

Agenda Item 6
Report PC25/26-01

Report to	Planning Committee
Date	10 July 2025
By	Director of Planning
Local Authority	Chichester District Council
Application Number	SDNP/24/01695/FUL
Applicant	Bloor Homes Ltd
Application	Change of use from forestry to Suitable Alternative Natural Greenspace (SANG), and associated minor facilitation works including the erection of fencing, improvements and enhancement of existing paths, creation of additional footpaths, siting of information boards, dog/litter bins, and heathland restoration.
Address	Iron Hill, Hollycombe Lane, Fernhurst, West Sussex

Recommendation:

- 1) That planning permission be granted subject to the completion of:**
 - i) A S106 Legal Agreement, the final form of wording for which is delegated to the Director of Planning to secure:**
 - **The use of the site as a Suitable Alternative Natural Greenspace (SANG), for the purpose of mitigating new residential development within the proximity of the Wealden Heaths Special Protection Area.**
 - **SANG and BNG Management Plan (the final form of wording to be delegated to Director of Planning) to secure the delivery of infrastructure (capital works) and future management and monitoring of the site in perpetuity (80 years);**
 - **Financial contribution of £150,000 towards the Authority's monitoring of the site in perpetuity (80 years).**
 - ii) The conditions set out at paragraph 9.2 of the report and any amendments or other conditions, as required.**
 - 2) That authority be delegated to the Director of Planning to refuse the application, with appropriate reasons, if the Legal Agreement is not completed within six months of the 10 July 2025 planning committee meeting.**
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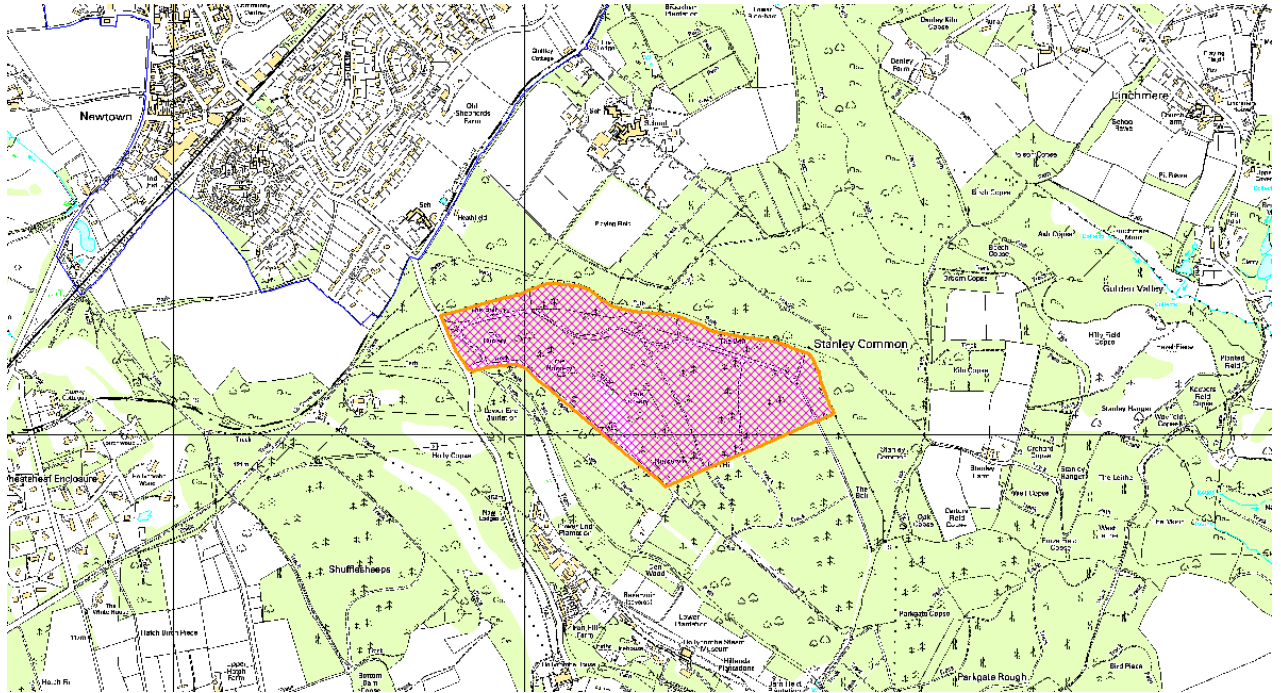
Executive Summary

Key Matters

- The application proposes a c.34ha area of land at Iron Hill to be used as Suitable Alternative Green Space (SANG). A SANG uses land to provide recreation (particularly dog walking) as an alternative for people visiting more sensitive sites, in this instance the Wealden Heath (Phase II) Special Protection Area and Woolmer Forest Special Area of Conservation (see map at **appendix 2**).
- A SANG is required to mitigate any likely significant effect upon the integrity of the Wealden Heaths from increased recreational pressure and disturbance, caused by net new residential development within a 5km buffer of it. This is necessary for development to accord with the Conservation of Habitats and Species Regulations 2017.
- The SANG is proposed by an Applicant which, separately, has applied to East Hampshire District Council for Outline Planning Permission for 67 dwellings on a site outside of the National Park and on the edge of Liphook (Chiltley Lane, see location plan at **appendix 2**). The purpose of the SANG is to mitigate this development for aforementioned reasons.
- Chiltley Lane was a draft housing allocation in East Hampshire District Council's (EHDC) draft Local Plan which was consulted upon in 2024. Since then, it is being revised in response to housing targets. Granting consent for the SANG could facilitate the development of Chiltley Lane, however, at this stage the status of the draft Local Plan and the undetermined application with EHDC should not be afforded weight as material considerations. Albeit, it is acknowledged that the SANG would be facilitating development elsewhere, which relates to broader strategic considerations.
- Instead, the SANG proposals need to be considered on their own merits in the context of the South Downs Local Plan, National Park Purposes and any other relevant material considerations. If granted, however, a S106 Agreement would secure it as mitigation for Chiltley Lane if developed. At 34ha, the SANG is much larger than it needs to be for this development, however, its size is acceptable.
- Iron Hill is already open access land and used recreationally, alongside Forestry England's own coniferous plantation activities. This existing use does not prevent the site becoming a SANG. However, Natural England have set criteria to meet for sites to be used in this way, in perpetuity.
- 168 objections have been received. The main issues relate to the National Park being used as SANG to facilitate development outside of it, the location, size and accessibility of the SANG and how it relates to Chiltley Lane, traffic and highway safety matters, parking, ecology and landscape impacts.
- It is reasonably well related to Liphook and accessible. It may become more popular, but the purpose of a SANG is to create an attractive alternative for recreation and its use is reasonably low key.
- A SANG Management Plan is proposed to deliver Natural England's requirements alongside objectives to conserve and enhance its landscape and ecology. Iron Hill does have poorer and fragmented heathland. Becoming a SANG could provide conservation and enhancement benefits at a large scale via the management plan, to be secured via a S106 Legal Agreement, and improve accessibility for people to enjoy the National Park.
- The application is recommended for approval. Main material considerations include:
 - Use of the site as SANG, including its scale, location and accessibility.
 - Conservation and enhancement of the Site's landscape character and ecology, in light of its use as SANG and associated physical works.

- The application is before Members because of the strategic issues it raises, the landscape, ecology and accessibility considerations and the level of local interest.

Site Location Map



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1. Site Description

- 1.1 The application site covers c.34ha of Iron Hill at the northern boundary of the National Park and south-east of Liphook. It comprises a mix of heathland, acid grassland, and areas of coniferous plantation and broadleaf woodland managed by Forestry England, who own and manage the site.
- 1.2 It is classified as open access land and it is publicly accessible. There is pedestrian access into the site from an existing car park, as well as public rights of way including the Serpents Trail running east-west and a public bridleway north-east to south-west south. There are also a number of undesignated paths and 'desire lines.'
- 1.3 The car park is at the north western edge of the site which is unsurfaced with no demarcated spaces. From here, there is direct access into Iron Hill. It's accessed via Midhurst Road/Hollycombe Lane which are characteristically rural with mature vegetation and embankments on either side, with no pavements and lighting in the site's vicinity. Further north, Midhurst Road has pavement and path along it until the edge of Liphook.
- 1.4 Iron Hill is approximately 350m from the edge of Liphook on Midhurst Road. It is approximately 950m south of the associated proposed residential scheme at Chiltley Lane (referred to in the assessment) on the edge of Liphook and outside of the National Park.
- 1.5 North and north west of the site are schools. Immediately on the south west edge of the site is a timber yard which is accessed through the Iron Hill car park. Further to the south west is an industrial estate with separate access. Hollycombe House (grade II) and its grade II* park and garden are also to the south west.
- 1.6 Wealden Heaths Special Protection Area (SPA) and Woolmer Forest Special Area of Conservation (SAC) (herein referred to as the Wealden Heaths) are approximately 1.2km north west and 2.3km to the north east of Iron Hill. They are designated for their habitats and protected bird species. Aspects of it are also a Site of Special Scientific Interest (SSSI). Much of the Wealden Heaths are within the National Park.

2. Relevant planning history

- 2.1 There is no relevant history of planning applications at this site.
- 2.2 The Applicant sought pre-application advice directly with Natural England regarding the suitability of Iron Hill as Suitable Alternative Natural Greenspace (SANG). The Authority was not part of those discussions. A description of a SANG and its purpose are outlined below.

3. Proposal

Background

- 3.1 The proposals closely relate to a proposed residential development under consideration by East Hampshire District Council (EHDC) at Chiltley Lane (a former poultry farm) (see map at **Appendix 2**). This site is on the south-east edge of Liphook outside of the National Park. There is an ongoing application for Outline Planning Permission (EHDC reference: 22789/007) which proposes 67 dwellings (originally 100 were proposed). That site has been a housing allocation in EHDC's emerging draft Local Plan (Regulation 18) which underwent consultation in January 2024. Since then, the Local Plan is being revised.
- 3.2 Chiltley Lane is within a 5km buffer around the Wealden Heaths, whereby new development is required to mitigate any likely increased recreational disturbance upon it, which can affect their ecological status. This issue relates to the purpose of this application under the SDNPA's consideration, as outlined below.

The proposals

- 3.3 Land at Iron Hill is proposed to be used as Suitable Alternative Natural Greenspace (SANG) to offset recreational pressures upon the Wealden Heaths from new residential development within its 5km proximity. In this instance, it relates to the Chiltley Lane site. Whilst SANGs relate broadly to recreation, a focus is on dog walking and disturbance to habitat and nesting birds. The use of SANGs is a widely accepted approach to mitigate

development, in order to accord with the Conservation of Habitats and Species Regulations (2017) (as amended).

How the site would become a SANG

3.4 The site is open access land owned and managed by Forestry England for forestry plantation purposes. Within the site it is already readily accessible with various designated footpaths and bridleways, including the Serpents Trail, and undesignated routes. Through the SANG designation, its use would effectively be formally more recreational (managed by S106 obligations) than land primarily used for forestry, albeit some forestry activities would remain on Iron Hill - particularly further south east of the application site.

3.5 Natural England set out various requirements for land to become a SANG, which overarchingly are:

- A suitable convenient location and readily accessible to attract existing and new residents away from a designated site.
- A 'natural environment' which involves similar habitat to designated sites to attract visitors away from a designated site.
- Appropriate long term management and monitoring regimes, for conservation and enhancement plus recreational access and amenity.
- On site, provide a network of paths, to include a circular walk of at least 2.5km;
- Enables walkers to let dogs off leads;
- Physical works to meet quality criteria – e.g. specification of paths, fencing, dog bins, information boards.
- Provide it in perpetuity (minimum 80 years);

3.6 In response, to the requirements the following is proposed:

Physical works

- Overall, infrastructure described below to be of natural materials, reflecting the setting.
- New kissing gate at the car park entrance plus some scrub clearance (to address any perceived lack of safety with access being used by forestry vehicles).
- Timber post and rail fencing with stock proof netting at the car park -more enclosure for enabling dogs off leads.
- New 230m path running parallel with the main route from the car park, which is used by the timber yard traffic. This would be segregated from the main track by post and rail fencing with stock proof netting.
- c.306m of existing informal 'desire line' tracks would be formalised to create a footpath network. They would be 1m wide and use naturalistic surfacing and timber edging where needed. In wetter areas, hoggin or bound gravel is proposed.
- Total of c.839m of new paths linking existing routes, including a 2.58km circular route and a shorter 1.16km route around the site. Length of routes are subject to some 'ground truthing' to avoid most sensitive areas and trees.
- Two timber information boards; (1) at the car park entrance: and (2) heathland area.
- Timber way marker posts identifying the circular routes.
- Dog bin at car park site entrance.

Existing car park

- No physical works are proposed to change its unsurfaced appearance and capacity (c.15 spaces). Some scrub clearance at its entrance to maintain visibility would be undertaken.

Proposed site management

- 3.7 An amended SANG Management Plan outlines the following overarching objectives and management regime:
- Conserve and enhance existing habitats and species.
 - Provide a readily accessible recreational resource in a diverse natural environment and experience, which conserves local character and encourages its use.
 - Manage the SANG for a balance of amenity and biodiversity benefits.
 - Improve existing heathland condition (enhancement of 6.8ha); its fragmentation and composition, and improve acid grassland.
 - Phased Birch tree and scrub clearance for heathland, plus importation of heathland seed, for its recovery.
 - Regime of conservation work (eg, timing, approach, seeding, supervision and licence(s)).
 - Longer term habitat management, including monitoring.
 - Deliver mandatory biodiversity net gain through monitoring.
 - Achieve Natural England's SANG requirements.
 - Maintain Forestry England's activities as a working forestry site.
 - Secure long term funding for infrastructure, conservation, maintenance and monitoring for an 80 year period; c.£789,000, of which c.£45,000 would be initial capital costs (eg, kissing gate, bins, fencing, finger posts etc).
4. **Consultations**
- 4.1 The following responses have been received:
- 4.2 **Archaeology:** No objection.
- 4.3 **Arboriculture:** No response, Members will be updated.
- 4.4 **Conservation:** Comments- the proposals may have an impact on the Registered Park and Garden of Hollycombe House (grade II*); clarification needed on whether there would be a direct visual impact.
- 4.5 **Ecology:** No objection, subject to conditions.
- 4.6 **Forestry England:** Comments (general advice), SDNPA should consider:
- Ancient woodlands, trees and irreplaceable habitats.
 - Existing trees retained wherever possible, take opportunities to incorporate new trees.
 - Deliver biodiversity net gain.
- 4.7 **Highways Authority:** Comments, further consideration needed for:
- Demonstration of pedestrian access to the SANG, including a plan of all pedestrian routes and road crossings.
 - Likely increased pedestrian demand for using the site, as a SANG.
 - Need to consider access by bicycle – to the site and within it.
 - Any likely increased parking demand upon the existing car park.
 - Clarification on any improvements to the car park.
 - Updated SANG Management Plan (March 2025) in part responds to queries on pedestrian access and demand, but does not address access by bicycle, any increased parking demand, and any works to the car park.
- 4.8 **Historic England:** No response, Members will be updated. (Officer note: This is in relation to the setting of Hollycombe House to the south.)

4.9 Landscape: Comments.

- Welcome the heathland management and long term benefits which could accrue, if undertaken well, but do not support the landscape strategy and site wide Landscape and Ecological Management Plan as presented; further work required.
- Is a low key deeply rural site offering an immersive experience with a high perception of naturalness and proximity to wildlife; in part the result of small, unmade and informal winding routes, highly distinctive and characteristic land uses, habitats and species.
- Above qualities have not influenced the proposals, which apply inflexible SANG criteria, to conserve site's existing character and features.
- SANG requirements do not conserve distinctive site qualities; inherent conflict between conserving/enhancing site's character and SANG requirements for improving access.
- SANG requirements of standardising paths, infrastructure (eg, dog bins, signage, fencing, gate) erode site's character and distinctiveness; moving towards an 'anywhere' standardised country park.
- SANGs alleviate pressure on designated sites, but Iron Hill also ecologically sensitive.
- SANG designed to allow dogs off leads; conflict with on-site habitat and species; question whether this is the right site.
- Do not support the current details on: extent of infrastructure, path routes and surfacing in wetter areas, inconclusive tree removal, timing of clearance works, sourcing of heathland seed, monitoring.

If approved, suggest conditions for:

- Updated Management Plan to address the above.
- Control of tree loss when providing new paths.
- Controlling amount of infrastructure, path building, and timber details.
- Interpretation board details.

4.10 Linch Parish: The site lies within Linch Parish but there is not a Parish Council. Neighbouring Parish Councils of Milland, Bramshott and Liphook and Linchmere and Fernhurst have been consulted, with responses from two Councils, as below.

4.11 Milland Parish Council: Objection.

Highway safety and sustainability

- No safe and reasonably direct pedestrian access from Chitley Lane site.
- No footpath along Hollycombe Lane.
- Vast majority of visitors will visit by car; informal car park often full.
- Without additional parking, risk cars queuing and/or parking on Hollycombe Lane.
- Increased traffic from the residential development will adversely impact upon parish residents who use Hollycombe Lane.

4.12 Bramshott and Liphook Parish Council: Objection.

- SANG in a separate planning authority and county to the proposed housing.
- Mitigates development outside of the National Park.
- Unconvinced the SANG promotes purpose 2.
- Further evidence of what measures will be taken to address the statutory duty.
- Site has high tranquillity and on-site proposals plus increased traffic and parked cars would harm this.

- Contrary to National Park Purposes.
- Car park often full but no increase in parking proposed.
- SANG size suggests future use as mitigation for other sites; car park inadequate.
- Poor accessibility -narrow undulating road.
- Site only accessible by car; not connected to any public footpath for safe access.
- Roads unsafe for pedestrians.
- SANG Management Plan requires details of capital works required and funding.
- Need to demonstrate how woodland management will be established to ensure that the SANG circular route and functionality not disrupted.

4.13 Natural England: Comments:

- Content delivery of this SANG would mitigate the Chiltley Lane development.
- Site already used for recreation and dog walking.
- Updated SANG Management Plan addresses concerns on expenditure/funding to establish and deliver SANG in perpetuity (80 years); to be secured via legal agreement.
- Size of SANG has capacity to accommodate other developments. Any future use to mitigate more residential sites needs further consideration.
- SANG design and layout meets much of criteria for circular walking routes, safety, access improvement, interpretation, providing a variety of habitats.
- Existing car parking sufficient but SANG's use for any further development beyond Chiltley Lane would require more parking.
- Support Forestry England being responsible for implementing SANG Management Plan.
- Provided SDNPA are content with Forestry England being the named management organisation then 'step-in rights' may not be required.
- Refer to standing advice, including for protected species.
- S245 duty relevant.
- Should align with SDNP Partnership Management Plan aims and National Park Purposes.
- Consider 'great weight' in NPPF to be given to landscape and scenic beauty of National Parks (defer to SDNPA Landscape Officer) and major development criteria;

Further information on:

- Confirm how the SANG Management Plan relates to Forestry England's "Woodlands of Rogate Management Plan" for the site; to avoid conflict between the two.

4.14 Public Rights of Way: Comments.

- Unclear if proposed routes within the site to be formally adopted as definitive PROW.
- Clarification required on status of proposed path adjacent to the main access given public bridleway along this track. If the proposed path is an alternative, it would not be supported due to maintenance liabilities and the rights along the definitive route of the bridleway for pedestrians, cyclists and horse riders should be maintained.

5. Representations

- 5.1 168 objections received. These include objections from the "South and East Liphook Residents' Group," a district Ward Councillor, and Bohunt Manor Community Action Group. Comments summarised below cover the consultation at start of the application and a subsequent re-consultation during April and May.

Principle

- Liphook a National Park gateway; need to uphold Purpose 1; duty to protect National Park edges.
- Mis-use of National Park to support unjustified new housing; Chiltley Lane not supported nor East Hampshire housing requirement.
- Precedent for more development using National Park for SANG and building close to boundary.
- Facilitates further development on Liphook edge; cumulatively impacting National Park.
- Unnecessary, attempt to improve acceptability of unwanted housing development.
- Proposals not in same parish, district, county and planning authority as Chiltley Lane;
- SANG distant from Chiltley Lane; unviable alternative, Wealden Heaths more accessible.
- Already publicly accessible popular open space and query whether it can qualify as a SANG - should be to create new open space, not commandeer existing sites.
- Satisfies requirements for a residential development, no other purpose.
- Residents can access countryside areas and green spaces (eg, Radford Park) without it.
- Question SANG attracting new or existing residents for mitigation purposes; ineffective location for safe walking/cycling; reliance on cars; not inclusive for local community.
- Proposals dependent on planning permission for new housing outside of National Park.
- Ample space at Chiltley Lane and adjacent fields for SANG; Iron Hill site excessively larger than required.
- Should be no connection between it and development in Bramshott and Liphook Parish.
- Major development and no exceptional circumstances; contrary to SD3.
- Contrary to National Park Purposes and core Local Plan policies.
- Site not natural open space given Forestry England's use, to now use as SANG.
- SANG does not cover all of Iron Hill; query overall management.
- No economic, environmental, or social benefits for local community or National Park.
- Harm to existing forestry business; should remain in forestry; compromising productivity.
- Concern increased public access could de-value importance of forestry.
- Developer promoting it as a community facility; no community engagement.
- Contrary to a 1960 covenant for land to be used for "best silviculture practice."
- Long term funding unclear and underestimated; query CIL liability.

Landscape

- Liphook and surrounds already undergone extensive development; extends village into the countryside; precedent for depleting rural spaces adjacent to SDNP boundary.
- Valued site; does not require any further human intervention; fine as is.
- Impact on character and appearance; loss of sense of countryside.
- Does not need improving; proposals a beautification; wildness lost to a 'groomed park.'
- New infrastructure harmful to natural character; added domestication and clutter.
- Impact on tranquillity from increased visitors and infrastructure.
- Increased usage will encourage litter and dog mess.
- Loss of trees/forest with impact on wildlife and carbon capture.

- Compromises efficient use of land with site divided up by footpaths.
- Bigger car park required, but would suburbanise/over develop.
- SANG has little value when natural character not conserved.
- Funding cannot be relied upon; query management responsibilities for upkeep.
- Impact on Serpents Trail amenity.

Ecology

- Wildlife sanctuary; harm to and loss of species diversity; impact from increased visitors and fencing.
- No material ecological benefits.
- Harm to heathland, will fragment it and reduce diversity.
- Heathland restoration will take time; could be achieved without designating a SANG.
- Inconsistent/inaccurate information (eg, BNG Metric, SANG Management Plan maps).
- Insufficient survey and assessment work; query survey timings.

Cultural Heritage

- Impact on Hollycombe House and park and garden (Grade II* listed).

Access, highways, parking

- Unsustainable location; over reliance and promoting access by car; not in walking distance; lack of public transport for access; attract visitors/traffic from wider area.
- Site too detached from the Chiltley Lane; no contiguous access.
- Impact on highway safety; increased traffic on poor condition rural roads.
- Poor and unsafe pedestrian and cycle access to/from Iron Hill; no disabled access.
- Accident data ignores rural road conditions; regular accidents of vehicles hitting banks.
- Traffic increase underestimated; baseline of existing visitors needs to be undertaken.
- Insufficient car parking capacity; informal and often full; needs to be larger as future usage underestimated and lack of assessed demand. Will lead to roadside verge parking.
- Car park rutted, no defined parking bays, floods in heavy rain, poor turning space; conflict between cars and forestry vehicles.
- Poor visibility for car park access; minimal improvements to sight lines.
- On site pedestrian safety from lorries accessing the site and timber yard.
- Existing on-site paths sufficient.
- No functional links to other cultural heritage and landscape visitor attractions.

5.2 **EHDC Councillor Mouland:** Objection.

- Residential proposals being considered since 2023; long process blighting local residents.
- Proposals a response to Radford Park, Liphook, not being supported as a SANG; Iron Hill already popular for walkers/cyclists.
- Site is detached insofar as it is not in Bramshott and Liphook parish, East Hampshire District (including planning authority area) or Hampshire.
- Not safely accessible on foot.
- Proposals make no sense on practical/common sense level; ticks Natural England boxes.

6. **Planning Policy Context**

6.1 The Development Plan comprises the South Downs Local Plan (SDLP) (2019). The most pertinent policies are listed below. A longer list of relevant policies and applicable legislation is in Appendix I.

6.2 For the avoidance of doubt, the site is close to but outside of the Liphook and Bramshott Neighbourhood Development Plan (NDP) and the Milland NDP areas.

6.3 Most relevant policies of the adopted SDLP (2019)

- SD4: Landscape Character
- SD9: Biodiversity and Geodiversity
- SD19: Transport and accessibility
- SD20: Walking, Cycling and Equestrian Routes
- SD21: Public Realm, Highway Design and Public Art
- SD22: Parking provision
- SD45: Green infrastructure

The South Downs Local Plan Review

6.4 The South Downs Local Plan is undergoing a period of review and the First Publication (18 Consultation) was undertaken between 20th January – 17th March 2025. This is the first publication of the Local Plan Review and therefore can only be attributed very little weight. As it progresses through the adoption process, it will gain more weight for the purposes of decision making.

6.5 Relevant supplementary planning documents (SPD) and other guidance

- Parking for Residential and Non-Residential Development SPD (2021)
- Ecosystems Services (non-householder) Technical Advice Note (TAN)
- Habitats Regulations Assessment TAN (2021)

6.6 Most relevant sections of the National Planning Policy Framework (NPPF) 2024

- Section 9: Promoting sustainable transport
- Section 12: Achieving well designed places
- Section 15: Conserving and enhancing the natural environment

6.7 Most relevant policies of the South Downs Partnership Management Plan (PMP) (2020-2025)

- Policy 1: Landscape
- Policy 29: Encourage use of the National Park for healthy outdoor activity
- Policy 39: Reduce impact of traffic and parking on a local area
- Policy 43: Support appropriate recreation

7. Planning Assessment

Background and wider considerations

7.1 The Wealden Heaths designations protect their habitats and wildlife from adverse effects under European and UK law – namely the Conservation of Habitats and Species Regulations 2017 (as amended). The designation is due to its heathland habitat for internationally important bird species which nest on or near to the ground. These are susceptible to disturbance from people recreationally using these areas, especially dog walking.

7.2 To accord with the legislation, EHDC officers consider that the Chitley Lane proposals are likely to have a significant adverse effect upon the integrity of the Wealden Heaths from recreational pressure and disturbance which may occur. This is because it involves new residential development within its 5km buffer. Therefore, due to the location and scale of

those proposals, the Developer (same applicant as this application) needs to mitigate this impact. Their approach is to propose land at Iron Hill to become Suitable Alternative Natural Greenspace (SANG).

- 7.3 The acceptability of the residential scheme, outside of the National Park, is for EHDC to determine. It is, however, contingent on the Authority approving the SANG proposals. Ultimately, the Authority's decision will either facilitate or constrain new residential development outside of the National Park at Chiltley Lane. Although, it is still a potential draft housing allocation for EHDC's emerging Local Plan (undergoing revisions concerning housing requirements) and the proposed outline application is undetermined.
- 7.4 Given the early stage of EHDC's Local Plan it should not be afforded weight as a material consideration. Also, the outcome of the Chiltley Lane application cannot be pre-judged. The proposed SANG needs to be considered on its own merits in the context of the South Downs Local Plan and National Park Purposes, which should be afforded the greatest weight.
- 7.5 In effect, consideration is given to its establishment as a stand-alone SANG in land use and management terms. However, the S106 Legal Agreement would tie in Chiltley Lane given the SANG's purpose as mitigation, with wording to trigger its implementation only if EDHC grant permission.
- 7.6 Turning to the Wealden Heaths, its largely within the National Park whereby National Park Purposes are relevant for conserving and enhancing it. It is also an area where the Authority is active regarding its 'Heathlands Re-united' programme. So whilst the SANG relates to development outside of the Park, its approval would, in any event, support conserving and enhancing the Wealden Heaths by helping to alleviate recreational disturbance. This is a relevant material consideration regarding Purpose 1 and policy SD10.
- 7.7 Conversely, how Iron Hill would be conserved and enhanced is addressed further below. However, it is not a case of balancing the impacts on one site against another and giving any more weight to the Wealden Heaths designations, compared to Iron Hill. Rather, Purpose 1 applies equally to all areas of the National Park with each application assessed on its merits.

Principle - use

- 7.8 Natural England raise no objection in principle to the use of this site as a SANG. It is already used for recreation and there are public rights of way and more informal routes linking it to the wider countryside. A SANG can legitimately be designated for existing areas as well as creating new sites. Improving accessibility around the site could attract visitors and would align with Purpose 2 as well as policy SD20 and the PMP.
- 7.9 Its use as a SANG and physical infrastructure are not considered to have a harmful landscape impact, as assessed below. The proposed conservation and enhancements would also align with purpose 1 and policies SD1, SD4 and SD9 and the S245 duty.
- 7.10 Forestry activity would remain at Iron Hill but predominantly further south, which is an accepted countryside use. Representations raise concern about potential conflicts between recreational users and ongoing commercial forestry activities, including the timber yard. However, the recreation and commercial uses appear to have been alongside one another for many years and, apart from concerns about access by large commercial vehicles at times, they have otherwise not appeared to significantly conflict with one another. Also, recreational and forestry use in many other areas is common.
- 7.11 Natural England have queried the relationship of the SANG Management Plan and Forestry England's "Woodlands of Rogate Forest Plan" which covers the application site. The latter has many conservation objectives and including improving recreational access.
- 7.12 Forestry England would continue to own and manage the site. The S106 agreement would have legal obligations to implement the SANG Management Plan, which does acknowledge Forestry England's plan, which would hold weight in the site's future management and take precedence. This is because their plan does not appear to be a legal document and prepared by them for their own guidance purposes. Notwithstanding, the SANG Management Plan outlines that Forestry England's future plan (period of the current plan expires next year)

should align with it. Their plan is also not exclusive to the application site and it covers a larger area of Iron Hill and various woodlands to the south west (7 in total), so it is not exclusively relevant to the application site.

- 7.13 For the reasons above, there is no concern regarding potential conflict raised in consultee advice.

Principle– location

- 7.14 The SANG needs to be sited where it can be an alternative to visiting the Wealden Heaths. Representations raise concern about its suitability because of its distance and safe accessibility to/from Chiltley Lane, and driving to Iron Hill. The Highways Authority have also asked for further information (summarised in section 4).
- 7.15 Officers have considered the accessibility of walking routes. Whilst the outcome of Chiltley Lane cannot be pre-judged, it is c.950m in a straight line from Iron Hill car park and approximately 1.2km to 1.8km via roads, dependant on the route. For approximately two thirds of a route via Midhurst Road there are pavements and a path until reaching the junction with Highfield Road, where the final c.350m of the route on Midhurst Road becomes embankments and mature vegetation on either side before reaching the car park.
- 7.16 An alternative route from Chiltley Lane along Highfield Road would involve walking on the road. At the Highfield/Midhurst Road junction, there is a way marked footpath (Serpents Trail) which leads into Iron Hill. This is a reasonably direct and off road route which is also at a point where the footpath along Midhurst Road ends, which means the aforementioned c.350m length of road could be avoided.
- 7.17 These routes would be the same for existing nearby residents and those further into Liphook, as they are the most direct and accessible. Whilst there is scope to walk/cycle, it is acknowledged that visitors predominantly visit by car. However, whether it is from Chiltley Lane or surrounding residential areas, the drive is quite short given the closeness of Iron Hill to the edge of Liphook.
- 7.18 Its location could be seen as a benefit. With improved accessibility on site, there could be a positive effect of providing a more attractive resource within easy reach by residents living in the southern side of Liphook, given the SANG is on the fringe of the Town and well related to it. In contrast, for those residents to reach the Wealden Heaths, its likely they experience congestion through central Liphook (eg, along The Square) at times to reach the A3 and would need to drive further. There could, therefore, be environmental benefit from shorter journeys to Iron Hill by people wishing to experience the countryside, compared to visiting Wealden Heaths.
- 7.19 Natural England's general approach is that a SANG should have a 'net effect' in reducing recreational pressures upon designated sites. This essentially means that a readily accessible SANG for a good proportion of existing residents could also have a net effect of reducing pressure upon designated sites. Whilst the SANG is required to mitigate a specific development, it should not necessarily be seen as solely related to providing recreational space for new residents.
- 7.20 It is acknowledged that improving the site's accessibility could encourage more visitors, but that is the purpose of a SANG. Encouraging people's ability to enjoy and access the countryside very much aligns with Purpose 2. Concerns about traffic and car park capacity are addressed further below.
- 7.21 Officer's acknowledge local concerns about whether a SANG could be accommodated in fields adjacent to Chiltley Lane or rely on existing Radford Park (northern edge of Liphook) as mitigation. Both areas are outside of the National Park to be able to comment.
- 7.22 However, based on the application with EHDC the adjacent land does not appear to be in the applicant's control. Also, a previous 2016 dismissed appeal at Chiltley Lane determined there was too much uncertainty regarding what an off-site contribution towards improvements at Radford Park would be used for, to justify its use as mitigation.

- 7.23 Officers cannot consider such alternatives and the application needs to be assessed on its own merits.

Principle - scale

- 7.24 At 34ha, it is a large application site. Officers agree with local concerns that the SANG is much larger than what is needed to mitigate Chiltley Lane. For a 67 dwelling scheme a 1.32ha SANG would be required. On this basis, the SANG would have capacity to accommodate additional future growth, which is also a local concern. At present, the scheme is proposed to mitigate one site which would be outlined in the S106 Agreement. Any further reliance on it as a more strategic SANG could involve the SDNPA if the Agreement was needing to be varied to accommodate this, or if further physical works requiring permission were required, such as enlarging the car park.
- 7.25 However, its overall size is consistent with much of its existing accessibility and so its use as a SANG is not significantly encroaching outside of how the site is used already. The SANG is not, therefore, out of scale with use of the land. Its size also means that conservation and enhancement of habitat and species could be achieved at greater scale, which is a significant benefit to give weight to.
- 7.26 Its size also accommodates Natural England's requirement of a 2.3-2.5km circular walk, which must start and finish at a car park. Incorporating existing paths and formalising some of the 'desire lines' means the overall scale of the path network is not excessive for the site to improve access. Paths would also be spread out across the site to afford visitors different lengths and experiential walks.

Summary on principles

- 7.27 Overall, having assessed the merits, considered consultee advice and representations, the site's use, scale and location are acceptable for the above reasons and the further considerations below.

Ecology and landscape considerations

- 7.28 Whilst the site is not designated for its habitat and wildlife, it is an ecologically sensitive site. As a baseline, the ecology information and records show that either within its surroundings there's notable habitat and species. Representations have criticised the Applicant's survey work and indeed further survey work and information has been undertaken at officer's request. This include bats, reptiles and Nightjar. Consequently, the ecologist is satisfied with the information provided.
- 7.29 Available information also highlights that the heathland is in a poor and fragmented condition. It is also being encroached upon by Silver Birch saplings which, unmanaged, threatens the heathland. In 2019, the Authority used Heathlands Reunited programme funding and SDNPA Rangers to undertake tree and scrub clearance to restore heathland here. However, more and continued conservation work is needed.
- 7.30 Given the use, there would not be any wider visual impact on the surrounding landscape and the physical works relate to paths, low level infrastructure and the car park is not fundamentally altered. Intrinsic and experiential characteristics and qualities of the surrounding landscape would also not be impacted for these reasons. It may be that improved accessibility and enhancements attract more visitors, but it is questionable as to how discernible this would be in the wider landscape regarding any impact on tranquillity, particularly as such recreation involves the quiet enjoyment of the countryside.
- 7.31 Natural England have various criteria for a SANG. They relate to accessibility, usability for dog walkers, safety, and the character and experience of sites. Consultee advice and representations raise concern about conflict between these requirements and the characteristics of the site. Essentially, there is concern about it being transformed into more of a country park character. Also, that conserving heathland conflicts with allowing dogs to be off leads.
- 7.32 A network of paths would be established but in part utilising existing routes and 'desire lines.' Chosen routes also aim to minimise or avoid access in the most sensitive areas. The

physical works are also reasonably low key. Whilst there would be more paths, way marker posts and infrastructure to manage the site, they are not so extensive in number, design and appearance that a country park character would be created. These interventions in the landscape also should be balanced with the conservation and enhancements that could accrue to further restore heathland habitat for example. Overall, the site's character would not be fundamentally undermined.

- 7.33 Improved accessibility and enhancements over time may encourage more visitors, but this aligns with Purpose 2 and the Partnership Management Plan of encouraging people to experience the National Park. Information boards and way markers for routes for example can help to manage this.
- 7.34 From officer site visits and representations, it is a popular site. Securing investment through the SANG use would help to manage it in terms of upgrading and maintaining paths, influencing positive visitor behaviour, and overall environmental management, all of which would benefit the site.
- 7.35 The SANG Management Plan is acceptable regarding aims and objectives for conserving and enhancing habitats and species on site. However, some further work on securing more details on paths (for example) and the periodic monitoring, as far as practicable, in response to consultee advice for example could be added or refined. As such, the recommendation includes the final wording of the SANG Management Plan to be delegated to officers and secured in the S106.
- 7.36 Overall conservation and enhancement of the site's habitats and species, plus improving access aligns with both National Park Purposes and relevant Local Plan policies. In respect of landscape and ecology considerations the proposals are acceptable.

Biodiversity Net Gain (BNG)

- 7.37 An acceptable BNG Metric has been submitted which demonstrates that mandatory BNG requirements can be met through the management of the site. There is no consultee objection to these details. The national BNG requirements can be more explicitly set out in an updated SANG Management Plan, as opposed to being another separate management plan, to be secured in the S106 Legal Agreement.

Trees

- 7.38 Regarding trees, a full tree survey of the site is arguably disproportionate given the scale of the proposals (c.34ha) and that the strategy in the SANG Management Plan is to avoid tree loss when introducing new paths. Many of the trees on site are coniferous and a degree of tree clearance of this uncharacteristic species is acceptable in any event. Officers would not support the loss of broadleaf native trees and this is an aspect which could be more explicit in a final agreed SANG Management Plan, in association with other minor amendments to address aspects of ecology and landscape consultee advice. Routes and specification of path surfacing to be laid, avoiding tree loss, with appropriate supervision by a suitably qualified person during implementation could also be secured in the Management Plan.

Cultural Heritage

- 7.39 Iron Hill is well enclosed and there is no intervisibility between it and Hollycombe House due to distance, intervening woodland, plus other development. Its grade II* park and garden extends c.80m away from Iron Hill car park and behind intervening woodland. It is not considered that the setting of the Hollycombe House or its gardens would be impacted by the proposals. The legislation cited in appendix I and Local Plan policy SD12 would be accorded with. There are no other listed buildings in the immediate vicinity whereby the proposals would impact upon their setting. Historic England have been consulted on the basis of the grade II* listing and Members will be updated with any comments received.

Impact on surrounding amenities

- 7.40 The site is already used recreationally. It is a good distance from surrounding properties and a low key use and less akin to a recreational country park for instance. For these reasons

and given the site's enclosed nature, there are unlikely to be direct impacts upon private amenities. Local concern has been raised about increased traffic, which is addressed below.

Highways and parking

- 7.41 The Highways Authority have queried details about increased walking and cycling on the roads and demand on the car park. Representations also raise concerns about increased traffic, road safety and car park capacity.
- 7.42 No.67 dwellings at Chitley Lane would have an anticipated c.165 new residents, which is a small addition to Liphook. The site is already used by recreational visitors and potentially mitigating 67 dwellings is unlikely to be discernible. Not all new residents may use the SANG (particularly if they don't own a dog) but its improved accessibility could appeal to the wider local community and increase visits. Overall, however, it currently appears as a fairly low key site and, in the event that improved accessibility increases its popularity, it may not result in increased traffic to the extent that it would be significantly harmful.
- 7.43 Over the last 5 years, there is no recorded accident data at Iron Hill. A speed survey undertaken in 2023 in the vicinity of the car park shows that speeds on this 60mph road were consistently below 40mph, which is likely due to its character. The car park entrance is large (a c.10m wide bell mouth entrance) with good visibility in either direction. In these respects there is not considered to be a highways issue.
- 7.44 The car park is an unsurfaced area where spaces are not demarcated but it is calculated at 15 spaces. Natural England have not raised an issue with its capacity. The Highways Authority requested further information on future demand, which is difficult to accurately estimate as it is not certain how many more people in the future may use it. Usage will also fluctuate between seasons and different peak times during the week and weekends.
- 7.45 There is scope for visitors to walk and cycle to the site but most travel by car. There does not appear to be any evidence to suggest car parking is overflowing onto the road and so any capacity issues at present are not sufficient to justify refusing the application.
- 7.46 To address any future issues, the SANG Management Plan is absent of a commitment to manage capacity issues and address, as necessary. This could be included in its final version for the S106 Agreement. In the event of car parking capacity becoming a significant issue, further consideration of expanding it further into the site would be needed. However, this is not part of the current proposals for consideration. In addition, further detail in the SANG Management Plan for repairing rutted areas and sensitive low key demarcating of spaces could help with accessibility and reducing ad-hoc parking, which may help with capacity.
- 7.47 In light of the above considerations, whilst the Highways Authority require some further information, it is considered that there is not a sufficient highway safety or access issue to justify refusing the application.

Public rights of way (PROW)

- 7.48 The existing PROW are satisfactorily incorporated into the proposed network of paths including forming part of the circular route for Natural England's requirements.
- 7.49 Consultee advice has queried the status of the new or upgraded paths. These are not intended to be designated as PROW and would simply be permissive routes. They have also queried whether an existing bridleway along the main track on the southern site edge would be impacted upon by new fencing. This is proposed to separate pedestrians from forestry traffic, whereas there is no separation at present.
- 7.50 Natural England require this fencing in their SANG criteria of safe walking routes. Whilst it would serve to physically separate walkers from vehicle traffic it would not be able to obstruct the PROW. The upkeep of this fencing is also part of the SANG Management regime management costs and so it would not be the responsibility of the County Council. Therefore, this is not a significant concern to justify a refusal on PROW impact grounds.

The S106 Agreement

- 7.51 SANGs can be provided by developers and private landowners (as in this case), subject to meeting Natural England's requirement. The Site's use, management regime, and funding for monitoring need to be secured in perpetuity (minimum 80 years). It is understood that the land would remain in Forestry England's ownership and they would be responsible for its long term management.
- 7.52 The final SANG Management Plan is to be secured in the Agreement to ensure that its implementation is legally enforceable. Its obligations also include a monitoring regime that involves providing the Authority with updates as to the management and condition of the SANG periodically, plus any remedial action as necessary.
- 7.53 The initial capital costs for establishing the new paths and installing infrastructure is c.£45,000. There is funding of approximately c.£788k to secure long term management objectives. This is sufficient on the basis that Natural England are satisfied with the financial information. In addition, officers wish to secure the SDNPA's own monitoring fees on a cost recovery basis regarding the SANG Management Plan and its timeframe. All of these financial and management commitments would be secured in the Agreement
- 7.54 Natural England have commented on 'step in rights.' This would involve whether the SDNPA would ever take over the management and liability of the SANG, The mechanisms to provide and retain the SANG is satisfactory and officers are not recommending that step-in rights would be necessary within the Agreement. This is on the basis that it has been sufficiently demonstrated that there is a long term landowner and sufficient finances and management regime to be secured, which do not to require the need for this provision and are sufficient so as likely adverse effects on the Wealden Heaths continue to be mitigated.
- 7.55 The implementation of the SANG would be dependent on Chiltley Lane being developed. The Agreement's wording would ensure that the SANG is implemented prior to the occupation of any new dwelling.

S245 duty

- 7.56 Within the overall planning balance, the scheme overall would further Purpose 1 and 2. Given compliance with the Local Plan as a whole, it is considered that the S245 duty is met.

8. Conclusion

- 8.1 The background to this application relates to facilitating development outside of the National Park, as mitigation for the likelihood of increased recreational pressure upon the Wealden Heaths. Whether this site is mitigating Chiltley Lane or other development, consideration has been given to its development as a SANG on its own merits.
- 8.2 Overall, its location, access, size, new infrastructure and overall management objectives, are supported. Natural England have not raised an objection. The site currently has poor and fragmented heathland. As a SANG and the investment to be secured, conservation and enhancement benefits at scale (34ha) could accrue, which align with Purpose 1. Access improvements also align with Purpose 2.
- 8.3 A S106 Agreement would secure the provision and long term future and management of the SANG. The recommendation proposes that the final version of the SANG Management Plan is delegated to the Director of Planning, which would likely involve minor changes to it. These would not fundamentally alter its objectives and approach.
- 8.4 The SANG would be required to be established prior to the occupation of any dwellings relying upon it as mitigation. This is intended to be the Chiltley Lane development, however, the outcome of that application cannot be pre-judged and attributed weight. In the event the development is not approved, the SANG proposals are unlikely to be implemented.
- 8.5 Consultee advice and representations have been considered. Overall, the proposals accord with individual policies and the Development Plan as a whole, the NPPF 2024, National Park Purposes and duty, and relevant legislation. It is considered that the relevant Development Plan policies are not out of date. There are no material considerations of sufficient weight which would justify refusing permission, once the S106 has been secured. Regarding

sustainable development, the proposals would help to deliver economic, social and environmental benefits.

- 8.6 A resolution to grant planning permission subject to securing the S106 Agreement and outlined conditions is recommended.

9. Reason for Recommendation

- 9.1 The recommendation is:

- 1) That planning permission be granted subject to the completion of:
 - i) A S106 Legal Agreement, the final form of wording for which is delegated to the Director of Planning to secure:
 - The use of the site as a Suitable Alternative Natural Greenspace (SANG), for the purpose of mitigating new residential development within the proximity of the Wealden Heaths Special Protection Area.
 - SANG and BNG Management Plan (the final form of wording to be delegated to Director of Planning) to secure the delivery of infrastructure (capital works) and future management and monitoring of the site in perpetuity (80 years);
 - Financial contribution of £150,000 towards the Authority's monitoring of the site in perpetuity (80 years).
 - ii) The conditions set out at paragraph 9.2 of the report and any amendments or other conditions, as required.
- 2) That authority be delegated to the Director of Planning to refuse the application, with appropriate reasons, if the Legal Agreement is not completed within six months of the 10th July 2025 planning committee meeting.

- 9.2 And the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with the provisions of Section 91 (1) of the Town and Country Planning Act 1990 (as amended) and Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the plans listed below under the heading "Plans Referred to in Consideration of this Application".

Reason: For the avoidance of doubt and in the interests of proper planning.

Use

3. The use of land for the purposes of Suitable Alternative Natural Greenspace shall only be carried out within land outlined in red on the approved site plan edp7868_d015 and in accordance with the approved SANG and BNG Management Plan.

Reason: To provide an accessible site for the purposes of SANG to mitigate recreational impacts upon the Wealden Heaths, plus conserve and enhance its landscape character, ecology, and surrounding amenity.

4. Prior to the site being brought into use as Suitable Alternative Natural Greenspace, the detailed design of information boards shall be submitted to and approved in writing by the Local Planning Authority. These details shall include information about raising awareness of the qualities and ecological sensitivities of habit and species, visitor conduct including dog walking, routes, and the National Park.

Reason: To promote the understanding and enjoyment of the site to visitors.

Highways

5. The access visibility splays as shown on approved plan A269-018P2 shall be provided in full and maintained thereafter.

Reason: To ensure an appropriate site access for highway safety purposes.

TIM SLANEY

Director of Planning

South Downs National Park Authority

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Appendices: Appendix 1- Legislation and policies
Appendix 2 – Site Location of Chiltley Lane and Wealden Heaths
SDNPA Consultees: Legal Services, Development Manager
Background Documents: [SDNP/24/01695/FUL | Change of use from forestry to Suitable Alternative Natural Greenspace \(SANG\), and associated minor facilitation works including the erection of fencing, improvements and enhancement of existing paths, creation of additional footpaths, siting of information boards, dog/litter bins, and heathland restoration. | Iron Hill Hollycombe Lane Fernhurst West Sussex](#)
[South Downs Local Plan \(2014-33\)](#)
[South Downs National Park Partnership Management Plan](#)
[SDNPA Supplementary Planning Documents and Technical Advice Notes](#)

