Agenda Item 6

Report PC24/25-17

Report to	**Planning Committee**
Date	**12 December 2024**
By	**Director of Planning (Interim)**
Local Authority	**Winchester City Council**
Application Number	**SDNP/24/02686/FUL**
Applicant	**Mr C Kilgannon (on behalf of Hockley Golf Club Ltd)**
Application	**Development of a sustainable irrigation system, including water storage pond; enhancement to driving range practice facility and re-establishment of the southern entrance.**
Address	**Hockley Golf Club, Winchester Road, Twyford, Hampshire, SO21 1PL**

Recommendation:

1) **That planning permission be refused for the reasons set out in paragraph 9.1 of this report.**

Executive Summary

The application site is a 14.4ha area which covers the existing driving range area at Hockley Golf Club (HGC) at the western extent of the National Park, approximately 0.7km north of Twyford and approximately 1.5km east of Winchester.

The proposals involve the importation of c.130,000m^3 of inert soils onto the site and a re-profiling of the land and the creation of a new irrigation system for the capture and storage of rainwater to be used for the upkeep of the golf course. This system involves a new storage pond being constructed on the higher slopes of the site at its eastern side and a network of pipes and new swale. In addition, the proposals also involve developing the driving range facility with new target greens, tees, and a 'short game' area.

The Applicant wishes to secure greater resilience and adaptation to climate change through capturing and storing rainwater on site and avoid abstracting water from the aquifer (which also feeds the River Itchen) and reduce mains water use.

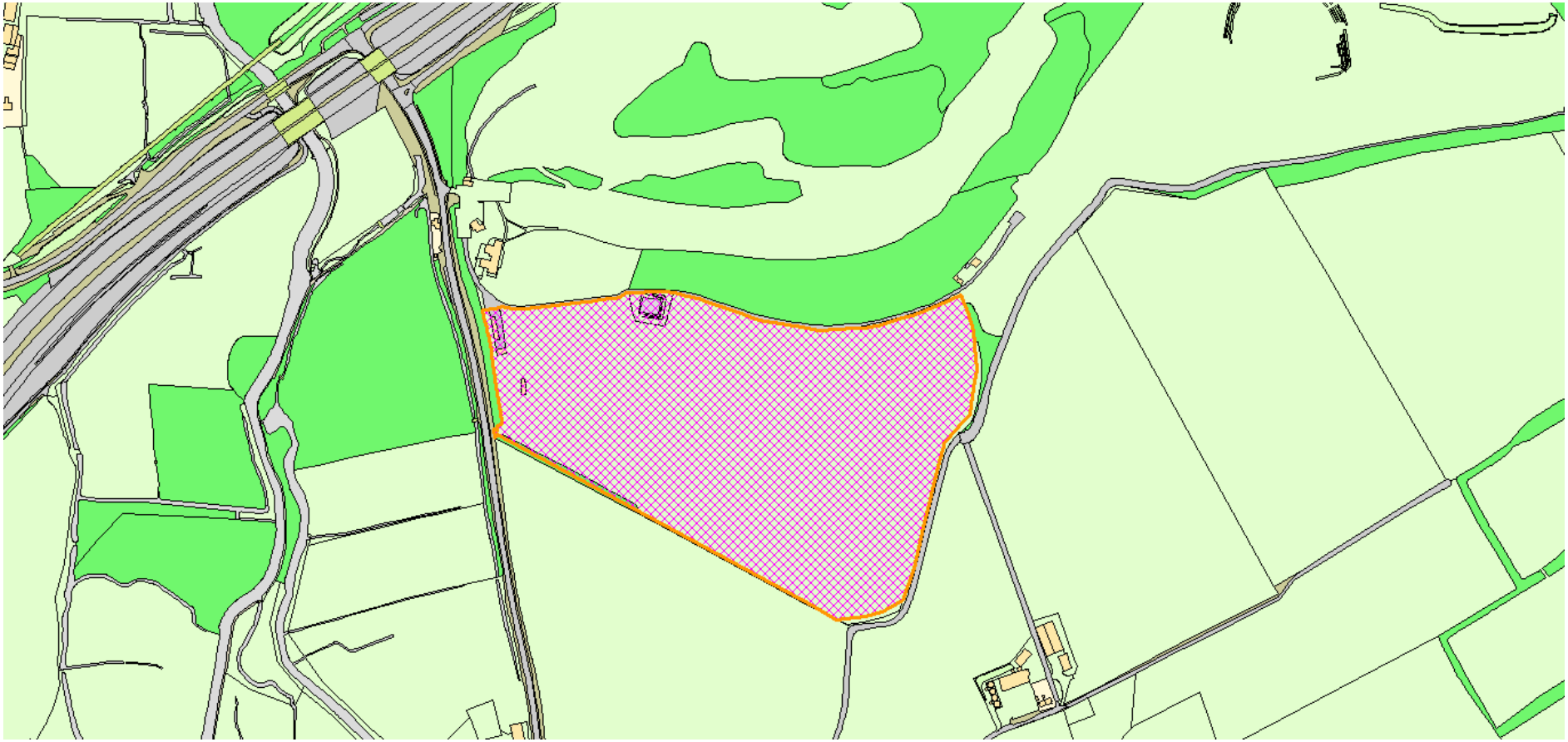
However, the extensive proposals would fundamentally alter the character and appearance of this open downland site, which contributes to the prevailing local landscape character, to one which would be significantly re-profiled and engineered. The mitigation of re-using the grassland topsoil on top of these earthworks would not mitigate for these impacts and it would appear as a large scale incongruous form and appearance that would not conserve or enhance the National Park landscape.

These works would also fundamentally change the natural processes of the site as a result of the irrigation scheme capturing and storing water, in comparison to its current characteristic of infiltrating rainfall into the chalk aquifer.

Consequently, for these reasons the proposals would not achieve a landscape-led and ecosystems services approach to development and would not constitute sustainable development, which outweigh that the proposals involve less reliance on abstraction and mains water. The application is therefore recommended for refusal in principle on landscape character and ecosystems services impacts.

The application is before Members due to the scale, nature and location of development and the issues raised, as well as the level of representations received.

Site Location Map



1. Site Description

1.1 Hockley Golf Club (HGC) was established in 1914 and has been owned by Winchester College since 1955. It covers 97ha and is situated near to the western National Park boundary. It is on the eastern side of the B3335, 0.7km north of Twyford, c.1.5km away from Winchester, and approximately 400m from Junction 11 of the M3 motorway. The River Itchen is approximately 250m west of the site, which is outside of its flood zone.

1.2 The application site is an irregular shaped 14.4ha parcel of land south of the main course and main clubhouse. It is used as a driving range and sheep graze its eastern end. The B3335 is adjacent to the western edge of the site where there is a low key access and further into the site there is a timber structure used as cover for golfers on the range. From here, the land steadily rises in an eastwards direction through the site.

1.3 The site is chalk downland and its lower slopes have short grassland which reflects its driving range use, whilst its upper slopes (most eastern end) have a more grazed character. The site is bordered by mature trees and hedgerows. There is a water storage pond surrounded by trees approximately central on its northern boundary, within the application site. A public right of way runs next to the northern site boundary along an existing track which affords some open views across the site, before this path leads into woodland and the wider course. The track continues to run alongside the site up to its eastern extent.

1.4 There are numerous designations within the site's vicinity. The course has a Site Importance for Nature Conservation (SINC) designation and there are two Scheduled Monuments within it, north of the application site. Trees along the B3335 and around the aforementioned storage pond and adjacent wood are subject to Tree Preservation Orders. There are 5 non-statutory nature conservation sites within 1km of the site.

1.5 There are 3 statutory designated sites within 1km which include The River Itchen Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI), and St Catherine's Hill SSSI. The course is also designated for nature conservation and archaeological value in the Twyford Neighbourhood Development Plan. The site is not within a source protection zone.

2. Relevant planning history

2.1 SDNP/23/02125/FUL: Development of a sustainable irrigation system, including water storage pond; enhancement to driving range practice facility. Application withdrawn 18.08.2023 by the applicant for a number of technical reasons raised by the case officer, relating to:

- Landscape; drainage; archaeology; ecology; and highways.

2.2 SDNP/20/00895/PRE: Development of a Golf Academy and Enhanced Water Storage Facility. (Same driving range site as current application plus a larger area). Advice issued 13.10.2020, as follows:

- Potential impacts on designated sites will need to be explored, including drainage issues and impacts on River Itchen SSSI and SAC.
- Importation of soil and material from external sites needs to be carefully monitored for invasive non-native species and quality, type and contamination of material.
- Substantial revisions required to meet policy.
- Ecological surveys and biodiversity net gain required.
- Alterations of the landform would be alien and detrimental to downland characteristics, resulting in irreversible negative effects.

3. Proposal

3.1 The proposals involve a new irrigation system on the existing driving range and upgrades to this recreational facility. The proposed irrigation system would enable the maintenance and upkeep of the golf course tees and greens, whilst reducing the reliance on water abstraction

and use of mains water, with its associated financial costs. The proposals also involve upgrading an existing access on the B3335 at the western end of the site, which would involve the removal of trees, and an internal gravel track.

Soil importation

3.2 This involves the importation of 130,000m³ of inert soils and the re-profiling of the driving range, including a new storage pond. The existing storage pond would remain and form part of the new drainage strategy.

3.3 The imported material would be sourced largely from greenfield construction sites and it would be subject to an existing management regime that would govern the type and quality of soil to be deposited, based on industry best practice and Environment Agency permitting.

3.4 The ground works would build up the western end of the site and the new ground level would then undulate in an easterly direction up to a new lined storage pond, which would be sited below a ridge line at the eastern extent of the site and outside of an archaeologically sensitive area.

3.5 The areas of greatest change would see the existing topography raised by 3-4m, including the bunding for the new storage pond. The highest slopes of the eastern extent of the site leading up to a ridge line would not be altered as extensively as the rest of the site and its landform would largely remain as is, below the existing ridge line. The works would also be inset from the site boundaries to avoid root protection zones of trees and disturbance to mature boundaries and habitat.

3.6 The existing topsoil (c.30cm) would be stripped off and stockpiled in phases. Once the imported material has been contoured, the existing topsoil would be re-laid over it with any new seeding or planting, in line with the landscape scheme.

3.7 An extensive network of underground drainage and at surface features would be installed in conjunction with the re-profiled landform. The system would capture surface water run-off into the new storage pond, with a 7,000m³ capacity, which is estimated to take 1-1.5 years to fill and is anticipated to be a permanent water body with some seasonal fluctuations.

3.8 For the mid central area of the site, pipework and an infiltration trench would collect and divert water to the existing storage pond. The water would be pumped back up to the new pond to then be used on the course. On the lower slopes of the site, pipework would direct water to a new swale near to the site access. The water would then soak into the ground.

Duration of the works

3.9 The works are anticipated to take 2-3 years to complete, including an 18 month period for importing the soils. The work would be undertaken in phases. Phase 1 would involve the construction of the southern access, site compound and soil screening area. Phases 2-6 would involve depositing and contouring the material in an anti-clockwise direction around the site. This would start at the highest end and work down the slope to then eventually retreat out of the site at the southern entrance.

3.10 All HGVs would arrive via M3 J11. Up to 50 daily HGV loads are proposed and accounting for empty lorries leaving this would amount to up to 100 daily vehicle movements. Empty HGVs would either turn south and travel through Twyford or northwards to M3 Junction 11, depending on their destinations. It is contended that most material would arise from sites along the Southampton, Winchester, Basingstoke corridor. This would mean most HGV would arrive and depart via the M3.

3.11 The site would be open between 7:30-5pm (Monday- Friday) and closed on weekends and bank holidays. In winter months, works would stop at 4pm.

The new facilities

3.12 The re-profiling, in addition to installing a new drainage scheme, would involve some re-orientation of the driving range from facing directly west to east to a north-west to south-

east aspect. Five new target greens of varying distances for golfers to aim at would be created.

3.13 A new 'short game' area would be created in between the driving range tee and the existing storage pond. This would have various slopes and bunkers around a central green and it would be smaller than the driving range. Its purpose would be to practice different approaches to greens which golfers would experience on the course.

3.14 The site would be used daily from 7:15am to dusk. There are no proposals to install artificial lighting to facilitate the range's use at later times.

Access works onto the B3335

3.15 These works would involve the re-establishment for a former agricultural access at the southwest corner of the site onto the B3335, which is evident by an existing dropped kerb but otherwise it has been lost to vegetation on the roadside embankment.

3.16 The works involve cutting through and clearing the roadside vegetated bank to create an access wide enough for HGV traffic and necessary visibility splays. This would involve the loss of 6 lower quality (category 'C') trees adjacent to the B3335, on either side of the access. The works would involve grading the land into the site and laying a new surface through the access and along the existing track which would be widened. A wheel washing facility would also be installed for the duration of the works.

Biodiversity net gain and landscape scheme

3.17 The new pond is proposed to mimic a dew pond with native planting around it for a range of habitat types. Mixed native planting around the site boundaries would supplement and strengthen the existing vegetation. Grassland is proposed to be enhanced and the eastern top area would continue to be grazed.

4. Consultations

4.1 **Arboriculture**: Comments awaited, Members will be updated.

4.2 **Archaeology**: No objection, subject to conditions.

4.3 **Dark Night Skies**: No objection; temporary construction lighting and lighting at the access need to be appropriate.

4.4 **Drainage**: Comments awaited, Members will be updated.

4.5 **Ecology**: No objection, subject to conditions.

4.6 **Environment Agency**: Objection.

- Insufficient information to confirm effects upon ground water resources, given sensitivity of local chalk ground water.
- Pond would be capturing water already infiltrating into ground that would otherwise recharge the chalk aquifer.
- Capturing water infiltrating into the ground may require an abstraction licence.
- Due to lack of water availability in the local chalk groundwater, presumption against any new/increase in consumption licences.
- Unclear that the proposals could operate in a way that would protect water resources in the River Itchen Chalk groundwater body.

4.7 **Environmental Health**: No objection, subject to a condition.

4.8 **Highways Authority**: No objection, subject to conditions.

4.9 **Planning Policy (SDNPA)**: Comments, as follows:

- Fundamentally, needs to be considered against Purpose 1.

- If the relevant Code of Practice, a Materials Management Plan and the 'CL:AIRE' protocol are followed then under this regime then imported soils would not be classified or defined as 'waste.'
- If the material is not waste, then the Hampshire Minerals and Waste Plan policies would not apply, apart from the safeguarding of mineral deposits.
- As the western part of the site is within a Mineral Consultation Area for river deposits, the relevant HMWP policy 15 applies.
- Would not be contrary to policy 15 given the nature of the development.
- Proposals should be determined using the South Downs Local Plan (2019) and Twyford Neighbourhood Plan (2022) policies.

4.10 **Public Rights of Way**: No objection.

4.11 **Landscape**: Objection, as follows:

- Conflicts with inherent landscape character and natural processes.
- Contrary to Purpose 1 and objectives of the Partnership Management Plan.
- Not landscape-led; needs a better understanding of landscape and its functions to inform design and deliver conservation and enhancement.
- Proposed mitigation unlikely to be successful long-term; does not address impacts.
- No mitigation for the loss/deterioration of natural functions.
- Significant effects from changes to landform, existing drainage, soil depth and type.
- Impact on views; amenity; sense of place; perceptual qualities; tranquillity; and wider relationship between the site and historic landscape features poorly considered.

<u>Landform</u>

- Landform important in the Open Downs; iconic landscape lost.
- Would not respect the existing landform character.
- Extensive land raising up to 4m, no direct mitigation for this landform change.
- Proposed gradients wholly different and convey an engineered character.
- Steeper slopes may reduce efficacy of the land to clean water; may be increased run-off.

<u>Soils</u>

- Soils are a fundamental determinant of landscape character; they and the processes they support need to be conserved and enhanced; proposals fail to achieve this.
- Proposed soil depths are atypical and contrary to character.
- Importing 'wrong' soils would fundamentally affect character and natural processes; no analysis of existing eco-systems services regarding soils and geology.
- Material from between Southampton, Winchester, Basingstoke likely be highly variable.
- Drainage infrastructure requires gravel and sand infilling; alien geology here.

<u>Water</u>

- No hydrological assessment for impact on aquifer recharge and designations.
- Utilising rainwater for irrigation positive, but relies on taking it out of the water cycle that would otherwise replenish the aquifer.
- Significant risk to water quality; high ground water vulnerability and potential pollutants.
- Soil depths may affect fundamental relationship between chalk aquifers and thin soils.

- No commitment to reducing overall water use, in a landscape with water stress.

Landscape character and water

- Location, scale and design of pond does not mimic a dew pond; incongruous feature exacerbated by landform changes.
- Extensive pipe network misses SUDs principle to mimic natural drainage patterns.
- Drainage scheme contrary to SD2, SD4 and SD17.
- Reliance on pipes and pumps takes the scheme away from being sustainable.
- Opportunity to enhance the existing storage pond missed.

4.12 **Lead Local Flood Authority**: No objection, subject to condition.

- Minimal impact on surface water given new topography would follow existing directions.
- Proposed pond would be at the top of the site. If a failure of its earthworks occurred, water would flow towards the highway. Suitable geotechnical review of pond bunding required to ensure they are appropriately designed.
- Pond earthworks could be managed through an inspection and maintenance plan to ensure continual monitoring of its integrity.

4.13 **Natural England**: No objection (no conditions recommended).

4.14 **Southern Water**: Comments awaited, Members will be updated.

4.15 **Twyford Parish Council**: Objection.

- Contrary to Development Plan; no justified exceptional circumstances.
- Landscape impact and waste disposal in the National Park.
- Primary justification is irrigation, but appears financial in order to reduce mains water.
- No explanation why water savings could not be achieved by other less intrusive means.
- Need to justify viability of importation of material to achieve water saving objectives.
- New water body in Southampton Airport flight path; a bird strike hazard.
- Conservation and archaeology value of the course needs formal conservation plan.

Transport

- Impact of increased HGV traffic; anticipated movements under reported.
- Severe impact on B3335 and village centre; cumulative impact with other commercial redevelopment locally and M3 J9 works.
- Lack of a sustainable transport policy for the membership to reduce reliance on cars.
- Acknowledge intention for access via M3 but empty loads would use other routes.
- Financial contribution towards existing traffic management projects would help to mitigate effects of increased traffic.
- Management Plan required for conservation and archaeological assets of the Course.

Temporary impacts

- Severe, intensive activity (lorries, machinery, engineering, placing soil).
- Activity would be visible over a wide area from multiple viewpoints; severe harm from tipping to take place at top of the slope.
- For construction - agricultural access to become more engineered; ground level changes; tree felling; harmful internal access; intensive use of access by HGVs and equipment.
- Significant waste operation over a period of 2-3 years.

Permanent effects

- Ground raising, pond and changes in land use broadly sympathetic to contours, but harm from changes to natural ground levels which are based on the Club's requirements.

Acknowledgements

- High profile and quality Course used by local residents.
- It is a recreation facility, albeit private whereby community function is limited.
- Need to manage water resources to address climate change; multiple benefits from water recovery for irrigation and reducing aquifer abstraction.
- Water recovery from rainfall and storage to provide year round irrigation and reduce aquifer abstraction in Itchen Valley (major benefit), but public benefit is 'slight' and the Club not demonstrated whether this could be achieved by less intrusive methods.
- Creation of pond and grassland habitat are potential enhancements.
- If transport policy for the Club, traffic management improvements, nature and archaeological conservation; and water savings concerns addressed these would comprise exceptional circumstances to support permission.
- If Permission granted, recommend conditions for new footpath on B3335; requested contributions; management plan for the golf course extended to include application site.

5. Representations

5.1 118 representations have been received. This comprises 87 in support and 31 objections, which raise the following:

Support

- Accords with National and local planning policy.
- Responds to future climate change, with a sensitive and well considered approach.
- The Club is environmentally conscious and has worked with SDNPA on scrub clearance and improving downland.
- Enhanced sustainable water management and avoids aquifer abstraction- beneficial to others and the environment.
- No flood risk.
- Improve the practice facilities and improving access, health and wellbeing.
- Greater biodiversity and landscape benefits.
- Respects the ecological and archaeological setting of the Club.
- Secures an economic future of HGC, including employment.
- Environmentally sensitive approach and in keeping with natural downland landscape.
- Minimal impact on local residents.
- Uses recycled soils.
- Modern practice facility important for teaching and attracting club members.
- Club provides social benefits.
- Supported by Hampshire Golf and England Golf.
- Need to retain status as a premier golf club in Hampshire and attract County and National events.
- There has been good community engagement.
- Comprehensive application; all technical matters addressed; a high quality design.

Objections

Environmental

- Commercial venture for the disposal of soils
- Impact upon Natural Beauty.
- Transportation and importation of construction site spoil into a National Park; out of keeping with the National Park designation.
- Question the importation of soil foreign to the area, with potential contaminants and risk to watercourses and aquifer.
- Impact of ground works on archaeologically sensitive site.
- Club have not considered alternative means to conserve water (eg, re-instate dew ponds elsewhere or reduce size of large greens that use a lot of water).
- Scale of earthworks; ground raised to an unacceptable height; over engineered.
- Does not respect the landscape and environment.
- Disturbance to wildlife.
- Site would be a land fill for years.
- Impact on archaeology

Traffic

- Increased HGV traffic, daily volume of lorries and over a long period; and Twyford crossroads is a bottle neck.
- Traffic impact on Twyford, Colden Common, Fair Oak and Horton Heath communities already blighted by traffic and large vehicles; B3335 already used as a rat run to M3.
- Risk of increased road accidents.
- Increased highway safety risk for pedestrians and cyclists, including school traffic.
- Pollution from HGV traffic.
- Transport Assessment underestimates daily vehicle movements.
- Empty vehicles should be routed back to the M3 and M27.
- Road into Twyford a priority cycle route; lack of impact assessment.
- Roads already at full capacity.

5.2 **Colden Common Parish Council (neighbouring Parish)**: Objection.

- No justification for importing 130,000 cubic metres of material.
- No other options for storing water have been explored.
- Would equate to 7,500 lorry movements during construction and additional congestion.
- Traffic through Colden Common and Twyford is unacceptable.
- Additional HGV movements on the B3354 would be unsafe for cyclists and pedestrians.
- Noise pollution in Colden Common and Twyford from lorries.

6. Planning Policy Context

6.1 The Development Plan comprises the South Downs Local Plan (SDLP) (2019), the Hampshire Minerals and Waste Plan (HMWP) (2013) and the Twyford Neighbourhood Development Plan (TNDP) (2022). The most pertinent policies are listed below. A longer list of relevant policies can be found in Appendix 1.

6.2 The development is not regarded as a waste development. The waste policies in the HMWP are not, therefore, engaged. This is addressed in the planning assessment where it is concluded that the imported material is not classified as 'waste.' However, as the western part of the site lies within a Minerals Conservation Area, the relevant HMWP policy applies and is addressed in the assessment

6.3 Most relevant polices of the adopted SDLP (2019)

- SD1: Sustainable Development
- SD2: Ecosystems Services
- SD4: Landscape Character
- SD10: International Sites
- SD17: Protection of the Water Environment
- SD19: Transport and Accessibility

6.4 Most relevant policies of the adopted TNDP (2022)

- SB2: Development outside of a Settlement Policy Boundary
- LHE2: Landscape Features and Views
- LH3: The Historic Environment, buildings and Archaeology
- MA1: Minor Traffic Management Improvements
- PO1: Pollution and Contaminated Land

6.5 Most relevant policy of the HMWP (2013)

- Policy 15: Safeguarding Mineral Resources

6.6 The Emerging HMWP- Partial Update (2024)

6.7 The HMWP Partial Update - Submission Plan 2024 updates the adopted HWMP (2013) policies. It was submitted to the Secretary of State on 29 July 2024 for a future Examination in Public prior to its adoption.

6.8 The National Planning Policy Framework (NPPF) 2023 outlines that emerging plans may be given weight. This is subject to their stage of preparation; extent of objections to relevant policies; and the degree of consistency with the NPPF. The following relevant emerging policy is relevant as a material planning consideration:

- Policy 15: Safeguarding Mineral Resources.

6.9 Relevant supplementary planning documents (SPD) and other guidance

- Ecosystems Services TAN
- Habitats Regulations Assessment TAN

6.10 Most relevant sections of the National Planning Policy Framework (NPPF) 2023

- Section 9: Promoting Sustainable Transport
- Section 15: Conserving and enhancing the natural environment.
- Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change

6.11 Most relevant policies of the South Downs Management Plan (2020-2025)

- Policy 1: Landscape
- Policy 6: Favour natural functions and processes for marine environments
- Policy 43: Support appropriate recreation

7. Planning Assessment

Background to the proposed irrigation system

7.1 The proposals would capture rainfall to irrigate the course and make its management more resilient to climate change. Due to the thin soils and chalk bedrock, rainfall infiltrates efficiently into the ground whereby the course is prone to drying out in summer months.

7.2 Currently, water storage capacity for irrigation is limited to the (artificial) pond at the application site, with a c.500m^3 capacity. The Club has an abstraction licence for 3,500m3 of ground water annually from the chalk aquifer, via a borehole next to the pond.

7.3 Maintenance of the course uses c.9,000m^3 of water annually and the mains water supply is used for the additional need beyond the limits of the abstraction licence. The mains water use has been increasing, with the drought conditions in Summer 2022 as an example.

7.4 The abstraction licence is also limited depending on the River Itchen. When water is in most demand during the Summer, the River can have a lower flow and if this drops below a threshold then abstraction is not permitted. The Club is unable to plans for this eventuality because they cannot abstract and store sufficient water during the Winter.

What is inert material and whether it is 'waste'

7.5 In this instance, the applicant states that the material would be predominantly sourced from greenfield development sites. The applicant's position is that the types of soils to be sourced would be inert. Inert material can arise from construction and demolition activities, and from excavation of soils, chalk, and clays which are recycled or recovered and taken to sites for landform changes and landscaping, such as golf courses for example.

7.6 Inert material can be defined as material that does not undergo any significant physical, chemical or biological transformation. Inert material will also not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter which it comes into contact with, in a way likely to give rise to environmental pollution or ham to human health. Furthermore, its leachability of any pollutant and its ecotoxicity must be insignificant and not endanger the quality of surface water and/or groundwater.

7.7 The National Planning Practice Guidance states that depositing soils onto golf courses can be considered as 'waste.' This can, however, be subject to further interrogation on a site specific basis. The Definition of Waste: Development Industry Code of Practice (regulated by the Environment Agency) sets out whether excavated materials are classified as waste or not. If material is dealt with in accordance with this Code of Practice the Environment Agency considers that it is unlikely to be classified as waste, provided it is re-used for the purpose of land development. - i.e material is not discarded from a development site and instead it is recovered and re-purposed.

7.8 Such a conclusion by the Environment Agency is also subject to an adequate Materials Management Plan being in place to inform requirements which soil material from a donor site must comply with to be deemed as suitable for a receptor site (in this instance Hockley Golf Club). This process (also known as the CL:AIRE protocol) does involve testing soils before they are accepted onto a site. Under this regime, imported clean/inert soils are not classified or defined as waste and as dug soils could be transferred from a construction site to another.

7.9 The applicant has demonstrated through the application documentation and correspondence that the soils would be handled via the above protocols, which has satisfied officers about the status of the material that would be imported.

Principle of development

7.10 It is acknowledged that HGC wish to secure greater resilience and adaptation to climate change through capturing and storing rainwater on site as well as develop their facilities.

7.11 Addressing climate change and achieving successful resilience and adaptation is overarchingly supported by the Authority in the Corporate Plan, Local Plan and Partnership Management Plan. Nationally, the NPPF also supports development that responds to climate change. This

position must, however, be couched within the context of Development Plan policies first when considering development proposals.

7.12 The site is within designated countryside whereby Local Plan policy SD25 and policy SB2 of the TNDP overarchingly apply. The latter largely replicates SD25 and, together, they set out that development may only be permitted in exceptional circumstances where it complies with other relevant Development Plan policies and responds to the landscape context of the area.

7.13 More specifically, SD25(2)(a-d) and SB2(b-c) set out exception criteria for instances where development may be acceptable. The proposals do not neatly fit within those categories, but they do involve an existing recreational golfing use rather than the introduction of a new use in the countryside. That said, other key relevant policies in this case are those relating to sustainable development, landscape and ecosystems services – namely SD1, SD2, SD4, LHE2. These should also be considered in conjunction with Purpose 1 and the 'great weight' to be applied to natural beauty.

7.14 Policy SD1 has a presumption in favour of sustainable development and re-iterates National Park Purposes and Duty. It also outlines that permission should be refused where proposals fail to meet Purpose 1 unless:

a) The benefits of the proposals demonstrably outweigh the great weight to be attached to those interests; and

b) There is substantial compliance with other relevant policies in the development plan.

7.15 Considerations for (a) and (b) are addressed below. In summary, there are some contended benefits (to varying degrees) but these are not considered to outweigh the great weight to be given to Purpose 1 and the landscape impacts considered below. Also, overall, there is not substantial compliance across the relevant Development Plan to accord with the SDLP policies and there are no material considerations of such weight to reach a conclusion that is not in accordance with the Development Plan.

7.16 The main overarching considerations of the proposals in a sustainable development context are presented in table 1 below. The table is a 'balanced scorecard' of the main contended benefits by the Applicant and impacts regarding whether the development is sufficiently sustainable to accord with SDLP policies. Overall, the greatest weight is given to the landscape and ecosystems services impacts and SD1 and SD2 is not accorded with.

	Applicant's contended benefits	**Impacts**
Environmental	Better water management of capturing and storing rain. SUDs scheme would enable the Golf Club to adapt and mitigate climate change by storing rain water to maintain the course, particularly in summer months.	Driving range is open downland. Apart from its mowing and grazing regime, the site landform does not appear to have been extensively affected by the presence of the Golf Club. It is a downland course.
	Less reliance on mains water equates to less stress on River Itchen from abstraction -particularly in summer months, and SE England generally under 'water stress.'	Fundamental change in character of the site. Proposals would significantly affect the land form with an engineered approach, including extensive underground and at surface drainage design.
	Biodiversity net gain. New native planting to bolster existing site boundaries. New habitat around the storage pond. Improvements to	Importation of soils from other geographical/geological areas (perhaps different geology to chalk downland) would not

	grassland. Improve connectivity between the site and course (designated SINC). Bird and bat boxes.	conserve and enhance chalk downland. Fundamental change from rainwater infiltrating to ground to replenish the aquifer to instead capturing it by the irrigation system. Disrupts natural processes.
	Re-purposing waste material from development sites elsewhere that could otherwise potentially go to landfill.	In addition to the land form changes, the site's character would visually change from low key downland to new target greens, short course and tees. New storage pond not a characteristic dew pond and artificial in scale and appearance.
		Imported material from specific unknown sources. Risk of additional nitrates and phosphates entering the river catchment. (However, this may be managed by EA permitting and Code of Practice).
		Increased HGV traffic for 2-3 years, plus cumulative impact of additional traffic from Junction 11 M3 works and other development anticipated in Twyford* (see Parish Council response).
		Visual impact from public right of way, including harm to landscape character and tranquillity during a lengthy construction period.
Social and economy	Facilitate improved practice facilities of the driving range with green targets, short game.	Noted.
	New facilities support club membership and viability including corporate events, championships, use by college students. Supporting a community facility.	Noted.
	Investment in the site and jobs.	Noted.

Table 1: Contended benefits vs harm (*temporary impact)

7.17 Ecosystems services are a relevant consideration for the principle of development, because SD2 requires development to have an overall positive impact on the ability of the natural environment to contribute goods and services. The proposals would be the opposite of this approach as they would interrupt the natural processes of the site. From rainwater simply

infiltrating into the ground and aquifer at present, the highly engineered approach of capturing water for storage and the importation of soils (currently of unknown geology) drastically changes this process.

7.18 Whilst the proposals could achieve compliance with some of the SD2 criteria, eg. provide more joined up habitat around the boundaries and storing carbon through tree planting, ultimately this does not outweigh the loss or deterioration of natural processes which already exist. There is, therefore, conflict with SD2 overarchingly as well as other specific criteria concerning the water environment.

Landscape impact

7.19 There does not appear to have been any significant changes to the site's landform since the golf club opened in the 1920s and it still makes a positive contribution to the surrounding open downland character.

7.20 Open downland is characterised as large-scale, open and an elevated landscape of rolling land with mini-scarps, dry valleys and large-scale field systems. There is also an absence of surface water, due to the permeability of soils and bedrock. The existing site is consistent with such broader characteristics insofar as its smooth, rolling landform and the ridgeline (or mini-scarp), chalk bedrock and thin soils support a grassland downland character. The site is a relatively large-scale field with fairly low key land management, especially further up the slopes in the visually exposed part of the site. The soils also perform key functions with respect of water, carbon storage and other natural processes.

7.21 More specifically, the site is within the East Winchester Open Downs landscape which is described in the Authority's Landscape Character Assessment (LCA) (2020) as:

Open rolling upland chalk landscape of rolling downs' and 'Furrowed by extensive branching dry valley systems which produce deep, narrow, rounded coombs.

7.22 And nature recovery ambitions for this landscape in the LCA include:

'Respect and enhance the rolling curves of the topography when land management changes are being planned.'

7.23 The importation of 130,000m3 of soils to re-profile and engineer chalk downland, and potentially depositing soils that are not consistent with local landscape character, raises the fundamental issue of how the proposals conserve and enhance the open downland character, as described above. It would intrinsically change a character of chalk bedrock and thin soils to something that is much deeper (3-4m in places) and underneath would be a highly engineered drainage network.

7.24 The re-profiling avoids the site boundaries which is relatively positive, but the overall landform changes are dictated by engineering the irrigation system to work effectively and maximise capturing rainfall. This approach and significantly interrupting the site's natural processes is not landscape-led nor an ecosystems approach in principle. Whilst it has sought to mimic some existing contours, it is nonetheless a heavily engineered development.

7.25 The extent of the works significantly impose upon the site to the detriment of its existing character, rather than giving greater consideration to what may be the site's capacity for changes to this downland character in a way which would conserve and enhance. The total amount of imported material (130,000m^3) is therefore unjustified. There is no evidence to suggest that this is the minimum necessary amount of material to achieve a workable sustainable irrigation system, but in any event there are in principle landscape concerns.

7.26 The driving range is a low key use and character, with a small shelter, some marker posts and it is mown and grazed. The proposals would drastically change its character with a new landform, more manicured target tees, the short game area and large pond which with its bunding shape and scale it is difficult to describe as a dew pond, nor would it be appreciated as such because from the lower slopes the bunding would be evident and potentially would not be seen as a water body. Rather, a steeper landform that has the potential to appear artificial would be seen. The pond appears to have been designed to the needs of the irrigation system rather than the landscape capacity and working with contours.

7.27 The open downland character for the above reasons would be lost and there is conflict with Purpose 1.

7.28 Visual impact is limited from wider afield but would be evident in some views including from surrounding public rights of way. The scheme would be most apparent in the first years given the engineering and deposit of soil. The works are anticipated to take 2-3 years which would be a large and apparent development during this period affecting the landscape and tranquillity. Beyond this phase, the submitted Landscape and Visual Impact Appraisal outlines that it could take up to 10 years for the development to better integrate into the landscape.

7.29 Over time it is likely to appear less prominent but this would not absolve it from impacting intrinsic landscape character. The PROW which runs past the site would be affected given its immediate views of the site. Whilst walkers already experience a golf course character when passing the site, the application site itself is low key chalk downland and the development would intensify this experience of recreational development.

Surface water drainage and flood risk

7.30 A detailed drainage scheme has been proposed which includes a new storage pond, retaining the existing pond and a new swale at the western end. It is also contended that SUDs techniques could manage the quality of surface water flowing across the site in terms of intercepting pollutants and allow them to degrade or be retained in situ without impacting the quality of water further downstream. The Lead Flood Authority has not objected on technical grounds in regard to the drainage strategy itself and any flood risk. A reason for refusal would not be justified on any flood risk grounds for these reasons.

7.31 Concerns about how the development affects natural process and ecosystems services also feeds into SD17 considerations. This policy advises that development which adversely affects ground water, surface water features and watercourse corridors will not be permitted unless they (1) conserve and enhance water quality and quantity; (2) do not affect the ability of the water environment to function by natural processes; and (3) conserve and enhance the character, appearance and setting of surface water features.

7.32 The importation of the large volume of soils and extensive irrigation system could impact upon the natural function of the site, as chalk downland helps to recharge ground water, contrary to SD17. Furthermore, the Environment Agency has queried the impact on aquifer replenishment as well. On this basis, a reason for refusal is recommended raising concerns about the lack of information to demonstrate that there would not be a significant impact upon ground water resources.

7.33 Natural England have not objected in regard to impacts upon the River Itchen and its designations, which is addressed further below regarding the Habitats Regulations 2017.

The Conservation of Habitats Regulations (2017)

7.34 The site would have the existing grass re-covering the new landform. It is contended that through re-using the topsoil that no new pollutants would be introduced. The sourcing of imported material is less clear. Certainly, greenfield sites from development sites are likely to be agricultural land. Hence, there is the potential for nitrates and phosphates from its agricultural use.

7.35 To fulfil the requirements under the Habitats Regulations (2017), officers are required to assess the likely significant effects of development on the European protected sites. Natural England have not raised an objection. However, as the Competent Authority, it is determined that there is the potential for a likely significant effect upon the Solent Special Protection Area (SPA) by virtue of increased risk of inputting nitrates and phosphates into the River Itchen from the importation of soils.

7.36 For the Purposes of an Appropriate Assessment, notwithstanding the concerns about the impact upon landscape and ecosystems services/natural processes of the site, a satisfactory permitting regime could mitigate this impact to the extent that a further Habitats Regulations Assessment is not required and a reason for refusal on this basis would not be justified.

Minerals Conservation Area

7.37 The western part of the site is located within a Minerals Conservation Area (MCA). Subject minerals are sub-alluvial river deposits within the River Itchen corridor. Policy 15 of the adopted HMWP and the emerging Partial Review seek to safeguard mineral deposits.

7.38 It is considered that this resource would not be compromised on the basis that the proposals would mostly raise, rather than excavate, the land with soils and this would not wholly compromise the minerals underneath from ever being extracted. Furthermore, if the minerals were to be affected, a planning condition relating to its incidental extraction as part of the development could be secured. Therefore, there would not be any conflict with policy 15.

Cultural heritage

7.39 The site is within an archaeologically sensitive area. The proposals have been informed by archaeological information and assessment and the County Archaeologist raises no objection subject to conditions.

7.40 The proposals are not considered to impact upon the setting of nearby listed buildings given the relationship between the site and nearby listed buildings (eg, in terms of distance as well as inter visibility). The proposals are not considered to lead to any less than substantial harm upon the significance of such heritage assets, whereby any such harm would need to be balanced with any public benefits of the proposals.

Highways

7.41 A satisfactory means of vehicular access would be provided at the southern end of the site in regard to highway safety and accommodating the access and egress of HGVs. There would be some tree works but otherwise its character and appearance would be acceptable.

7.42 Third party representations consistently raise the impact (temporary) of HGV movements. Certainly, additional HGV traffic can impact upon local amenity and there is the potential for cumulative impacts with the M3 J9 works which have now started and will take place for 3-5 years. Overall, the Highways Authority raises no objection and given the temporary nature of the works a reason for refusal could not be sustained.

7.43 Twyford Parish Council have requested a financial contribution towards improvements to the B3335 to mitigate the impact of HGV movements. However, given the temporary nature of these as part of a construction phase, rather than a permanent impact that would otherwise be related to the use of the site, any contribution would not be justified on planning grounds.

Ecology and biodiversity net gain

7.44 The county ecologist raises no objection to the proposed mitigation and enhancement measures regarding protected species and habitats, which could be secured by conditions. They are also satisfied that sufficient biodiversity net gain is proposed. The proposed landscape strategy would deliver some biodiversity net gain and its more detailed design can be secured via condition. In these respects, SD9 could be accorded with.

Impact on surrounding amenities

7.45 Third party representations have raised concerns about traffic which are addressed above. Once the scheme was complete, it would not have any significant detrimental impact upon the amenity of surrounding residential properties. There would be some impact upon the amenity of the existing public right of way running past the site and this is raised as a concern in the recommended reason for refusal. This is due to the visually harmful changes to the character of the site.

8. Conclusion

8.1 It is recognised that the applicant has sought to address many of the technical matters consultees raised in the previously withdrawn application. The current proposals have also reduced the scale of importation and extent of landform changes and there is BNG and supplementing boundary vegetation which would be of benefit. These aspects either

individually or cumulatively, however, do not address the underlying issue of fundamentally changing chalk downland into a move intensively designed and used driving range and drainage scheme.

8.2 Overall, the proposals would fundamentally not conserve or enhance the National Park landscape by virtue of transforming a largely unaltered chalk download into a more highly engineered character with large scale importation of soils, land re-profiling large storage pond and golf features (eg. target greens, tees, short game area).

8.3 It is acknowledged that HGC propose a solution for them to store water, avoid abstraction and further water mains use. However, the proposals focus on an irrigation system that effectively would disrupt natural processes of the chalk downland.

8.4 The NPPF outlines overarching economic, social and environmental objectives to sustainable development. In these respects, there would be social and economic benefits. However, the aforementioned environmental harm outweighs these benefits.

8.5 The proposals do not comply with both relevant individual policies and the Development Plan as a whole, the NPPF, National Park Purposes and duty, and relevant legislation. There are no material considerations of sufficient weight which would justify granting permission.

8.6 The application is, therefore, recommended for refusal for the reason below.

9. Reason for Recommendation

9.1 It is recommended that the application be refused for the following reasons:

1) The proposals would fail to conserve or enhance the landscape and scenic beauty of the National Park, by virtue of the importation of soils upon chalk downland which would create an incongruous scale, form and appearance of the development. Furthermore, the proposals would impact upon natural processes through the altered landform and extensive engineered irrigation scheme. The proposals, therefore, fail to achieve a landscape-led and ecosystems services approach to development. The site forms part of the surrounding rural landscape and the development would, therefore, not sensitively integrate with local landscape character, its special qualities, and would significantly intrinsically and visually harm the character and appearance of the site. Consequently, the proposals are contrary to policies SD1, SD2, SD4, SD5, SD17 of the South Downs Local Plan (2019), policies SB2 and LHE2 of the Twyford Neighbourhood Development Plan (2022), the First Purpose of a National Park and the National Planning Policy Framework 2023.

2) Insufficient information has been provided to satisfactorily demonstrate that the proposed development would not have an adverse effect upon ground water resources, as a result of capturing water on site that would otherwise infiltrate into the ground and recharge the chalk aquifer. The proposals are, therefore, contrary to policies SD1, SD2 and SD17 of the South Downs Local Plan (2019) and the National Planning Policy Framework 2023.

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Appendices: Appendix 1- Legislation and policies

SDNPA Consultees:	Legal Services, Development Manager
Background Documents:	SDNP/24/02686/FUL | Development of a sustainable irrigation system, including water storage pond; enhancement to driving range practice facility and re-establishment of the southern entrance. | Hockley Golf Club Winchester Road Twyford Hampshire SO21 1PL
	South Downs Local Plan (2014-33)
	South Downs National Park Partnership Management Plan
	SDNPA Supplementary Planning Documents and Technical Advice Notes
	Twyford Neighbourhood Plan - South Downs National Park Authority
	Hampshire Minerals and Waste Plan | Environment | Hampshire County Council
	Regulation 22 - Submission of Documents to the Secretary of State | Environment | Hampshire County Council (HMWP Partial Update)