

Chris Beaver (Chris@planningsphere.co.uk)

Our Ref:
Contact Officer:
Tel. No.:

SDNP/14/01638/PRE
Pat Aird
01730 819266

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Dear Mr Beaver

Pre-Application Advice – Mixed use development

Site Address: Bohunt Manor, Portsmouth Road, Liphook, Hampshire, GU30 7DL,

Further to your application for pre-application advice I am able to provide the following comments based on the information you have provided.

Site Description

The development site is located the southwest edge of Liphook on the main southerly approach road to the town (Portsmouth Road). It lies within the SDNP the boundary of which follows the road. The site elevation is between 105 and 100 meters AOD approximately and slopes away from the town towards open countryside and the parkland landscape of Foley Manor to the west and Liphook Golf course on Wheatsheaf Common to the south.

There is a hedgerow along Portsmouth Road but views are more open to the west and south over open countryside and the National Park.

This site (and land to the south and west of Liphook) was identified as meeting the criteria for designation as National Park and included within The Countryside Agency's Designation Order 2002. This area is regarded as having high scenic value and a distinct sense of place derived from the mosaic of woodland and pasture associated with the nearby Foley Manor. The variety of landscape elements namely woodland, mix of arable and pasture and waterbodies, as well as undulating topography, provides visual interest. This along with relatively high levels of tranquillity, due to a lack of public roads across the wider area, offers high quality recreation experiences from public rights of way and areas of open access land.

The development site lies within character area L3 Woolmer Forest/Weaver's Down in the South Downs assessment and forms part of the Wealden Farmland and Heath Mosaic landscape type. In relation to the East Hampshire assessment it forms part of character area 8b Woolmer Forest/Weaver's Down while the settlement of Liphook lies within character area 8c Whitehill to Liphook Farmland and Heath Mosaic..

Proposal

The residential part of the development comprises approximately 210 units, including open market housing, affordable housing, custom-build housing, live-work housing and sheltered almshouses. A work-hub of c. 1400sqm is proposed to provide flexible workspace for start-up companies and small and medium sized enterprises and ancillary community use space, a cafe and other visitor facilities

economy. The proposal includes a nature reserve area and open recreation area including a cricket pitch proposed as a suitable Alternative Natural Greenspace (SANG).

The submitted Masterplan also includes a number of permitted community facilities medical centre; football pitch, pavilion and pedestrian cycle link to Bohunt School; community allotments; and community barn providing secure storage for community allotments.

The initial submission included the following

- Pre-Application Planning Statement – PlanningSphere
- Draft Application Document Submission Schedule - PlanningSphere
- Landscape Review – Macgregor Smith (September 2013)
- Landscape Analysis & Strategy – Macgregor Smith
- Historic Development & Character Analysis – Adam Architecture
- Custom Build overview – HAB
- Transport Assessment Executive Summary – FMW Consultancy
- EIA and Ecology Executive Summary - Engain
- Site Location Plan – Macgregor Smith
- Master Plan – Adam Architecture & HAB
- Context Master Plan – Macgregor Smith
- Workhub Plan – Adam Architecture
- Street Hierarchy Plan – Adam Architecture
- Route Hierarchy Plan – Adam Architecture
- Schedule of Accommodation – Adam Architecture
- Park Build Heights
- Needs alternative justification

Policy Context

Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory development plan in this area is the East Hampshire District Local Plan Second Review 2006. The SDNPA and East Hampshire District Council have prepared a Joint Core Strategy which was adopted by EHDC on 8th May 2014 and by the SDNPA on 12 June 2014.

National Planning Policy Framework (NPPF) and Circular 2010

The site lies within the South Downs National Park, the designation reflecting the highest quality of the landscape and scenic beauty in which the site is located. Government policy relating to National Parks is set out in English National Parks and the Broads: UK Government Vision and Circular 2010 and The National Planning Policy Framework (NPPF) which was issued and came into effect on 27 March 2012. The Circular and NPPF confirm that National Parks have the highest status of protection and the NPPF states at paragraph 115 that great weight should be given to conserving landscape and scenic beauty in the National Parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight in National Parks.

The South Downs Partnership Management Plan (SDPMP) was adopted on 3 December 2013. It sets out a vision and long term outcomes for the National Park, as well as 5 year policies and a continually updated delivery framework. The SDPMP is a material consideration in planning applications and has some weight pending adoption of the SDNP Local Plan.

National Park Purposes

The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of their areas;
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social well-being of the local community in pursuit of these purposes. The SDNPA also has a duty to seek to foster the economic and social well-being of the local communities within the National Park.

NPPF and Circular 2010

The English National Parks and the Broads UK government Vision and Circular 2010 paragraph 78 states that: *"The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services."*

As set out in paragraphs 115 - 116 of the NPPF National Parks which have the highest status of protection planning permission should be refused for major developments in these designated areas except in exceptional circumstance and where it can be demonstrated they are in the public interest.

Article 2 of the Town and Country Planning (Development Management Procedure)(England) Order 1995/419 advises that the provision of 10 or more dwelling houses is considered major development, which is a starting point for considering whether the application is major. The SDNPA have sought legal advice on this point and the Maurici opinion is available to view on our web site. The opinion advises that the NPA must consider whether there is anything to rebut the presumption that the development is major. Local circumstances, the particular facts of the application and planning policies must be taken into account before coming to a view. In this case the proposed development by reason of its nature and location has the potential to have a serious adverse impact on the natural beauty provided by the SDNP. The proposal therefore constitutes major development in the National Park for the purposes of paragraph 116 of the NPPF. Paragraph 116 states that planning permission for major developments in National Parks should be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Consideration of such applications should include an assessment of (inter alia):

- the need for the development, including in terms of any national considerations, and the impact of permitting or refusing it, upon the local economy;
- the cost of, and scope for, development outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated.

Planning Assessment

Principle of Development

This is a proposal for major development within the SDNPA on a site designated by the East Hampshire District Local Plan 2006 as land outside of the settlement boundary. The SDNPA currently can demonstrate a 5 year housing land supply and it has not been demonstrated that there are no sites outside the designated area that meet the 175 dwelling requirement for Liphook. Whilst EHDC have carried out a limited informal consultation on preferred sites for future housing development they are not the local planning authority for the area in which this site is located. Moreover it is generally accepted that a local planning authority should meet its own needs and should not rely on sites in an adjoining local planning authority. Further consultation to identify sites which transcend local planning authority boundaries might be through the preparation of a Neighbourhood Plan and I understand the parish council are considering this as a way forward. However, this would not obviate the need for compliance with paragraph 116 of the NPPF. Policy CPI4 of the JCS may permit the provision of up to 30% market housing to support affordable housing providing this market housing is low cost such as starter homes but there is no policy support within the adopted development plan or the NPPF for a proposal which is predominantly market housing on a site outside of a settlement boundary. As such there is a clear policy objection to residential development of the site at this point in time.

Landscape Impact and Design

Counsel's Opinion was sought by the SDNPA in relation to 5 year land supply for the emerging Joint Core Strategy. A copy of this opinion can be found on the Southdowns website as an appendix to item 10 at the Full NPA committee meeting on 16 April 2013. This Opinion supports the 'landscape first' approach to housing development within a National Park irrespective of the requirement for a 5 year housing land supply.

As you are aware from the comments of the SDNPA Design Review Panel and our meeting on Monday 14 July 2014 the lay out and design of the current proposal is not considered to take a 'landscape first' approach. You have been advised how important it is to consider the topography of the site and of the need to reflect the existing landscape character which requires an analysis of what is special. The topography should therefore be a key component of any analysis and complement an understanding of landscape types such as woodland, heathland and wetland already identified as well as existing views. Of particular note is the break in the slope across the site - this is likely to affect perceptions of the urban-countryside interface and the extent to which development to the west of Portsmouth Road will be viewed from the open countryside.

Vehicular access to the site is proposed from the new roundabout to be constructed to serve the new medical centre. This has severely constrained the design of the development and resulted in the poor layout referred to above. Whilst Notice has recently been served that work will shortly commence to implement this permission I would strongly suggest this is reviewed to ensure the layout of the proposal is genuinely landscape led. Although the medical centre and roundabout have been granted permission it would appear from your submission that the housing development would be needed to cross subsidise the construction and maintenance costs (so it will not be implemented until/unless the housing is approved). Therefore I would urge you to take the opportunity to re-consider this highways approach.

Other Issues

You will be aware from the documents on the public access system that comments have been received from the RSPB relating to the potential impact on birds and from EHDC relating to drainage.

Future Steps

The assessment above is based on the masterplan and amendments submitted as part of the pre-application process. However at our meeting on Monday some interesting ideas were presented briefly in relation to a more landscape led design with greater flexibility in the housing to cater for changing needs over the lifetime of the owner. I would therefore suggest that if you wished for further advice on design, notwithstanding the clear policy objection, you may wish to proceed by way of a new pre-application enquiry governed by a Planning Performance Agreement setting out the scope of future discussions and meetings with a timetable for completion. Please let me know if you would be interested in this approach.

I hope this response has been of assistance. You will appreciate the views expressed are those of officers and do not prejudice any decision by the SDNPA on any future applications.

Yours sincerely,

Pat Aird
Development Manager