

## **1 INTRODUCTION**

### **1.1 Personal Details**

1.1.1 My name is Bob Schofield and I appear at this inquiry, as a local resident, on behalf of the Stop Pyestock bLot Act Today (SPLAT) campaign group. I am a long term resident of Fleet and Church Crookham (1974) and more recently, since 1989, a resident of the Pondtail area of Fleet.

### **1.2 Issues to be addressed in this Proof of Evidence**

1.2.1 My evidence will address the following issues:

- 1 –Location
  - a) Strategic Gap
  - b) SPA's SSSIs, SINCs
  - c) Inadequate Access
  - d) Local Employment Base
  - e) Housing
- 2 –“Green Traffic” Issues
  - a) Lack of an Effective Travel Plan
  - b) Car Parking Provision
  - c) In-commuting
- 3 – Environmental consequences
  - a) Emissions
  - b) Loss of Carbon Sequestration
  - c) Carbon Embedded in Construction
- 4 – Economic Considerations.

### **1.3 The Proposal**

1.3.1 The planning application is to convert the substantially disused National Gas Turbine Establishment (NGTE) into a major road freight distribution depot operating on a 24 hours per day by 7 days a week basis. It is proposed to provide 1137 parking spaces, 60 lorry parking bays and substantial hard standing working areas

approximately equal to the building area. The total area of the site is approximately 45 Ha.

## **1.4 Existing conditions**

- 1.4.1 Hart District is characterised by its wide variety of largely rural landscapes. The countryside is described as “a functional and precious resource, also valuable as an amenity playing an important role in the local quality of life.”
- 1.4.2 Hart District is emerging from a period of extensive and intensive development which has brought with it significant pressures on the local infrastructure.
- 1.4.3 The District’s local employment provision is based primarily in the Blackwater Valley but has been enhanced by new commercial developments around Fleet and Hook. The majority of local industry is therefore small scale, high technology based.
- 1.4.4 The Draft South East Plan recognises particular challenges faced by the sub-region which set the scene for the Proof of Evidence.
- *How to realise economic potential of the area without compromising the quality of life of residents*
  - *Achieve a better balance between the location and growth of jobs and homes while protecting the areas environmental assets, including the SPA*
  - *Deliver the requirements for physical, social and environmental infrastructure needed to support existing and future economic and housing growth.*

## **2 LOCATION**

### **2.1 Strategic Gap**

- 2.1.1 Locating the development within a designated Strategic Gap requires it to meet the conditions of Hampshire Structure Plan Policy

G1, Local Plan Policies CON 19, DEV12 and DEV13. These establish the function of the Strategic Gap and set the parameters for development within the Gap for sites with existing planning approval. Breaches of these policies are dealt with in other evidence. As a consequence of the primary function of the Strategic Gap, it provides significant amenity and recreational space together with habitats for areas of ecological and environmental importance.

- 2.1.2 Regional Planning Guidance RPG9 (South East Plan) Policy Q4 is most relevant in the case of Pyestock due to the presence of the Strategic Gap and the local amenity areas that exist within it.
- 2.1.3 PPG4 - Industrial Commercial Development and Small Firms stresses *"that economic growth and a high quality environment have to be pursued together."* The 24 hour a day 7 day a week operation of the proposed facility in close proximity to a significant recreational and amenity area as well as residential areas has been a cause of major public concern.
- 2.1.4 The necessity for 24 hour, 7 day a week operation is questioned because of the evolution of the design of the development. It is argued that against a range of Policies, the mass, scale and nature of the proposed development seriously erodes the currently fragile separation of Fleet and communities on the District Boundary, changes the rural character of the area and impacts a valued amenity area. The development is unsustainable and as such warrants refusal.

## **2.2 SPA's SSSIs, SINCS**

- 2.2.1 The development is located in close proximity to a number of sites of special interest including the Thames Basin Heath SPA, SSSIs and SINCS. Separate evidence is presented on ecological concerns.

The discussion, through a review of relevant policies, addresses the weight that should be given to environmental impacts in relation to sustainable development. It concludes that the conditions that control against unacceptable development are stringent and establishes that the environmental protection of these sites should be given a high weighting. Precaution would dictate that development should not be permitted as no special circumstances have been proved.

## **2.3 Inadequate Access**

- 2.3.1 The quality and suitability of the local and immediately accessible national road network are assessed against the guidance given in PPG13 and a major study undertaken for the West Midlands Employment Land Advisory Group.
- 2.3.2 It is assessed that the character of the A287 Minley Link Road does not make it an adequate access to the trunk road. The M3 is already operating near capacity, exhibits current network stress and is predicted to deteriorate progressively with time.
- 2.3.3 The roads providing the major approach to the development, Minley Link Road and Summit Avenue, exhibit severe signs of distress in the peak traffic periods, demonstrating inadequate local road infrastructure to cope with existing traffic conditions.
- 2.3.4 The Appellant has not demonstrated that the proposed modifications to the local road network will have any positive impact.
- 2.3.5 It is concluded that a failure to recognise the problem of inadequate road capacity will have significant socio-economic repercussions for the North Hants area.

## **2.4 Local Employment Base**

- 2.4.1 It is demonstrated that Hart District fails to measure up to a set of criteria for "good access to labour" relevant to distribution depots. The low levels of unemployment and high levels of qualification and skills will not provide the labour force required by the development. The development has no sympathy with the traditional employment in the area. and does not meet the needs of the local economy.

## **2.5 Housing**

- 2.5.1 Hart is a high cost housing area and has inadequate affordable housing to meet current demand. Warehouse manual staff would place further pressure on the affordable housing market.

## **3 GREEN TRAFFIC ISSUES**

### **3.1 Lack of an Effective Travel Plan**

- 3.1.1 This addresses the Appellant's recognition of inadequate public transport in the Pyestock area. The imposition of a 2 km embargo on employee car access and the provision of cycle ways fail to recognise the lack of employee availability within the immediate area.

There is no clear evidence that a "bespoke bus service" will affect any change in travel patterns, especially in view of the proposed shift working.

The Appellant's proposal disrupts one of the best cycle ways in the District.

### **3.2 Car parking provision**

- 3.2.1 The lack of commitment to manage travel patterns is exposed in the number of car parking spaces to be provided which it is demonstrated is the equivalent of a 91% provision; no restraint on personal car usage.

A real commitment to changing modes of travel would halve the number of parking spaces.

### **3.3 In-commuting**

- 3.3.1 It is argued that in recognition of a local shortage in suitable labour, the Appellant has extended the employment catchment to Basingstoke and Dean, involving up to 40 mile journeys to work. The development will therefore create further in-commuting contrary to RPG9 paragraph 3.5.11. and contrary to the principles of sustainability.
- 3.3.2 It is concluded that a development of this type and scale would be better located within a designated Regional Hub.

## **4 UNSUSTAINABLE ENVIRONMENTAL CONSEQUENCES**

### **4.1 Emissions**

- 4.1.1 It is demonstrated that Government Policy is to reduce green house gas affects and particularly reduce CO<sub>2</sub> emissions. The road freight only proposal is contrary to government direction.

### **4.2 Loss of carbon sequestration**

- 4.2.1 The Climate Change supplement to PPS1 recognises the benefit of carbon sequestration by natural vegetation and this has been recognised by one of the Appellant's associates. The intensification of development, through the increase in developed floor space reduces the carbon sequestration potential of the site and this is not addressed in the ES.

### **4.3 Carbon embedded in Construction**

- 4.3.1 It is contended that no carbon balance has been established for the proposed development. Although the new buildings may meet operational standards for energy efficiency, the major damage has been caused during construction. The total carbon balance for the application has not been addressed within the ES.

## **5 ECONOMIC CONSIDERATIONS**

- 5.1 Using the direction established in PPS1 to promote “a strong, stable and productive economy and the regional interpretation placed on this by RPG9 it is argued that the application does not meet these economic parameters.
- 5.2 Although the use of brown-field sites is endorsed, it is questioned if a single use of land representing 60% of the available employment land in the District, that is unlikely to raise local skill levels, is the best use of the site.
- 5.3 It is highlighted that no needs analysis has been conducted in respect of the proposed development to see whether it is necessary for any essential economic or other reason. No alternative sites have been considered to see whether an alternative location might better meet any such need and provide both social and economic benefit to improve the quality of life of more deprived people in the Region.
- 5.4 The proposal fails to address emerging policy WCBV2 in promoting “Smart Economic Growth” The proposed development not only fails to meet the objectives, but potential harm to the existing local economy is enumerated.
- 5.5 There is no demonstrable social, environmental or economic benefit to justify the infliction of such harm. The proposal is unsustainable in terms of local and regional policy and should be rejected.