 to March 2022) Mapledean Projects / Metis Homes and their consultants worked closely with the SDNPA's Design Officer Mark Waller-Gutierrez and others to develop a 'Buriton-specific' design with a material palette reflecting the Buriton character.
- b) This application to discharge Condition 3 diverges significantly from that aim – and from the designs approved at the SDNPA's Planning Committee Meeting.
- c) The 'Material Specification' document submitted by Imperial Homes includes completely out-of-character window styles and, to make matters worse, they (and the French Doors) would be UPVC in a strange "sage green" colour which would have absolutely no relationship with Buriton at all. This must not be allowed.
- d) The style of the fenestration has changed from the scheme approved by the SDNPA Planning Committee (as well as the colour) and the new proposals do not meet the local guidelines contained in the Buriton Village Design Statement Supplementary Planning Document.
- e) The proposed fascias and soffits are described as UPVC EuroCell, Colour Cream. Here again, this has no association with designs in Buriton where window frames, fascias and soffits are white.
- f) The design of the porches has also been changed from that shown in the plans approved by the SDNPA Planning Committee. The approved designs were of a simpler structure and that is still felt to fit better with the local character.
- g) It is clear from the photographs of windows, fascias, soffits and porches included at the end of the 'Material Specification' document that Imperial Homes have already built developments elsewhere which include 'sage green' windows, cream soffits & fascias and the new style of porches which they are now proposing. This is not, therefore, a Buriton-specific design as approved by the National Park's Planning Committee. It is an 'off-the-shelf' design already built elsewhere. It must not be permitted here.
- h) Examples of these sage green windows etc can be found at Autumn Gate in Aldingbourne, Post Mean in Bishops Waltham and The Pavilions in Swanmore. This proves that these proposed materials and finishes have no relationship with Buriton – and they are not appropriate here.
- i) Rather than implementing a Buriton-specific design, the new developers seem determined to make these new houses 'stand out' as being completely different from anything else anywhere in the parish. This must not be allowed. The original proposals (approved by the SDNPA Planning Committee) must be adhered to.
- j) We have no expertise on brickwork but, here again, the materials and styles approved by the SDNPA Planning Committee must be carried through. The fact that a different developer now owns the site should not mean that a deterioration in quality should be accepted.
- k) We can find no reference to the swift boxes (which are due to be "integrated into the external walls of each of the new houses), bat bricks (which are due to be "integrated under the eaves or in high walls of



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each property”, nor be bricks which are also due to be included on each property – and also into the ‘growing wall’ which borders the car parking and turning area. It would be helpful if all these important features were explicitly cited before Conditions are discharged. These are explicitly referred to in Condition 13 (Ecology) as well as in paragraph 8.12 of the SDNPA Committee Report

- l) Nor can we find any reference in the information from Imperial Homes about the Solar Panels which are specified in paragraphs 3.3 and 8.10 of the National Park’s Committee Report and which are clearly shown on all the final Roof Plans. More details are required.
- m) Finally, the Parish Council would seek reassurance that the materials and finishes for the four affordable units (including porches etc) will be identical to the other houses. There is nothing in any of the submissions from Imperial Homes to explicitly confirm this important point.

Condition 11 (Hard Landscaping)

- a) This Condition requires details of existing trees and other vegetation to be retained and the Design & Access Statement for the development made it very clear that “The development landscape design strategy seeks to retain, protect, and enhance the existing hedge line boundaries surrounding the development area.”
- b) Policy SD62 of the South Downs Local Plan (which allocated this site) said that a scheme would be acceptable subject to, inter alia, “Existing mature trees and hedgerows to be retained and enhanced.”
- c) But the plans suggest that very little is being retained – including nothing along the important northern boundary which had been designed as a vital Landscape Feature, providing the transition to the countryside. Will the proposed new planting be sufficient to serve this important purpose?
- d) Details of the Northern Boundary Hedgerow are clearly stated on the Approved Plan (19156-RSL-001-Rev B): “Following early discussions with the SDNP this GI element was increased to a minimum width of 5 metres. It will be planted with a mixture of native species such as Blackthorn, Hawthorn, Dog Rose, Dog Wood, Holly, Wild Privet and Wayfaring Tree.” It will be vital that this minimum width of 5 metres is implemented and that there is sufficient planting of native species throughout it.
- e) The 5 metre northern boundary feature proposed by Mapledean Projects (following their liaison with SDNPA officers) included a significant number of high canopies – but the Imperial Homes proposals appear to have halved this number. This is not acceptable as this northern boundary feature has been designed to fulfil a number of important functions.
- f) It appears that virtually everything that was alive on the site has already been removed by the developers – in spite of the important findings of the dormice surveys etc. Can that be right?
- g) All the internal boundary features have been changed from the hedging (shown on the Approved Plan 19156-RSL-001-Rev B) to 1.8m high timber close boarded fencing. This is completely unacceptable.
- h) All the hedging included when the proposals were approved by the SDNPA’s Planning Committee must be reinstated. This is an important issue – not just aesthetically but also because the National Park Authority should be promoting hedging for its biodiversity benefits (and not allowing a retrograde change to fencing which would provide no benefit to wildlife) and to help control excess rain water at times of high rainfall (rather than potentially causing unnecessary flooding of gardens).
- i) The Imperial Homes ‘Proposed Landscape Plan’ shows 1.8m close boarded fencing running all along the eastern edge of the southern swale feature: a considerable distance in a new area of public open space in the public realm at the main entrance into the village. This would look appalling and cannot be allowed.
- j) The Design & Access Statement explained that “The northern boundary of the site, consisting of an existing hedgerow, would be gapped up with proposed single species native hedgerow planting. This boundary treatment would extend along the post and rail wire fence to the southern edge of the site and plot boundaries thus reinforcing and providing a soft screen with ecological benefits through providing habitat and foraging opportunities for wildlife.” There is no ambiguity here: there is to be hedging all the way round the perimeter of the site (not close boarded fencing!) and for the plot boundaries. This is confirmed in the Approved Plan: 19156-RSL-001-Rev B.



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- k) Close boarded fencing would not have been approved by the SDNPA Planning Committee and it would be contrary to both the Buriton Village Design Statement SPD and to the National Park's Design Guide SPD (C11).
- l) Condition 11 also requires details of the layout of surfaces including materials, permeability and details such as kerbs: both at the site entrance and throughout the site. The only permeable areas appear to be the car parking areas. Elsewhere Tarmac and Concrete Slabs are indicated with no details of permeability etc.
- m) But the approved plans included "SuDS Compliant Paving to Access Road and Parking" explaining that "The access drive would be surfaced with permeable tarmac to be in keeping with the surrounding context of the site. The raised tables would be accented with permeable block paving of a grey tone while edging and kerbs would comprise blocks of silver grey tone and textured finish. Parking bays would be differentiated with Golpla System (Supplier: Geosynthetics or equal and approved) reinforced angular aggregates of buff tone to complement the colour palette of the building façades."
- n) The proposals now being put forward by Imperial Homes do not appear to comply with these important permeability issues – which could have adverse effects on drainage etc and they have had no independent drainage consideration.
- o) Villagers are already finding, in the relatively short period of time since the site has been cleared of vegetation and graded, that large quantities of rainwater run-off are flowing off the southern boundary of the site in the vicinity of Marsh Mead and down the footpath link into Glebe Road. The housing units in that corner of Glebe Road were not named Marsh Mead without reason! All permeability and drainage issues must be thoroughly controlled by the planning conditions.
- p) The Approved Plan 19156-RSL-001-Rev B explains that the entrance and internal highways are to be "dressed with a 'tar and chip' finish and no kerbing" and that "the only signage will be a traditional low level street sign". But the Imperial Homes proposals only describe "Tarmac (Black)" which suggests yet another departure from the approved plans which would only reduce the quality of the implemented designs. This change should not be allowed.
- q) We can find no details of kerbs and we trust that this means that this aspect of the Approved Plan 19156-RSL-001-Rev B (ie. that there should be no kerbing) is being honoured. But it would be preferable to get this explicitly in writing from Imperial Homes. It would be completely unsatisfactory if any urban or sub-urban kerbing were to be introduced during construction.
- r) Nor do the new proposals show the locations of the raised tables (which are to be accented with permeable block paving of a grey tone). These important design details should not be omitted from the final scheme being implemented.
- s) We can find no details of any of the ancillary structures, including no mention of the Green Roofs to garages and garden sheds which are specified in the approved scheme: "Roofs to garages and garden sheds to be constructed with a green roof system to enhance the ecological aspect of the development by providing additional habitat for wildlife. The green roof would comprise a fire break system infilled with pebbles of buff and brown tones along the edges."
- t) Similarly there is only minimal reference to the 'growing wall' which borders the car parking and turning area. The Approved Plan (19156-RSL-001-Rev B) specifies that "climbing plants and small shrub species such as Dog Rose, Honeysuckle and Spindle will be planted in front of the 1800mm high masonry wall and six 'bee bricks' will be built into the wall. These measures will provide an improved wildlife route." Only 4 climbing plants are being proposed to cover this long wall – and no Dog Roses or Spindle are being proposed. This important feature merits more planting before this Condition is discharged.
- u) SDNPA officers will recall that at the Planning Committee meeting in February there was much discussion about extending the new footpath alongside Greenway Lane further northwards beyond the site boundary. The landowner was not willing to allow this but (as explained in paragraph 5.1 of the March Committee Report, and indicated on the Approved Plan 19156-RSL-001-Rev B) Metis Homes / Mapledean Projects "have made provision for this route to be extended at some stage in the future if the situation were to change." The Plan indicates this provision by dotted lines in the 'Village Gateway' Landscape Feature. But the Imperial Homes submissions make no reference to this at all.



Condition 12 (Planting Proposals – including Biodiversity Net Gain)

- a) This condition requires details of planting proposals, following the approved layout plan: 19156-RSL-001-Rev B, but some significant parts of the requirements are missing, including details (such as cross sections) of the swales / bunding.
- b) The approved layout plan shows a continuous hedge along the southern boundary of the site (as well as along the northern and western boundaries) and also shows hedges marking the boundaries of the internal plots, gardens etc.
- c) Statements in the Design & Access Statement confirm the importance of this approach: “The development landscape design strategy seeks to retain, protect, and enhance the existing hedge line boundaries surrounding the development area. Habitat corridors would be created to the northern, southern, and western edges of the development site area with the incorporation of reinforced and enhanced native hedge lines; removal of the coniferous tree planting to the northern boundary; and replacement with new native intermittent tree planting. The proposed native landscape components of reinforced hedge lines; native tree planting; wildflower grasslands; and SUDs wetland features to the northern and southern site edges seek to provide an overall biodiversity net gain for the development scheme.”
- d) In the report to the Planning Committee in February and March 2022 the SDNPA’s Landscape Officer stressed that “visual effects of the scheme are reliant upon boundary treatments”.
- e) But all these boundary features appear to have been changed: from the hedging shown on the Approved Plan to 1.8m high timber close boarded fencing. This is completely unacceptable. All the hedging included when the proposals were approved by the SDNPA’s Planning Committee must be implemented.
- f) This is an important issue – not just aesthetically but also because the National Park Authority should be promoting hedging for its biodiversity benefits (and not allowing a retrograde change to fencing which would provide no benefit to wildlife) and to help control excess rain water at times of high rainfall (rather than potentially causing unnecessary flooding of gardens).
- g) As has already been referenced above, villagers are already finding (in the relatively short period of time since the site has been cleared of vegetation) that large quantities of rainwater run-off are flowing off the southern boundary of the site in the vicinity of Marsh Mead and down the footpath link into Glebe Road. All the hedging included when the proposals were approved by the SDNPA’s Planning Committee must be implemented as they form important parts of the overall drainage scheme.
- h) Most of the species on the new Imperial Homes “Proposed Landscape Plan” appear to be suitable for this site, with the following exceptions which should not be planted:
 - Hebe Hedge Planting: there is a lot of this out-of-character hedging being proposed (providing frontage to the boundaries of plots 1,2,3,4,5,7,8 and 9 [identified as No. 18 on the Materials Key]). This is too suburban / municipal for this rural village and should not be used
 - There are also three Hebes being proposed in the ‘Shrub Planting and Ground Cover Mix’ (Red Edge, Midsummer Beauty and White Gem) and, here again, they should not be included due to their municipal appearance. These species are ‘anywhere / everywhere’ planting; there are many much more appropriate species that could be used in the Buriton setting / context
 - Skimmia japonica ‘Rubella’ is also inappropriate, being municipal in appearance and preferring a more acidic soil
 - Rosa ‘Kent’ is a fully double-flowered rose and so is not good for wildlife; a Rosa rigosa would be preferable as it has single flowers and large red hips
 - In the ‘Native Planting and Ground Cover Mix’, Hiyacinthoides non-scripta is a bluebell. But, unless Imperial Homes can guarantee that they can get bulbs of proper native English bluebells (which we doubt that they can), they would be planting a hybrid which could put nearby native bluebells under threat. This development site is close to two SINC, at least one of which is renowned for its native English bluebells. It would be irresponsible for the developers to take the unnecessary step of risking spreading the wrong sort of bluebell into this nearby SINC woodland. This species should not be planted here



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- *Cornus sanguinea* is also a bit of a pest, spreading very easily underground. Many hours are spent at nearby nature reserves trying to keep it under control. And if it is planned to plant a cultivar with brightly coloured stems then this, too, would look rather municipal and not truly native. For these reasons, this species should also be omitted.
- i) As well as these objections to a small number of specific species, the Parish Council also has questions about the quantities being proposed. A lot of (appropriate) planting will be required on this site to obtain the desired affects and it will be important that the developers are not allowed to scrimp.
- j) There are due to be some significant areas of Wildflower Meadows – most notably as part of the wide northern boundary SuDS Swale feature and as part of the SuDS Swale at the southern tip of the site. In the Ecology Enhancements part of the LEMP, Imperial Homes state that they would sow a native wildflower mixture (such as Emorsgate Seed’s Standard Meadow Mixture – EM2). However, the Approved Plan (Approved Plan 19156-RSL-001-Rev B) produced by Mapledean Projects said that these Swales would be planted with Emorsgate EM8: Meadow Mix for Wetlands Composition. The annotation on the Plan explains that “EM8 contains species suitable for seasonally wet soils and is based on the vegetation of traditional floodplain and water meadows.” It would appear that EM8 would be more suitable than EM2. It is also noted that in the ‘Materials Key’ on the Imperial Homes “Proposed Landscape Plan”: Emorsgate EM8 mix is listed (for the areas denoted buy the number 20). This difference between these two Imperial Homes documents must be resolved before this Condition is discharged. The success of the wildflower meadow areas is a vital part of the overall Landscape Led Design Strategy.
- k) It is disturbing to note that one of the main objectives in the Landscape Design section of the Imperial Homes LEMP is: “To soften the vertical dimension along the base of the buildings by utilising bold groups of flowering semi-native planting to provide all year round colour and interest.” All the work to date (by Mapledean Projects and by SDNPA experts) has focused on native planting so as to support pollinators and other wildlife. The introduction of semi-native species may not be appropriate – and ‘bold groups of planting’ to cater for some human tastes may not sit well with the Buriton setting / context. This appears to be another instance of Imperial Homes aiming to make their new development ‘stand out’ as being completely different from the rest of the village, rather than implementing a Buriton-specific design. This should not be allowed to happen.
- l) Details of the Northern Boundary Hedgerow are clearly stated on the Approved Plan (19156-RSL-001-Rev B): “Following early discussions with the SDNP this GI element was increased to a minimum width of 5 metres. It will be planted with a mixture of native species such as Blackthorn, Hawthorn, Dog Rose, Dog Wood, Holly, Wild Privet and Wayfaring Tree.” It will be vital that this minimum width of 5 metres is implemented and that there is sufficient planting of native species throughout it.
- m) The Approved Plan (19156-RSL-001-Rev B) also included the addition of a number of new trees to be planted at the bottom of plots 4, 8, 9 and 10 (along the back of Glebe Road gardens). The new plans provided by Imperial Homes do not include any of these. Instead, they are proposing the addition of a few fruit trees in the middle of the gardens. As mentioned elsewhere, the large tree shown on the plans by Imperial Homes does not exist and therefore more planting of new trees along the border with Glebe Road is required for neighbouring amenity etc.
- n) The Imperial Homes proposals state that at the time of localised hedge removal they would also be planting hedges and trees in the buffer strip as shown in their Landscape Plan. It is noticeable that this has not yet been done.
- o) The National Park’s Committee Report and the applicant’s Design & Access Statement both clearly state that “The development should achieve an overall Biodiversity Net gain using the Defra metric.”
- p) Paragraph 8.12 of the SDNPA’s report to the Planning Committee explained that “This scheme would introduce further supplementary boundary planting and other planting throughout the site that would deliver a degree of biodiversity net gain over and above the existing character and ecological value of the site.”
- q) But, it appears as though Imperial Homes may now be claiming that they cannot provide a Net Gain of Biodiversity on site. Their LEMP document proposes that they would plant some broadleaved trees on an area of land on a farm in a completely different parish, a number of miles away. This should be



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unacceptable. It would be appalling if this new Local Plan site in a National Park were to result in a deterioration of on-site biodiversity. Using hedging to mark the boundaries of the internal plots as well as around all the boundaries of the site (instead of the timber close boarded fencing which Imperial Homes are hoping to use instead) must be part of the way forward.

- r) Finally we feel that it may be helpful to remind everyone about the nature of this site: it is a clay soiled water meadow and the planting must be suitable if it is to succeed. Besides the many inappropriate urban/suburban choices of plants, other species such as native bluebells require moist well drained soil in partial shade with deciduous tree cover to thrive. Where a nod to native species has been included by Imperial Homes it is pure tokenism and seemingly without understanding or interest in the outcome. This is clearly not the thoughtful, knowledgeable approach that had led to the approved ecology/biodiversity planting plans that would have been acceptable in a National Park. The fact that there is an intended biodiversity loss on this site in a rural parish in a National Park is outrageous and utterly inexcusable. There can be no excuse by the developer for this attempt to reduce cost and profiteer from this site. All the original details in the approved application were well developed and necessary for accepting any development on this sensitive site.

Conditions 11 and 12: the Landscape and Ecology Management Plan (LEMP)

- a) A Landscape and Ecology Management Plan (dated July 2022) appears to have been submitted to "Discharge Conditions 11 and 12 of Planning Permission 21/02014/FUL".
- b) But, as the County Council's ecologist has pointed out: "The purpose of any LEMP is to fully incorporate agreed measures for ecological mitigation, compensation and enhancement alongside measures for proposed landscaping.
- c) The submitted LEMP does not, however, do this. For example, perhaps the key constraint at this site is the presence of the legally protected Hazel Dormouse, for which a Dormouse Mitigation Strategy was submitted and secured. The LEMP does not mention this strategy, nor the legal requirements (via Natural England licensing) through which vegetation clearance must occur.
- d) The LEMP should serve as a single source of accessible information detailing specific measures for ecology and landscape. For the LEMP not to include details of legal requirements relating to protected species and vegetation removal is significant.
- e) In addition, there is no plan showing habitat considered to support Hazel Dormice and how these will be protected from disturbance.
- f) The submitted LEMP needs to take full account of the detailed ecological submissions and include, explicitly and in detail, the conditioned measures for ecological mitigation, compensation and enhancement."
- g) The Parish Council fully supports all these important points being made by the County Council.
- h) The very first sentence of the Landscape Design Objectives section of Imperial Homes's LEMP states that an objective is to "soften the hard lines of the development around the boundaries by planting" but in practice this is a world away from all the 1.8m wooden fencing and brick walls that are now being proposed! The LEMP appears to 'talk a good talk', but the detailed proposals do not match the rhetoric.
- i) Similarly the final sentence of the "Design Objectives and Procedures" in the LEMP document states that "All existing hedgerows to be retained and protected in accordance with the above method statement. The hedgerows to be enhanced and reinforced with new native hedges as per the proposed landscaping plan." But all the planting across the northern boundary of the site has already been removed.
- j) There are some 'weasel words' in the "Ecology Enhancements" part of the Imperial Homes LEMP where it is stated that "Potential enhancements will include provision of bat boxes and/or bat tiles to be installed on suitable retained trees and/or residential properties" and towards the end of the same section it is stated that "Two in-built and two tree-mounted bat boxes will be installed." This seems to be a very small provision and the Mapledean Projects proposals, which were approved as part of SDNP/21/02014/FUL, clearly state that there will be "integrated bat bricks under the eaves or in high



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walls of each property.” This important provision, for the range of bat species identified, should be retained in the final built scheme.

- k) There are some other ‘weasel words’ towards the end of the “Ecology Enhancements” part of the LEMP where it is stated that: “It is recommended that mature trees and hedgerows within the site are retained where possible, as these habitats have the potential to support dormice, nesting birds and act as commuting corridors for bats.” This acknowledges the importance of dormice, birds and bats but the words “it is recommended” already seem to have been superseded by the removal of so many mature trees and hedgerows within days of the developer moving onto the site!

Condition 14 (External Lighting)

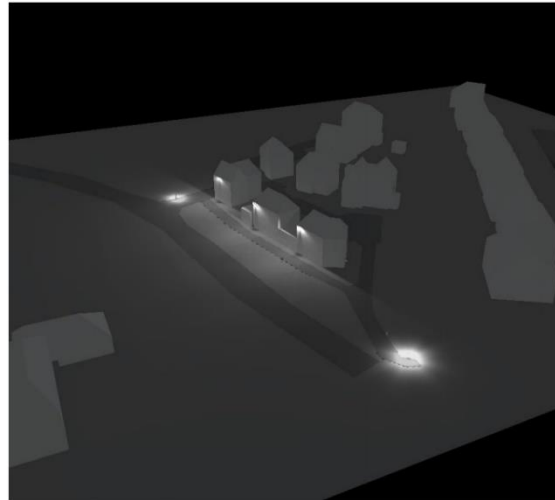
- a) Condition 14 requires details of external lighting to be approved in writing by the Local Planning Authority.
- b) The report considered by the SDNPA planning Committee at its meetings in February and March 2022 explained that: “the applicant has provided a comprehensive lighting assessment which demonstrates minimal external lighting, which is on the road frontage boundary.” The plans showed a total of 5 external lights: 2 bollards (1m) and 3 bollard sensor lights (one on each of units 1-3 (6m). The visual representation of the proposed lighting scheme shows how these are designed to provide suitable lighting for the new footpath in front of units 1, 2 and 3.
- c) As the applicant’s Lighting Assessment (6th April 2021) made clear, the whole scheme had been designed with 3 important issues in mind: (i) effects of obtrusive lighting on nearby residential receptors; (ii) effects on local sensitive ecological receptors; and (iii) effects on sky glow levels at this critical, narrow pinch-point in the International Dark Skies Reserve. The Assessment concluded that “following the installation of an appropriate lighting scheme as detailed in this report” adverse effects, including on “bat foraging/commuting routes”, were considered to be low and “dark corridors beyond the limits of the site are expected to be retained.” Those conclusions were based on the Lighting Scheme as submitted which only included a total of 5 external lights: primarily designed to provide suitable lighting for the new footpath.
- d) The revised proposals now submitted to SDNPA appear to include 26 external lights – none of which assist along the new footpath. This is a completely different lighting scheme and must not be approved. The original scheme had been drawn up as part of a thorough study with lighting specialists and was approved by the SDNPA Planning Committee only because there was due to be “minimal external lighting, which is on the road frontage boundary.”
- e) Paragraph 8.13 of the SDNPA’s report to the Planning Committee explained that “the level of lighting accords with the requirements laid out in the Dark Night Skies Technical Advice Note and SD8 of the South Downs Local Plan and T1 and T3 of the Buriton Village Design Statement, and has been secured via condition.” That statement must be upheld.
- f) Many of the lights now proposed would impact on the residents of Glebe Road and would not ensure that lighting to our dark skies would be kept to a minimum. Furthermore the latest plans still show a large tree covering a large area at the rear of numbers 39 and 41 Glebe Road. This is not correct. This large tree has been removed – but by continuing to include it on the plans, the developers are suggesting a false sense of natural privacy and landscape benefits.
- g) The documents submitted to obtain a discharge of this Condition also make no reference to the bat foraging/commuting routes nor to the dark corridors beyond the limits of the site and provides little if any explanation of either horizontal illuminance or vertical illuminance.
- h) All the good work undertaken by the SDNPA and by Mapledean Projects and their lighting experts would be ignored if this revised scheme was accepted. The original proposals, as approved, must be retained.
- i) Condition 13 (relating to ecology) makes this explicitly clear, stating that “Development shall proceed in accordance with ... figure 6 of the lighting assessment by Mapledean Projects (April 2021)”. This should not be changed.
- j) Figure 6 from the lighting assessment (and its visual representation: figure 7) are reproduced overleaf.



Figure 6



Figure 7 – Visual Representation of Proposed External Lighting Model



Condition 16 (Electric Vehicle Charging)

The Parish Council has no comments on the discharge of this Condition.

Condition 21 (Air Source Heat Pump Noise)

- a) Condition 21 relates to the Air Source Heat Pumps (ASHP) and requires full details of the positions, operating noise output of the units, measured background noise levels (Leq, peak noise, tonal effects) and any required mitigation measures.
- b) The Parish Council notes that a plan provides an indication of where each ASHP would be positioned but that no details seem to be provided about the noise issues which are of significant importance to all those living nearby.
- c) Most of the units are being placed to the rear of the new properties and in some instances are situated very close to the boundary of some Glebe Road residents.
- d) Anecdotal evidence in the village and elsewhere indicates that, unless positioned with great care and consideration, the noise from ASHPs can cause disturbance to neighbours including at anti-social times of the day and night.
- e) The Parish Council notes that EHDC's Environmental Health Department is also unhappy with the lack of information provided. They point out that "The only information that has been provided is the position of the proposed ASHP units. There are no details on noise from the proposed units or measured background levels for the site etc." They add that "the applicant needs to provide an acoustic report which details the noise from the units compared with measured noise levels for the site, together with information on the impact of noise from the units on existing nearby sensitive receptors as well as new ones being introduced onsite."
- f) EHDC also requests that the applicant should "confirm the model of ASHP being installed as it isn't clear from the most recently submitted information (which is also very difficult to read due to being out of focus)".
- g) The Sustainability Statement submitted by the Mapledean Projects (which is explicitly cited in the wording of Condition 21) states that "All properties will be fitted with high efficiency Air Source Heat Pumps" and the Parish Council will expect to see compliance with this specification before this Condition is discharged.
- h) The Parish Council supports all these objections being made by EHDC and agrees that insufficient information has been submitted to comply with the condition.



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In conclusion

In conclusion, the Parish Council is very disappointed and alarmed by many of the proposals now being made by Imperial Homes.

They appear to be disregarding many aspects of the plans approved by the National Park's Planning Committee which had been developed and refined by Mapledean Projects / Metis Homes with SDNPA experts (and others) over a period of about 18 months.

Unfortunately the disregarded aspects provide many ecological and other benefits and the new proposals introduce many out of character elements.

The Mapledean proposals (as approved by the SDNPA's Planning Committee) were greener, integrated, aesthetically softer and wildlife friendly. Those now provided by Imperial Homes are unnatural, segregated, aesthetically harsh and with no consideration to protecting local wildlife.

It is doubtful whether this scheme (as now re-designed by Imperial Homes) would have received planning permission from the National Park Authority.

The fact that a different developer now owns the site should not mean that a deterioration in quality should be accepted.

There can be no excuse by the developer for any attempts to reduce cost and profiteer from this site. All the original details in the approved application were well-developed and necessary for accepting any development on this sensitive site.

The Parish Council trusts that the National Park Authority will refuse to sanction the Discharge of Planning Conditions until such time as much better, revised proposals are submitted taking account of all the matters raised in this letter.

Yours sincerely

Petra Norris
Clerk to Buriton Parish Council