

SOS BOHUNT MANOR COMMUNITY ACTION GROUP

Reference Planning Application SDNP/14/06426/OUT

Bohunt Park on the Bohunt Manor Estate

This application should be refused for the following reasons :-

1. National Planning Policy Framework:

- a. The proposal is contrary to the National Planning Policy Framework: major developments in the UK National Parks are disallowed unless they are in the public interest. This development is not in the public interest. It is contrary to the provisions of the Bramshott and Liphook Parish Plan and will be for the intended Neighbourhood Plan. The landowner company, GVI Ltd, presented their proposals to a very crowded public meeting at the Millennium Hall Liphook organised by the Parish Council on the 9th July 2013 and the audience was overwhelmingly against the proposal. From this public meeting a compact number of residents formed the SOS Bohunt Community Action Group to continue to resist the proposal.
- b. A letter dated the 3rd March 2014 to the SOS Bohunt Community Action Group from The Department for Communities and Local Government stated that:-

"The Government does not want to see any more open land developed than is absolutely necessary. The National Planning Policy Framework makes clear that, while supporting economic growth, the Government is committed to conserving and enhancing the natural environment. For example, the Framework makes clear that National Parks enjoy the highest status of protection in relation to landscape and scenic beauty. Also, paragraph 116 of the Framework explains that planning permission should be refused for major developments in National Parks except in exceptional circumstances and where it can be demonstrated they are in the public interest. The Government has not defined 'major development' as this will be for the relevant decision maker, taking into account the proposal in question and the local context" **See Appendix A**

- c. Reference should also be made to the SDNP Scoping opinion reference SDNP/13/06144/SCOPE
- d. The development proposal should be refused because the 140 proposed dwellings exceeds the 10 dwellings limit denoted in the James Maurici's legal opinion which sets out the definition of a Major Development.

2. Dark Skies

We support the SDNP's initiative and application for Dark Skies Reserve Status

3. Joint Core Strategy:

- a. The proposal is contrary to the provisions of the Joint Core Strategy including its Green Infrastructure Study.
- b. We in Liphook support East Hants District Council's Local Plan: Joint Core Strategy. Planning applications for over six hundred houses have already been recently approved and there are pending planning applications for a further three hundred and sixty houses, not including Bohunt Manor Frontage Land. We are not opposed to development. We are only opposed to development in

inappropriate places such as the South Downs National Park. The EHDC Housing & Employment Allocation has proposed other land within the Parish for the necessary 175 dwellings required by the JCS.

- c. There is no need for further structures to be built within the Parish for employment purposes as there are already empty factories and warehouses. The introduction of Rural Hubs is more applicable to smaller communities where there are no other employment opportunities available. As stated previously there are several areas within the Bramshott & Liphook Parish settlement boundaries on brownfield sites, outside the South Downs National Park, where these facilities could be provided.
- d. Section 8.54 of the applicant's Planning Statement notes correctly that the proposed development is outside the agreed Settlement Boundary.

4. UK Government Vision and Circular 2010:

- a. The proposal is contrary to the provisions of the UK Government Vision and Circular 2010. The Park is not to be used for unrestricted housing targets; land elsewhere in the Bramshott & Liphook Parish has been earmarked for this purpose.
- b. The proposal is outside the settlement policy boundary of Liphook [EHDC]

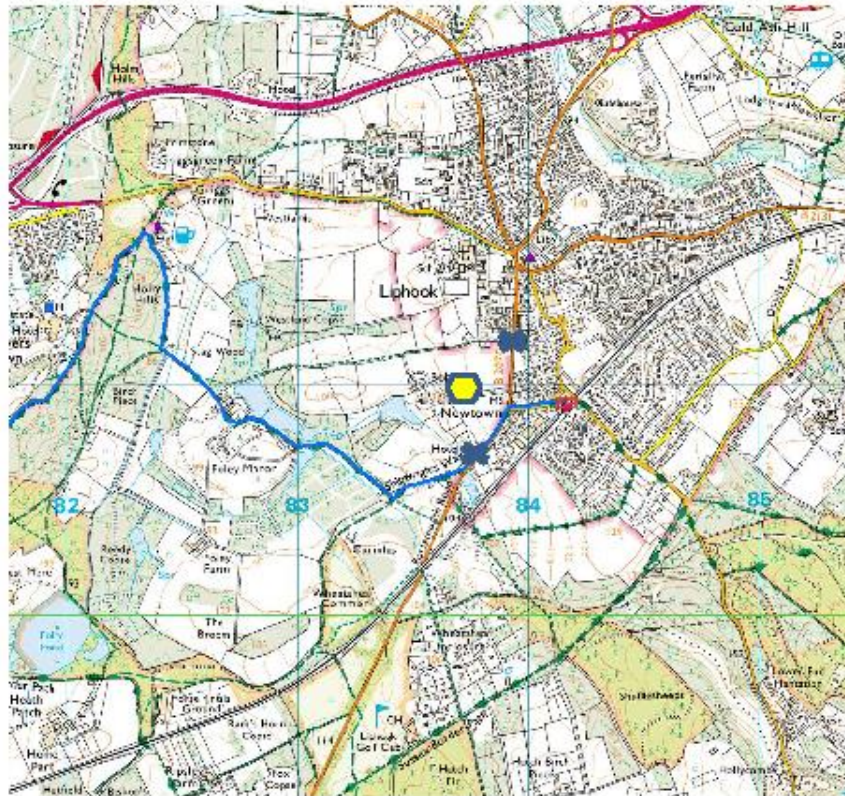
5. Scenery:

- a. The proposed development will not complement or assist the Special Qualities of the National Park. The proposal, so close to SSI's and the Wealden Heaths Special Protection Area, will either remove completely or will damage the rural character of the property and the ecological balance of the area will be irreversible.
- b. It will remove our beautiful scenic views at this northern Gateway to the National Park where the General Public already have access from the Portsmouth Road into the SDNP via two existing Public Footpaths as indicated on the map below Liphook has long cherished the scenic views to and from Weavers Down. The need to protect these views is noted in EHDC's Landscape Capacity Study [June 2013]
- c. Page 75 of the applicant's Planning Statement refers to the appearance of the buildings with Photo Voltaic panels fitted. If the PV panels are placed on the south and south west elevations of the dwellings they will be seen from the nearby Weavers Down and other parts of the SDNP glinting in the sunlight.








View over the Proposed Development site to the Wealden Heaths Special Protection Area [Weavers Down]

**Map Showing The Shipwrights' Way
Related to the Bohunt Manor Estate and the South Downs National Park**



KEY:

	Existing Entry Point to the South Downs National Park from Liphook using Public Rights of Way
	The Shipwrights Way
	Public Footpath
	South Downs National Park Boundary
	Proposed Bohunt Development Site

SOS Bohunt Manor Community Action Group 27th November 2014

6. Infrastructure and Utilities:

- a. The proposal will exacerbate the many infrastructure problems in respect of traffic management, drainage and utilities.
- b. The roundabout is pivotal to the proposed development, but the position, design and traffic flow are not without complications.

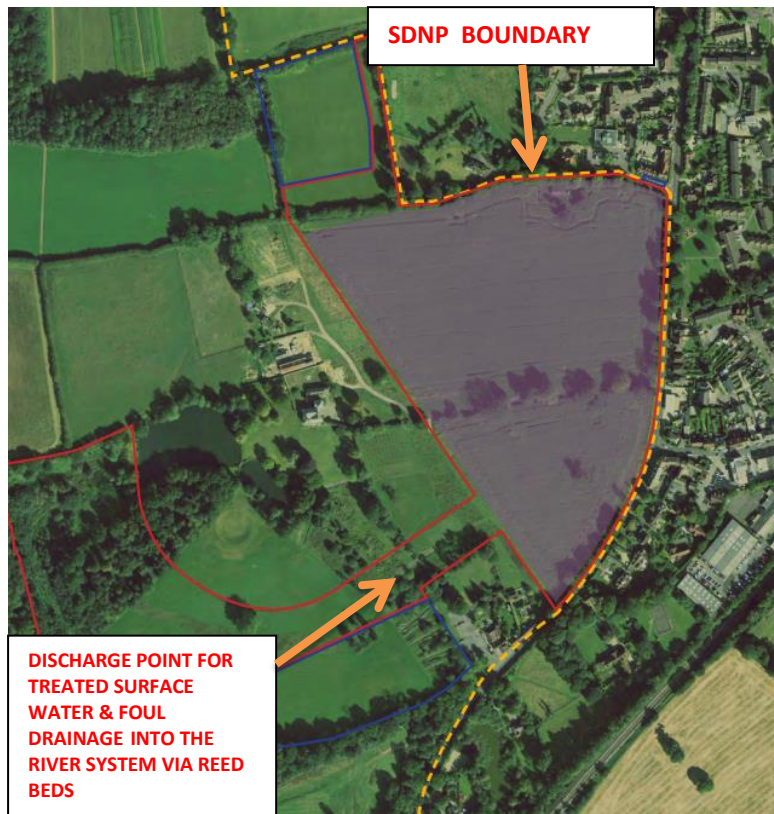
- c. Liphook suffers from traffic entering The Square from Portsmouth Road linked with the main traffic flow which is along Headley Road and Haslemere Road. This proposal will compound this problem; any large new development should be closer to the A3 Trunk Road thus avoiding the village conservation area
- d. It is recognised in Volume 2 of the Environment Statement [reference 6.43] that there is a major problem connecting this proposed development to the existing foul and surface water main drainage system. The Thames Water report has been referred to but has not been disclosed; we ought to see this report and be able to read exactly what Thames Water has said. The drainage system proposed has been forced on the applicants due to the poor condition and low capacity of the sewers in Liphook, which has caused surface foul water discharge in Portsmouth Road and Longmoor Road

Mains sewer upgrading to cope with the proposed number of new houses on this topographically challenging site is not a viable option without massive investment by Thames Water.

- e. It is noted that the Bohunt Park applicants are proposing to discharge the foul and surface water into attenuation tanks for primary treatment and then remove any pollutants via an ecological system of reed and willow beds close to The Links Public House and next to the public footpath.
This treated water will then discharge into the local river system running through the South Downs National Park and into the River Wey. The local streams have very good quality water.
- f. Our concerns relate to the efficiency of these Sustainable Drainage Systems [SuDS] when such a large number of dwellings and high rainwater might overwhelm the system and therefore affect the environmentally sensitive River Wey headwaters and the nearby Wealden Heaths Special Protection Area [SPA]
- g. The Wealden Heaths Special Protection Area [SPA] contains the largest and most diverse area of lowland heathland habitats in Hampshire (outside the New Forest) and is considered the most important area of heathland in the Weald of Southern England. It is the only site in Britain known to support all twelve native species of reptiles and amphibians and supports a nationally important heathland flora, with associated birds and invertebrate fauna.
- h. We are also concerned that the maintenance of the foul water pumping station and monitoring of the discharge quality will be vitally important to prevent pollution of the River Wey feeder stream.
- i. In the Environmental Statement Volume 2 Water Resources it states that
"4.11 The only surface water feature present on site is a minor stream that connects the pond to the southwest of Bohunt Manor with the south eastern boundary of the site at Portsmouth Road. This stream runs in a northwest-southeast orientation"
- j. We query if this water course has the capacity to accommodate the flows from the combined foul and surface water discharges, especially in surge conditions.
- k. To work effectively and safely these systems need to be closely monitored and robustly managed so that pollutants do not discharge into the river system. In the case of Bohunt the discharge point enters into a small stream feeding into the

river system which passes through the adjacent Wealden Heaths Special Protection Area [SPA].

- I. Such a large number of dwellings and high rainwater could create a surge which may not be accommodated in the proposed large underground attenuation chambers, therefore affecting the environmentally sensitive River Wey tributaries. The design of the pumping chamber would need to incorporate emergency power connections to forestall any problems once there is a cessation of sewage pumping operations during the frequent extended power cuts that we unfortunately suffer in Liphook.



- m. Page 15 of the Environment Statement refers to Air Source Heating Pumps serving the apartments. Clarification is sought on the measures to attenuate the noise from the units.
- n. There will be an excess of lorry movement delivering to the Bio mass pellet stores proposed for some of the buildings on the development.

7. Archaeology:

- a. There is evidence of archeological finds on the site and the location of the proposed buildings in a prominent position is historically significant in respect of the Bronze Age and Roman artefacts found.
- b. The history of the Bohunt Manor Estate and of adjoining areas indicates that there may be other significant archeological finds which would be destroyed by the development.

- c. We disagree with the comment on Page 11 of the Environmental Statement *"that small numbers of artefacts recovered from the site during a survey were determined to be of little or no archaeological significance"*
- d. Substantial historical artefacts have been found on the Estate. An exhibition of the finds was recently displayed at the Liphook Heritage Centre. The display of artefacts was very extensive and included a Bronze Age axe head, a Celtic coin, many Roman coins, Roman pottery shards, several medieval coins from King Canute's reign to Elizabeth I reign, coins from James I through to George III, 19th and 20th century coins, 17th century Jews harps, trade tokens and a collection of 19th century musket balls. The locations of these finds are shown on the plan **Appendix B** to this document.
- e. Hampshire County Council Archaeological Department have expressed interest in these finds. They have already commented on the planning application seeking further detailed research.
- f. The Geophysical Survey does not encompass the whole site and should be added to where any building works, such as hard landscaping, is proposed.
- g. Some of the linear features already identified should be investigated to confirm what they are.
- h. Some hard surfaced paths are proposed for the area and they cut right across the possible Bronze/Iron Age monument in the corner of the field and the area near it which might or might not contain a villa. Both would be disturbed by any works associated with the paths. No prior archaeological survey work has been carried out in this area and this should be undertaken.

8. Ecology:

- a. The site was home to a wildlife sanctuary created by the late Sir Adrian and Lady Holman that was subsequently bequeathed to the World Wildlife Fund [WWF]. In a handwritten letter from Sir Peter Scott, then Chairman of the World Wildlife Fund, dated 24th April 1971 to Lady Holman he said:-

"I feel sure that the arrangement that has been worked out will keep your lovely property available to birds and those that like to see them, long after we've all departed from the scene. Future generations will, I'm sure, be as grateful as I am for what you have planned"

Despite this bequest the WWF sold the Bohunt Estate land, relevant to the current planning application, to the current landowner

- b. The Bohunt Manor gardens include a lake where the Great Crested Newt [A European Protected Species] could be expected to breed.
- c. As previously stated the Wealden Heaths Special Protection Area [SPA] contains the largest and most diverse area of lowland heathland habitats in Hampshire (outside the New Forest) and is considered the most important area of heathland in the Weald of Southern England. It is the only site in Britain known to support all twelve native species of reptiles and amphibians and supports a nationally important heathland flora, with associated birds and invertebrate fauna.

- d. A full ecological survey should be carried out to establish the facts.
- e. In the RSPB's letter dated 29th May 2014 to the SDNPA [for the attention of Pat Aird] they stated that:-

The RSPB's view is that development in this location within the South Downs National Park does not conform with the purpose of the Park to 'conserve and enhance the natural beauty, wildlife and cultural heritage of the area'. This is principally because the development is likely to lead to increased recreational disturbance of the Wealden Heaths Phase 2 Special Protection Area (the SPA). Furthermore, as the level of housing proposed is above the allocation for Liphook in the East Hampshire Local Plan, the proposal is a departure and as such should not be supported."

- f. It should also be noted that 41 leading environmental organisations published the Nature Check Report in November 2013. These organisations include the RSPB, The Wildlife Trusts and the WWF.
- g. The full report can be accessed by following the link below:-

http://www.wcl.org.uk/docs/Link_Nature_Check_Report_November_2013.pdf

- h. The following statement concludes the report:-

Wildlife and Countryside Link (Link) is a coalition of voluntary organisations concerned with the conservation and protection of wildlife, countryside and the marine environment. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage over 750,000 hectares of land.

- i. The destruction of productive arable land on this important estate is wholly unacceptable. Indeed when the WWF purchased the Estate they undertook to "see that this land was not desecrated or damaged in any way" as reported in an East Hampshire Post article dated 31st May 1979
- j. Page 11 of the applicant's Environmental Statement mentions that sensitive plants and animals have been found and that "*Investigations have identified wildlife of potential sensitivity in the area during the construction and operational stages. Bats, reptiles, dormice, and badgers use the area for feeding and commute to other areas. Common species of birds are known to nest on the site.*" This statement reinforces our contention that the site is ecologically important and should not be disturbed.
- k. Page 12 of the Environmental Statement mentions that "*All landscaping will be maintained to ensure that features establish properly.*"

How will this be undertaken in the long term and who will finance this work?

- l. Mitigation measures proposed by the applicant cannot achieve 100% success.



View to Liphook the Bohunt Estate from the Weavers Down - Wealden Heaths Special Protection Area [SPA]

- m. The Environmental Statement, Volume 2: Archaeology and Historical Landscape Section 4.5 states that *"In considering the effect of this change, well-maintained hedgerows are a sustainable landscape feature and can persist over hundreds of years. Lines of trees are often less permanent, although still over a long time frame. Thus, the effect of the loss of the hedgerows in historical landscape terms is significant."* This statement recognises the important contribution that the Bohunt Estate has to the local environment.
- n. GVI Ltd have already been criticised in November 2013 by the East Hampshire District Council for felling protected trees and hedgerows. Their actions in the past do not give confidence that they are sincere in their proposals to provide an ecologically balanced environment as part of their intentions for the site.

9. Long term responsibilities:

- a. There is no clear future in terms of ownership or maintenance for the cricket pitch, café with shop, Medical Centre, community allotments, community barn and nature reserve.
- b. We understand that the proposed Medical Centre cannot be afforded by the NHS. The application contains no evidence that this facility is needed.
- c. The Medical Centre will not be constructed unless the housing is approved and NHS Funding is definitely in place. With the current status on NHS Funding the likelihood of constructing the Medical Centre within the foreseeable future is doubtful. If the option is not exercised within a prescribed time the developer would be able to pursue other potential uses of the building site, subject to obtaining planning permission.
- d. Page 32 Design access Statement notes that Cross subsidy of the roundabout needs construction of the dwellings to finance the access for the LUFC and Medical Centre.
- e. We note that The Environment Statement Page 6 says *"Work has begun in some areas, for already consented features of the Bohunt Park development, including*

the medical centre, allotments and football pitch and stand.” For the avoidance of doubt it should be noted that only notional ground excavation has commenced on the Medical Centre, but no work has commenced on the football pitch and pavilion/stand

- f. Reference page 4 of the Design access Statement: Who will be monitoring the Management Company tasked to administer the management of the allotments, drainage system, landscape, café and shop? This arrangement is fraught with problems both in the near and long term. What are the terms of reference for the Management Company?
- g. Reference Section 6.10 on the Planning Statement. It should be noted that the pedestrian link to Bohunt Academy will only be open during school hours, so is of less optimum benefit.

10. Sustainability Appraisal

- a. The proposal from GVI is not sustainable for, at least, the following reasons:-
 - The proposal flies in the face of the thorough Sustainability Appraisal by URS for EHDC August 2013 which notes (page 7) that the JCS Spatial Strategy will ensure that growth is directed to locations away from the National Park and away from the Wealden Heaths Special Protection Area. It is not clear why GVI does not recognise this expert assessment.
 - **Issue 28** of the Sustainability Appraisal by URS for the National Park Authority, February 2014, is designed for exactly the circumstance now in question:
 - *What approach should be adopted for development proposals on sites within the National Park that adjoin settlements outside the National Park?*
 - The proposal from GVI does not satisfy either of the options reviewed in that Appraisal because other suitable, developable and deliverable sites do exist outside the National Park, and have already been identified by EHDC with its list of SHLAA Included sites. If any of these 'Included' sites had not been suitable, developable and deliverable they would not have been assessed 'Included' by EHDC. In fact Liphook is inundated by developer proposals and there is no lack of choice. The challenge is, currently, one of reducing the shortlist.
 - The JCS allocation for new housing for the villages within the National Park is 100 for the period to 2028. The GVI proposal would use up and exceed all this allocation by **40%**, and defies or ignores the sustainability needs of the villages for which the allocation is designed: factors of the vitality of these communities, health and wellbeing, their economies and climate change mitigation and adaptation (inter alia) are either ignored or swept aside by GVI as of no importance.
- b. We support our Government's well publicised aims for sustainable development.

11 Major development

- a. The development proposal should be refused because the 140 proposed dwellings exceeds the 10 dwellings limit described in the Maurici legal opinion which sets out the definition of a Major Development.
- b. The proposal by GVI is therefore a Major Development and, to accord with the 2010 National Parks Vision, the proposed development should be refused.

12. Local Interim Planning Statement

- a. Sections 5.3 and 7.48 Planning Statement making reference to the LIPS meeting held on 17th July 2014 at the Millennium Hall Liphook. The comments regarding 'voting' need to be challenged. It has been documented in letters and emails sent to East Hampshire District Council by our organisation and many individuals that the LIPS Consultation was poorly managed, disorganised and the 'voting' was both unsupervised and unregulated.
East Hampshire District Council is aware of the shortcomings of the Consultation event and has promised to correctly regulate and manage future events of this nature. The alleged 'voting' consisted of members of the public applying stickers onto various plans where the housing allocations were identified. There was evidence that many multi stickers were fixed in bulk to the Bohunt Manor site plans by individuals, which is a form of vote rigging. The Bohunt Estate should not have been included in the LIPS Consultation as it is outside the remit of East Hampshire District Council because it is in the South Downs National Park. Therefore any reference to 'voting' at the LIPS meeting in the applicant's submission should be ignored.
- b. The Local Interim Planning Statement for Liphook published by East Hampshire District Council in August 2014 includes an assessment of the need for dwellings within the Parish of Bramshott & Liphook.
- c. The Liphook – Local Interim Planning Statement recognises that there is a conflict between the amenity value and any development proposal.
- d. Key points in the Liphook –Local Interim Planning Statement are:-
 - That the East Hampshire District Council have no planning authority within the SDNP boundary
 - The areas adjoining the Parish of Bramshott & Liphook were finalised at the Public Enquiry in 2006.
- e. The owner of the contended site had the opportunity to submit a speculative planning application prior to the Park designation. However, no application was submitted and that the opportunity to test the site's suitability without the full National Park designation was lost.
- f. When including the land the Inspector said
'In my judgement the wider sweep warrants inclusion in the SDNP'. The SDNP boundary around Liphook is therefore firmly established and the special considerations of the NPPF that apply to National Parks will apply to the Bohunt and south of Longmoor Road (Foley Manor) sites. The SDNP boundary will therefore have a profound impact on the future shape of Liphook village as a whole."
- g. The nationally important SDNP land adjoining Liphook must be seen as a positive, providing an important landscape setting to the environmental sustainability of the village.
- h. Section 4.2 of the applicant's Planning Statement states that *'Over the last decade almost all of Liphook's employment sites have closed'*. This is an incorrect

statement. There are many employment sites within the Parish of Bramshott & Liphook as described in the Bramshott & Liphook Parish Plan.

- i. In conclusion the boundaries of the SDNP were set in recognition of the amenity value to Liphook and this benefit should take precedence over the proposed development.

13. Construction

- a. Page 14 of the applicant's Environmental Statement that "*There will be a temporary benefit of construction employment to a workforce of approximately 200 persons during the building of the proposed development. This provides a positive effect on local employment.*"

We do not believe that this statement is realistic and that the constructors will travel substantial distances to service this proposed site. This is contrary to the SDNP policy of local employment and would not be compliant with the aims and objectives of BREEAM. How will this be managed and what research has been undertaken to establish the availability of these local skilled persons?

- b. The Environmental Statement Volume 2 identifies that there will be a range of 20000m³ to 100000m³ of materials movements on the local roads which are already at capacity.
- c. It also states that Onsite Concrete Batching will take place. It is our opinion that this Onsite Concrete Batching will not take place and all concrete will be delivered by Ready Mixed Concrete trucks.
- d. Section 6.6 in the Environment Statement Vol. 2 mentions that there will 10 lorry movements per day during construction. This number is unrealistic because, assuming 20 m³ load capacity for each truck, the stated 100000m³ of materials will generate 5000 lorry movements. Assuming a 4 year construction period [see Section 6.6 of the Environment Statement] this will equate to an average of 22 lorry movements per day. Realistically this could be up to at least 60 lorry movements at peak times which will exacerbate the already critical status of traffic through the Liphook Conservation Area.

14 Comments on the Design Access Statement not noted elsewhere in our response

- a. Page 5 Acknowledges that national parks development should be restricted
- b. Page 6 Paragraph 115
"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in these areas, and should be given great weight in National Parks and the Broads."
Therefore why develop this site located in the South Downs National Park?
- c. Page 16 We see no reason why the land could not continue to be farmed
- d. Page 16 We disagree with the statement that there are limited public views
There are sweeping views to and from Weavers Down. [see Paragraph 5b above]
- e. Page 16 GVI Ltd had ample time to disagree with Park Boundaries before they were finalised in 2010, but chose not to.

- f. Page 21 Illegal removal of protected trees and hedgerows has taken place. [See paragraph 8n above]
- g. Page 47 Where do footballers park their cars, coaches, etc. on match days as only 20 car spaces are to be provided on the Pavilion car park. We suspect that they would overflow into the adjacent roads. Parking will not be available on the Bohunt Academy's campus because permission for pedestrian access outside of school hours has not been agreed.
- h. Page 82 – 84 Shows vernacular architecture which is not wholly emulated in the developer's proposals.
- i. Page 99 What aesthetic controls will be proposed for the HAB self-build dwellings?

15. Sustainable Future use

- a. While it may not be strict criteria for determination of a planning application, many people in Liphook consider that a look to the sustainable future for the property to be sensible at this time. This Group – with the unanimous support from the Community meeting in July 2013 - has the objective to support the re-creation of the scenic, ecological and cultural regime practised and intended by the benefactors, Sir Adrian and Lady Betty Holman, in a modern fashion to proactively signpost the Gateway position into the National Park.
- b. We would support the restoration of the former agricultural tenant, and within this fabric a cricket ground located adjacent to the Portsmouth Road being not incompatible with the scenic views to and from the west.
- c. We would also support the construction of a Visitor Centre provided it was clearly defined who was responsible for its construction, maintenance and administration.
- d. This would assert the Gateway to the National Park within an appropriate rural fabric.

Appendix A: Letter from the Department for Communities and Local Government



Department for
Communities and
Local Government

Mr R Miller
Chairman
SOS Bohunt Manor
The Heathers
44A London Road
Liphook
Hampshire GU30 7AN

Our Ref: P1/74/004374/14

3 March 2014

Dear Mr Miller

Thank you for your letter of 30 January to the Prime Minister, written on behalf of SOS Bohunt Manor Community Action Group, about proposed housing in the South Downs National Park. Your letter has been transferred to this Department because we have policy responsibility for planning. I have been asked to reply.

I have noted your comments and concerns about the proposed development and your request for support in opposing it. However, central government can only intervene in local planning matters where it has the legal powers to do so, for example through the work of the Planning Inspectorate on Local Plans and planning appeals. In addition, because Planning Inspectors act on behalf of the Secretary of State, which I also do, I am limited to making comments relating to development proposals in general terms.

The Government does not want to see any more open land developed than is absolutely necessary. The National Planning Policy Framework makes clear that, while supporting economic growth, the Government is committed to conserving and enhancing the natural environment. For example, the Framework makes clear that National Parks enjoy the highest status of protection in relation to landscape and scenic beauty. Also, paragraph 116 of the Framework explains that planning permission should be refused for major developments in National Parks except in exceptional circumstances and where it can be demonstrated they are in the public interest. The Government has not defined 'major development' as this will be a matter for the relevant decision maker, taking into account the proposal in question and the local context.

Yours sincerely

Chris Kent

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Appendix B: Location of Artefacts Found on the Bohunt Manor Estate

