

## **1. INTRODUCTION**

### **1.1 Personal Details**

- 1.1.1 My name is Bob Schofield and I appear at this inquiry on behalf of the Stop Pyestock bLot Act Today (SPLAT) campaign group. I am a long term resident of Fleet and Church Crookham
- 1.1.2 I have a degree in Civil Engineering and I am a Chartered Civil Engineer and a Chartered Member of the Institution of Water and Environmental Managers. I have a degree in law from Reading University I appear at this inquiry as a local resident and as a member of SPLAT who has spent the last two years analysing and researching the proposed development at Pyestock.

### **1.2 Stop Pyestock bLot Act Today campaign group**

- 1.2.1 SPLAT is a non-political local residents and communities representative group formed in 2005 to oppose the proposed development at Pyestock, North Hampshire. Through its public information services, an active web site and regular distribution of over 10,000 information sheets, SPLAT has raised public awareness of this scheme and facilitated the submission of some 12,000 letters of objection.
- 1.2.2 We do not present ourselves as technical experts.
- 1.2.3 Apart from the application of analysis and logic our greatest expertise is in local knowledge and the impact that this development would have on the local communities, commerce and the environment.

### **1.3 Description of the Site and its Location**

- 1.3.1 The site, formerly known as the National Gas Turbine Establishment, occupies a roughly triangular area of land comprising 45 Hectares (Ha) of mixed woodland and grassland. The western boundary of the site is roughly parallel to and approximately 400 metres from the

development boundary of the Pondtail area of Fleet. The centre of gravity of the site is approximately 1 km south of the A3013 Fleet to Cove Road and 2 km due south of the M3. It is just less than 3 km, by road, from the site to Junction 4A of the M3 motorway.

- 1.3.2 Immediately to the south of the site is the Basingstoke Canal which forms the northern boundary of a part of the Thames Basin Heath Special Protection area. Approximately 400 m to the North West of the site is Fleet Pond nature reserve. Immediately north of and adjoining the site is a public amenity/recreation area comprising woodland walks and open fields. The whole strip of land running north to south around the site is designated a Strategic Gap providing a landscape delineation between Fleet, Farnborough, Aldershot and Yately.
- 1.3.3 The area provides a central peaceful amenity for many residents of Hart and Rushmoor, especially those in the Pondtail, Ancells Farm and Southwood Areas.

#### **1.4 Planning History of the Site**

- 1.4.1 The site was progressively developed as a gas turbine research establishment from the 1940s until 1975. In its prime, around 1976, the site and some adjoining areas employed around 1600 staff. By 2000 employment levels were around 300.
- 1.4.2 In 1999 DERA submitted an 18/84 notice of their intention to create a new research centre at Cody Park which became known as the "Hub". In July 2001, QinetiQ founded from the partition of DERA submitted a planning application (03/01475/OUT) for a mixed development on the site which floundered because of traffic impacts. In February 2003 QinetiQ applied for and secured a Certificate of Lawful Use.
- 1.4.3 In 2004 Qinetiq sold the site to Prudential Farnborough who submitted their first planning applications for a Distribution

warehouse development in 2005; 05/00238/Major an Outline Planning Application, all matters reserved except access.

## **1.5 Identification of Key Issues**

- 1.5.1 The main objections initially raised by SPLAT on behalf of its members are itemised together with the modifications proposed by the Appellant. It is concluded that these modifications do not adequately address the policy issues or the harm caused by the development.

## **1.6 Issues Dealt with in this Proof of Evidence**

- 1.6.1 This proof addresses

Planning Policy both current and emerging at National, Regional and Local levels

The Strategic Gap

## **2. NATIONAL POLICY**

- 2.1 The Proof identifies policies PPS1, PPG4, PPG9, PPG13, PPG23 and PPG24 to have relevance to the development.

## **3. REGIONAL POLICY**

- 3.1 The Proof identifies those parts of RG9 and the emerging regional policy contained in the South East Regional plan relevant to the Development.

## **4. LOCAL PLANS**

- 4.1 The proof identifies saved policies within the Hampshire County Council Structure Plan and Hart District Council's Local Plan and emerging policy within Hart's Local Development Framework that are relevant to the development.

## **5. REQUIRED PLANNING APPROACH**

- 5.1 This section of the proof addresses the requirement of Section 38(6) of the Planning and Compulsory Purchase Act 2004 that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 An evaluation is carried out of three policies G1, CON19 and DEV12. which directly control development within the Strategic Gap. The numerous constraints imposed to protect the openness and rural nature of the Strategic Gap so that it achieves its function of preventing coalescence of identifiable urban areas are appraised to establish a framework for testing the appropriateness of the development.
- 5.3 Comparison is drawn with the recent Appeal decision on the Strategic Rail Freight Terminal at Radlett located within the Green Belt. It was refused because the need to build within the Green Belt was not proved by an inadequate assessment of alternative sites. A similar provision exists within Policy G1 relevant to the Strategic Gap and yet no alternative site assessment has been performed.
- 5.4 Unlike Radlett, it is argued that there is no compelling need for development supported by policy.
- 5.5 This appreciation of the policy framework is then used to test the development.

## **6 ANALYSIS**

### **6.1 Strategic Gap / Landscape and Visual Impacts**

- 6.1.1 The visual impact of the development is assessed and the case is made that it is the awareness of the scale and type of development that visually diminishes the Strategic Gap.

### **6.2 Maintain Employment Levels**

- 6.2.1 This section argues the meaning of "existing employment levels" and challenges the Appellant's reliance on historic

peak employment level. The case is made that intensifying the development beyond the constraints of DEV12 leads to excessive harm as a consequence of the breach.

### **6.3 Retaining the open and rural nature of the Strategic Gap**

6.3.1 This section addresses the scale of development within the site and its sympathy with the rural and open nature of the Strategic Gap. It is argued the mass and scale of the buildings detract from the open nature of the site and the 24 hour operations destroy the rural nature of the site.

### **6.4 Associated Works**

6.4.1 The associated access works and road improvements necessitated by the scale and type of development are assessed and are deemed to have a visual and physical impact on the Strategic Gap which diminishes the Gap in breach of CON19.

### **6.5 Inappropriate Scale of Development**

6.5.1 This section addresses the scale of development against the restraint of DEV12 and argues that the inappropriate increase in floor space leads to consequential harm.

### **6.6 Case for Development**

6.6.1 The case is made that there is no compelling need for the development that could outweigh any breach of policy.

### **6.7 Future Direction**

6.7.1 The permanence of the Strategic Gap is established through reference to emerging policy. The conclusion is drawn that policies have been saved to ensure protection of the Strategic Gap during this period of hiatus in the planning

system. Significant weight should therefore be given to protecting the Strategic Gap.

## **7 CONCLUSION**

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 directs that planning determinations must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.2 It is concluded that there is no compelling evidence of a need to be met sufficient to justify the breach of policy and the infliction of harm in all its forms.
- 7.3 It is contented that in the absence of such evidence the application must be refused.