
Appeal Decision

Hearing held on 25 November 2025

Site visit made on 26 November 2025

by Andrew Smith BA (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 15 December 2025

Appeal Ref: APP/Y9507/W/25/3367752

Hockley Golf Club, Winchester Road, Twyford, Hampshire SO21 1PL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mr Chris Kilgannon on behalf of Hockley Golf Club Limited against the decision of South Downs National Park Authority.
 - The application Ref is SDNP/24/02686/FUL.
 - The development proposed is a sustainable irrigation system, including water storage pond; and enhancement to driving range practice facility.
-

Decision

1. The appeal is allowed and planning permission is granted for the development of a sustainable irrigation system, including water storage pond; and enhancement to driving range practice facility at Hockley Golf Club, Winchester Road, Twyford, Hampshire SO21 1PL in accordance with the terms of the application, Ref SDNP/24/02686/FUL, subject to the conditions set out in the attached schedule.

Preliminary Matters

2. An amendment to the proposed sustainable irrigation system has been forthcoming at appeal stage with subterranean pipework, which had comprised a part of the original drainage scheme, omitted. This change has been motivated by a desire not to require an abstraction license from the Environment Agency (the EA) via a regime that sits outside of the planning process. As such, a revised Sustainable Drainage Layout¹ supported by a Technical Note² has been submitted alongside written addenda to the appellant's 'Appeal Statement' and 'Hydrogeological Appraisal and Water Features Survey'. These documents ensure the provision of up-to-date and consistent information pertaining to water balance modelling and water use. As the amendment to the drainage scheme is somewhat minor and related to subterranean works only, I am content that no party is prejudiced by me accepting this suite of revised/additional information for determination purposes.
3. It is evident that a new Local Plan is emerging, although this is at an early stage with submission for examination yet to occur. Therefore, the emerging policies of the new Local Plan attract very limited weight currently. I shall determine the appeal on this basis.

¹ Rev 1, dated November 2023

² Technical Note – Evidence on Water Balance Modelling and Water Use at Hockley Golf Club

4. The statutory purposes of National Parks are: conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas designated; and promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public. Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 amends the duty on relevant authorities in respect of their functions which affect land in National Parks and other protected landscapes. Relevant authorities must now 'seek to further' the statutory purposes of National Parks. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes. I shall be mindful of the amended duty in my determination of this appeal.
5. It is common ground between the main parties that the scheme does not constitute major development for the purposes of paragraphs 190 and 191 of the National Planning Policy Framework (December 2024) (the Framework). I have no reason to take a different stance and shall consider the appeal on this basis.
6. The National Park Authority's (the NPA's) second reason for refusing planning permission refers to insufficient information to satisfactorily demonstrate that the proposal would not have an adverse effect upon ground water resources as a result of capturing water that would otherwise infiltrate into the ground and recharge the chalk aquifer. However, following appeal stage submissions from the EA that offer no objections to the scheme, the NPA has confirmed it no longer wishes to defend its second refusal reason. I shall formulate the appeal's Main Issue accordingly.

Main Issue

7. The effect of the proposal upon the landscape character and scenic beauty of the South Downs National Park (SDNP), including consideration of the proposal's effect upon natural processes and ecosystem services.

Reasons

Landscape character - baseline

8. The appeal site forms a part of Hockley Golf Club and is comprised of chalk downland typified by the presence of thin soils located above a highly permeable chalk bedrock. The site exhibits a sloped and simple topography, gradually rising from west to east, with its lower slopes typically closely mown consistent with driving range activities. Meanwhile, its upper slopes, also grassed, are less tended to and exhibit a more untouched and agricultural appearance consistent with periodic grazing by livestock. Buffers of established planting tend to demark the site's perimeter, including an area of woodland to the north and a line of mature trees to the west which aligns the B3335 road.
9. In accordance with the South Downs Landscape Character Assessment (October 2020), the site falls within the Open Downland Landscape Character Type and, more specifically, the East Winchester Open Downs Landscape Character Area (the EWOPLCA). The key characteristics of the EWOPLCA include: an open rolling upland chalk landscape of rolling downs; a domination of large 18th and 19th century fields of arable and pasture, bounded by sparse thorn hedgerows to create a very open landscape; occasional areas of species-rich unimproved chalk grassland; occasional scrub and woodland on steeper slopes providing visual texture in the landscape; and a strong sense of remoteness and tranquillity.

10. The site is positioned to the western edge of both the EWOPLCA and the SDNP taken as a whole. As a consequence, it is located proximate to the M3 motorway corridor which detracts from any possible strong sense of tranquillity or remoteness. It is also the case that the western portion of the site does not comprise a very open landscape. It is instead well-enclosed, in-part owing to its comparatively low land level and a prevalence of mature planting to its southern, western, and northern sides. These features heavily constrain openness as well as visibility.
11. At a local level, my attention, at the Hearing, was drawn to a Landscape Character Assessment for the parish of Twyford, which is referenced in the supporting text to Policy LHE2 of the Twyford Neighbourhood Plan (February 2022) (the NP). I am led to understand that this document draws a distinction between areas of lower valley proximate to the River Itchen and areas of downland higher up. In this context, whichever the specific landscape character area(s) at play, it is fair to observe the site to provide a transitional landscape whereby its lower-lying and well-enclosed western portion offers an observable contrast with open and elevated rolling landform to the east that is visible from a range of afar vantage points.
12. Moreover, even whilst acknowledging the influence of the M3 and the aforementioned makeup of its western part, the site, in overall terms, exhibits a landscape character that is broadly reflective of the typical characteristics of the EWOPLCA. Indeed, a simple rolling landform and chalk grassland composition are readily distinguishable attributes that offer a meaningful contribution to the landscape character of the wider chalk downland landscape within which the site falls. Thus, most particularly when considered in the context of the SDNP designation at play, the site can be rightfully thought to offer high value in landscape character terms.

The proposed landform changes – landscape and visual effects

13. The proposal would involve the importation to the site of up to 130,000 cubic metres of inert soils. This material would be used to manipulate the site's landform in conjunction with the creation of a water storage pond (the pond) as the centrepiece of a newly planned sustainable irrigation system. The pond would occupy a roughly central part of the site so as to be situated eastward of, and thus above, the site's lower slopes.
14. Concerns have been raised that the landform changes intended, to involve levels rises as high as four metres, would appear highly manipulated and overtly engineered so as to fundamentally alter the character of the landscape. However, the cross-sectional plans submitted indicate that land level changes would, for the most part, be considerably less than four metres. Further, subtle alterations to site gradients are typically illustrated. It is also noteworthy that intended groundworks would be set away from the site's boundaries so as to assist in minimising their anticipated perceptibility.
15. The suggestion has been made that the pond and its associated bunding would represent an incongruous feature in the landscape. This is not least due to a general absence in the area of surface water owing to the porosity of chalk bedrock such that water is usually located below ground. As was set out at the Hearing, the precise design of the pond's bunding has been led, to at least some extent, by a desire to avoid the creation of a raised and overtly visible chalk edge to its upper

(eastern) side. I see logic in this assertion and find that the proposed contours of the remodelled landform would act to ensure that the singular, albeit sizeable, new pond in question comprises a discreet addition – consistent with my viewpoint analysis below. Accordingly, it is my judgement that the intended landform alterations, when considered collectively and in physical terms, would not necessitate a fundamental alteration to the character of the landscape. This is notwithstanding unavoidable short term impacts during construction and the subsequent reestablishment of vegetation cover.

16. I note here that, as confirmed at the Hearing and consistent with the submitted plans, it is not the intention for the pond to be fenced. Indeed, even though a part of the site is (and shall be) seasonally grazed, there is no clear reason to suspect that the erection of permanent fencing would be an inevitable outcome of the scheme.
17. As regards planned driving range enhancements, it is noteworthy that the site already operates as a driving range with associated paraphernalia and designated short game facilities already in place. The planned improvement works would not, to any material degree, extend the range. They would instead be centred upon the formation of a series of new driving range/short game greens as well as a new grass tee. Even where envisaged to be positioned to central areas of the site's lower slopes, such enhancements would be targeted and have minimal implications in landscape or visual terms. This finding similarly applies to the anticipated loss from the central part of the site of a short extent of especially sparse and fragmented hedgerow.
18. Representative viewpoint assessment is contained within, and comprises an integral part of, the submitted Landscape and Visual Impact Assessment (June 2024) (the LVIA). Major adverse visual effects are predicted and acknowledged during the construction phase from specific vantage points. These include along a relatively short stretch of a footpath³ that aligns the western end of the northern edge of the site, and locations along Hurdle Way, which encompasses high ground to the southwest at distance from the site.
19. Further, the LVIA identifies a series of moderate or slight adverse visual effects during the construction phase from various other locations to the west and southwest of the site that typically comprise part of a wider public right of way network that I understand to be well used. By virtue of my site inspection (which included a northbound journey along the M3 as a car passenger) I was able to obtain a clear understanding of the extent and distances of available views as well as the composition of existing tree cover and its fairly anticipated implications for views (now and in the future). Accordingly, I find the LVIA to be broadly representative of the scheme's fairly envisaged initial visual effects.
20. Nevertheless, as is inevitable and also reflected in the LVIA, such effects would reduce overtime. This would be most particularly as a consequence of ground cover and other new planting establishing. Whilst I stop short of identifying any slight beneficial outcome overtime, it is fair to assert that a neutral visual effect would ultimately materialise from the vast majority of viewpoints assessed via the LVIA. I note here that new planting to the site's perimeter would comprise part of a

³ Public Right of Way 234:15

seemingly realistic and logical Landscape and Ecological Strategy Plan⁴ that incorporates the reinforcement of proportionate and non-excessive planted buffers.

21. For the avoidance of doubt, especially in the context of groundworks being set in their entirety beneath the ridgeline that closely relates to the eastern boundary of the site, the proposed landform alterations and associated water storage pond would, following their full establishment, be largely imperceptible in available views at distance from the west/southwest. Corroboration of this has been assisted by computer generated imagery submitted at appeal stage, which includes predicted images from a specified Hurdle Way viewpoint⁵ at one and ten years post-implementation.
22. At the Hearing, an interested party raised concerns in landscape/visual terms related to site access being reinstated at the point of an existing dropped kerb crossover off the B3335. Such works would necessitate the removal of multiple trees, as is acknowledged via the Arboricultural Impact Appraisal and Method Statement (May 2024)⁶. However, no especially significant or valuable specimen is intended to be removed. Further, whilst ground excavation to ensure an appropriate access gradient would be necessitated, no-dig construction techniques are to be utilised within the root protection areas of trees earmarked for retention. On this basis, following inspection, I am satisfied that the reinstatement of the access would have minor implications for tree cover along the site's western boundary and would not promote the availability of open and unhindered views across the site from the B3335.
23. Even so, from the short stretch of footpath that is positioned to the site's northern edge, adverse visual effects could not be fully mitigated even in the longer term. This is owing to the proximate nature of these views and the manner in which the intended raised levels would alter topography, the experience of the horizon in eastward views, and the perceptibility of the site's southern boundary. Even so, it must be noted that views beyond this southern boundary are already of a constrained nature due to established vegetation and the manner in which the land level beyond drops away. Therefore, it is my judgement that permanent adverse visual effects of a minor degree would ensue for users of Public Right of Way 234:15.

Natural processes and ecosystem services

24. Concerns have been raised with respect to the depth of soil proposed and the potential for natural processes to be impacted, especially in a general location typified by thin soils and an existence of calcareous grassland. Indeed, the NPA has suggested that the interaction between thin soils and the chalk bedrock beneath (which creates calcareous conditions) would be disconnected.
25. A Biodiversity Net Gain Assessment (September 2024) has been produced, which incorporates a comprehensive review of baseline conditions at the site. It can be seen that, to almost all areas situated outside of the portion of the site that accommodates driving range activities, neutral grassland habitat of moderate condition and medium distinctiveness has been identified. It was indicated at the Hearing that, whilst some indicators of calcareous conditions (such as relevant

⁴ Ref: J00842-GA-01F

⁵ Viewpoint 17, as defined in the LVIA

⁶ Ref: 19063-AIA2-CA

species) would have been identifiable during survey work, an overall neutral classification was – and remains – fairly applicable. There is no clear evidence before me to indicate a situation otherwise. I thus have no obvious reason to doubt the assertion made that the scheme would necessitate no losses of unimproved calcareous grassland.

26. It is also apparent from written evidence and discussion at the Hearing that measures are intended to be taken to promote the establishment of conditions capable of supporting calcareous grassland. For example, it has been indicated that newly restored areas would be reinstated using stripped turves/soil overseeded using hay cut and collected from calcareous grassland found elsewhere within the wider golf course (where a SINC⁷ grassland designation is in place) or in accordance with a suitable prescribed mix. A commitment has also been sounded to giving careful thought to the layering of imported material to ensure the provision of chalk rubble (or similar) close to the surface in order to mimic the proximity of bedrock and to assist with raising the pH of the soil to that consistent with calcareous conditions.
27. It is the intention to import inert soils to the site, which would comprise clean as-dug soils from local construction sites. Such soils would be subject to testing to ensure their suitability and inert nature, and to obtain assurances that the importation/re-use of soils would not constitute the disposal of waste. This would be done under the parameters of a Materials Management Plan (MMP) capable of being secured (and verified post-construction) via planning condition. Any such MMP would play an important role in ensuring the robust implementation of procedures for soil assessment (including with regard to pH values) and the management, recording and tracking of imported soils. It would also be capable of securing a methodology for the layering of imported materials.
28. It is of relevance also that a Habitat Management and Monitoring Plan (HMMP) to accord with a Biodiversity Gain Plan, to be produced in accordance with relevant statutory requirements as well as with a submitted Biodiversity Net Gain Assessment (September 2024), is envisaged to secure detailed management measures to maintain habitat (including existing and proposed areas of neutral grassland) for a period of 30 years.
29. To my mind, in view of the aforementioned control/mitigation/management mechanisms securable via condition, there is no clear reason to suspect a material deterioration of established grassland habitats at the site as a consequence of the planned imported soils and associated restoration works. This finding is applicable even beyond the expiry of the aforementioned 30 year management period.
30. For the avoidance of doubt, it is not my view that an unduly complicated or intricate mosaic of on-site habitats would be created. Further, whilst newly imported soils would inevitably have an influence upon infiltration processes, the MMP would play an important role in securing rigorous testing procedures to ensure no undue risk of an adverse impact upon water quality. Compliance with Policy SD17 (Protection of the Water Environment) of the LP is thus satisfactorily achieved.
31. Policy SD2 of the South Downs Local Plan (July 2019) (the LP) relates to Ecosystem Services, which are benefits that people and society get from the natural environment. The policy indicates that development proposals will be

⁷ Site of Importance for Nature Conservation

permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services.

32. The Council has suggested non-compliance with specific provisions of Policy SD2, in the contexts of: the protection/provision of natural habitats; the conservation of water resources and improvement of water quality; the ability to store carbon; the conservation and enhancement of soils; and the reduction of pollution levels. However, in view of my above assessments, I do not identify material conflict with any of these specific policy provisions. Moreover, any suggestion that carbon releases associated with soil stripping would not be suitably offset by new planting has not been suitably substantiated. It is also noteworthy that, in direct accordance with another provision of the policy, improved resilience to climate change is a key driver of the project before me for determination.

Conclusion on the Main Issue

33. As identified in my reasoning above, I have identified a locational range of sometimes major visual effects during the construction phase as well as a permanent minor adverse visual effect for users of Public Right of Way 234:15. However, by their very nature, effects during the construction phase would be time limited. Further, the identifiable permanent minor adverse visual effect would apply to merely a short section of the aforementioned footpath.
34. Thus, whilst bearing in mind my above identification of no fundamental alteration to the character of the landscape as well as the favourable nature of my above findings with specific regard to natural processes and ecosystems services in lieu of mitigation measures to be secured via condition, it is my view that the harm fairly attributable to the proposed development's effect upon the landscape character and scenic beauty of the SDNP is of a residual and minor nature. The implications of this harm shall be explored within my Planning Balance below.

Other Matters

Habitat sites

35. The site lies proximate to the River Itchen Special Area of Conservation (the SAC). Therefore, I must have regard to The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitat Regulations). These regulations require that, where the project is likely to have a significant effect on (a) European site(s) (either alone or in combination with other plans or projects), the competent authority must make an appropriate assessment of the implications of the project in view of relevant conservation objectives. For the purposes of this appeal, I am the competent authority.
36. The SAC comprises chalk stream and river, fen meadow, flood pasture, wet woodlands, side channels, runnels and ditches associated with the main river and meadows. It is designated for both habitats (including river habitat and floating vegetation often dominated by water-crowfoot) and species (including Southern damselfly and Bullhead fish). Thus, any potential adverse effect on water flow and quality is important to either rule out or mitigate against.
37. In view of the characteristics of the proposed development, likely significant effects would occur on the qualifying features of the SAC as a consequence of potential nutrient loading. However, the MMP and associated verification report to be

secured via condition would ensure an effective procedure for soil testing so as to guard against any potential of adding nutrients to the catchment. Natural England, in its role as the relevant statutory nature conservation body, has, at appeal stage, confirmed its acceptance to this approach.

38. For the above reasons, the proposal would mitigate its likely significant effect upon the SAC. I am thus satisfied that the development would not adversely affect the integrity of the SAC. The scheme therefore accords with Policy SD9 of the LP and the natural environment provisions of the Framework, in so far as these policies guard against any adverse effect on the integrity of any international site.

Archaeology and heritage assets

39. The scheme is supported by a detailed Archaeological Evaluation (March 2024) (the AE). As part of this, a total of 29 trenches were excavated – 24 of which contained archaeological features particularly concentrated to the eastern half of the site. The AE acknowledges the presence of Scheduled Monuments (SMs) within 500 metres of the site to the north and northeast. The proposal responds to the findings of the AE in the sense groundworks would not take place across the part of the site identified to be most sensitive – a northeastern section.
40. The Council's Archaeology Officer has confirmed that the work undertaken to date provides a good assessment of the site's archaeological potential and has accepted that it has been suitably demonstrated that the topographical settings of the SMs would not be substantially affected by the proposed groundworks. I agree with this position and do not identify harm to heritage significance. The presence of archaeological remains close to the surface has been noted by the Officer, hence potential vulnerability and a request for a further programme of archaeological investigation and recording to be secured via condition in the event the appeal be successful. Moreover, to ensure the archaeological interest of the site is suitably safeguarded and recorded as necessary, conditions to secure a Written Scheme of Investigation and the subsequent implementation of any mitigation works identified are reasonable and necessary to impose.
41. In terms of other designated heritage assets, I am satisfied that the site is sufficiently distanced from Twyford Conservation Area such that there would be no adverse effect upon its setting as a designated heritage asset. Similarly, whilst I am aware of listed buildings in the general vicinity of the site, including the Grade II* Listed Church of St Mary and the Grade II Listed Hockley Cottages, I am content that no losses of significance or special interest would result from development within their settings that would be focussed upon the establishment of a sustainable irrigation system and associated groundworks.

Surface water management and ground water resources

42. Surface water would be managed for the purposes of serving the new irrigation system. Whilst adjustments to site gradients would raise the potential for runoff to occur, it is the intention for this to be managed and stored within the confines of the appeal site prior to either being used for irrigation purposes or infiltrated to ground. The drainage strategy includes the installation of a lined interceptor trench across the driving range that would channel runoff to an existing lagoon in place to the site's northern edge, before being pumped uphill eastwards to the pond. To the western part of the site, runoff would be directed to a swale located adjacent to the

site's western boundary (which would be served by an infiltration trench beneath) and an access road soakaway.

43. It is noteworthy that the proposed volume of the pond has been informed by transient water balance modelling so as to estimate the likely yield of rainwater from the site. Having considered all related evidence before me and considered the calculated implications of subterranean pipework having been removed from the drainage strategy at appeal stage, I am satisfied that the pond is of commensurate size for the role intended for it. Further, it is reasonable to assert that potential lesser-engineered alternatives for improving rainwater capture at the golf club would be unable to collect a comparable volume of stored water for the purposes of irrigation (most particularly during summer months).
44. In view of the above, it has been demonstrated that a fit-for-purpose and proportionate approach for managing surface water at the site would be implemented in the event the appeal be successful. Indeed, the Lead Local Flood Authority has raised no objection and satisfactory compliance with Policy SD50 of the LP would be achieved in so far as it sets out that development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change.
45. Furthermore, on the basis that excess rainfall would be returned to the chalk aquifer via infiltration, there is no reason to suspect that the natural hydrological balance in existence would be disrupted by the scheme. This is most particularly on the basis that licensed groundwater abstraction is intended to be reduced in lieu of the enhanced rainwater capture envisaged. In addition, the absence of any objection from the EA offers a clear indication that the proposal would be fairly anticipated to have an acceptable effect upon groundwater resources – as is agreed by the main parties to this appeal.

Further Other Matters

46. It was acknowledged by the appellant at the Hearing that the proposal, which is principally centred upon the importation of a large quantity of inert soils to the site, is commercially driven with a financial element having influenced the scheme's precise makeup. However, this is not a reason in itself to resist the grant of planning permission. Moreover, it is my responsibility to consider the proposal that is before me upon its own individual planning merits.
47. I note here that Twyford Parish Council have requested highways-related contributions. However, on the basis that no material enlargement to the golf club's operational elements is intended and that the construction phase of development would necessarily be temporary, there is no clear justification to demonstrate that any such contribution would be necessary, fair, and reasonable. In this same context, neither would a Travel Plan (or similar document to seek to promote sustainable travel choices) be reasonable and necessary to secure via condition in the event the appeal be successful.

Planning Balance

48. I have found the proposal to cause a minor level of harm to the landscape character and scenic beauty of the SDNP. As set out in the Framework, great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. Whilst the scheme (when considered as a whole) would not

achieve conservation or enhancement in this regard, it does not automatically follow that planning permission ought to be refused. Instead, any justified benefits of the scheme require weighting against the identified harm. This is consistent with the approach endorsed by Policy SD1 of the LP.

49. In terms of the scheme's benefits, the proposal would promote the sustainable management of water resources at the golf club in direct response to the effects of climate change. Given the high level of water associated to the club's operations, this is an important environmental benefit. Indeed, the club's dependency upon potable water would be considerably reduced. The proposal would also bring with it economic and social benefits via protecting the longer term viability of the golf club (safeguarding existing jobs in the process) and offering an enhancement to its recreational facilities. The achievement of a minimum 10% biodiversity net gain is a further factor that weighs positively in the planning balance.
50. These benefits, when considered cumulatively, would be considerable and attract significant weight. To my mind, such benefits would be sufficient to outweigh the minor harm identifiable to the landscape and scenic beauty of the SDNP. This is even whilst acknowledging the duty to 'seek to further' the statutory purposes of National Parks, and the requirement of Policy SD1 to attach greater weight to the first of the two statutory National Park purposes (set out under my Preliminary Matters above) should conflict arise between them.
51. There is some degree of policy conflict with Policies SD4 and SD5 of the LP and Policy LHE2 of the NP in so far as these policies require development proposals to conserve and enhance landscape character and to take account of Twyford's landscape. However, there is identifiable compliance with a wide range of other development plan policies. These include policies that govern the principle of development outside of settlement boundaries – namely Policy SD25 of the LP and Policy SB2 of the NP. For the avoidance of doubt, I am satisfied that an essential need for a countryside location is applicable to the scheme, and that there is a proven need for the development (which I am content would comprise community infrastructure, when interpreted against the provisions of the LP) that cannot be met elsewhere.
52. As such, even though the development would not fully conserve the landscape character and scenic beauty of the SDNP, it is my judgment that the scheme accords with the development plan when read as a whole and relevant material considerations do not lead me to a decision otherwise.

Conditions

53. A list of draft planning conditions was worked upon by the parties in advance of the Hearing. Following further discussion at the event, I have considered the conditions against advice in the Framework and Planning Practice Guidance. As a result, I have made amendments to the list for consistency and clarity purposes. Pre-commencement conditions have only been applied where agreed to by the appellant and where necessary to guide initial works on site.
54. A condition setting out the approved plans is necessary in the interests of certainty. However, I have not imposed a condition requiring the completion of the development by any set point in time. This is in accordance with guidance

contained within the Planning Practice Guidance⁸ and the relevant tests for conditions set out at paragraph 57 of the Framework. Moreover, whilst the aim to control the longevity of works is acknowledged, the effective enforcement of any such condition would – to my mind – be unduly challenging owing to the range of external factors that can influence the implementation/progression of development. In any event, even in the absence of a condition controlling the precise timing of the development's completion, logic dictates that construction activities at the site shall necessarily have a finite duration.

55. A condition setting a maximum cubic meterage for inert non-waste soil importation is reasonable in the interests of appropriate soil management and ensuring implementation in full accordance with the development proposal and associated landscape strategy applied for. For the same reasons, conditions securing the facilitation of development in a phased manner in full accordance with the relevant Operational Layout Plan and associated text within the Planning Statement, and subsequent verification via plans to confirm the landform post-works, are reasonable and necessary to impose.
56. In the interests of environmental and ecological protection, including for the purposes of protecting the integrity of the SAC, conditions requiring the submission, implementation and verification of a MMP related to the soils to be imported to the site are reasonable to impose.
57. In the interests of protecting water resources, a Water Quality and Elevation Monitoring Programme to include confirmation of post-construction monitoring activities, is reasonable to secure via condition. Meanwhile, in the interests of guarding against flood risk and promoting the effective management of surface water, conditions requiring implementation in accordance with relevant submitted documents/plans as well as details of long term maintenance arrangements are reasonable to impose.
58. So as to protect highway safety and the general amenities of the area, a Construction Environmental Management Plan (CEMP) is reasonable to secure via condition. An element of this would confirm how vehicles (most particularly HGVs) would be routed to and from the site. As discussed at the Hearing, it is the preliminary intention that all loaded HGVs arrive at the site via the closest junction of the M3 and that most leave in the same manner. However, whilst it is not currently possible for the appellant to pinpoint the precise destinations from which sourced soils would be imported, it is envisaged that there would be potential for some unloaded vehicles to egress southwards via Twyford village where expedient to do so.
59. With respect to anticipated HGV movements, I acknowledge the highway/pedestrian safety concerns raised by interested parties and the existence of ongoing construction activities elsewhere in Twyford and its surrounding area. However, having explored routes through Twyford as part of my inspection, I have no clear reason to take issue with some residual HGV movements being directed through Twyford as a natural/logical consequence of the location(s) of soils to be imported. This stance is subject to suitable assurances/measures being put in place (via the CEMP) to ensure that HGV movements via Twyford are restricted as far as feasible and realistic to do so during the construction period.

⁸ Ref: Paragraph 005 Reference ID: 21a-005-20190723

60. In the interests of highway safety, a condition to ensure the southern access point to the site is reinstated/constructed prior to the importation of soils is reasonable. For the same reason, and to ensure adjacent trees to be retained are properly protected, a condition to secure full details of levels (related to excavation works necessitated), surfacing and related drainage arrangements, is necessary to impose. Also, in the interests of robust tree protection, a condition to secure implementation in accordance with Arboricultural details and associated protection measures is reasonable.
61. In the interests of ensuring the effective provision of ecological/biodiversity enhancements, conditions are reasonable and necessary that secure: compliance with specific measures set out in the Submitted Ecological Impact Assessment; the submission and implementation of a site-wide Landscape and Ecological Enhancement and Management Plan; the Biodiversity Gain Plan to be prepared in accordance with the Biodiversity Net Gain Assessment already submitted (I have referenced the latest version before me, which aligns with the approved version of the Landscape and Ecology Strategy Plan); the submission and implementation of a Habitat Management and Monitoring Plan; and a completion report verifying habitat enhancements.
62. To conserve dark night skies, a condition to guard against the installation of any permanent lighting is necessary. In the interests of ensuring the safe movement of aircraft, the submission and implementation of a Bird Hazard Management Plan is reasonable to secure prior to the pond becoming operational. This is owing to its potential to attract birds.

Conclusion

63. For the reasons given above, the appeal is allowed such that planning permission is hereby granted subject to conditions.

Andrew Smith

INSPECTOR

Schedule of Conditions

- 1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
- 2) The development hereby permitted shall be carried out in full accordance with the following approved plans: HGC-APP-01 (Site Location Plan); J00842-S-01 Rev B (Typical Sections 1 of 3); J00842-S-02 Rev B (Typical Sections 2 of 3); J00842-S-03 Rev B (Typical Sections 3 of 3); J00842-GA-01F (Landscape and Ecology Strategy Plan); OLP-01 W2 (Proposed Landform Operational Layout Plan); Sustainable Drainage Layout, Rev 1, dated November 2025; 196.0006.001 (Visibility Splays); 196.0006.003 (Internal track and B3335 access); 196.0006.004 (Swept Path).
- 3) No more than 130,000 cubic metres of inert non-waste soils shall be imported onto the site throughout the implementation of the development.
- 4) Prior to the commencement of development, a Materials Management Plan (MMP) shall be submitted to and approved in writing by the Local Planning Authority. The MMP shall set out details, objectives and measures to ensure that only appropriate sustainably re-used non-waste material (soils) are imported. These measures shall include:
 - a) A project description;
 - b) Material types and quantities, limited to the amount necessary pursuant to Condition 3, to include a methodology for the layering of materials on site;
 - c) Assessment criteria/process for how soils to be imported will be assessed for their suitability (including their pH values) and certainty for their intended use, without further processing (chemically, geotechnically), and proposed screening measures;
 - d) Procedure for the management, recording, and tracking of imported soils (including origin, excavation, contractual details, handling, storage and phasing of final placement on site);
 - e) Demonstration that importation is a re-use of soils and would not constitute the disposal of waste (in accordance with the 'CL:AIRE Definition of Waste: Development Industry Code of Practice.'
 - f) Review process during implementation by a suitably qualified person(s) registered with CL:AIRE Code of Practice;
 - g) Demonstration that imported soils shall not be a risk to human health or the environment;
 - h) Maintaining an up-to-date written record of the monitoring of the details pursuant to criterion (a) to (g) during implementation of the development, to be made available to the Local Planning Authority for inspection within 14 days of any request;
 - i) Requirement to produce a Verification Report by a suitably qualified person(s) post importation of the soils, auditing how the MMP has been met including documentary evidence.

The development shall, thereafter, be undertaken in full accordance with the MMP.

- 5) Within 3 months following the completion of the importation and placement of soils approved under the Materials Management Plan pursuant to Condition 4, the Verification Report (required by Condition 4(i)) shall be submitted to and approved in writing by the Local Planning Authority.

- 6) No development shall commence until a Water Quality and Elevation Monitoring Programme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include:
- a) Details of monitoring locations including, as a minimum, the new storage pond, existing lagoon and existing borehole;
 - b) Details of baseline monitoring;
 - c) Details of the parameters to be monitored, which shall include water elevations, nitrate, phosphate, ammonia, turbidity and suspended solids;
 - d) A monitoring frequency of quarterly sampling for a minimum period of two years following the completion of the new lagoon;
 - e) Provision for the submission of annual monitoring reports summarising results, interpretation and any exceedances.

The approved scheme shall be implemented in full and maintained for the duration of the monitoring period unless otherwise agreed in writing by the Local Planning Authority.

- 7) No development shall commence until an updated CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include:
- a) The anticipated number, frequency and types of vehicles used during construction and routing of vehicles;
 - b) How deliveries would be managed in terms of vehicles entering and leaving the site and timings;
 - c) Traffic management provisions;
 - d) The method of access and routing of vehicles;
 - e) The parking of vehicles by site operatives and visitors;
 - f) The loading and unloading areas of plant, materials and waste;
 - g) Location of temporary site buildings, compounds;
 - h) The storage of plant and materials;
 - i) Measures to control surface water run off;
 - j) Construction timings to avoid disturbance of protected species;
 - k) Dust suppression, mitigation and avoidance measures;
 - l) Noise and vibration reduction measures;
 - m) Details of site monitoring and logging of results;
 - n) Hours of operation during construction;
 - o) The erection and maintenance of any security hoarding;
 - p) The provision of wheel washing facilities;
 - q) A scheme for recycling/disposing of waste resulting from construction works;
 - r) Construction lighting and its operation;
 - s) A programme of and phasing of demolition (if any);
 - t) The arrangements for deliveries associated with all construction works.

The development shall, thereafter, be undertaken in full accordance with the approved CEMP.

- 8) Prior to the commencement of development, a site-wide Landscape and Ecological Enhancement and Management Plan, detailing the species and grassland mixes and management prescriptions for the retained, enhanced and newly created vegetation and habitats, planting around the pond, existing and new boundary hedging and trees shall be submitted to and approved in writing by the Local Planning Authority. The development shall, thereafter, be carried out and managed in full accordance with the approved details.

- 9) No development or any works of site preparation or enabling works shall take place until a Written Scheme of Investigation has been submitted to and approved in writing by the Local Planning Authority.
- 10) No development or any works of site preparation or enabling works shall take place within each phase until the applicant has implemented archaeological mitigation work(s) in full accordance with the approved Written Scheme of Investigation pursuant to Condition 9.
- 11) The Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Net Gain Assessment (referenced 20.0276.0002.F2, dated 12 September 2024), including its accompanying BNG Metric calculations, prepared by ECOSA Ltd.
- 12) Prior to the commencement of the development hereby permitted, a Habitat Management and Monitoring Plan (HMMP) shall be submitted to and approved in writing by the Local Planning Authority. The HMMP shall accord with the Biodiversity Gain Plan and include:
 - a) A non-technical summary;
 - b) The roles and responsibilities of the people or organisations delivering the HMMP;
 - c) The planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
 - d) The management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the first use of the development;
 - e) The monitoring methodology and frequency in respect of the created or enhanced habitat;
 - f) Provision for the identification, agreement and implementation of contingencies and/or remedial actions where the results from monitoring show that the conservation aims and objectives of the HMMP are not being met.

The created and/or enhanced habitat specified in the approved HMMP shall thereafter be managed, maintained and monitored in accordance with the approved HMMP.
- 13) Prior to the first use of the development hereby permitted, a completion report, evidencing the completed habitat enhancements set out in the approved HMMP, shall be submitted to and approved in writing by the Local Planning Authority.
- 14) Prior to the commencement of works for the B3335 access that is depicted upon approved plans J00842-GA-01E, 196.0006.001, and 196.0006.003, the following information shall be submitted to and approved in writing by the Local Planning Authority:
 - a) Existing and proposed topographical cross sections in a north-south direction through the access and existing ground levels either side of it;
 - b) Surfacing details;
 - c) Surface water drainage details.

The access shall, thereafter, be implemented in full accordance with the approved details.

- 15) Prior to the importation of soils, the approved access shall be constructed in accordance with approved plans J00842-GA-01E, 196.0006.001, 196.0006.003, the submitted Transport Assessment (December 2022), and the approved details pursuant to Condition 14. The access and its visibility splays shall, thereafter, be fully retained and maintained.
- 16) The development hereby permitted shall be undertaken in full accordance with the phased implementation detailed on approved plan 'Proposed Landform Operational Layout Plan OLP-01 W2' and section 3.3 'Facilitating the Development' of the submitted Planning Statement (dated June 2024).
- 17) Within three months following the completion of Phase 6 of the development (as identified on approved plan 'Proposed Landform Operational Layout Plan OLP-01 W2'), a topographical plan and cross sections detailing the new landform across the site and a comparison with the approved cross sections cited in Condition 2, shall be submitted to and approved in writing by the Local Planning Authority.
- 18) Prior to the first operation of the water storage pond hereby permitted, a Bird Hazard Management Plan (BHMP) shall be submitted to and approved in writing by the Local Planning Authority in consultation with Southampton Airport. The BHMP shall include details of monitoring of any standing water within the site, temporary or permanent. The BHMP shall be implemented as approved upon first operation of the water storage pond and shall remain in force for the life of the development. No subsequent alterations to the BHMP shall take place unless first submitted to and approved in writing by the Local Planning Authority in consultation with Southampton Airport.
- 19) The surface water drainage scheme shall be undertaken in full accordance with The Flood Risk Assessment and Detailed Sustainable Drainage Strategy (prepared by HK Hydrology Ltd, dated May 2024), updated Technical Note (received on 13 October 2025), and approved Sustainable Drainage Layout, Rev 1 (dated November 2025).
- 20) Details for the long term maintenance arrangements for the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority prior to the construction of the water storage pond hereby permitted. The submitted details shall include:
 - a) Maintenance schedules for each drainage feature, including type and ownership details;
 - b) Detailed inspection regimes and potential remedial works in relation to the pond and its supporting banks;
 - c) Details of decommissioning the pond if operation or the golf course ceases or irrigation is no longer required.
- 21) The development shall be implemented in full accordance with the submitted Arboricultural Impact Appraisal and Method Statement (prepared by Barrell Tree Consultancy, referenced 19063-AIA2-CA, dated 13 May 2024) and associated Protection Plan, referenced 19063-4.
- 22) The development shall be implemented in full accordance with the measures detailed in Section 5.0 "Assessment of Ecological Effects and Mitigation/Compensation/Enhancement measures" of the submitted Ecological

Impact Assessment (prepared by ECOSA Ltd, Revision 3, dated 7 June 2024).
This is with the exception of sub-section 5.4 (Habitats), to be alternatively controlled via Conditions 11, 12, and 13.

23) No permanent lighting shall be installed on the site, including the grass tees, short game practice area, and driving range target greens.

APPEARANCES

FOR THE APPELLANT

Matthew Reed KC	Counsel
Stuart Austin MSc MRTPI	IRUK Waste Planning & Consultancy
Paul Wynn BSc MBA	Major Projects Director, Hockley Golf Club
Jason Holmes BA (Hons) DipLA PG Cert CMLI	Principal Landscape Architect, Johns Associates
Matt Johns BSc (Hons) MSc CEnv MCIEEM FGS	Director, Johns Associates
David Walker MSc FGS IAH	H2Ogeo Ltd
Henry Kelly MSc C.WEM CIWEM	HK Hydrology
Mark Smith BA (Hons) MCIHT	Paul Basham Associates

FOR THE NATIONAL PARK AUTHORITY

Richard Ferguson	Development Management Lead
Ruth Childs	Landscape Officer

INTERESTED PARTIES

Susan Cook	Ward Councillor – Twyford & Colden Common
Chris Corcoran	Twyford Parish Council
Peter Dawson	President, Hockley Golf Club
Andrew Dunne	Club Captain, Hockley Golf Club
Tim Smith	Local resident and Hockley Golf Club member
Steve Pullen	Local resident
Tom Frost	Local resident

DOCUMENT SUBMITTED DURING THE HEARING

- A Extracts from a document produced by The Countryside Agency entitled 'South Downs National Park – The boundary and the reasoning for it'

DOCUMENTS SUBMITTED AFTER THE HEARING

- B Attendees list detailing qualifications, submitted via email by the appellant on 26 November 2025
- C Copy of Policy SD6 of the South Downs Local Plan, submitted via email by the NPA on 26 November 2025
- D Email from the NPA enclosing written comments from Southampton Airport dated 27 November 2025 that propose Bird Hazard Management Plan condition, submitted 1 December 2025
- E Email from Natural England in response to a request from the Inspector for written observations, submitted 4 December 2025