



9 Sussex Gardens
Petersfield
Hampshire
GU31 4JY

Tel: 07943 536065

Email: buritonparishcouncil@hotmail.co.uk

6th December 2022

Kerr Brown
The Planning Inspectorate
Major Casework
Temple Quay House
2 The Square
Bristol, BS1 6PN

By email: Kerr.Brown@planninginspectorate.gov.uk

Dear Mr Brown

Appeal reference: APP/Y9507/W/22/3308885

Relating to 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 objected strongly to this planning application in February 2022 and spoke at the National Park's Committee Meeting in April: opposing the proposals and supporting the planning officers' recommendations that the application should be refused.

It was noted that all the members of the National Park's Planning Committee voted unanimously to refuse the application.

The Parish Council continues to object to the proposals and now makes this further submission.

We understand that the Planning Inspector will receive a copy of our objection and copies of correspondence from about 100 other objectors (individuals and organisations) and we trust that all will be carefully studied and taken into account.

Whilst the Parish Council represents the community living in the parish (including in the nearby hamlet of Weston and in the 17 homes which sit within 200 yards of this site), we note that a wide range of experts and people living further away are also objecting. Both the CPRE and Friends of the South Downs make some very important points as do the Petersfield Society and Petersfield Town Council. The Hampshire Astronomical Group is also objecting for a number of reasons, including material effects on one of the largest Astronomical Observatories in the UK. Evidence from the National Park's expert officers on landscape, design, tourism, dark skies and other important policy matters is also very telling.



BURITON PARISH COUNCIL

The letter from the Parish Council (dated 3 February 2022) contains a list of over 20 'bullet points' and 3 important paragraphs at the end. We would wish all these points to be carefully considered by the Planning Inspector.

In addition to our earlier submissions we would like to highlight a number of particularly significant issues upon which the community has strong views, including:

- landscape character
- dark night skies
- the issue of 'need' and the local economy
- highways activity and safety.

Landscape character

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.

We have yet to find any references to either the Village Design Statement or the Local Landscape Character Statement in the applicant's documents. But SPDs, adopted by the local planning authority, carry material weight in the consideration of planning applications.

We trust that the Planning Inspector will use the adopted SPD in coming to their conclusions.

And we trust that the Inspector will have particular regard to the comments submitted by the Buriton Village Design Statement Group (dated 2 February 2022).

As well as ignoring the Village Design Statement & Local Landscape Character Statement, the applicants seem to be paying no regard to the local landscape character and have not adopted a landscape-led approach:

- the landscape character here is spring-line settlements nestling in the foot of the downs with dispersed farmsteads across a farmed landscape
- this character can be seen in this parish and elsewhere along the foot of the scarp slope
- the proposals to locate a significant new development in the proposed location would produce development that would be incongruous in the prevailing landscape character
- the site is well beyond any settlement boundary and would be a very undesirable intrusion, eroding the sweep of countryside and landscape setting just below the scarp slope of the downs: including the highest part of the downs: Butser Hill
- Policy SD4 states that "proposals will only be permitted where they conserve and enhance landscape character" – these proposals fail that test.

We would also point out:

- just because the A3 and its slip roads already exist does not justify developing in its corridor
- the A3 itself is virtually hidden in this area: nestled and contained by tree belts etc
- in contrast, the new development would not be hidden and it would bring a fundamental change to the character and create its own aesthetic rather than having regard to its context
- hence, as we have explained in our initial submission, there would be visual impacts from the Open Access land on Butser Hill – 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



BURITON PARISH COUNCIL

- planning applications for much smaller and less intrusive developments on this site have been refused in the past – and that should be the outcome again
- the community has doubts as to whether the proposed grassland ecology (to produce a grassy mound to cover the building) will ever work or become established. This could create an even worse blot on the landscape
- the community feels that the proposals are simply ‘green-washing’ a traditional Service Station – with considerable impacts and no positive conservation value
- we understand that a long, transparent acoustic screen is due to be wrapped around parts of the site to reduce noise levels for visitors. But we suspect that when the sun is shining this (and all the windscreens on parked cars and windows on the lodges) would act as a huge reflector and the gaze of anyone walking on the higher ground to the south would be immediately attracted to this dazzle-point from below
- the lodge buildings are not contextually designed: they are ‘anywhere’ buildings (not taking any cues from the local area) as well as being laid out in a very regimented way
- irrespective of the design and layouts: this is simply the wrong location for such a development.

Dark Night Skies

As mentioned in our initial submission, this particular part of our parish forms a narrow (and therefore crucial) pinch-point in the 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.

But the community has other comments and concerns, too:

- Buriton is one of only 10 Dark Skies Discovery Sites in the whole of the National Park
- the Milky Way can be seen from our Recreation Ground – but the application site is only 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
- there are due to be scores of lodges encouraging external dining and seating on outdoor balconies and it can be anticipated that lodge doors will commonly be open with light spill and pollution adding to other visible intrusion from the site. No system of curfews would be practical or enforceable
- this is likely to affect the Core Area as well as the buffer area of the Dark Skies Reserve
- we have seen comments made by the Hampshire Astronomical Group and the Clanfield Observatory and would agree with all their concerns
- 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.

The issue of ‘need’ – and the local economy

It is recognised that the South Downs Local Plan explains that there are shortages of visitor accommodation in the national park at weekends and during the week in the summer. But it stresses that arrangements for visitors should not compromise the special qualities of the area.



BURITON PARISH COUNCIL

The relevant Policy in the Local Plan (SD23) has very clear stipulations about any visitor accommodation to be allowed, including:

- development proposals will not detract from the experience of visitors or adversely affect the character, historical significance, appearance or amenity of the area (SD23 1(c))
- the design of any new buildings are sensitive to the character and setting (SD23 1(d))
- any proposal does not have an adverse impact on the vitality and viability of villages or Assets of Community Value (SD23 1(f))
- where proposals are located outside settlement policy boundaries they positively contribute to the natural beauty, wildlife and cultural heritage of the National Park (SD23 1(g)).

This planning application fails all those tests.

And, there is plenty of scope for this development to be elsewhere

- It does not need to be in this location
- Vehicles travel along the part of the A3 which runs through the National Park in about 20 minutes
- It is only about 15 minutes from Portsmouth
- In this part of the National Park, there is no need for accommodation 'for the Park' to be provided 'inside the Park'. There are plenty of other opportunities
- Even some locations on the A3 inside the National Park may be possible – and would certainly be more suitable and less damaging
- As the representation from Petersfield Town Council explains: "this is the wrong location for this application and would be better situated on a brownfield site near to the town of Petersfield allowing more people to reach it using active travel, especially for occasional walkers. This application would mean a rural green field (the most environmentally friendly use of the space with a medieval ditch), would become an industrial location ..."

The applicants seem to ignore the fact that there is already a nearby place to do many of the things that they are proposing to do: charge electric vehicles, shop, go walking or cycling... It is called the Queen Elizabeth Country Park and it has been looking after the local landscape for almost 50 years. The Country Park is likely to be extended as a result of SDNP/20/01535/FUL where a quarry site is being restored to natural downland. 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 local community also feels strongly about other adverse impacts, including:

- the project is very 'inward looking' and no benefits to the local economy are foreseen
- instead, the vitality and viability of both our village Inns is threatened
- both premises (the Five Bells and the Nest Hotel) are designated Assets of Community Value and both have submitted strong objections to the proposals
- there are other local farm-house B&B establishments which could also suffer
- all 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
- these establishments are also part the character of the local community and would be a huge loss
- there is some talk in the proposals about helping local farms by purchasing waste from them – but the numbers of dairy and beef farms are declining and none of our local farms appear to have been approached about this initiative – including one of our parish councillors. We are therefore wondering: how local the 'local' sources would be; and how far this waste would need to be transported, undermining the alleged sustainability credentials.



BURITON PARISH COUNCIL

Highways activity and safety

At present the proposed site is quiet and benign. But the scale of activity relating to the new developments will result in a very busy site. This will include all the 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.

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

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. We would urge the Inspector to observe all these conditions at any busy time of day.

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.

Sadly there was a fatal accident almost in this precise location in March this year (2022) which supports the community's view that the area is already dangerous. But, of course, this data will not yet appear in accident statistics.

We also understand that a local serving police officer (off duty) has had his car written off at this location since the Planning Application was considered by the South Downs Planning Authority – but, again, miraculously, no injuries occurred and so none of the relevant authorities are likely to be aware of the incident. But if a serving police officer, very familiar with all the local highways and their risks, can be involved in an incident like this – it highlights the dangers and risks to others.

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 proposed service station facility.

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

In conclusion

For all the reasons cited above and in earlier submissions, this proposed development is in the wrong place. It should not be in this location, it should not be in the countryside and it does not need to be inside the National Park.

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



BURITON PARISH COUNCIL

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.

We trust that the Inspector will take all the Parish Council's submissions and all those from the local community carefully into account.

Yours sincerely

Petra Norris
Clerk to Buriton Parish Council