NORTH WALTHAM PARISH COUNCIL



Chairman: Robert Cooper

Clerk: Hayley Thomas 7 Smiths Mead, North Waltham, RG25 2SZ Tel: 01256 396868, Email: clerk@northwaltham.info

22nd January 2023

Dear Brian O'Donovan,

Re: Application 23/03120/FUL Land at Oakdown Farm A30 Dummer Basingstoke

Demolition of three dwellings, outbuildings and related structures and construction of storage and distribution units (use class B8) with ancillary offices and gatehouses, associated infrastructure works (including parking and landscaping), and full details of site levels, access, drainage, tree retention and diversion of underground pipeline. (Phased and delivered across separate and self-contained plots)

North Waltham Parish Council (NWPC) wishes to register **our objection** to this application based on the following points:

1. Impact to landscape character and appearance

It is our view that the application conflicts with Policy EM1 of the adopted Basingstoke and Deane Local plan. EM1 requires all development to respect, enhance and not be detrimental to the character and visual amenity of the receiving landscape. This site has previously been considered as having high landscape function value in common with its 'Open Downs' character. Large scale, high visual impacting commercial development such as this application would be uncharacteristic of the receiving landscape.

Considering the photomontage views along with the development sectional views provided in the application it is clear to us that very little change (a ridgeline reduction of <1%) has been made to the scale of visual impact of this application, despite previous rejections on this EM1 conflict. This is particularly obvious at key viewpoints such as the route of Wayfarer walk, where the structure towers circa 30m above road level. This application has not sufficiently mitigated previous concerns (cited by local community, B&D and Government inspector) on this matter and should therefore be rejected.

2. Suitable development

It is our view that the application conflicts with Policy EP1 of the adopted Basingstoke and Deane Local plan which states that such development should be contained within the Strategic Employment Areas and should only be considered outside these areas if proposals are sympathetic to the local landscape, character and the visual amenity of the area and also mitigating the impact of the development on the character of nearby settlements. Point 1 above provides our view that these conditions are not met by this application.

3. Need and Employment

It is our view that the representation of 'need' made by the applicant does not represent a local view but aims to confuse by showing a very large regional view of this sector. While we recognise that the borough may need to accommodate some additional distribution and storage facilities, we believe that a thorough review of existing stock (to include near neighbouring towns with M3 connections,

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such as Eastleigh, Winchester, Hook & Fleet) should be conducted and made public before accepting the applicant's claim. We believe that the scale of this application would significantly exceed the additional development needs for warehousing in this area if considering current stock and agreed planning in the wider catchment mentioned. Given such options, the use of greenfield may be reduced or deemed unnecessary.

It is also our view that the figures of employment role type presented by the applicant are both unrealistic and incongruent with the majority employment need in our area.

Whilst we do not have data specific to unemployment in Basingstoke against the typical logistics roles this proposal would bring, we do know that Basingstoke has an unemployment of approx. 3,000 people and that the % employment rate in this area for this 'Process Plant and Machine Operative' roles is <1%. It is reasonable therefore to state that the demand is very low (certainly lower than the 1,100 jobs cited by the applicant) for this type of role in our immediate area. This is also demonstrated by the inability of local logistics organisations to recruit locally.

This proposal is therefore likely to bring significant additional traffic load due to commuting of staff from outside of the borough. With this in mind, the addition of the bus service between site and Basingstoke town is unlikely to be their primary mode of transport, but rather additional cars using both East and West approaches. – see point on Traffic and Road Safety.

4. Traffic and Road Safety

Having analysed traffic and road noise data provided by the applicant, we feel they have made unrealistic assumptions that almost all site traffic will use road segments East of the site entrance and towards the M3 Jnc7. One example of this is evident within their submitted Transport Assessment Appendix 12 – referring to "link 1 A30 - West of main site access", tables 12.20 and 12.21 forecast 0% growth of HGV traffic on this link [at peak times] post development.

This prediction is considered unsound due primarily to the nature of modern-day navigation systems selecting the shortest route (not the route assumed by the applicants modelling). For example, any traffic approaching from the north or west (e.g. from Swindon, Oxford, Birmingham, etc.) would be directed to use Stockbridge Road, joining the A30 just south of the Wheatsheaf Inn. It is evident by the applicants' data that this has not been considered and therefore puts doubt over all traffic volume (and traffic noise) predictions. To further this point it is also felt (and proven in the past) that increases in traffic on the A30 will be felt by the local villages as 'rat-runs' are developed. Road users will not follow a simulated model, but will find (or be directed by SatNav) the quickest routes. We do not see this additional use (to also include commuting for the 1,100 jobs cited) of cars in the traffic modelling presented. We therefore recommend that this data is treated as inaccurate.

We would also point to previous national issues of 'HGV Stacking' where such developments have not allowed for queuing external to the site, creating major road safety issues by parking on verges and / or blocking of lanes.

We would also suggest that further consideration should be taken to the overall safety of the M3 Junction 7 to site route, as this has been a key factor in rejection of previous applications on this site (e.g. BDB/37720 & BDB/39350 Erection of Comprehensive Motorway Service Area). This point has also been recognised by HCC who have proposed schemes of north-bound M3 offload onto A30 from a revised Junction 8. The combination of these previous warnings is a clear statement of huge road

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safety risks. We do not believe a simple adjustment of traffic light patterns and an extra feeder lane at Southwood Corner will mitigate this level of safety concern.

A final point on this matter is that the new road layout proposed within this application may be incompatible with the proposed Cycle route 23 in current B&DBC local plan.

5. Noise pollution

It is our view that incremental night-time operational peak noise increases, as detailed within Table 2 of the applicant's Appendix 14.7, exceed acceptable limits, even with proposed mitigation. In several locations, the predicted peak noise is between 10 and 20dB above the baseline background figures (example Ganderdown cottages increasing from 41dB background to 61dB peak operations at night). Increases of this level would be considered by the local community as unacceptable.

6. Light pollution

We recognise the applicant's strategy to use 'sympathetic lighting schemes' and remain within the boundaries of Environmental Zone E2 criteria. However, all forms of lighting, regardless of how well positioned and angled, will suffer from light spill and reflected glare. This is an unlit area, as such obtrusive light will detract from the natural character and beauty of this area.

It must also be considered that that higher levels of traffic will contribute further to light pollution - something not highlighted or considered within the applicants' proposal.

Yours sincerely,			

North Waltham Parish Council