

South Downs National Park Authority

Attn: Keith Reed

13 February 2015

Dear Sir

**SDNP/14/06426/OUT - Bohunt Park, Bohunt Manor, Portsmouth Road, Liphook, GU30 7DL**  
Up to 140 residential units, live-work units; farm shop and cafe; nature reserve area; Suitable Alternative Natural Green Space (SANGS) area

**CPRE Hampshire objects to this application for the reasons set out below**

This application site is within the South Downs National Park (SDNP) and outside the Settlement Policy Boundary of Liphook.

This proposed development exceeds 10 dwellings and, for the reasons set out below, would have significant effects on the environment. Accordingly it must be considered “major development” in the SDNP, **NPPF paragraph 116** applies, and it must be refused unless there are exceptional circumstances and public interest can be demonstrated.

Within the SDNP area of East Hampshire there is, we understand, against its own housing requirements, a 5 year supply of housing land to meet the requirements of NPPF paragraph 49. Housing requirements cannot therefore provide exceptional circumstances and public interest to justify this development. The fact that a proposed development may be of good design, sustainable and provide community facilities cannot on its own provide exceptional circumstances and public interest within the meaning of NPPF paragraph 116.

In any event, NPPF paragraph 116 requires consideration of the scope for developing elsewhere outside the SDNP. There are various SHLAA sites on the edge of Liphook outside the SDNP which are potentially available to meet the 175 dwellings identified as needed at Liphook in the **East Hampshire Joint Core Strategy (JCS)**, by way of new allocation. Indeed there is ample scope within SHLAA sites outside the SDNP for meeting the whole of the JCS allocation.

One of these SHLAA sites is at Lowsley Farm South of A3, and is a proposed allocation for 175 dwellings in the East Hampshire Housing and Employment Allocation Plan. The allocation of this site is supported by CPRE Hampshire as it is an appropriate site for housing. It will by itself provide the whole 175 dwellings needed.

**Accordingly, this application should be refused on the basis of NPPF paragraph 116 as no exceptional circumstances or public interest is demonstrated.**

As there is now a 5 year supply of specific deliverable sites for housing within the East Hampshire part of the SDNP, policies in the JCS for the supply of housing should be considered up to date, and applications for housing development must accord with the policies in the JCS as a whole (NPPF paragraph 196). Correspondingly, applications that do not accord with policies in the JCS should be refused.

**JCS Policy CP10** provides that sites to provide housing numbers identified as new allocations to the East Hampshire part of the SDNP will be allocated through the SDNP Local Plan or Neighbourhood Plans. As the SDNP Local Plan and Neighbourhood Plans are only now emerging it follows that allowing this development would not accord with the structure for allocations stipulated in the JCS.

Following the **SDNP Partnership Management Plan (PMP) Policy 50**, the focus of the SDNP Local Plan is to provide housing closely matched to social and economic needs of local people. This is an approach which has strong CPRE support, and **JCS Policy CP20** requires new development to be in accordance with the ambitions within the PMP. It will require appropriate allocations of housing to a number of villages of the 100 dwellings for which sites are required by the JCS to be allocated to villages in the SDNP. Yet if this

proposed development of 140 dwellings were to be allowed it would exceed 100 dwellings by a considerable margin and so use up at Liphook the whole of the allocation to villages, thereby preventing other villages from benefitting from housing allocations to meet social and economic needs.

**To allow this development at Liphook would not accord with the structure provided in JCS Policy CP10 for identifying sites for housing allocations, nor would it accord with the ambitions within PMP (or JCS Policy CP 20) as it would deny housing allocations to other villages to meet their social and economic needs.**

The site is outside the Settlement Policy Boundary (SPB) for Liphook, but the proposed development would not comply with **JCS Policy CP10** which permits only small scale development outside SPBs in defined circumstances, or **JCS Policy CP 19** which provides for policy of general restraint outside SPBs to protect the countryside for its own sake.

**The proposed development would not comply with JCS Policies CP10 or CP19 regarding development outside Settlement Policy Boundaries.**

As regards impact on landscape, this development would be visible from the viewpoint on Weavers Down but in the distance and the impact would be limited, provided lighting is designed to minimise impact on dark skies. There would also be points on the footpath which runs to the north of the site where what are now views of open fields would become views of a large housing development, but the impact on the character of this footpath would be limited, provided planning conditions require maintenance of the hedgerow on the south side of the path.

However **JCS Policy CP20** requires new development within the SDNP to conserve and enhance the natural beauty and tranquillity of the SDNP and promote enjoyment of its Special Qualities. This reflects the statutory purposes for national parks, and NPPF paragraph 115 which requires great weight to be given to natural beauty within the SDNP. JCS Policy CP20 also requires new development to protect and enhance local distinctiveness, sense of place and tranquillity and protect green corridors extending into settlements.

The main landscape impact of this development would be loss to built development of the two open fields which bring the SDNP right into the village centre, and which allow fine and much appreciated views from the Portsmouth Road across the SDNP to Weavers Down, as well as towards Foley Manor. We consider this would amount to severe adverse impact on landscape character, visual amenity and tranquillity of this area within the SDNP. It would also remove the green corridor extending from the SDNP into the village.

**Accordingly, this development would not further national park purposes or the Special Qualities of the SDNP, or comply with NPPF paragraph 115 or JCS Policy CP20 as regards landscape impacts of new development.**

**For the reasons stated above, CPRE Hampshire considers this application should be refused.**

**CPRE Hampshire South Downs & Central Planning Group**