



Basingstoke and Deane Local Plan Update (2021-2040) Consultation on the Draft Regulation 18 version

Representation form

The Basingstoke and Deane Local Plan Update consultation is currently open for comment for a period of six weeks from **Monday 22 January 2024 until midnight on Monday 4 March 2024**.

To view the consultation documents and find out more information, please visit the council's website:
www.basingstoke.gov.uk/LPU-have-your-say

We would encourage you to respond online, via the council's consultation portal:
<https://consult.basingstoke.gov.uk/> **to save time and reduce our cost.**

Representations can also be submitted by returning this form or by writing to Basingstoke and Deane Borough Council:

post: Planning Policy Team, Civic Offices, London Road, Basingstoke RG21 4AH

email: local.plan@basingstoke.gov.uk

If you would like any of the consultation information, including this form, in a different format, e.g. large print, Braille, please contact customerservice@basingstoke.gov.uk or call the council's Contact Centre on 01256 844844.

This form has two parts:

Part A – personal details (needs only to be completed once).

Part B – your representation(s). **Please complete a separate form for each representation.**

Part A – Personal details	
Title: Ms	Name: Tessa Robertson
Organisation: The Dever Society (where relevant)	Job title: Chair (where relevant):
Address: PO Box 508 Winchester Postcode: SO23 3DQ	Email address: admin@deversociety.org.uk Telephone number:
If you are an agent, who are you representing?	

Are you responding as:

- | | | | |
|---------------------------------------|--------------------------|--------------------------------|--------------------------|
| An individual | <input type="checkbox"/> | A town or parish council | <input type="checkbox"/> |
| A county/borough council | <input type="checkbox"/> | A borough councillor/MP | <input type="checkbox"/> |
| On behalf of an organisation | <input type="checkbox"/> | On behalf of a community group | X |
| A landowner/developer/agent/architect | <input type="checkbox"/> | Other | <input type="checkbox"/> |

Part B – Representations on the Regulation 18 consultation

Please fill in a new Part B form for each representation on the Regulation 18 consultation, please do not include any personal details in this section of the form.

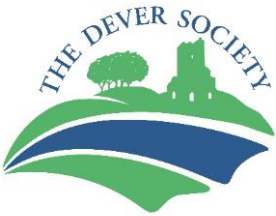
1. Please state which part of the Local Plan Update you are commenting on:

Title of document you are commenting on:	Local Plan Update 2021-2040 Draft for Regulation 18 Consultation		
Please quote relevant chapter, policy, figure or paragraph:	SPS5.4 – Southern Manydown SPS5.5 – Popham Garden Village		
Do you support, object or are you making a comment?:	Support	Object X	Comment

2. Please provide any comments below:

Expand this box as necessary. If attaching additional sheets, please clearly mark these with the title of the document and part of the document that the comment relates to, and your name.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



1. Introduction

1.1 The Dever Society is an amenity society for the Hampshire Downs and the Dever Valley, and is a registered charity. The Society's principal objective is to conserve, protect and celebrate the countryside in this part of Hampshire. In particular, it is concerned with the conservation and enhancement of the Mid-Hampshire Downs and the Dever Valley, which comprise the rural heartland of the county. The Downs provide a unique and valued resource for those who visit and enjoy the countryside, as well as forming an essential feature of the agricultural economy of the county.

1.2 The Dever Society was formed in 1990 in response to proposals by Zurich/Eagle Star to develop a large new settlement on farmland around the railway station at Micheldever Station in Winchester District, some 10 miles to the north of the city of Winchester and close to the boundary with Basingstoke and Deane Borough. The land is now owned by the Irish racehorse breeder John Magnier, who continues to promote the new town. The Society has several thousand supporters, drawn not only from those who live in the Downs and the Dever Valley, but also from a wide area of Hampshire and elsewhere in Britain.

1.3 The Society's principal focus remains the protection of this area of the Hampshire Downs and Dever Valley from inappropriate development, and it has always played an active role in the planning of the wider area, regardless of local authority boundaries. We are therefore extremely concerned at the Regulation 18 draft's inclusion of a 3,000 home 'garden village' on Popham airfield and 7,500 new dwellings at 'Southern Manydown.'

1.4 The Dever Society strongly objects to Policies SPS5.4 Southern Manydown and SPS5.5 Popham Garden Village for the following reasons.

2. Failure to consult local communities and Winchester City Council

2.1 The Dever Society notes the Reg 18 draft's emphasis on the importance of consulting local communities and ensuring they have their say in shaping their own areas (eg page 11-12 box). However, despite the fact that the proposed development at Popham airfield is only metres away from the boundary with Winchester District, and is on the edge of the village of Micheldever Station, no consultation with the residents has taken place. This is in spite of the fact that the proposed development at Popham in particular would have a major impact on this small community, and residents therefore should have been consulted. It is not acceptable that because it has been proposed by a neighbouring local authority, residents have had no say about a large new development with all its consequent impacts only a stone's throw from their village.

2.2 There also appears to have been no consultation with Winchester City Council, despite the 'duty to cooperate' and the significant impact that 3,000 new homes at Popham in particular would have on Winchester District. In addition, some of the infrastructure proposed for Popham would be in Winchester District and so would require the consent and cooperation of WCC. This may not be forthcoming, particularly if the proposed infrastructure has an adverse impact on areas within the District such as Micheldever Station.

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3. Climate change

3.1 We note the fact that BDBC declared a climate emergency in 2019 and has a target of making the borough carbon neutral by 2030. However, new settlements in the countryside are the most carbon intensive option and therefore put at risk the council's carbon neutrality goal. Transport is one of Basingstoke's largest sources of carbon emissions. The carbon implications of the car-dependent communities that new settlements invariably become, carbon emissions from decades of construction, loss of soil carbon stores and sinks and the carbon costs of building new infrastructure from scratch would all add to the carbon footprint of the development. While to some extent this is true of all development, this impact can be mitigated in existing urban areas through recycling and minimising the amount of new infrastructure that needs to be provided.

3.2 This all means that freestanding new settlements in rural locations are the worst housing option for Basingstoke from a carbon perspective and so are irreconcilable with policies to combat climate change. Claims by developers promoting new settlements in the countryside that their developments would be net zero and carbon neutral are frankly laughable.

4. Transport

4.1 Cars

4.1.1 New settlements in the countryside such as the 'garden village' proposed for Popham encourage car use. Research has shown that even in new settlements where there is a single railway station, the majority of journeys are made by car. Freestanding new settlements in the countryside are by definition located at a distance from the towns to which many residents would travel for work, leisure or shopping, or from which employees for the new settlement's employment offering would live. Only some of these would be easily accessible by train, meaning that journeys would mainly be by car.

4.1.2 Add to this the fact that new settlements are often very close to motorways and trunk roads (as is the case with Popham), and it is clear that residents and in-commuters are likely to take the easy option of using their cars.

4.1.3 These conclusions are reinforced by a recent review of the Government's Garden Villages and Garden Towns initiative. The review, entitled *Garden Villages and Garden Towns: Visions and Reality. Garden Village Dream vs the Tarmac Estate?* (2020) was produced by Transport for New Homes, whose steering group includes representatives from the Royal Town Planning Institute, CPRE, Network Rail and the RAC.

4.1.4 In August 2018, the Ministry for Housing, Communities and Local Government produced its Garden Communities Prospectus. This explained the importance of integrated and forward-looking transport, stating that this should include: "*the promotion of public transport, walking, and cycling so that settlements are easy to navigate, and facilitate simple and sustainable access to jobs, education, and services*".

4.1.5 However, the recent review found that garden villages and towns have failed to live up to expectations. It states that: "*Having found that the visions for garden communities were all about sustainable living with walking, cycling and public transport all key to enabling this, it was with some amazement that we found that nearly every new garden community hinged on major road improvements to cater for a massive expected rise in car use.*"

4.1.6 One of the reasons for this is their location. The report states that "*Garden villages were typically small discrete settlements, and we thought their size and location close to major road junctions, would mean*

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these places would be unlikely to function self-sufficiently”.

4.1.7 It was found that trains were very infrequent, many locations struggled to support a commercial bus service and with regard to cycling, the settlements were too far from neighbouring towns and surrounded by dual carriageway trunk roads. The settlements did, however, contain abundant car parking and indeed were dominated by this use, with small gardens and little greenery. All of these outcomes are likely to occur with the ‘garden village’ at Popham airfield. Indeed, this is a classic instance of where these outcomes can be predicted with confidence, given the airfield’s location close to the strategic trunk road network.

4.1.8 10,500 new homes at Popham and Southern Manydown will undoubtedly cause significant increases in traffic on the A303, A34 and A33. Traffic studies carried out on the impact of the proposed new town at Micheldever Station showed that traffic on these roads plus on a number of local roads increased to a very large extent, especially at peak times, and caused unacceptable congestion. It seems likely that residents of the ‘garden village’ for example, would likely use Overton Road and Larkwhistle Farm Road to reach the A33 when travelling to Winchester. These two local roads are completely inappropriate for such an increase in traffic.

4.2 Micheldever railway station

4.2.1 The Reg 18 draft makes much of the proximity of the railway station at Micheldever station to the proposed ‘garden village’, and yet fails to acknowledge the impact the increase of commuters from the new development would have on both the railway station and the village of Micheldever Station itself.

4.2.2 Significant numbers of commuters from outside the area use the railway station, and this has caused real problems with parking. The small station car park is full every weekday, and people parking on the roads and on verges became a real problem which has only been partially solved through the designation of most of the roadsides as residents’ parking. The Reg 18 draft states that the development must provide “safe, suitable and convenient access” to the railway station, but is unclear how this will be achieved. Even if some kind of shuttle bus were provided, it seems likely that large numbers of commuters would drive to the station, exacerbating the parking issues and causing congestion on Overton Road (a narrow road which in the village has parking along one side meaning that for much of its length it is in effect a single track road with passing places) at peak periods. The draft also says it will provide pedestrian and cycle access from the new development to the station, even though this could only mean cycle lanes and footpaths along Overton Road, which would require alterations to the road and the consent of the landowners and Winchester City Council, neither of which is certain.

4.2.3 The current service at Micheldever station is one train per hour in each direction. Increasing the number of trains that stop at Micheldever to accommodate an increase in passenger numbers as a result of the new development at Popham is likely to be problematic.

4.2.4 Network Rail’s 2015 Wessex Route Study (WRS) investigates what capacity and capability will be required from the railway network in 2019-2024 and beyond up to 2043. It is important to clarify that the WRS’s conclusions did not take account of the impact of increased passenger numbers or of the demand for more trains caused by a new development at Popham airfield.

4.2.5 The WRS concludes that the routes analysed, including the South West Main Line which Micheldever is on, are among some of the most densely trafficked routes in the country, with significant overcrowding already occurring and likely to become worse in the future. It also notes: “[Journey times south of Basingstoke] are all impacted by the constraints on the South West Main Line south of and including Basingstoke.”

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4.2.6 To address this, the WRS recommends 10-car capable stations to meet the capacity gap on the South West Main Line, to enable the operation of longer trains. However, due to short platforms, Micheldever is only capable of accommodating six carriages. The WRS also explores an expensive and disruptive engineering option, which would involve the construction of two new railway lines four miles in length between Waller's Ash Tunnel to the south of Micheldever Station, and Popham Tunnels immediately north of the station, to allow fast trains to bypass Micheldever. However, apart from being expensive and disruptive, it is not clear that such an option would even be possible, owing to the short distance between the platforms at Micheldever and the entry to the first Popham Tunnel. In any case, this is not one of the upgrades currently planned in the Railways Upgrade Plan Update 2017 Wessex, published by Network Rail in 2017, or the Wessex Route Strategic Plan (2019).

4.2.7 As such, the track is unable to support the need for increased traffic and additional trains currently projected, let alone the increase in the number of trains that would be required to provide an attractive service for a rise in passenger numbers caused by development at Popham.

4.2.8 It is not clear whether BDBC has had discussions with Network Rail or Southwestern Railway about these problems. It has certainly not consulted the residents of Micheldever Station about the increase in commuters and the impact on their village.

4.3 Buses

4.3.1 It is unlikely that a regular dedicated bus service would be viable for the 1,400 dwellings that would be built at Popham airfield during the Local Plan period to 2040, and it is likely to be many years, if ever, that such a service would accommodate significant numbers of commuters.

5. Infrastructure

5.1 A new settlement on Popham airfield would need brand new infrastructure in the form of roads, lighting, schools, healthcare, public transport, sewage, electricity, water and other utilities and so on. This is costly in both investment and environmental terms. By far the more sustainable option is therefore to develop at existing settlements, where the already available infrastructure can be used and expanded if necessary.

5.2 The Reg 18 draft states that 1,400 dwellings will be built at Popham during the plan period. This is not a large enough development to justify building at the start of the project the extensive infrastructure required. It is accepted in the draft, for example, that significant alterations to the A303 and Overton Road will be required, and it is hard to see how the cost of this could be covered by a development of only 1,400 homes.

5.3 BDBC's draft Infrastructure Delivery Plan puts the cost of transport, education and community facilities squarely on the developer, but past experience shows that developers pay for only a small proportion of new infrastructure; the rest is paid for out of the public purse. Providing the infrastructure for a new settlement risks decreasing the amount of public funding available for improvements to infrastructure in more sustainably located development in or at the edges of existing settlements.

6. Brownfield development and urban sprawl

6.1 The Reg 18 draft states that the focus of growth will be in Basingstoke Town and that the strategy will "maximise opportunities for development within built up areas and on previously developed land... while minimising the loss of greenfield land." And yet the vast majority of the new housing development proposed in the draft is on greenfield sites, not in built up areas or on previously developed land.

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6.2 The proposed 'garden village' at Popham particularly seems to be in conflict with this ambition. It is a clear outlier, on its own and far removed from the town centre. We fail to see how this location can possibly be seen as environmentally sustainable or desirable. It seems obvious that the outcome of the 10,500 home developments at Popham and Southern Manydown can only be a large urban sprawl extending from the town centre right up to the boundary with Winchester District, putting at risk the future of the important green gap between Basingstoke and Winchester.

7. Water quality and supply

7.1 Popham airfield is located in the Test (Upper) water body of the Test Upper and Middle Catchment. The River Test is regarded as one of the finest chalk streams in the world and is classified as a Site of Special Scientific Interest (SSSI) throughout its course. The geology in the catchment provides the high water quality groundwater on which the river and its wildlife depend. The Reg 18 draft recognises the need to protect and enhance the River Test on pages 17 and 25, and proposed Policy ENV5 on page 159 specifically commits to ensuring that development within the Test catchment and its tributaries will be required to conserve and enhance water sources and quality, the natural characteristics of the river, its ecosystem, geodiversity and ecological connectivity and so on.

7.2 By altering surfaces from grassland and woodland to tarmacked and drained surfaces, development causes run-off, allowing sediments to enter watercourses. Development also causes pollutants such as heavy metals, hydrocarbons, microplastics and de-icing salt to contaminate streams. Pollution and sediment run-off have been shown to be a particular problem during the construction phase, when disturbance to the site is at its highest. Production of fine sediments can be accentuated where clays are present, as is the case at Popham.

7.3 We find it difficult to see how Policy ENV5 can be achieved with a development of 3,000 dwellings at Popham. The problems inherent in this are recognised in paragraph 6.83 on page 89.

7.4 The availability of water supplies in the area is of concern. Indications are that there is restricted groundwater available over much of the area and this could be a significant issue if water supply for a new settlement were to be obtained from groundwater abstraction. As it is in this area that the springs and headwaters that supply the River Test are located, further abstraction would also be likely to adversely affect the water levels and biodiversity interest of this internationally important chalk stream.

8. Nature conservation and biodiversity

8.1 Building new towns in the countryside destroys and degrades biodiversity. Habitat fragmentation, the disturbance caused during the decades construction would take, the tarmacking over of soils and the air, noise and light pollution and disturbance caused by such developments, all have disastrous impacts on biodiversity.

8.2 The draft recognises the importance of protecting and enhancing the landscape and ensuring a net gain in biodiversity. There are two Sites of Importance for Nature Conservation (SINCs) in or adjacent to the Popham airfield site (Misholt Copse & Cocksford Firs and Oaken Copse), as well as areas of ancient woodland. There are also protected species including bats and dormice. Mitigation and species relocation measures are rarely successful and the SINCs, ancient woodlands and protected species would all be adversely affected during the construction phase and by the development itself. In addition, Micheldever Spoil Heaps SSSI, described by Natural England as "of quite exceptional botanical importance" is a short distance to the west and would be similarly affected.

Data Protection Statement

In complying with the General Data Protection Regulation (GDPR), Basingstoke and Deane Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to the consultation on the council's website. This will include publication of names of respondents and company names (where appropriate). Please ensure you do not include any personal information in Part B of the document. Copies of all consultation responses, including Part A, will be available to view at the council offices, and photocopies can be made of these representations on request.

By submitting representations, your details will be added to the Basingstoke and Deane Local Plan Consultation database and you may be contacted at future stages of the local plan process. All personal data will be processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation ('GDPR').

If you do not wish to be contacted further, please advise us.

No, I do not wish to be contacted about the Local Plan

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We will process personal data provided on this form only for the purposes relating to this consultation. A summary of consultation responses may be reported to the relevant council Committee and published on the council's website.

As a public authority the council is subject to the provisions of the Freedom of Information Act (FOIA) and Environmental Information Regulations (EIR). This means we may be required to disclose information provided as part of this consultation if it is requested. Personal data will not be disclosed under FOIA or EIR.

- we will share your information with the appointed inspector for the purpose of examining the Local Plan
- we will not disclose any information to other organisations unless we are required by law to do so
- your personal details will only be held as long as is needed for this consultation and in accordance with our retention policy
- we may contact you in future to see if you'd like to be added to our consultation database

For further details on how your information is used; how we maintain the security of your information and your rights, including how to access information we hold on you and how to complain if you have any concerns about how your personal details are processed, please visit www.basingstoke.gov.uk or email dpo@basingstoke.gov.uk