



DROXFORD PARISH COUNCIL

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Droxford Parish Council

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For Attention of Sarah Round
Principal Development Management Officer
Planning Department
South Downs National Park Authority

23rd January 2026

Dear Sarah

Re: Planning Application SDNP/25/04920/FUL – Change of use from agricultural field to golf course including creation of 4 holes, associated fairways and tees, with an irrigation pond in the south west corner of the field and works associated with the existing golf course including; reshaping of existing fairways and tees, translocating trees, with new chalk grassland and chalk scrapes over the whole site.

Thank you for consulting Droxford Parish Council on the above application. We have reviewed the submitted Planning Statement, Landscape Character and Visual Impact Assessment (LVIA), Transport Statement and other associated documents in detail and **wish to strongly object to the application.**

Whilst we support Corhampton Golf Club's ambition of improving the course and on-site biodiversity, the proposal is a major development with importation volumes on an industrial scale which are not necessary for the stated objectives, are beyond waste recovery and should be regarded as landfill.

The associated relentless HGV movements would be completely unacceptable for the rural road network and would pose a risk to other users of the public highway and the tranquillity of Droxford and other local villages.

The scheme conflicts with the objective of the South Downs National Park Authority to conserve and enhance the landscapes of the National Park and many of the Local Plan policies and should not be approved. The proposal results in benefits for a private members' club, with adverse impacts felt by the community, the National Park and those who use it.

Our objections are as follows:

1. This is a major development with importation volumes on an industrial scale.

1.1. The proposal estimates importation of 317,000m³ (un-capped) of inert soils which equates to approximately 475,000 tonnes of material¹.

¹ https://earthwise.bgs.ac.uk/index.php/0R/15/065_Appendix_4_-_Bulking_of_soils_%26_rocks_classification_descriptions

- 1.2. This will be the equivalent of about two years of output from the newly approved Hamble Airfield Quarry², one of Hampshire's largest sand and gravel quarries.
- 1.3. This demonstrates the application at Corhampton Golf Club would be industrial in scale and will be landscape changing with average land-raising of c.3m across the whole site, excluding the woodland regeneration areas, with mounding of more than 8 metres above existing levels, the height of a two-storey house.
- 1.4. This is inconsistent with the stated objectives of the South Downs National Park (SDPN) to conserve and enhance the landscape character and its scenic beauty.
- 1.5. The proposed development is not recognised as a 'Schedule 1' activity³ under the Environmental Impact Assessment (EIA) Regulation 6. Namely, Category 10 (Waste disposal installations of non-hazardous waste with a capacity exceeding 100 tonnes per day) and possibly Category 9 depending on type/source of soils/materials used for landscaping⁴ (see Appendix 1).

2. The volumes are not necessary; new holes can be created without them.

- 2.1. During a meeting with Corhampton Golf Club on 14th January 2026, at which they presented their proposals, they confirmed:
 - 2.1.1. The design brief to the contractor was to develop a proposal that would be cost neutral to the golf club.
 - 2.1.2. No alternative design proposals were created to show what could be accomplished by using either only on-site cut and fill with minimal topsoil for finishing the landscaping, or by significantly reducing the amount of inert imported material used in landscaping.
- 2.2. The proposals therefore fail to demonstrate that the industrial scale soil importation is necessary for creating four new golf holes, a lagoon and network of pond and swales.

3. The volumes proposed therefore must be treated as waste disposal not recovery.

- 3.1. The South East Waste Planning Advisory Group (SEWPAG), of which SDNP is a member, issued the 'Joint Position Statement: Permanent Deposit of Inert Waste on Land in the South East of England' (Nov 2019). This sets out the management control requirements on activities involving the permanent deposit of inert excavation waste on land and that the creation of features associated with mounding on golf courses should follow one of two approaches:
 - 3.1.1. Where material will be sourced from a construction site – clean inert excavation waste brought to site – this should be treated as recovery and supported by an Environment Agency (EA) Recovery Permit; or
 - 3.1.2. Where clean material is excavated on site of use and/or specifically sourced for the purpose of the development this should not require an EA permit but follow the 'CL:AIRE Definition of Waste Code of Practice' (DoWCoP).

² <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3355894>

³ Integrated Skills Limited's assessment dated J00600-sdnpa-3 10 Dec 25 - Planning submission

⁴ [What are Schedule 1 and Schedule 2 categories in EIA? - ExamChum](#)

3.2. Recovery Permit approach:

3.2.1. EA Guidance document ‘Waste recovery plans and deposit for recovery permits’ (2023) states:

3.2.1.1. “You must provide evidence to show that you:

3.2.1.1.1. will only use the amount of waste needed to carry out the function that would otherwise be provided by non-waste,

3.2.1.1.2. have considered alternative proposals that could use a smaller amount of waste to achieve the same function.”

3.2.2. Therefore, as this development proposal has not demonstrated it would only use the amount of waste needed to carry out the function that would otherwise be provided by non-waste, which must be the minimum amount, or considered alternative proposals that could use a smaller amount of waste, it is clear it should not be granted a recovery permit and therefore not be awarded planning permission.

3.3. DoWCoP approach:

3.3.1. DoWCoP states that four factors need to be evidenced for imported inert soils not to be classified as waste. Factor Four states:

3.3.1.1. “Materials should only be used in the quantities necessary for that use, and no more. The use of an excessive amount of material will indicate that it is being disposed of and is waste.”

3.3.2. Furthermore, DoWCoP requires a Materials Management Plan (MMP) to be developed to demonstrate compliance with the four factors and reinforces that:

3.3.2.1. “Projects must not use more material than is necessary.”

3.3.3. The application does not include an MMP and has not demonstrated that the proposed soil importation volumes are the minimum necessary, thus the imported soils cannot be governed using DoWCoP and must be considered waste for disposal.

3.4. Without pre-determination evidence of cut-and-fill calculations, engineering design, alternatives appraisal and ecological justification, it cannot be lawfully concluded that 317,000 m³ is necessary. Granting permission first and relying on either EA Recovery Permit or DoWCoP conditions later would create a circular and unenforceable control regime, whereby the existence of planning permission is then used as evidence of necessity under those measures. This undermines both the planning system and waste regulation. It also risks the importation of waste being driven primarily by gate-fee income rather than genuine engineering need, which is not a legitimate justification for major landscape re-profiling within the South Downs National Park. The SDNP authority must therefore require full, independently verified technical evidence of minimum-volume necessity before determination, not as a post-consent condition.

4. The proposals meet the definition of landfill.

- 4.1. Under the Environmental Permitting Regulations 2016, landfill includes any deposit of waste where the primary purpose is disposal.
- 4.2. Therefore, the scheme is functionally a landfill operation.
- 4.3. The site is not allocated for landfill and conflicts with the Hampshire Minerals & Waste Plan 2013 (HMWP) (partial Update Dec 2025).
- 4.4. No exceptional circumstances are demonstrated as to why it should be included as a viable site within the HMWP.
- 4.5. The proposal would see annual import volumes equivalent to ~10% of Hampshire's annual inert waste arisings (Hampshire Minerals & Waste Plan - Waste: Background Study - October 2023).
- 4.6. The proposal conflicts with HMWP Policies 10, 16, and 29 and therefore should not be approved.

5. The proposal would lead to unacceptable HGV movements on rural roads.

- 5.1. Based on the applicant's phasing plan and realistic assumptions (Appendix 1):
 - 5.1.1. The development would generate c.48,800 two-way HGV movements.
 - 5.1.2. During the height of the import requirement this could lead to c.45 loads/day (90 movements/day).
 - 5.1.3. This represents an enormous 625% increase in HGV movements on Shepherds Farm Lane compared to the HGV movements recorded in the applicants submitted Transport Statement for the hours of 07:00 to 17:00.
 - 5.1.4. The Transport Assessment claim that this "*will be imperceptible to other road users*" is nonsense and demonstrates a lack of local awareness.
 - 5.1.5. Using a peak flow factor of 1.75× recognising traffic variability, these daily volumes could result in 16–20 HGV movements/hour.

5.2. Road safety and amenity impacts

- 5.2.1. Shepherds Farm Lane has a 3-tonne restriction except for loading indicating it is not appropriate for such volume of HGV movements.
- 5.2.2. The lane is narrow with limited passing places and fragile, degrading edges.
- 5.2.3. It is heavily used by walkers, cyclists, equestrians and agricultural vehicles.

- 5.2.4. The road edge at the entrance site is exposed and would not handle predicted movements leading to verge failure and degradation.
- 5.2.5. There is no clear management proposal to ensure trucks leaving site do not turn right, putting further pressure on the narrow rural road network and impacting the tranquillity of the village of Droxford.
- 5.2.6. The site reception area has not been designed to accommodate vehicles waiting for the weighbridge or load testing prior to offloading which could result in queuing upon the public highway.
- 5.2.7. The Planning Statement also states that “all HGVs leaving the site will be checked and cleaned before entering Shepherds Farm Lane”, however there are no wheel washing facilities or parking areas demarcated for the activity on the site-set-up plan which risks this crucial activity from being undertaken.
- 5.2.8. This volume of truck movements and associated muck on the highway represents an unacceptable risk to other road users.

5.3. The proposal conflicts with SDNP policies SD19 (Transport and Accessibility) and SD21 (Public Realm, Highway Design and Public Art).

6. The excessive size of the scheme conflicts with SD Local Plan objectives and policies.

6.1. Local Plan Objective

- 6.1.1. The industrial scale of the proposal will not conserve and enhance the landscapes of the National Park.

6.2. SD4: Landscape Character

- 6.2.1. The layout and scale of proposals do not conserve and enhance existing landscape with land-raising of 8+ metres in places with new topography inconsistent with the current features.

6.3. SD6: Safeguarding Views

- 6.3.1. The proposed land-raising will block landscape views from the Wayfarer’s Walk (demonstrated in cross-section B in the document ‘CROSS_SECTIONS__1_2_-2262809’) and from the public highway both during construction, due to stockpiling, and post construction (see cross-section A).

6.4. SD16: Archaeology

- 6.4.1. No archaeology assessment has been provided.
- 6.4.2. The application fails to recognise the Anglo Saxon burial mound just within the site from the proposed vehicle entrance.

7. Ecological assessment and biodiversity net gain (BNG) calculations are not robust.

7.1. The proposals fail to specify the soil source locations or control measures to ensure only appropriate soils and subsoils are imported to the site and only state that they will be of similar characteristics. Importing inappropriate materials, or materials containing high nutrient or phosphorus levels or contaminants, will put the extremely sensitive chalk downland at risk and expose the critical aquifer to pollutants.

Marginal contamination can be significant at scale i.e., 10 mg/kg above background for a metal across 475,000 tonnes is c4.5 tonnes of that metal introduced in total. This is a significant concern as the scheme represents large-scale re-engineering of landform, soils and hydrology in a permeable chalk landscape where pollutants can move rapidly through fissures to groundwater, springs and the river. Once the soils are reworked, any adverse impacts would be effectively irreversible.

7.2. The Planning Inspector in the recent Hockley Golf Club planning application appeal noted:

7.2.1. “Newly imported soils would inevitably have an influence upon infiltration processes... rigorous testing procedures [are required] to ensure no undue risk of an adverse impact upon water quality.” (Appeal Decision, para. 7)

7.2.2. The current proposals fail to clearly set out how rigorous testing will be undertaken, including the frequency.

7.3. The BNG calculations fail to consider that a minimum 12-metre-wide corridor needs to be maintained through the southern part of the ancient woodland regeneration area to be compliant with National Grid guidelines for vegetation above buried power cables.⁵ This 80m long stretch equates to 960m², about 3% of the woodland area.

7.4. The BNG appears to include the creation of c.4,800m² of calcareous grassland to the southern part of area identified in that document as MG2, however, the Masterplan document (GGD373-3103H) indicates that this is remaining as the practice pitch and putt area for the golf club, so should not be included in the calculation.

7.5. Furthermore, the BNG improperly includes habitat enhancements not caused by, dependent on, or necessary for the proposed development. In particular, the conversion of neutral or modified grassland to calcareous grassland in areas MG6, MG2, MG2b, ONG4, CG17, ONG2, ONG1 and CG18 (Appendix 1 of the BNG Habitat Management & Monitoring Plan) is a measure that could be delivered independently of the development and therefore fails the statutory test of additionality. BNG units must reflect the biodiversity consequences of the development itself, not unrelated enhancements within the red line boundary. The inclusion of such measures artificially inflates the BNG score and renders the assessment non-compliant with the Biodiversity Gain Regulations and Natural England’s guidance.

⁵ <https://www.nationalgrid.com/sites/default/files/documents/24359-Tree%20Planting%20Guidance.pdf>

8. The application fails to provide appropriate information for detailed assessment.

- 8.1. The Planning Statement indicates that the lagoon will be served by a solar powered submerged pump, however, no solar arrays or battery storage sites are shown or assessed in the Landscape and Visual Impact Assessment.
- 8.2. The Planning Statement states that a Surface Water Management Plan is provided on Drawing No. GGD-373-3108 although this file has not been provided as part of the application which is a fundamental omission due to the importance of topographical assessment and the viability of the irrigation lagoon proposed.
- 8.3. It is noted that there is no planning application statement as required for Core Policy SD2: Ecosystem Services.
- 8.4. The Construction and Environmental Management Plan (CEMP) is a lightweight narrative summary which doesn't acknowledge the volume of importation, fails to define the anticipated earthwork volumes per phase, fails to provide details of the source of imported materials and fails to clarify stockpile heights and management for imported soils. It also contradicts the Planning Statement regarding wheel washing facilities, stating only that a brush will be available for wheel cleaning, which is not sufficient.
- 8.5. The Noise document provided by the applicant is woefully inadequate for assessing the potential disturbance to neighbours and the environment during construction. It fails to acknowledge the volume of earth working, clarify the anticipated duration of works which would have a noise impact, define the quantum and type of onsite machinery proposed to be used for the land-raising activity. Without this information, a proper assessment of impact cannot be made.
- 8.6. The Landscape Character and Visual Impact Assessment (LCVIA) material made available for assessment cannot be given material weight. The document does not present the core components required under the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3), including a clear assessment of receptor sensitivity, magnitude of change, significance of effects, construction-phase impacts including stockpiles, compounds and machinery, cumulative impacts or tranquillity effects.

It fails to acknowledge the volume of material being imported and the impact of land-raising appropriately including the loss of views from parts of the Wayfarers Walk. It also fails to address the impact upon direct neighbours with views across the site. In the absence of this information within the submitted LVIA material, the assessment does not follow the principles of GLVIA3 and therefore does not provide a reliable or robust basis for judging landscape or visual harm within the National Park.
- 8.7. No archaeology assessment has been presented.

9. The proposal benefits a private members' club at the cost of public impact.

- 9.1. The proposal benefits a private members' club, while:
 - 9.1.1. Construction impacts fall on the wider community.

9.1.2. Landscape and tranquillity impacts affect National Park users.

9.1.3. Traffic impacts affect local residents and public rights of way users.

9.2. The application does not demonstrate that public benefits outweigh harm, in contradiction to policies SD2: Ecosystem Services and SD9: Biodiversity and Geodiversity.

Finally, we would like to reflect our disappointment that immediate neighbours, local residents and the Parish Council were not consulted by Corhampton Golf Club in advance of the planning application being submitted.

Having regard to the matters detailed above, Droxford Parish Council concludes that the application conflicts with key considerations affecting the local community and the National Park. Accordingly, we recommend that the application is not approved and that it is referred to the South Downs Planning Committee for determination.

Yours sincerely



Ailsa Duckworth
Clerk/RFO – on behalf of
Droxford Parish Council

Appendix 1

Importation volumes and HGV movements

Assumptions:

Based on c.13 m³ per load (8-wheeler tipper truck max load 18-20 tonnes and average soil / sub-soil fill weight of 1.5t/m³) and 317,000 m³:

- Total inbound loads: $\approx 24,400$
- Total two-way movements: $\approx 48,800$
- Programme: lower ramp-up, peak volumes required in Phases 3-5
- Average day: $\approx 40-45$ loads/day $\rightarrow \approx 80-90$ movements/day
- Summer average over 10 hours a day operation: $\approx 4-5$ loads/hr $\rightarrow \approx 9$ movements/hr
- Winter average over 8 hours of operation: $\approx 5-6$ loads/hr $\rightarrow \approx 10-12$ movements/hr (restricted hours as per the CEMP)
- Summer peak (1.75x): ≈ 8 loads/hr $\rightarrow \approx 16$ movements/hr
- Winter peak (1.75x): ≈ 10 loads/hr $\rightarrow \approx 20$ movements/hr

To reflect typical bunching of HGV deliveries rather than a perfectly even profile, a peak hour factor of 1.75x the average hourly flow has been applied, which sits within the commonly used 1.5–2.0x range for construction traffic assessments.

Tonnage

Total 475,000t delivered over 3 years (253 working days) [2]

158,500tonnes a year

c.625 tonnes a day [1]

[1] Exceeds Schedule 1' activity under the Environmental Impact Assessment (EIA) Regulation 6. Namely, Category 10 (Waste disposal installations of non-hazardous waste with a capacity exceeding 100 tonnes per day).

[2] Depending on soil type 317,000 m³ =approx.. 380,000 to 700,000tonnes with 1.5t/m³ being a commonly used industry planning assumption for as yet undetermined source locations.