



Mr Keith Reed
South Downs National Park
South Downs Centre
North Street
Midhurst
West Sussex
GU29 9DH

Beechcroft House
Vicarage Lane
Curdrige
Hampshire
SO32 2DP

By email only: Planning@southdowns.gov.uk

[e feedback@hiwwt.org.uk](mailto:feedback@hiwwt.org.uk)
[t 01489 774400](tel:01489774400)
www.hiwwt.org.uk

9th February 2015

Your Ref: SDNP/14/06426/OUT

Our Ref: 13.83.3.15

Dear Mr Reed

PROPOSAL:

UP TO 140 RESIDENTIAL UNITS, INCLUDING 40% AFFORDABLE HOUSING, CUSTOM-BUILD PLOTS, AND LIVE-WORK UNITS; FARM SHOP AND CAFE; NATURE RESERVE AREA; SUITABLE ALTERNATIVE NATURAL GREEN SPACE (SANGS) AREA; SUSTAINABLE DRAINAGE INFRASTRUCTURE; AND ASSOCIATED ACCESS WORKS.

LOCATION:

BOHUNT PARK BOHUNT MANOR PORTSMOUTH ROAD LIPHOOK HAMPSHIRE GU30 7DL

DESIGNATED SITES:

WEALDEN HEATHS PHASE 2 - SPECIAL PROTECTION AREA (SPA), SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)

WOOLMER FOREST – SSSI

BRAMSHOTT AND LUDSHOTT COMMONS – SSSI

FOREST MERE – SSSI

CHAPEL COMMON - SSSI

BOHUNT MANOR WOODLAND – SITE OF IMPORTANCE FOR NATURE CONSERVATION (SINC)

BOHUNT MANOR MEADOW - SINC

WHEATSHEAF COMMON/LIPHOOK GOLF COURSE - SINC

The Wildlife Trust were aware of this application at the pre-application stage (SDNP/14/01638/PRE), which was for a mixed use development comprising 210 dwellings, plus employment and community uses. We did not comment on the application at that stage, but were aware of the comments made by the RSPB, in their response of 29th May 2014; we fully supported the RSPB's comments.

We have been made aware of this outline application through consultation with concerned members of the public and through our weekly screening of planning applications. Having reviewed the information supporting this application we have several concerns with it.

We acknowledge the efforts that have been made by the applicant to address some of the previous concerns raised, and also note that the number of dwellings has been reduced from 210 to 140. Nonetheless, this is still a significant development within the South Downs National Park and within 5km of the Wealden Heaths Phase 2 SPA. We consider that this development does not conform with

the purpose of the park, which is to 'conserve and enhance the natural beauty, wildlife and cultural heritage of the area'.

Our principal concern is the potential for recreational impacts to occur on the Wealden Heaths Phase 2 SPA as a result of the proposed development, and the lack of a strategic approach aimed at addressing such impacts. As you will be aware there is significant pressure on the network of sites that form the SPA from development proposals in the local area, including the proposals at Whitehill-Bordon. The developments in the Liphook area are coming forward in a piecemeal way, and in the absence of a strategic approach, a significant effect may occur. We consider that such a strategic approach should use the model that was developed for the Thames Basin Heaths, whereby Suitable Alternative Natural Greenspace, is provided and in addition supported by contributions towards access management on the SPAs. This approach has been tested and has been shown to be working on the Thames Basin Heaths and without such an approach for Wealden Heaths SPA there is no certainty that a significant effect will not occur on the designated sites.

We acknowledge that the proposals include the provision of 9.7 hectares of Accessible Natural Green Space, of which 7.1 hectares are classified as Suitable Alternative Natural Greenspace. However, 2.3 hectares of this land has been designated for its nature conservation value at County level (SINCs). On a point of principle the Trust is opposed to the inclusion of land that has been designated for its nature conservation value, as recreation space. We consider that this land should be protected and managed for its nature conservation value, and contributions should be provided to ensure that the interest features of the sites are maintained.

We note that the proposed new development is connected to the SPA via an un-surfaced track, which is approximately 1.25km to the west and therefore it is anticipated that some residents will use the SPA for recreation. We note within the Habitats Regulations Assessment¹ (paragraph 7.8) that the proposals include the creation of 'a new and improved access into the SANGS from public rights of way' by creating an 'alternative route along which residents would be able to walk a circular route; along this footpath and then south, back through the SANGS and into the residential area using existing public rights of way comprising well surfaced paths'. We are concerned that this circular route will not function as intended, since the majority of the development is located in the north of the site and within easy access of the public right of way. As such the new residents may prefer to walk directly to the SPA and back rather than through the new development since this will provide them the opportunity to exercise their dogs off the lead for longer. We therefore consider that it is important that an access management strategy is in place to ensure that the new residents use the SANG land as intended.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful in determining this application and if you wish to discuss these matters further, then please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

Yours sincerely



Trevor Codlin
Senior Planning Ecologist

My Direct Dial: 01489 774457
Main Switchboard: 01489 774400
Email: Trevor.Codlin@hiwwt.org.uk

¹ Engain (2014) Bohunt Park, Liphook, Hampshire: Information to Inform a Habitat Regulations Assessment