East Hampshire Planning Policy

14 October 2019

Dear Sir

**East Hampshire Draft Local Plan**

**Response to Large Development Sites Consultation**

This is the Response of CPRE Hamsphire to the Large Development Sites Consultation

**Applying principles of Sustainability**

As said in our Response to the Draft Local Plan Review Consultation, we agree in principle that new settlements can present an opportunity to be ambitious, achieving the highest standards of design, the most sustainable development layouts and the most inclusive and positive communities, supported by innovative technologies and modern approaches to infrastructure.

However, NPPF 2019 paragraph 72 makes it clear that a standalone new settlement should be of a size to support a sustainable community, with sufficient access to services and employment opportunities within the development itself or in larger towns where there is good access. It is Government policy in relation to Garden Villages, and widely acknowledged, that at least 1500 homes is needed for a new standalone community in order to provide the necessary critical mass. Whitehill Bordon is a good example of such a new settlement, development of which we have always supported.

This Consultation concerns proposed sites for 600 homes or more, but none of which is proposed accommodate as many as 1500 new homes. It is not, therefore a consultation involving a new settlement, but rather on identifying two large sites for housing development, as the title indicates.

In principle we consider that, in order to meet Government mandated housing numbers at the later end of the Plan Period, identification of one or more large sites for housing development is strongly preferable to yet more sporadic development across the District, adding to the large numbers already under construction or consented.

But, in order to meet the requirements of sustainability these two large development sites will need to become part of an existing settlement of significant size in order to take advantage of the existing infrastructure, facilities and services available there, provided these are sufficient to meet the needs of the existing and new residents after incorporating infrastructure provided by the large development.

*Northbrook Park*

Yet, contrary to the above principles of sustainability, Northbrook Park is proposed as standalone development for 800 homes, with poor access to Farnham some 3 kilometres distant. This would not achieve the sustainability requirements for a new settlement and should now be ruled out of the process.

*Whitehill Bordon*

However, the proposed Large Development Site for 1284 homes at Whitehill Bordon as part of the new settlement already approved and under construction would very much accord with the above principles of sustainability, as well as being a continuation of the current strategy for regeneration of the former Bordon Garrison. The site would be essentially brownfield development, which CPRE strongly supports, and would be able to take advantage of existing and proposed employment provision, the well developed plans for a new town centre, and the newly completed relief road. The proposed SANGS would avoid adverse impacts on the Wealden Heaths Phase II SPA.

Accordingly, CPRE Hampshire supports the Large Development Site proposed at Whitehill Bordon. This Site also has the support of the Council.

In addition to the proposed Large Development Site at Whitehill Bordon we are aware of a site owned by Hampshire County Council at Whitehill Bordon which has been rejected as a Large Development Site as it is assessed not to have capacity for 600 homes. Yet it has been proposed for 510 homes, which is little short of 600, and its development could make a significant contribution to required housing numbers to the relief of a Large Development Site in open countryside. Again it would benefit from being part of the regeneration of Whitehill Bordon and contribute to the sustainability of the new settlement there.

**Exclusion of Valued Landscapes**

The Draft Local Plan, as consulted on, rightly provides that the countryside will be protected for its landscape, natural resources and ecological value as well as its intrinsic character and beauty. Also that new development "should be located to protect and enhance valued and high quality landscapes".

We supported these policies in our Response, which reflect well NPPF para 170(a) requiring that the planning system and decisions should contribute to and enhance the natural landscape by protecting and enhancing "valued" landscapes, and para 170(b) which recognises the intrinsic character and beauty of the countryside.

In *Stroud District Council v Gladman Developments* the Court of Appeal recognised the concept of a "valued landscape" as something different from a Designated Landscape to which specific planning rules apply as set out in NPPF. Following that decision, it is now established in appeal decisions that landscapes that have demonstrable attributes that raise them above the ordinary may constitute "valued landscapes".

In assessing whether a landscape has such demonstrable attribute use has been made by Inspectors on appeal of the Landscape Institute Guidelines for Landscape and Visual Impact Assessment (GVLIA), as well as prior appeal decisions and their own judgment and reasons.

We have visited all the proposed Large Development Sites and, applying the principles established in GVLIA and appeal cases, have assessed each Site as to its demonstrable attributes in terms of both landscape character and physical distinctiveness, and public experience of the landscape

Our detailed assessments are set out in **Appendices A to D** of this Response, which are to be read as an integral part of this Response. We believe these assessments would be upheld by the Inspector at Examination of the Draft Local Plan.

CPRE Hampshire has concluded that the following proposed Large Development Sites are located within a "valued landscape":

* Chalton Park Farm, Alton
* Neatham Down, Alton
* Land South of Winchester Road, Four Marks
* Part of Northbrook Park

it is accepted by the Court and Inspectors on appeal that identification as a "valued landscape" indicates development should be restricted, on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused.

Accordingly, we consider that allocation of any of the above sites as a Large Development Site would be would wholly inappropriate, contrary to established planning rules for "valued Landscapes" as well as the principles for protecting landscape set out in the Draft Local Plan, and so would render the Draft Local Plan Unsound at Examination.

We note that table setting out the Council's Site assessment of the proposed Large Development Sites in traffic light form in the Background Paper does not have a column for landscape, despite this being raised as an issue in several developers' proposals. Such a column needs to be added with a red light for each of the above 4 Sites to indicate "valued landscape".

**Identifying a further Large Development Site**

As regards identifying, so far as necessary, one Large Development Site in addition to Whitehill Bordon from the 5 remaining Sites, we accept this will require a planning balancing to be made by the Council. CPRE Hampshire does not have the detailed knowledge of all the factors which will need to be taken account of in relation to each Site, and so offers no order of preference. However we consider it important that the following matters of particular CPRE interest are given high priority in reaching a decision:

* community concerns expressed in response to this consultation
* pertinent policies in relevant "made" Neighbourhood Development Plans
* minimising loss of countryside outside existing Settlement Policy Boundaries
* reducing CO2 impacts from transport by selecting a location close to employment prospects, public transport, services and facilities, using the *Transport for New Homes Checklist*
* opportunities for walking and cycling to work, services and facilities
* protection of the setting of Heritage Assets
* high quality design

 and

* beforeconsiderationfor inclusion in the Local Plan, a professional assessment by independent consultants agreed by HCC but paid for by the developer for each site, of road improvements and traffic management measures which would be required to prevent increased congestion and reductions in road safety in the local area, and
* beforeconsiderationfor inclusion in the Local Plan, a professional assessment by independent consultants agreed by the relevant public body but paid for by the developer for each site of the infrastructure which would need to be provided by the large development to the existing settlement to ensure the needs of the existing and new residents are met, and the phase of development of the site when it needs to be provided

**Reserve Site**

While the District is required to accept housing numbers based on the current standard methodology for calculating housing need, this may well change over time with changes in government or acceptance by

central government of the current decline in household formations. So, it may well be that some of the housing numbers stated in the Draft Local Plan will not end up being needed during the Plan Period.

If the numbers needed were to fall significantly, or some be absorbed by a large windfall site, then a Large Development Site outside Whitehill Bordon would likely not be required. We therefore suggest that any such Site be allocated in the Draft Local Plan as a Reserve Site, which would only be released if shown to be required within 5 yearly Local Plan reviews, and otherwise remain subject to countryside policies. EHDC has past experience of Reserve Sites.

*CPRE Hampshire South Downs & Central Planning Group*

**Appendix A - Land at Chawton Park Farm, Alton**

**Appendix B - Land east of the A31 at Neatham Down, Alton**

**Appendix C - Land South of Winchester Road, Four Marks**

**Appendix D - Land at Northbrook Park, Bentley Parish**

**Appendix A - Land at Chawton Park Farm, Alton**

Land at Chawton Park Farm, Alton, ("the Site") is being considered for a large development site of up to 1250 dwellings

CPRE Hampshire has now had the opportunity to make an assessment of the Site in the context of a "valued" landscape on which development is restricted in accordance with national guidance. This assessment has regard to:

* Hampshire Integrated Landscape Character Assessment ("HILCA")
* East Hampshire Landscape Character Assessment ("EHLCA)
* a study of criteria used by Inspectors on appeal in deciding whether appeal sites are "valued" landscapes
* our own observations

**Assessment of landscape character and physical distinctiveness**

Chawton Park Farm is situated about 1 kilometre to the west of the built up area of Alton. The Site extends westwards for a distance of 1.5 kilometres. It is on the central eastern edge of LCA 6a - East Hampshire Wooded Downland Plateau in HILCA and north eastern part of LCA 2B - Four Marks Clay Plateau in EHCLA. The Site is in a narrow valley of pasture and arable fields, leading up on the northern side to a plateau and then into broadleaved woodland reaching to the skyline. The southern side consists of a grassland field rising up the valley side and leading into broadleaved woodland, again reaching to the skyline. This woodland shields the valley from the Watercress Line and the A31 further to the south. The valley, as a whole, has a strong sense of enclosure and seclusion.

Within the Site, the valley floor contains at the eastern end an unclassified road bordered by hedgerows serving Chawton Park Farmhouse. This leads past the farmhouse and yard into a bridleway with, on the northern side, a narrow piece of broadleaved woodland containing some fine trees. The bridleway continues along the valley floor to the western end of the Site where it enters woodland.

Chawton Park Farmhouse is a grade II listed building with an historic barn in the yard immediately to the west, and other buildings of considerable character to the south of the road.

The valley has a strong rural and physically distinctive character, especially on the southern side of the bridleway as the grassland field on the valley side leads down to the historic Chawton Park Farmhouse and associated buildings.

Around the Farmhouse to the north, and to the south of the public road, the landscape of fields is more open, but still contained in a valley leading to broadleaved woodland north and south. New Cottages, situated on the road, do not have the historical interest of Chawton Park Farmhouse, but are typical of cottages built for agricultural workers.

The Site is fully representative of the peaceful rural landscape of the Four Marks Clay Plateau.

This landscape is within the Wooded Downland Area of Special Landscape Quality as proposed in a Report by RPS Watson to East Hampshire District Council dated 8 December 1994, based on its scarcity value, scenic quality, unspoilt character and sense of place. This assessment is as valid today as it was in 1994. It is within an area of Medium / Low Landscape Capacity in the East Hampshire Landscape Capacity Study.

**Assessment of public experience of the landscape**

The Site is experienced by the public from the public road leading to Chawton Park Farmhouse, the bridleway leading west from the farmhouse up the valley, and a bridleway at the eastern end of the Site which leading north from the road through woodland up the valley side.

From the bridleway, which is obviously much used, the view down the valley leading to the Grade II listed Chawton Park Farmhouse and associated farm buildings is one of great natural beauty, historical resonance and tranquillity (in its widest sense). It is not spoilt by any modern agricultural buildings visible at Chawton Park Farm. The scene is framed by the woodland on the valley side to the south and the strip of woodland adjoining the northern side of the bridleway. Views into the fields to the north through the strip of woodland are limited, but the rising valley side, with its own tranquillity, contributes to the overall beauty of this landscape and to its strong feeling of enclosure and seclusion. This bridleway provides an outstanding countryside experience.

From the public road and the bridleway leading northwards at the eastern end of the site there are views of an unspoilt valley which, if not to the same degree as those from the main bridleway, have a clear sense of enclosure and seclusion.

**Accordingly, taking account of**

* **the distinctive character of this undeveloped valley of great natural beauty, with its strong historic resonance and tranquillity,**
* **the high quality of the public experience of this landscape, especially from the bridleway running in the valley bottom, and**
* **the significant contribution to the landscape character areas identified in HILCA and EHLCA**

**CPRE Hampshire considers the Site has demonstrable attributes which raises it above the ordinary such that it is a "valued landscape" to which NPPF paragraph 170(a) applies.**

Clearly, allocation of the Site for housing would destroy its peaceful rural character and tranquillity by introducing visually intrusive development, with accompanying lighting and noise, up the valley sides, ruining the outstanding public experience of this landscape from the bridleway on the valley floor. This high quality countryside experience would no longer be available to residents of nearby Alton.

**Appendix B - Land east of the A31 at Neatham Down, Alton**

Land east of the A31 at Neatham Down, Alton ("the Site") is being considered for a large development site of 600 dwellings

CPRE Hampshire has now had the opportunity to make an assessment of this area in the context of a "valued" landscape on which development is restricted in accordance with national guidance. This assessment has regard to:

* Hampshire Integrated Landscape Character Assessment ("HILCA")
* East Hampshire Landscape Character Assessment ("EHLCA)
* a study of criteria used by Inspectors on appeal in deciding whether appeal sites are "valued" landscapes
* our own observations

**Assessment of landscape character and physical distinctiveness**

The area being considered is north of Neatham Down and Golden Chair Farm, some 1.5 kilometres from the centre of Alton. The Site extends north westwards for a distance of some 600 metres. It is within an open downland part of LCA 3f - Wey Valley in HILCA, and is a chalk outlier on the western edge of LCA 6C - Worldham Greensand Terrace in EHCLA.

The Site is within a landscape to the east of the A31 consisting of a tract of chalk outliers extending over some 2.5 kilometres running north east to south west which form the western edge of the Worldham Greensand Terrace LCA and the eastern side of the Wey Valley opposite the town of Alton. These outliers include Copt Hill and Neatham Down, extending over to the west of the A31 at Windmill Hill.

The landscape consists of large fields of mainly arable land bounded by hedgerows with small areas of woodland. It is very open and rolling landscape with long vistas across Alton to the elevated chalk plateau which rises steeply behind the town and runs parallel along the opposite side of the Wey Valley, and long vistas to the south east and south towards the South Downs National park at East Worldham and Selborne.

The A31 runs north east/south west between the chalk outliers, with the B3004 (Cakers Lane) to the south of Neatham Down leading eastwards away from the A31 to East Worldham and Kingsley. To the north of the B3004 the Hangers Way trail also leads eastwards from the A31 around the lower part of the southern slope of Neatham Down to East Worldham. A footpath runs north west from East Worldham across the eastern slope of Neatham Down to Copt Hill and then to the A31.

In a field immediately adjacent to B3004, on the northern side, is a solar farm.

This landscape is one of great natural beauty and is essentially peaceful and tranquil, little disturbed by the A31 or the town of Alton which are largely hidden by hedgerows and woodland. It is entirely undeveloped, other than the solar farm mentioned

This tract of landscape is within the Wooded Downland Area of Special Landscape Quality as proposed in a Report by RPS Watson to East Hampshire District Council dated 8 December 1994, based on its scarcity value, scenic quality, unspoilt character and sense of place. This assessment is as valid today as it was in 1994

**Assessment of public experience of the landscape**

This open tract of landscape is experienced by the public from the A3 (mainly in winter when the hedgerows lining the road are devoid of leaves), from Cakers Lane, form the Hangers Way, from the footpath leading to Copt Hill, and across the A31 from public vantage points in Alton, notably Windmill Hill .

Views are drawn to the chalk outliers of Neatham Down, Windmill Hill and Copt Hill (where visible), but the arable fields and hedgerows leading up to the outliers are very much part of the overall impact of natural beauty. Wide open views as described above are experienced from parts of the Hangers Way and the footpath leading to Copt Hill.

The landscape provides a high degree of tranquillity (in its widest sense) despite the presence of the A31 and the solar farm north of Cakers Lane. It has a sense of place which is quite separate from that of the town of Alton, from which in large part it is separated by the A31.

*The Site itself is visible from the footpath leading to Copt Hill which borders two sides of the site.*

**Accordingly, taking account of**

* **the scenic quality and unspoilt character of this undeveloped tract of landscape of great natural beauty, with its open views and strong sense of tranquillity,**
* **the high quality of the public experience of this landscape,**
* **the significant contribution to the landscape character areas identified in HILCA and EHLCA**

**CPRE Hampshire considers the Site forms part of a tract of landscape which has demonstrable attributes which raises it above the ordinary, such that it is a "valued landscape" to which NPPF paragraph 170(a) applies.**

Allocation of the Site for housing would bring development over the A31 into a tract of landscape which is undeveloped and separate from the town of Alton, impinging on its natural beauty and tranquillity by introducing visually intrusive development, with accompanying lighting and noise. This would set a

precedent for further development on the eastern side of the A31 which would potentially destroy this "valued landscape".

**Appendix C - Land South of Winchester Road, Four Marks**

Land west of Four Marks ("the Site") is being considered for a settlement of 600 dwellings

CPRE Hampshire has now had the opportunity to make an assessment of this area in the context of a "valued" landscape on which development is restricted in accordance with national guidance. This assessment has regard to:

* Hampshire Integrated Landscape Character Assessment ("HILCA")
* East Hampshire Landscape Character Assessment ("EHLCA)
* a study of criteria used by Inspectors on appeal in deciding whether appeal sites are "valued" landscapes
* our own observations

**Assessment of landscape character and physical distinctiveness**

The area being considered is [*on the southern side of the A31 as it approaches Four Marks from the south west*]. It is at the eastern edge of LCA 7d - Bighton and Bramdean Downs in HILCA, and the western edge of LCA 2B - Four Marks Clay Plateau in EHCLA.

The Site is on land which rises to the western edge of the built up area of Four Marks. It is within open chalk downland, level at the upper end where it joins Barn Lane, but then on a gradual slope which leads on down to Horse Land and Manor Farm. It is open arable land.

From the Site there are very fine long distance views to Cheesefoot Head and the Winchester Science Centre, both within the South Downs National Park.

The A31 runs along the northern boundary with Brislands Lane, a rural road, to the southern boundary. It is bounded to the north and north west by part of Barn Lane track and a Byway Open to All Traffic (BOAT) track.

The Site is part of tract of landscape running between North Street and Four Marks consisting of a valley of chalk downland rising some 70 metres each side. The A31 is at the bottom 100 metre contour, rising sharply as it approaches Four Marks, with the Watercress Line some 300 metres to the north. This valley is of considerable natural beauty. It is entirely undeveloped beyond the two transport corridors.

This landscape is within the Downland with Woodland Area of Special Landscape Quality as proposed in a Report by RPS Watson to East Hampshire District Council dated 8 December 1994, based on its scarcity value, scenic quality, unspoilt character and sense of place. This assessment is as valid today as it was in 1994. It is within area 2b.7 (Medium Landscape Capacity) in the East Hampshire District Landscape Capacity Study

**Assessment of public experience of the landscape**

This open tract of landscape is experienced by the public from the A31 (mainly in winter when the hedgerows lining the road are devoid of leaves) and the Watercress Line, from Horse Lane, from Barn Lane and from the BOAT referred to (again mainly in winter when the hedgerows are devoid of leave)

For those many members of the public travelling on the A31 and Watercress Line there is a very real sense of being within a valley forming part of a large tract of open countryside, all of considerable natural beauty. The built up area of Four Marks, beyond the crest of the hill, is not visible.

From Barn Lane and the BOAT the public can experience the very fine long distance views to the west. From the A31 and Horse Lane it is a view of open arable downland leading up to woodland at the summit. The footpath between Ropley Stoke and Brisland Lane runs through tranquil countryside.

The landscape provides a high degree of tranquillity (in its widest sense) despite the presence of the A31 and the Watercress Line. It has a sense of place which is quite separate from that of the settlement of Four Marks, where development is largely beyond the summit of the hill.

**Accordingly, taking account of**

* **the scenic quality and unspoilt character of this undeveloped tract of landscape of considerable natural beauty, with its long distance and open views and sense of tranquillity,**
* **the quality of the public experience of this landscape,**
* **the contribution to the landscape character areas identified in HILCA and EHLCA**

**CPRE Hampshire considers the Site forms part of a tract of landscape which has demonstrable attributes which raises it above the ordinary, such that it is a "valued landscape" to which NPPF 2019 paragraph 170(a) applies.**

Allocation of the Site for housing would bring development over the A31 into a tract of landscape which is undeveloped and separate from the town of Alton, impinging on its natural beauty and tranquillity by introducing visually intrusive development, with accompanying lighting and noise. This would set a precedent for further development on the eastern side of the A31 which would potentially destroy this Valued Landscape.

**Appendix D - Land at Northbrook Park, Bentley Parish**

Land at Northbrook Park (the Site") is proposed to be allocated for a new settlement in the Draft East Hampshire District Local Plan.

CPRE Hampshire has now had the opportunity to make an assessment of the Site in the context of a "valued" landscape on which development is restricted in accordance with national guidance. This assessment has regard to:

* Hampshire Integrated Landscape Character Assessment ("HILCA")
* East Hampshire Landscape Character Assessment ("EHLCA)
* a study of criteria used by Inspectors on appeal in deciding whether appeal sites are "valued" landscapes
* our own observations

**Assessment of landscape character and physical distinctiveness**

Northbrook Park is situated about 1.65 kilometres to the east of the current settlement boundary of the village of Bentley. The proposed Site extends to the north and south of the A31. It is within the north eastern part of LCA 3f - Wey Valley in HILCA and LCA 4B - Northern Wey Valley in EHLCA. The Wey Valley is a broad valley with gently rising valley sides through which the River Wey flows. It is characterised by a distinct flat valley floor with permanent pasture and water meadows within the flood plain extending over the river Wey. Woodland is also a feature of the valley floor, often lining the river. Willow trees are characteristic along the river banks.

The setting of the valley is enhanced by the wooded slopes of the Alice Holt Forest to the south and the rising, largely wooded, downs to the north.

Paragraph 4B.20 of the EHLCA states that the overall management objective for the LCA is "to conserve the tranquil, natural character of the Northern Wey Valley, and the individual identity of the small villages set on the gravel terrace above the floodplain. The valley should provide an open rural landscape between the towns of Alton and Farnham. The character of the enclosing valley sides, particularly the downland to the north of the Wey, which form the backdrop to the valley, should also be conserved.”

As well as the undoubted attraction of the unspoiled chalk stream valley, there are many historical features and buildings within the Wey Valley, including a number of large and historic houses at points along the northern side of the valley and built to look south over the River Wey. These include within the Bentley Parish, Marsh House, Marelands, Jenkyn Place, Coldrey and Northbrook House itself, which is Grade II Listed

and registered in the Hampshire Register of Historic Parks and Gardens. Although today often separated from the river by the A31, they form part of the historic landscape.

The Valley has historically been an important transport corridor and is traversed by the main A31 road and the Alton to Waterloo railway line. This landscape is therefore appreciated and valued by more people than just the local residents.

In one of his famous Rural Rides, the most famous local inhabitant, the reformer, writer and MP William Cobbett (1763-1835), born and raised in Farnham, includes the following: “The vale between Alton and Farnham is the finest ten miles in England. Here is a river with fine meadows on each side of it, and with rising grounds having some hop-gardens and some pretty woods”. Gilbert White, Selborne resident and naturalist, also wrote in his journals about the landscape in admiring terms.

Within the Site the northern valley side leading up from the A31 is cloaked by medium sized arable fields, leading beyond the Site to woodland reaching to the skyline. There are a number of buildings, some modern, around Northbrook House. To the south, the Site includes the River Wey and its adjoining pasture land and water meadows, leading southwards into woodland, again reaching to the skyline. This woodland is the northern boundary of Alice Holt Forest, which is within the South Downs National Park (SDNP), so that the Site is in the setting of the national park.

Apart from one modern building adjoining the eastern boundary of the Site, in use as an equestrian business, the area to the south of the A31 is a well preserved landscape of a meandering river and adjoining woodland, pasture and water meadows. It has a strong rural and physically distinctive character, with an intense sense of the history and the ecology of water meadows and related pasture land. It is fully representative of the tract of this landscape of great natural beauty which stretches the length of the Wey Valley either side of the river. It is shielded from the A31 by a bank of trees along the road. Although today separated by the A31, we see Northbrook House and its parkland garden (Grade II listed and registered in the Hampshire Register of Historic Parks and Gardens) as forming part of this distinctive landscape.

This tract of landscape to the south of the A31 is within the River Valley Area of Special Landscape Quality as proposed in a Report by RPS Watson to East Hampshire District Council dated 8 December 1994, based on its scarcity value, scenic quality, unspoilt character and sense of place. This assessment is as valid today as it was in 1994. It is also within an area of Low Landscape Capacity in the East Hampshire Landscape Capacity Study.

**Assessment of public experience of the landscape**

From points where roads and rights of way cross the River Wey, there are extensive views of the distinctive and historic riverside landscape to east and west, and especially from the footpath leading east from Turks

Mill as it rises to pass under the railway into the SDNP. The footpath itself, following the river, has great charm, sense of history and tranquillity (in its widest sense), despite the noise from the A31. The roof of Northbrook House is visible at the eastern end, even in summer, making the connection with the historic great houses along the river valley which overlook the river.

In summer there are occasional views into this landscape through the trees lining the A31 and the railway line. In other seasons the views in to this distinctive landscape are more extensive.

**Accordingly, taking account of**

* **the distinctive and historic landscape, of great natural beauty, adjoining the River Wey**
* **the contribution of the public experience of this landscape from publics right of way, the A31 and the railway line, and**
* **the important contribution of the Site to the tract of valley landscape identified in LCA 3f - Wey Valley in HILCA and LCA 4b - Northern Wey Valley in EHLCA,**
* **the close proximity to the South Downs National Park**

**CPRE Hampshire considers that the part of the Site which is to the south of the A31, incorporating also the listed Northbrook House and its registered historic park and garden to the north of the A31, is situated within a landscape stretching from Farnham to Alton along the River Wey which has demonstrable attributes which raises it above the ordinary, such that it is a "valued landscape" to which NPPF paragraph 170(a) applies.**

Clearly, use of that part of the Site for employment buildings would destroy the continuity of this valley landscape extending from Farnham to Bentley along the River Wey, as well as that part of it within the Site. The public experience of this distinctive and historic landscape of great beauty would be much diminished.

The relative tranquillity and intrinsically dark landscape to be experienced within this part of the continuous tract of valley landscape would be the destroyed by appearance of large buildings, traffic and lighting