

# Hampshire Hospitals Foundation Trust CTU

## North Waltham Parish Council Planning Comments

15/01225/OUT | Hybrid application for Full planning permission for the erection of a critical treatment hospital, cancer treatment centre additional development including energy centre, service yard, link building and underground link. Helicopter landing strip and pad, associated internal roads, car parking and landscaping together with the means of access via a new roundabout on the A30. Outline planning permission for the details of siting and means of access to the site for proposed ambulance station and pathology laboratory with all other matters reserved | Land West of Ganderdown Copse Winchester Road Dummer Hampshire.

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## 1. Introduction

- 1.1. Hampshire Hospitals Foundation Trust, under their service delivery model of "Local where possible, central where necessary", are seeking planning permission to develop a new Critical Treatment Hospital (CTH) and Cancer Treatment Centre (CTC) in open countryside next to Ganderdown Copse to the south west of Basingstoke. The site is 22ha of actively farmed agricultural land bounded by low, trimmed Parish defining hedgerows, in a landscape of open arable farmland, with few buildings and limited urban form.
- 1.2. The applications aim is to acquire full planning permission for the 6 storey Critical Treatment Hospital (41,178m<sup>2</sup>), The Cancer Treatment Centre (5,690m<sup>2</sup>), Energy Centre (3,394m<sup>2</sup>), helicopter landing pad and car parking for c.821 vehicles along with outline planning permission for Central Pathology Laboratory (c. 3,000m<sup>2</sup>) and an Ambulance Station (c. 5,000m<sup>2</sup>)

## 2. Key Issues

- 2.1. **The principle of the proposed development does not accord with planning policy**, which presumes against development in the countryside. Exceptions have to be adequately justified and there are strong arguments to be made that the proposed scheme does not do so.
- 2.2. **The need for the health facility has been far from demonstrated.** No evidence base has been supplied demonstrating inadequate response times for ambulances or lack of existing suitable facilities or whether these can be sufficiently upgraded to meet identified need.
- 2.3. **The need for the greenfield location has not been proven.** At page the DAP Statement accepts that no Brownfield sites have been considered. The cost of land allocated in the proposed Local Plan is not an acceptable reason for ruling out those locations and the proposed health facility should not be permitted at the cost of the character and amenity of the countryside, landscape, ecology and cultural heritage so highly valued by local people
- 2.4. **The unacceptably harmful impact to the heritage of the local area** including the importance of the rural setting to the historic Roman road (which lies to the east and also bordering the south-east of the site following the line of the A30), milestone marker (close to the southern boundary of the site), Grade Two listed building (Southwood Farm House to the east of the site) and ancient woodland including Ganderdown Copse, and which planning policy requires to be preserved and protected for the public benefit long-term.
- 2.5. **Unacceptable harmful visual impact to the character and amenity of the landscape.** The proposed scheme would be located on the hillside and, despite the proposed planting scheme, which it would tower above and be very prominent in the landscape and irrevocably harm public views from the A30, M3 and other PROWS and, in particular, from The Wayfarers Walk and from the Dummer Conservation Area. This is acknowledged at page of the application Design & Access Statement. The proposed scheme, including the planting, would block views, that currently exist, through the site to the surrounding

countryside that are currently available and are much valued by local (residential and business) and visiting populations (working and tourist/leisure). There is already harmful impact on the rural area arising from light spill from the town and road network and the harm would be significantly increased by the proposed scheme. This would have an unacceptable impact on the 'dark skies' at night important to star gazers and much valued by local people. Removing the darkened night environment that is required for many of the star gazers in the area.

- 2.6. Unacceptable harmful external/environmental impacts including those arising from traffic impacts and noise** due to the amount and type of vehicles including Ambulances (with sirens and flashing lights) and supply lorries. A proportion of staff, patient, visitor and supply vehicles are likely to use inappropriate routes and roads to reach the site through the widespread use of GPS technology. It would be very difficult to control this by condition. Especially from the settlements to the north of the proposed site, i.e. Kingsclear and Overton where the direct route would be through North Waltham. It should be noted, that all the grade one and listed buildings in the village have no foundations and will be adversely affected by the increased volume of traffic.
- 2.7. Unacceptable harmful impacts to valuable landscape important to the setting of the cultural heritage** including Listed buildings and monuments and the Dummer Conservation Area and proximity to the North Wessex AONB.

### 3. Context

- 3.1. The proposed development site is located on farmland under crop production to the north west of Ganderdown Copse approx. 2km from the present Basingstoke settlement policy boundary and approx. 1km from the proposed revised settlement policy boundary.
- 3.2. The location of the proposed development is such that there is limited inter-visibility between the proposed site and the Basingstoke settlement policy boundary reinforcing that the location is in character landscape with attributes, heritage assets and ecology/biodiversity that are quite different for the more urban environment and as such highly valued and prized by local residents.
- 3.3. The very highly valued landscape attributes include, but are not limited to;
  - 3.3.1. A substantial number of Grade two listed buildings in local, including the conservations areas of Dummer and North Waltham.
  - 3.3.2. Various scheduled Ancient woodlands, including Ganderdown Copse and South Wood.
  - 3.3.3. The Grade II listed Milestone marker on the A30.
  - 3.3.4. A landscape of semi-enclosed arable fiends, bounded by ancient hedgerows and infrequent woodland blocks.
  - 3.3.5. The Wayfarer's Walk long distance footpath and the associated panoramic vistas
  - 3.3.6. Buildings in a style that is general two story and domestic in character, with no urban sprawl
  - 3.3.7. A feeling of countryside with relative openness and a sense of relative darkness with limited urban influence.
  - 3.3.8. The next commercial environment is over 1.5 K away
- 3.4. The locations character area is described in the Basingstoke and Deane Landscape Assessment (2001) as;

*"This is a varied landscape of open arable farmland, a more enclosed part around the road network and North Waltham, and an area of semi-enclosed arable fields, given coherence by the well-defined dry valley that runs through the area. The predominant large arable fields are bounded by low, trimmed hedgerows and infrequent woodland blocks, creating a feeling of relative openness".*

Basingstoke and Deane Landscape Assessment (2001), Area 17 - Dummer and Popham Down

- 3.5. The location character area is described in the Basingstoke and Deane Design and Sustainability Supplementary Planning Document (2008) as;

*"There is a pattern of medium to large-scale arable fields with large woodland blocks on the areas underlain by clay and flint. There are many trees and hedgerows throughout and varying inter-visibility across the area. The area has a generally quiet, un-spoilt rural character." "New development should be carefully sited in the landscape with consideration for long distance views and traditional settlement form. Consideration should be given to views of the countryside from the railway*

*lines and from the Wayfarers Walk. Narrow country lanes should be protected from unnecessary improvements and urbanisation."*

Basingstoke and Deane Design and Sustainability Supplementary Planning Document (2008), Appendix 14

**3.6.** Design and Sustainability SPD describes the majority of building in the area as;

*"Buildings are generally two-storey and domestic in character. Many were built as farmhouses and farm workers' cottages." and that "New development should reflect the traditional building styles, materials and colours. Boundaries should be marked by hedgerows or by walls that are built out of materials characteristic of the area, for example brick and flint."*

Design and Sustainability SPD - Appendix 14

- 3.7.** The location is also within 0.1km of landscape character area 14: Oakley/Steventon Down and 0.6km of landscape character area 16: Basingstoke Down.
- 3.8.** Ganderdown Copse, mixed woodland designated as a Site of Importance for Nature Conservation (SINC) and Ancient Semi-Natural Woodland, bounds the site to the South East. There are also two further Ancient Semi-Natural Woodlands within 1km of the proposed site (South Wood and Deane Heath Copse).
- 3.9.** The ancient Milestone on the A30 adjacent to the site is Grade II listed along with Southwood Farmhouse, also Grade II listed, (circa – 1900), that is approx.700 metres from the proposed secondary access point and with views of the eastern profile of the site. While not in a conservation area nor listed the Sun Inn, located 900 metres to south west, is a much valued local landmark and is recognised as a non-designated heritage asset in line with National Planning Practice Guidance (NPPG Paragraph 39), important to the character and amenity of the area together with its rural setting.
- 3.10.** There are two conservation areas within 2.5km of the proposed site. Dummer Conservation Area, which is a 'historic rural settlement', is set at an elevated position in the landscape and with clear inter-visibility with the application site approx. 1km to the south. North Waltham Conservation Area is located 2km to the west of the application site important to the rural setting of the historic environment including views and the countryside along the approach roads from the south and east.
- 3.11.** The hedgerows bounding the application land to the east, south and west of the site are all historic parish boundaries and are classified as "important" in accordance with the 1997 Hedgerow Regulations. These Hedges also qualify under the UK Biodiversity Action Plan (UK BAP) in that more than 80% of the hedgerow supports native species. In addition to those directly related to the site there is a further hedgerow down the section of Trenchards Lane that is deemed Important under the 1997 Hedgerow Regulations and qualifies under the UK Biodiversity Action Plan (UK BAP).
- 3.12.** Other recent decisions made by Basingstoke and Deane Borough Council, as the Local Planning Authority, have set the precedent with regards to development that would harm the character and amenity of the rural landscape noting the following comments on a number of local planning refusal notices.

- 3.12.1.** (BDB/73408) Refused due to unduly prominent position along a main road, which is within the countryside. The refusal stated its siting would fail to respond to the local context of the area and adversely affect scenic quality of the area. This was refused to ensure the LPA could refuse similar proposals within the countryside and was against policy E1 and E6 of BDBC LP.
- 3.12.2.** (14/03422/FUL) Refused for one caravan in the countryside due to the unsympathetic impact on the rural landscape. (14/03245/FUL) Refused due to the verdant character being impacted in the countryside, yet this was one house.
- 3.12.3.** (BDB/74134) Stated that The Sun Inn is an attractive cream-rendered building with a tiled roof. It is not within a conservation area and is not listed, but the Council have identified it as a 'heritage asset', in line with the guidance contained within Planning Policy Statement 5: Planning for the Historic Environment. The planning inspectorate agreed the existing building is attractive in itself and in its setting within the landscape which, combined with the age of the property, gives the building value as a non designated heritage asset.
- 3.12.4.** (14/03431/FUL) Was Refused due to their sitting and relationship to the undeveloped parcel of land, represented a harmful isolated form of development in the open countryside therefore in this highly visible location the proposed development would be harmful to the visual amenity an open character of the countryside. It was noted this proposal will have an impact on the A3030 Stockbridge Road causing undue interference with the safety of road users.
- 3.13.** These decisions set the approach to be taken by the LPA in this application for the land in the open countryside adjacent to Ganderdown Copse. The LPA must be consistent in its approach and decisions.

## **4. Assessment of the Design Proposals**

### **4.1. Cultural Heritage**

- 4.1.1.** The Dummer Conservation area is located 1km to the south of the site and is described in The Dummer Conservation Area Appraisal (BDBC, 2003).
- 4.1.2.** The appraisal notes that the outward views from the conservation area and the contribution of open land "cannot be underestimated".
- 4.1.3.** The noted views from Tower Hill and the cemetery would be impacted by the development, with the upper levels of the development clearly visible and incongruous to the countryside setting from 1km away.
- 4.1.4.** The ancient Milestone on the A30 adjacent to the site is Grade II listed and is located approx.50m from the site and its setting will be irrevocably harmed by significant alterations to the A30 in the proposal.
- 4.1.5.** Southwood Farmhouse (Grade II) is located 700 metres from proposed secondary access point and its setting will be considerably changed and harmed by views of the eastern profile of the development site.
- 4.1.6.** The local landmark of the Sun Inn, located on the A30 900 metres to south west, is a recognised non-designated heritage asset and deemed attractive in itself and in its setting and should be adequately protected in line with Planning Policy Guidance (PPG Paragraph 39),
- 4.1.7.** The hedgerows along the east of the site are all historic parish boundaries and along with those on the south and west parameters are classified as "important" in accordance with the 1997 Hedgerow Regulations.

### **4.2. Landscape and Visual Impact**

- 4.2.1.** The amount of built form and other operational development, including hard-standing around the buildings, will result in obtrusive features in the open landscape given the scale and complexity of the proposal and is contrary to the most up to date planning policy set out in Paragraphs 109 and 123 of National Planning Policy Framework (NPPF) which is the most up to date planning policy to be applied.
- 4.2.2.** The removal of hedgerows during the construction would result in the loss of 'green corridors' vital to the conservation of ecology and bio-diversity of the landscape and area and contrary to the requirements of Paragraphs 109, 113, 118 and 199 of the NPPF
- 4.2.3.** The rural and undeveloped character of the site itself is likely to be significantly affected by the proposal, including removal of parts of the boundary hedgerow, such as along Trenchards Lane
- 4.2.4.** The construction works are likely to be as equally harmful to the landscape and rural roads as the completed development

- 4.2.5.** The development is likely to have significant visual impact upon 8 of the 13 representative viewpoints as shown in the Environmental Impact Assessment
- 4.2.6.** The host landscape character area will also be Significantly impacted, due to the introduction of a large-scale built development (i.e. a 6 storey Hospital and a significant number of additional buildings housing other healthcare facilities and support services) into a rural and undeveloped location and would be contrary to the requirements of Paragraphs 109 and 123 of the NPPF
- 4.2.7.** The limited inter-visibility between the proposed site and Basingstoke only serves to reinforce the impact the development will have on the host character consisting mainly of isolated farmsteads and small settlements. Perhaps this should be included in the 'context' section above as well?
- 4.2.8.** The introduction of a six storey (31 metre high) building, in addition to the considerable footprint, into undeveloped land area would be a significant change to the identified and valued character of the landscape
- 4.2.9.** The height of the proposed development would be prominent and obtrusive in the undeveloped character of the site
- 4.2.10.** The introduction of a cooling stack (approx. 33m) is a significant alteration to the host character area, and would be utterly incongruous
- 4.2.11.** The nature of the development would alter the site beyond recognition and a valuable area of landscape would be lost
- 4.2.12.** The cumulative effect of these would result in a Highly Significant impact upon the host character landscape.
- 4.2.13.** The introduction of a large scale development will have a harmful and significant impact on the visual amenity on the two adjoining character areas given that neither have developments of this scale and nature and would be completely out of keeping
- 4.2.14.** Despite the introduction of mitigating planting the proposed development will continue to be highly visible from the Wayfarers Walk to the east of the site (VP2). Therefore there is a Major adverse level of visual effect and the effect will remain Highly Significant.
- 4.2.15.** Mitigating planting will result in a significant reduction of views from the Wayfarers Walk to the north of the site (VP3) resulting in an unacceptably harmful affect to public amenity
- 4.2.16.** Due to the inability of the mitigating planting to screen the upper floors of the CTH building, ambulance building and the cooling stack the eastern profile of the development will present a Highly Significant visual impact to New Cottages at Southwood Farm (VP4) which will remain as Major Adverse.
- 4.2.17.** The view from the Footpath near to the Sun Inn (VP5) will suffer from a Moderate adverse level of visual effect as a result of the mitigating plantings limitations with



regards to screening the upper storeys of the CTH building, ambulance building and cooling stack and the effect will be Significant.

**4.2.18.** A Moderate adverse level of visual effect due to the proposed mitigating planting not providing any screening to the upper storeys of the CTH building and the cooling stack will again affect the Wayfarer's Walk to the South-east (VP6), and as such the effect will be Significant.

**4.2.19.** The view from beside Ganderdown Copse (VP11) will receive little effect from the proposed mitigating planting and as such will receive a High degree of change and a Moderate adverse level of visual effect, which is Significant.

### **4.3. Ecology and Nature**

**4.3.1.** 600 metres of hedgerow to the east of the site along Trenchards Lane have been deemed 'important' under the Hedgerow Regulations 1997, Schedule 1, Paragraph 7 in that at least 7 woody species listed in schedule 3 to the regulations are present (Oak, Whitebeam, Wild Privet, Dogwood, Hazel, Bramble, Hawthorn, Field Maple, Blackthorn, Rose), and connects to 2 other hedges.

**4.3.2.** The aforementioned hedgerow is also been deemed 'important' under the Hedgerow Regulations 1997, Schedule 1, Paragraph 8 and is adjacent to a byway open to all traffic and a road used and a public path (Wayfarers Walk), has a bank on one side for at least 50% of its length, gaps do not exceed more than 10%, there is 12 standard trees in a length of 240 metres (at least one per 50 metres) and also has a parallel hedge within 15 metres.

**4.3.3.** All of the hedgerows to be by the proposed development of Trenchards Lane qualify under the UK Biodiversity Action Plan (UK BAP) in that 80% of the hedgerow supports native species, and as such should be protected in line with the 1990 Convention on Biological Diversity (CBD).

**4.3.4.** During the construction phase of the proposed development there is a risk to direct and indirect impacts on retained hedgerows including root damage and compaction from machinery, and pollution from litter and dust.

**4.3.5.** During the operational phase of the proposal there is potential impact upon remaining hedgerows from poor management and the polluting effect of litter.

**4.3.6.** There is a total of 13 Sites of Importance for Nature Conservation (SINCs) within 2km of the proposed site the closest being Ganderdown Copse that directly adjoins the site.

**4.3.7.** Ganderdown Copse is designated Ancient Semi-Natural woodland and is included in the Ancient Woodland Inventory (Provisional) for England.

**4.3.8.** Pardown Copse and Small's copse (1.2km to the north) and Peak Copse (275m to the south east) are both SINC's with a record of dormice.

- 4.3.9.** South Wood and Deane Heath Copse (both within 1km of the site) are designated Ancient Semi-Natural woodland and are included in the Ancient Woodland Inventory (Provisional) for England.
- 4.3.10.** As a result of the construction phase of the proposed development Ganderdown Copse could be impacted by pollution from dust and litter, disturbance from construction machinery and works along with increased light and noise levels.
- 4.3.11.** There is the potential for the construction phase to result in alterations to the hydrology affecting Ganderdown Copse. There is also the potential for these changes to the local hydrology to persist well into the operational phase of the proposed development.
- 4.3.12.** With one outlier badger sett to be found on the edge of woodland to the east of the site the proposed development will result in approx. 30% of typical badger territory.
- 4.3.13.** The new proposal will result in an increase in the volume of vehicular traffic to the road network around the site, which will present an increased risk of road mortality for the local badger population.
- 4.3.14.** Increased levels of lighting and noise from the proposed development, if poorly mitigated, will have a detrimental impact upon the present dark foraging and commuting areas for bats.
- 4.3.15.** North Waltham and Southwood Farm have recorded resident population of slow worms.

#### **4.4. Lighting Effects**

- 4.4.1.** The proposed location and the surrounding area are described by Hampshire County Council's Street Lighting Policy Document (4th edition) as Environmental Zone E2, primary defined as being those within "the Countryside Policy Area Boundary" for development purposes, as described in District and Local Plans.
- 4.4.2.** The site is presently unlit, as are all local roads including Trenchards Lane.
- 4.4.3.** The closest occurrence of street lighting is at a distance of 1.5km to the east of the site along the A30.
- 4.4.4.** The degree of lighting that would be introduced by the proposed development would result in the site being reclassified to Environmental Zone E3 (Areas of Medium District Brightness),
- 4.4.5.** The impact on the surrounding character landscape of the introduction of an area of greater brightness cannot and should not be underestimated.
- 4.4.6.** The introduction of street lighting around the proposed A30 roundabout and entrance to the site will result in light spill into the surrounding area.
- 4.4.7.** There is insufficient statistical evidence that the proposed mitigating back light shields will provide effecting protection against intrusive light spill into the surrounding hedgerows.

- 4.4.8.** There is insufficient evidence that the proposed footpath/cycleway connecting the site the southerly extent of Basingstoke will receive the required lighting to meet the required levels of pedestrian safety or personal security as described in Hampshire County Council's Street Lighting Policy Document (4th edition).
- 4.4.9.** Notwithstanding point 4.4.8 there is insufficient analysis of the impact of increased highway lighting between the proposed site, Basingstoke and the adjacent primary road infrastructure.

#### **4.5. Traffic and Transport**

- 4.5.1.** The Traffic Assessment for the proposed development states that all analysis has been based only on traffic flows from existing housing development, with the minimal addition of Longwood Copse (57 dwellings) and Kennel Farm (310 dwellings).
- 4.5.2.** Assuming the developments proposed schedule it is due to open no sooner than 2018. This makes the BDBC's Emerging Local Plan (ELP) a material consideration in decisions on planning applications. The ELP contains proposals for a number of developments that will have significant impact on the number of dwellings between the proposed site and Basingstoke. These include the Golf Course (1000 dwellings), Hounsome Fields (750 dwellings) and Manydown North (3,400 dwellings) along with the already approved Beggarwood N development (96 dwellings). It seems distinct unreasonable that the proposed CTH development does not take these into account with its traffic assessment, nor is the CTH considered in the ELP Traffic Assessment (provided to BDBC by Parsons Brinckerhoff).
- 4.5.3.** The proposal's Traffic Assessment limits its distribution of vehicular trips to 10-15km (paragraph 4.5.2), while elsewhere the application stated that the facility will be providing care for the whole geographical extent of the HHFT's remit. This includes the proposed maternity unit, which is scheduled to provide all consultant delivered obstetric care within the HHFT. Therefore patients and visitors will, by definition, be travelling from considerably further afield than the suggested 10-15km.
- 4.5.4.** The assumption made in Table 5 of the proposals Traffic Assessment that 0% of traffic will be travelling to the site from the M3 SW is completely incompatible with the stated role as providing essential resources for the whole of the geographical extent of the NNFT.
- 4.5.5.** Paragraph 2.7.5 of the proposals Traffic Assessment state that as a result of locating the new development at this site will result in a reduction in the average distance of travel to a local hospital and thus the proportion of the borough's population living within 8km of their local hospital. This contrary to the HHFT specifically stipulate elsewhere in the application that the CTH will NOT be a general hospital and for regular outpatient activities. Therefore this proposal will not, as stated in paragraph 2.7.7, improve local access.

- 4.5.6. The Accident Study Area (Inset 2.5) fails to include Junction 8 of the M3, which would be subject a considerable increase in traffic having to negotiate the sub-standard bifurcation at junction 8.
- 4.5.7. The proposals Traffic Assessment fails to include analysis, with regards to trip attraction and impact, the complete rural road network north of the site and that through the village of Dummer on the opposite side of M3 junction 7.
- 4.5.8. Contrary to the proposals statement that additional traffic using Trenchards Lane will be "for service and resilience purposes", there will in practice be a considerable percentage of staff and patients commencing any car journey from the existing Basingstoke Hospital, Buckskin, Manydown North, Popley, Rooksdown, Winklebury and Worting will access the site be travelling through Oakley village via Trenchards Lane. This will be a considerably more attractive option than traversing Basingstoke and A30 corridor especially at peak periods.
- 4.5.9. In addition to the above routes, there will also be a similar effect upon routes through North Waltham with a percentage staff and patients from Whitchurch, Overton and other communities in the North West of the HHFT catchment area, electing to take a more direct route than the A34 and A303.
- 4.5.10. The proposal indicates a 188% increase in the Mean Maximum Queue at the A30/ Winchester Road signal junction. Such an increase in congestion will result in an increase in the number of vehicles travelling though the village of Dummer to avoid queuing traffic.
- 4.5.11. Paragraph 3.6.2 of the proposals Traffic Assessment states that the development will have 801 car parking spaces. Yet the Design and Access Statement stipulates;

**Staff Parking Provision**

CTH	376
Pathology	90
CTC	35
Total	501

**Visitor Parking Provision**

Main	250
CTC	35
Total	285

**Grand Total 786**

- 4.5.12. Given the statement in the proposals Travel Plan that it is an ambitious target of having little as 65% of staff travelling by car and the limitations of opportunities of modal shift. The car park provision of 501 spaces for 600-700 staff is completely insufficient and entirely inflexible.
- 4.5.13. Considering the site's location, it is not reasonable to target approx. 6% of employees to travel by rail to/from the hospital, nor is it reasonable to expect as many as 10% of staff members walking to work.

**4.5.14.** Given the volume of residential property that presently falls within the approx. 5km average journey time by cycle specified by the 2013 National Travel Survey it is not reasonable to expect more than 2% as presently represented by the model split of journey times to work for Basingstoke and Deane.

**4.5.15.** Although the proposal indicate that the number 8 bus service will be extended via a three year subsidy and access discounts will be provided via access to the easinet scheme. However;

- The extension of the bus route is likely to result in an increase from the present 15-minute journey time to near 25 minutes, which could easily reach 1hr at peak traffic times.
- Given the potential for substantial increases in the residential developments, e.g. the Golf Course will doubtless have significant detrimental impacts upon travel times for the No. 8 route.
- As the proposal is not for a General Hospital the majority of staff members with strict and immovable shift patterns will make prospective journeys. Therefore a bus service that has the risk of sever delays due to peak time traffic in the A30 corridor, and only runs an hourly service after 19.56 is unreliable and unacceptable.

**4.5.16.** Paragraph 1.6.45 of the proposals Environmental Statement states that “with regard to non-car accessibility, the assessment concludes that the Proposed Development will have a beneficial and long term effect” is not borne out by the facts. The application admits that hardly anyone will walk, cycling will be unattractive and impractical due to distance, gradient and exposure to fast moving traffic and bus travel will not be a practical alternative for staff with critical care responsibilities and non-social shift patterns. The location and nature of this proposed hospital will mean that almost all access will be by private car, contrary to the sustainability requirements of the NPPF and the policies of the emerging Local Plan.

**4.5.17.** The proposals Travel Plan target of 65% of staff journeys being by private car travel rebutted by evidence from a survey carried out by Southern Communications Ltd whose offices are located near the proposal site at Junction 7. Their 2014 survey, presented as part of the Travel Plan for their planning application 14/03618/FUL, shows that of their 80 in-house employees, only 2 walk or cycle to work and the remaining 78 employees travel by private car (4 of these by a Company provided taxi).

## **4.6. Noise Effects**

**4.6.1.** The application is inconsistent with its analysis of the potential impact of helicopter noise. The Environmental Statement indicates that there will be "one flight per month", while the CAA Consultants report suggests that there is the potential for "four a day". While the noise effect of each visit will be short in duration (typically 3-4 minutes), the potential for 4 flights a day (24 hours a day) will present a significant noise disruption for local residents.

- 4.6.2.** While the proposal recognises the developments need for alternative ventilation inline with the excessive noise levels that may result from open windows. Such mitigation is not proposed for nearby residential properties that are likely to equally affected by helicopter and other noise resulting from the development.
- 4.6.3.** The long term rise in noise levels from the increased traffic generated by the development will present a 37% increase across the tested location, spreading as far from the proposed development as Stockbridge Road (2.5km from the site).
- 4.6.4.** While the potential inclusion of a Construction Environmental Management Plan (CEMP) during any construction phase, is to acknowledge as a positive move. It is a misguided belief that communication and simply providing information on construction can be an effective means of mitigating the impact of noise upon sensitive receptors especially local residents.
- 4.6.5.** Due to the proposals lack of detailed design there is insufficient evidence that the cumulative impact of plant noise from emission points, vents etc. will be within acceptable tolerance levels for background noise at the nearest residential receptors.

## 5. Assessment of Planning Policy

- 5.1.** The primary policy for determining planning applications in Basingstoke and Deane are;
- The saved policies of the BDBC Adopted Local Plan (1996-2011)
  - Adopted supplementary planning guidance, e.g. the Design Guidance, Conservation Area Guidance.
  - BDBC Emerging Local Plan (2011-2029)
  - National Planning Policy Framework (NPPF) (2012)
  - National Planning Practice Guidance (NPPG) (2014)
- 5.2.** National Planning Policy Framework paragraph 24 describes the sequential testing of potential development locations as part of good and sound planning practice. This proposal does not contain any evidence of a sequential test.
- 5.3.** The proposal contains insufficient evidence of a robust site selection study and thus the justification for the selection of the proposed development site. The application fails to prove that a proper strategic assessment to examine a range of reasonable alternatives was undertaken in advance of the selection of the proposed site.
- 5.4.** Although not an explicit legal requirement there is insufficient evidence that any potential alternative sites were appraised to the same level as the preferred option (Heard v Broadland District Council, South Norfolk District Council, Norwich City Council, February 2014)
- 5.5.** Contrary to NPPF Paragraph 111 there is insufficient evidence in the proposal that there is no suitable previously developed land that meets the requirements of the development.
- 5.6.** The announcement of details of the project in the local press as being the finalized and approved application before undertaking any form of consultation was distressing and misleading for a number of local residents.
- 5.7.** The consultation meetings subsequently arranged were arranged at short notice at a holiday time that meant that a lot of people were unable to attend and provide their input to the process.
- 5.8.** The application has changed significantly from that sent out for consultation (increased in size from 3 to 6 floors).
- 5.9.** The application is heavily based on input from external consultants. The Trust has only released the information reluctantly and in an incomplete form after several Freedom Of Information (FOI) requests. The Trust initially denied having this information and only after being submitted to FOI reviews did it make a poor quality black and white scan of a coloured document available. The Trust also claimed that the scoping and tendering documents (which would be needed to fully understand the document supplied) had been 'lost'.
- 5.10.** Given that documents used to scope the questions that led to the site selection were 'lost' it is not possible for the answers to be trusted. A new analysis should be undertaken

and all information relevant to that analysis should be supplied as a part of a proper consultation exercise.

- 5.11.** The application site lies outside of a settlement policy boundary and within the Countryside, being of a sufficient distance it to result in no inter-visibility between the site itself and Basingstoke (primarily due to an intervening ridgeline) thus the development is not supported by Saved Policies D8 and D9 of Basingstoke and Deane's (BDBC) Adopted Local Plan (1996-2011), and is contrary to the National Planning Policy Framework (NPPF) section 11.
- 5.12.** The proposed development by virtue of its scale, both vertical and land coverage would be incongruous in the landscape adversely affecting the scenic and visual quality of the landscape and would therefore have an unacceptably harmful impact on the rural amenity of the area. As such the proposed development fails to comply with Saved Policies D8, E1i and E6 of Basingstoke and Deane's (BDBC) Adopted Local Plan (1996-2011) and does not meet the NPPF's Core requirement to take account of the different roles and character of different areas, recognising the intrinsic character and beauty of the countryside.
- 5.13.** The application dominates the surrounding cottages and Grade II listed building. This is introducing buildings/urban form in a location where there have historically been no existing builds. The proposal would significantly change the character and context of the site, disrupting hierarchy and wider outlook of the existing listed buildings and their relationship with the landscape. This therefore does not comply with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, NPPF (section 12) and Saved Policies E1 and E6 of Basingstoke and Deane's (BDBC) Adopted Local Plan (1996-2011).
- 5.14.** The landscape character of the site is described in Basingstoke and Deane Landscape Assessment (2001) as, "This is a varied landscape of open arable farmland, a more enclosed part around the road network and North Waltham, and an area of semi-enclosed arable fields, given coherence by the well-defined dry valley that runs through the area. The predominant large arable fields are bounded by low, trimmed hedgerows and infrequent woodland blocks, creating a feeling of relative openness". The proposed development is unsympathetic to the rural landscape and visual amenities of the area. As such the proposal would be contrary to Saved Policy D8, E1 and E6 of Basingstoke and Deane's (BDBC) Adopted Local Plan (1996-2011), Policy EM1 of the BDBC Emerging Local Plan (2011-2029), section 11 of the National Planning Policy Framework (NPPF).
- 5.15.** The unacceptably harmful impact to the heritage of the local area including the important rural setting in which the Roman road (which lies to the east and also bordering the south-east of the site following the line of the A30) and the milestone marker (close to the southern boundary of the site) are, Grade Two listed building (Southwood Farm House to the east of the site) ancient woodland including (names to be added) and which planning policy requires to be preserved and protected for the public benefit long-term.
- 5.16.** The development would represent a dangerous precedent for other similar major development schemes in the area and create the potential for coalescence with the



adopted and proposed settlement policy boundary of Basingstoke, i.e. unchecked urban sprawl in to the countryside’.

- 5.17.** The accumulative impact on infrastructure in the area particular when taking in to account proposals for large scale housing development on land at Kennel Farm and other sites being proposed in BDBC’s draft local plan.
- 5.18.** Creating potential for coalescence with the adopted and proposed settlement boundary of Basingstoke, i.e. unchecked urban sprawl in to the countryside. There is no proposed strategic gap between the adopted and proposed settlement boundary to the east and therefore very little to protect the sprawl continuing.
- 5.19.** High standard of design - as the proposed design is not in keeping with the character of the local area as defined in Design and Sustainability SPD - Appendix 14 and does not reflect traditional building styles, materials and colours the development is contrary to Saved Policy E1i Basingstoke and Deane's (BDBC) Adopted Local Plan (1996-2011) and Policy EM1 of Basingstoke and Deane’s Emerging Local Plan (2011- 2029)
- 5.20.** The proposed design presents a detrimental impact upon the visual amenity of locations such as the Wayfarers Walk and the grade-II listed Southwood Farm along with the Sun Inn (heritage asset). This shows minimal consideration for the Design and Sustainability SPD Appendix 14 which states "Consideration should be given to views of the countryside from the railway lines and from the Wayfarers Walk. Narrow country lanes should be protected from unnecessary improvements and urbanisation." These effects are therefore contrary to NPPF (paragraph 134).
- 5.21.** The setting of the adjacent conservation areas especially Dummer but including North Waltham would be detrimentally effected by the proposed development. Primarily the visual impact from Tower Hill and the cemetery in Dummer and this is against Saved Policy E3
- 5.22.** In proposals Traffic Assessment fails to take in to account to not take into account the potential severe impacts on the local highway network with resulting in unacceptable harm to the character and amenity of the rural roads and lanes in the parish of North Waltham along with neighbouring parishes. Conflicting with Saved Policy E1iii of the adopted local plan.
- 5.23.** Contrary to Saved Policy E1 the likely increase volumes of traffic using the rural road network will impact greatly upon the day-to-day lives and amenities of the local population. The likelihood of delivery lorries and emergency vehicles taking inappropriate routes will have a detrimental impact upon verges and banks in rural roads and cause congestion, along with limiting the local agricultural community to move plant and livestock.
- 5.24.** The proposed location was rejected under the SHLAA report compiled for Basingstoke and Deane’s Emerging Local Plan. The site was deemed unsuitable for Strategic Housing on the grounds of no planning history, being open countryside and reducing the gaps to adjoining settlements. All of which are valid material considerations with regards to the proposed development.

- 5.25.** Contrary to Saved Policy A1 the number of staff car parking spaces against the number of staff that will be on duty at any one time is inadequate before visitors even join the site. It is unknown how many would use public transport. There is no option for an overflow car park due to the rural setting and country lanes.
- 5.26.** The infrastructure contribution of the roundabout does not fully cover the impact to the rural lanes and the A30 further afield and the increased flow of traffic it will cause, against policy C1.
- 5.27.** The site location is too far into the rural environment for a footpath to be considered viable. The quote of 10% of staff to be walking to work when the next substantially housing development is over 1.5 KM away is not realistic and is against policy A2 and NPPF core planning principles.
- 5.28.** The likely substantial percentage volumes of staff members commuting by single occupancy car journeys to the development fails to meet the NPPF's Core Planning Principle of making "the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable" and is in conflict with Saved Policy A2 Basingstoke and Deane's (BDBC) Adopted Local Plan (1996-2011).
- 5.29.** Core planning principles should be plan-led, empowering local people to shape their surroundings and positive vision for the future area; this is against what people voted for in the North Waltham Village plan.
- 5.30.** Planning should have a high degree of predictability, as the CCG has not proven the need this removes the predictability of future planning applications for housing if the NHS do not use the site.
- 5.31.** The proposed widening of Trenchards Lane to the east of the site in order to facility improved access to the secondary site entrance will result in the loss of a hedgerow that have been deemed 'important' under the Hedgerow Regulations 1997, Schedule 1, Paragraph 7 in that at least 7 woody species listed in schedule 3 to the regulations are present (Oak, Whitebeam, Wild Privet, Dogwood, Hazel, Bramble, Hawthorn, Field Maple, Blackthorn, Rose), and connects to 2 other hedges. This hedgerow have also been deemed 'important' under the Hedgerow Regulations 1997, Schedule 1, Paragraph 8 and is adjacent to a byway open to all traffic and a road used and a public path (Wayfarers Walk), has a bank on one side for at least 50% of its length, gaps do not exceed more than 10%, there is 12 standard trees in a length of 240 metres (at least on per 50 metres) and also has a parallel hedge within 15 metres. In addition to this hedgerow the others along the proposed section of widening all qualify under the UK Biodiversity Action Plan (UK BAP) in that 80% of the hedgerow supports native species, and as such should be protected in line with the 1990 Convention on Biological Diversity (CBD).
- 5.32.** In addition to these planning based objections we also have a number of more ordinary concerns, for example the likelihood that the development is to grow in the future and the potential for the HHFT to wish to expand the facilities and services that the site provides resulting in the potential development of adjoining fields.

- 5.33.** The North Waltham Village Plans (2005, 2010), 100% respondents stated that they would like to keep the rural nature of North Waltham, and would like extensions in line with the rural nature of the village. It is therefore not surprising to find that in line with the desire to keep North Waltham rural, a large majority (92%) said no to Basingstoke expanding closer to North Waltham. There was little desire for any urban services, i.e. streetlights.
- 5.34.** The North Waltham Village plan noted that residents are not generally disturbed by noise and light except from the M3 and low flying aircraft. The proposed development would increase the disturbance levels as already noted and therefore have an adverse effect upon the quality of life for residents.
- 5.35.** It has been recorded in the village plan of (2010) that the residents would like to see more public footpaths around the village.

## 6. Conclusions

- 6.1.** Taking in to consideration the points raised by the Parish Councils review of the proposal North Waltham are formally objecting to planning application 15/01225/OUT. It is our belief that HHFT have undertaken a flawed consultation process. This has led to an application that is, in our opinion, ill informed, poorly constructed and has given rise to the large number of objections raised. We would request that the application is withdrawn or reconsidered, a proper consultation is undertaken including the review of brown field sites, and a revised application is submitted. As documented throughout this report our concerns relating to the proposal quite substantial, however the primary concerns are as follows;
- 6.1.1.** The principle of the proposed development does not accord planning policy, which presumes against development in the countryside. Exceptions have to be adequately justified and there is room to argue that the submission does not do so.
- 6.1.2.** The need for the health facility has not been adequately demonstrated. No evidence base has been supplied demonstrating inadequate response times for ambulances or lack of existing suitable facilities or whether these can be sufficiently upgraded to meet identified need.
- 6.1.3.** The need for the greenfield location has not been adequately demonstrated. At page the DAP Statement accepts that no Brownfield sites have been considered, which is in against the guidance of paragraph 111 of the NPPF, as it fails to prove the lack of suitable previously developed land. The cost of land allocated in the proposed Local Land is not sufficient reason for ruling out those locations and the proposed health facility should not be permitted at the cost of the character and amenity of the countryside, landscape, ecology and cultural heritage.
- 6.1.4.** The unacceptably harmful impact to the heritage of the local area including the important rural setting in which the Roman road (which lies to the east and also bordering the south-east of the site following the line of the A30) and the milestone marker (close to the southern boundary of the site) are, Grade Two listed building (Southwood Farm House to the east of the site) ancient woodland including, Ganderdown Copse, and which planning policy requires to be preserved and protected for the public benefit long-term.
- 6.1.5.** Unacceptable harmful visual impact to the landscape. The proposed scheme would be located on the hillside and, despite the proposed planting scheme; it would be prominent in the landscape and detrimental to public views from the A30, M3 and PROWS and, in particular, from The Wayfarers Walk and from the Dummer Conservation Area. This is acknowledged at page of the application Design & Access Statement. The proposed scheme, including the planting, would block views, that currently exist, through the site to the surrounding countryside that are currently available and are much valued by local (residential and business) and visiting populations (working and tourist/leisure). The lighting impact in the area would be likely to increase. Removing the darkened night environment that is required for many of the stargazers in the area.

- 6.1.6.** Unacceptable harmful external/environmental impacts including those arising from traffic impacts and noise due to the amount and type of vehicles including Ambulances (with sirens and flashing lights) and supply lorries. A proportion of staff, patient, visitor and supply vehicles are likely to use inappropriate routes and roads to reach the site through the widespread use of GPS technology. It would be very difficult to control this by condition. Especially from the settlements to the north of the proposed site, i.e. Kingsclear and Overton where the direct route would be through North Waltham. It should be noted, that all the grade one and listed building in the village have no foundations and will be adversely affected by the increased volume of traffic.
- 6.1.7.** Unacceptable harmful impacts to the setting of landscape and cultural heritage including Listed buildings and monuments and the Dummer Conservation Area and proximity to the North Wessex AONB.
- 6.1.8.** In relation to section 11 of the NPPF, the proposed development fails to protect or enhance a valued landscape. It impacts greatly on the biodiversity of the area failing to provide a net gain and thus does not contribute to the government's commitment to establishing coherent ecological networks. As a result of a lack of a valid sequential site assessment the proposal fails to demonstrate that the impacts of developing the proposed greenfield site are justifiable in comparison to a those on brownfield site (paragraph 111), or one of lower agricultural value (paragraph 112).
- 6.1.9.** The proposed development is contrary to Paragraph 109 and 123 of the NPP because: 'The amount of built form and other operational development, including hard-standing around the buildings, will result in obtrusive features in the open landscape given the scale and complexity of the proposal'
- 6.1.10.** The proposed development would result in the loss of, although not limited to, the following highly valued landscape assets;
- Rural countryside with a feeling of relative openness.
  - Culturally and ecologically important Hedgerows.
  - Local biodiversity.
  - Valuable agricultural land and soils vital to crop production and to the economy and food production.
  - A landscape of long distance views and traditional settlement forms.
- 6.1.11.** This application against all of the following policies;
- NPPF – paragraphs 111, 24 (section 11, section 12)
  - North Waltham Village Plans (2005, 2010)
  - BDBC Local Plan Saved Policies A1, A2, C1, D8, D9, E1(i)(iii), E3, E6
  - BDBC Emerging Local Plan EM1
  - Section 66 – of the Planning (Listed buildings and conservation areas Act (1990)
  - Design and Sustainability - SPD Appendix 14

- SHLAA Report in Basingstoke and Deane's Local Plan
- Hedgerow regulations 1997 – Schedule 1 Paragraph 7 and 8
- 1990 Convention on Biological Diversity