

# Working in Partnership



Nikki Wood Managing Director Environmental Gain Ltd The Old Church School Butts Hill Frome Bath BATT THR 24 January 2014 Our Ref:
Contact Officer:
→ Tel. No.:

SDNP/13/06144/SCOPE Pat Aird 01730 234110

Dear Madam

# Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2011

Applicant:

**Green Village Investments** 

Proposal: Location: Request for Scoping opinion - Residential development of up to 200 units Land South Of Bohunt Manor Portsmouth Road Liphook Hampshire

I refer to your request for a Scoping Opinion from the South Downs National Park Authority under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 for mixed use development comprising up to 200 dwellings (40% affordable), a rural work hub, a village green, a nature reserve, a new football pitch, a 3.3 ha SANGS, a football and a cricket pitch and associated infrastructure including a medical centre, community allotments and SUDS on 22.4 hectares of land at Bohunt Manor frontage land, Liphook, Hampshire.

The proposed development is located within the South Downs National Park and exceeds the threshold criteria under Schedule 2, 10b of the Town and Country Planning (Environmental Impact Assessment)

Regulations 2011 (the EIA Regulations). There is a likelihood of significant environmental effects occurring as a result of the development in this location and therefore a planning application is to be accompanied by an ES.

This Scoping Opinion provides advice on the aspects and issues to be considered by the ES and is guided by the responses received from statutory and non-statutory consultees (available to view on the SDNPA public access web page) and is written in accordance with the EIA Regulations. In particular I would draw your attention to the requirement to consider impacts in combination with reference to the first purpose of designation which relates to the impact on natural beauty, wildlife and cultural heritage. There should be a holisitic approach in the Environmental Statement (ES) to these three aspects of the environment and their inter-relationship should be acknowledged and reflected in the assessment of the impact of the development. The SDNPA landscape has been formed by the interaction of human activity with the environment over millennia and this is an important aspect of the The South Downs Integrated Landscape Assessment. Therefore **Archaeology and Cultural Heritage** should be scoped into the EIA.

The SDNPA also consider that the use of resources, in particular water, is an important consideration and should be included in the ES. The SDNPA also consider that the Introduction, Site and Surroundings, Description of the Development should all be scoped in. The construction programme should also be set out in the description of development.

The following documents should be referred to in the ES:

- English National Parks and the Broads, UK Government Vision and Circular 2010
- Special Qualities of the National Park Report
- State of the South Downs National Park 2012
- South Downs Integrated Landscape Character Assessment 2011
- South Downs Historic Landscape Character Assessment
- Historic Mapping
- Local Character Assessment and VDS

Photomontage viewpoints and other viewpoints can be referred to SDNP for further discussion.

## Lighting

The existence of 'Dark Skies' is one of the special qualities of the SDNPA and some areas have some of the darkest skies in England. This issue should be considered as part of the wider landscape impact. The impact of lighting on wildlife should also be considered and cross referenced to the assessment of the impact on ecology.

#### **Ecology**

Full guidance on the approach to be taken in EIA is set out in the response to this scoping request by Natural England, attached to this letter. In view of the first purpose of SDNP designation and proximity of the site to internationally and nationally designated sites and locally designated sites and potential for cumulative impact the SDNPA agree that this issue should be scoped in.

#### Cultural heritage

As stated in the introduction, the SDNP is a historic landscape formed by the interaction of human activity with the environment over time, as acknowledged in section 6.32 of the Scoping Report. This is why the first purpose of designation includes the conservation and enhancement of cultural heritage. As such archaeology and cultural heritage should be scoped into the ES and integrated with landscape and ecology.

# Socio-economic impact

This also relates to the duty of national park designation. The need for housing, and in particular affordable housing, and the impact this will have on the economy should be considered both in this section and in considering the need for the development in the SDNP within the section of ES relating to 'Alternatives' and the cumulative effects of the development with other plans and projects. The provision of community facilities and educational facilities also need to be taken into consideration, together with the impact on recreation and tourism related to access to the countryside and the second purpose of designation. The SDNPA agree that the impact of the loss of agricultural land would be insignificant.

## Noise and vibration

In view of the fact the size is currently undeveloped and emits very little or no noise tranquillity is one of the special qualities of the SDNP and the increase in traffic movements should be scoped in to the ES and cross references to the landscape and visual impact. The potential for vibration issues at the construction stage also need to be addressed through a detailed description of the activities proposed at construction stage.

can be found in:

- CIRIA C522 document Sustainable Drainage Systems design manual for England and Wales
- CIRIA C697 document SuDS manual.

For a development of this size a connection to the public foul sewer would be appropriate and I suggest you have discussions with Thames Water.

#### Traffic and transportation

The Highway Authority has confirmed that a Transport Assessment will be required. This should be prepared in accordance with DfT requirements set out in 'Guide for Transport Assessments'. Trip rates can be calculated directly from TRICs but further information will be required relating to journey to work trips as the 'Workplace Location' census data does not represent all of the peak hour trips. The use of 2014 and 2019 in the TA is agreed, as is the use of TEMPRO although information will be required on the methodology for obtaining existing traffic flows. It is agreed the junctions listed should be assessed in the TA. The Travel Plan should be developed in accordance with HCC guidance. The roundabout at the Portsmouth Road/Station Road junction capacity will need to be assessed in terms of the additional traffic generated by the development. The TA should also include an analysis of personal injury accident data in the vicinity for the last 5 years.

#### Other issues

Finally, whilst scoping opinion requests are not open to public consultation they are published on the SDNPA web site for information. A member of the public has commented that there are errors in the scoping report at paragraphs 3.2, 3.8, 4.3, 6.2, 6.12, and 6.16, giving as an example a figure for the population of Liphook in 3.3 which is 24% different from that in the emerging Liphook Parish Plan, and 35% less than what the population is expected to be in 2021 when approved planning permissions are occupied. You may wish to consider this comment when preparing the final draft of the ES.

#### **Non-Technical Summary**

This must be written using plain English and easy for the layperson to read and understand.

The Scoping Opinion has now been formally adopted by the SDNPA. If you have any further queries please contact the case officer Pat Aird, whose details are at the top of this letter.

Yours faithfully

TIM SLANEY
Director of Planning

South Downs National Park Authority