

DUMMER PARISH COUNCIL

The Planning department
Basingstoke and Deane Borough Council
London Road
Basingstoke
Hants
RG21 4AH

Dear Mr O'Donovan

Ref: 23/O3120/FUL

Location: Land At Oakdown Farm Winchester Road Dummer Basingstoke Hampshire
Proposal: Demolition of three dwellings, outbuildings and related structures and construction of storage and distribution units (use class B8) with ancillary offices and gatehouses, associated infrastructure works (including parking and landscaping), and full details of site levels, access, drainage, tree retention and diversion of underground pipeline. (Phased and delivered across separate and self-contained plots)
Grid Ref: 458772, 147179

1. INTRODUCTION

In this document we detail the objections Dummer Parish Council wish to raise related to the application. These are grouped under sections related to:

- ALP Policies EP1 and EM1
- Comments related to the Economic Needs for and the Benefits to BDBC Residents of this development
- Other comments related to the impact of this application

Given the rejection at appeal of the last application for this site by the same developer, it is relevant to reference those aspects that the Inspector deemed important to his decision. Where applicable they are prefixed by the Plxx where xx is the relevant paragraph of his report.

2. APPLICABLE POLICIES TO BE CONSIDERED

The following issues have been categorised according to the relevant Adopted Local Plan Policies for this application:

EP1 Development proposals for storage and distribution floorspace, outside of the existing Strategic Employment Areas, which come forward in advance of a subsequent DPD, will be permitted which are:

- g) **Able to successfully mitigate the landscape impact**, which will include the provision of sufficient space for appropriate soft landscaping/green infrastructure, appropriate location of development within the site, and utilise a design, and layout of built form and use of materials in order to ensure that any landscape impacts are minimised;
- h) **Compatible with any neighbouring uses, including residential properties;**
- i) For the provision of high quality floorspace;

- j) Well related to the strategic road network and easily accessible for HGV's;
- k) Capable of being provided without having a severe highways impact;
- l) **Able to successfully mitigate the impact of the development on the character of nearby settlements;** and
- m) Able to **demonstrate there is a proven need** for the floorspace proposed.

EM1 – Development proposals must **respect, enhance and not be detrimental** to the character or visual amenity of the landscape likely to be affected, paying particular regard to:

- a) The particular qualities identified within the council's **landscape character assessment** and any subsequent updates or relevant guidance;
- b) The visual amenity and scenic quality;
- c) The **setting** of a settlement, **including important views to, across, within and out of settlements;**
- d) The **local character of buildings and settlements**, including important open areas;
- e) Trees, ancient woodland, hedgerows, water features such as rivers and other landscape features and their function as ecological networks;
- f) **Intrinsically dark landscapes;**
- g) Historic landscapes, parks and gardens and features; and
- h) The character of the borough's rivers and tributaries, including the River Loddon and Test, which should be safeguarded.

3. ISSUES RELATED TO POLICY EP1

3.1. Policy EP1 g) – Able to successfully mitigate the landscape impact

Even with the proposed changes there remains a significant amount of change to the landscape resulting from the engineering work to create the plateaus and the access roundabout and roads. There may be some reduction in the size of the buildings (over the appeal application) but there are more buildings and the site continues to appear overdeveloped bearing in mind that the Borough's 2022 Landscape Sensitivity Study concluded that the site could only accommodate limited development in the northern area of the site.

It is difficult to see how the changes have mitigated the '**high scale of change**' that '**would be irreversible**' highlighted by the planning inspector as **major** (PI22 & PI32-34 – Landscape Effects).

3.2. Policy EP1 h) Incompatibility with neighbouring uses

Notwithstanding the proposed low noise road surface on the A30 we believe that the impact on the residents of Ganderdown Cottages and the other adjacent housing around the southern end of Trenchards Lane will (in terms of noise, vibration and air quality) be more serious than the applicant estimates. A pedestrian / cycle crossing adjacent to the houses will result in HGV's accelerating from the A30 roundabout only to have to slow / stop for the crossing and then accelerate again as they try to climb the hill towards the Southwood junction (where there is likely to be another stop/start cycle).

HGV movement on site with reversing warnings will also be intrusive. The site lighting (see 4.3) will also be significant given the height of the Unit (BG1 and others) above the A30 road level. Both the HGV and Lighting issues will, at night, be almost continuous when compared to the current situation where the traffic reduces significantly during the overnight hours.

For residents living further away (including Dummer) the lighting effects will be impossible to ignore (see 4.3 again).

3.3. Policy EP1 k) Capable of being provided without having a severe highways impact;

With the change to the site design and the rearrangement of the distribution roads it appears that there are more opportunities for congestion and safety issues if HGVs arrive on site outside of their allotted arrival times. The rejected application had more features (e.g. a marshalling yard before the entrance to Unit1 and a roundabout at the SW end of the site) to support the safe manoeuvring of HGV's that arrive at the wrong time. In the current application, it would appear that HGVs would have to reverse in the roads also being used by other road users. HGV drivers may seek waiting areas in unsuitable locations on nearby roads especially within the Dummer Conservation Area which would affect the character of this historic settlement contrary to Policy EM1 d). There is substantial evidence of this occurring in communities adjacent to other similar B8 large warehouse developments without sufficient on-site holding areas.

It is important to ensure the HGVs do not park-up on (or back up onto) the A30 as this is a key transport route. As with the previous application, should the application be approved, it is important that access is managed to an agreed Operational Traffic Management Plan (covered by a planning condition). It is not clear who is going to represent the local residents should a traffic problem be experienced so an exception / problem reporting process needs to be documented in the management plan.

If, as we understand the site is to be used exclusively for B8 HGV type usage (and not last mile delivery businesses) this needs to be ensured by the insertion of an appropriate planning condition.

3.4. Policy EP1 I) Able to successfully mitigate the impact of the development on the character of nearby settlements

3.4.1. Please see 3.2 above with respect to those residents living along the A30 directly opposite the site.

3.4.2. Whilst the developer is suggesting that all HGV traffic will only travel to / from the M3 J7, there is a significant concern that the local roads and settlements will be impacted both during the construction and operational phases as travellers seek alternative routes at times of congestion.

3.4.3. The CEMP should not just assume 'no issue' but clearly define a plan to address the likelihood of rat-running on the roads through Dummer to avoid delays caused by the construction. This could include, for example, a closure of the road from Tower Hill to the A30 as was recently implemented during work on the M3 bridge.

3.4.4. The Service Delivery and / or the Operational Traffic Management Plan should include plans to address consequential impact on the local roads.

3.5. Policy EP1 m) Is there a proven need and is this the right location?

See section 5 below.

4. ISSUES RELATED TO POLICY EM1

In PI71, the inspector found that the appeal application conflicts with Policy EM1 b), c), d) and f). We believe that this is still the case for the current application and particular issues are highlighted below.

4.1. Policy EM1 b) The visual amenity and scenic quality

4.1.1. Building and Plateau Heights

Despite the reduction in building heights, the plateau heights are increased (over the appeal application) so the net reduction in overall height over the surroundings and from key viewpoints is not as significant as being promoted and has failed to significantly address the visual impact issues. There are many views of the site that are dominated by the height of the buildings above their surroundings (see 4.2.1 below).

	Appeal Application	New Application	Comment
View from Trenchards Lane			
Height of Roofline above viewpoint	28.242m (Unit1)	26.787 (Unit BG1)	-1.455m But the Unit closer to the A30
View from A30 Roundabout			Two Units now in view
Height of Roofline above viewpoint	31.234m (Unit 1)	29.779m (Unit BG2)	-1.464 (Unit pushed back on the site)
Height of Roofline above viewpoint	31.234m (Unit 1)	27.754m (Unit BG 3/4)	The 3 rd Building -3.48m (Unit closer to the A30)

4.2. Policy EM1 c) Impact on views to across, within and out of settlements

Local Plan Policy EM1 says: *“Development proposals must also respect the sense of place, sense of tranquillity or remoteness, and the quiet enjoyment of the landscape from public rights of way. Development proposals will not be accepted unless they maintain the integrity of existing settlements and prevent their coalescence.”*

4.2.1.Key Viewpoints / Visual Receptors

The Planning Inspector for the appeal application assessed the overall visual impact in PI57 as **acute** and **adverse**.

Below is a list of key viewpoints / visual receptors identified in the appeal report which we consider continue to emphasise the visual impact of the proposed development and whose adverse effect has been wrongly downplayed by the applicant's consultants:

Viewpoint / Visual Receptor	Inspectors Report Reference	Inspector Report Categorization	New Application Applicant's Categorization	New Application Objectors' Categorization
N(Tower Hill)	PI45	Major Adverse	Minor Adverse – Negligible Adverse at Year 15	Major Adverse – the buildings appear as one unit and are still visible at Year 15
Users of Footpath D2/D3	PI46	Major Adverse	Not directly referenced	Major Adverse – buildings extensively visible at Year 15. The adverse effect cannot be mitigated.
R (Visitors to Sun Inn)	PI48	Moderate Adverse	Moderate Adverse	Major Adverse. It is noticeable that the building BG6 is closer to the A30. The montage at Year 15 is too optimistic and limited to summertime foliage.
B (Wayfarers Walk)	PI49-51	Major Adverse (PI51)	Moderate Adverse	Major Adverse – the gaps between the buildings deliver little benefit. The buildings still appear continuous
S (Footpath 174/1/1) from North Waltham)	PI49-51	Major Adverse (PI51)	Major/Moderate Adverse	Major Adverse – the gaps between the buildings deliver little benefit. The buildings still appear continuous
C (Trenchards Lane)	PI52	Substantial Adverse	Moderate/Minor Adverse at Year 0 and Year 15	Substantial Adverse. The building (BG1) will still appear well above the planting at year 15. Given it is closer to the Receptor it further emphasises its height when compared to the appeal application.
Y (New Roundabout)	PI56	Minor Adverse	Moderate Adverse	Moderate Adverse – it is noticeable that the applicant has used a

				'full summer leaf' view to hide the buildings.
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The applicant claims that all the above receptors, apart from Footpath 174/1/1 from North Waltham are "Not Significant". Paragraph 6.44 of GLVIA states:

"There are no hard and fast rules about what makes a significant effect, and there cannot be a standard approach since circumstances vary with the location and context and with the type of proposal. In making a judgement about the significance of visual effects the following points should be noted:

- *Effects on people who are particularly sensitive to changes in views and visual amenity are more likely to be significant;*
- *Effects on people at recognised and important viewpoints or from recognised scenic routes are more likely to be significant;*
- *Large-scale changes which introduce new, non-characteristic or discordant or intrusive elements into the view are more likely to be significant than small changes or changes involving features already present within the view."*

We cannot see how the application of these criteria can result in any other conclusion that the effect of the proposed development on all of these viewpoints will be anything other than "**Significant**".

4.3. Policy EM1 f) Impact on the intrinsically Dark Landscape

The planning inspector reported in the appeal report (PI60) – *Notwithstanding these measures given the height of the building and the extent of its visibility within the surrounding area, I find that the scheme would emit light to the surrounding areas in breach of the area's existing dark skies.*

In PI62 the inspector believed the appeal application would conflict with this policy.

Despite the minimal change in building heights and plateau levels the need to satisfy the lighting requirement for the safe operation of the site during 24x7 operation remains. In particular, along the A30 side of the site there remains the lighting required to illuminate the building entrances (BG1,2,3 and 7), the car parks (BG1,2 3 and 7). Whilst the planting may help at year 15 it is unlikely to be of much use in earlier years or outside of the late spring / summer period. Therefore, we consider that the new application will continue to conflict with this policy.

5. COMMENTS ON THE ECONOMIC NEEDS FOR AND BENEFITS TO BDBC RESIDENTS OF THIS APPLICATION

5.1. Key Points

The following key questions /considerations are detailed further in the following sections:

Quantum of Development required – Given the amount of Logistics development being proposed in the area, across 3 council areas, is there sufficient justification for the total need to be provided?

Quantum and Types of Jobs to be provided – How does the spectrum of job types that the site might provide relate to the needs of those that live in the BDBC area?

Employee availability to fill the job vacancies – Given the significant demand for development of this type in the area and the catchment areas from where employees might come is there sufficient capacity available to staff these sites?

What is happening to the Strategic Employment Areas – Are the types and sizes of the buildings in the SEA's appropriate in meeting the needs of the employers in the years up to 2039? Is there a need to regenerate these areas?

5.2. Quantum of Development Required in the Area

5.2.1. In the BDBC Economic Needs Assessment 2021, it considers BDBC to be its own FEMA (Functional Economic Market Area) within which it assesses the development required in the Local Plan Period. However, it suggests (in 3.26) that this approach has obvious limitations re-logistics and suggests the Logistics FEMA which may extend outside Hampshire and into Wiltshire and a strategic M3/A303 approach is needed. It says (in 3.27) that *"a cross boundary strategic approach would be particularly advantageous given the cumulative impact of many individual warehouse schemes along a constrained strategic route west of Amesbury. To date we have seen various developer promoted evidence of sub regional 'need', but no consideration of potential supply and constraints to meet this need (beyond the site or area being promoted)".* However, despite the perceived benefits, the ENA fails to reach a solid conclusion regarding the issue and continues to focus of single district approach.

5.2.2. Developers are seeking to promote a significant need for logistics space in the North Hampshire area e.g. at Lodge Farm (M3 J5), in Hart DC, an application has been submitted for 105,000 sqm (outside of the Local Plan provisions) and the developer suggests that Hart is under provisioned for logistics space. In their Local Plan Update process, Test Valley BC have identified a need in their draft Local Plan Update 311,195 sqm (North Test Valley) and 210,280sqm (South Test Valley).

5.2.3. The above figures are significant and it is not clear how much cross-LPA work has been undertaken to assess the wider need in the area and ability to support this amount of development from locations such as Andover, Basingstoke and Hook / Odiham.

5.3. Quantum and Types of Jobs to be Provided

5.3.1. The applicant is proposing 1000+ jobs at the site but there is no detail about the prospective occupiers and what their real staff needs are. Nor is there any description of the amount of automation that will be implemented in the warehouses. Automation is becoming more common in the logistics business as they seek to reduce cost and / or mitigate the difficulty of recruiting staff for warehouse jobs.

5.3.2. The applicant is suggesting that the percentage of managerial staff that will be employed at the site is far greater than other logistics experts advise. The following table shows a comparison from different sources, Savills who provided the data for Newlands and for the British Property Federation compared with data from a 2023 report by Prologis (www.prologis.co.uk) that surveyed 29 operations ranging in size from 1,310 to 50,497 sqm and with staff ranging from 1 to 1000.

Source	Managerial and Professional	Office Staff	Warehouse staff, drivers and others
Savills report for Newlands (2023) – this application	41%	15%	44%
Savills report for British Property Fedn (2021)	34%	15%	50%
Prologis report on Logistics (2023)	9%	14%	77%

The Prologis report is available here: <https://www.prologis.co.uk/news-research/global-insights/critical-infrastructure-driving-employment-growth-within-uks>

5.3.3. From the above table it appears that Savills are suggesting warehouse operations need a significant amount of management. The Prologis report appears more realistic and reflective of a more sensible management / other worker split.

5.3.4. Based on the Prologis survey findings the estimated number of staff for Oakdown Farm would be 883.

5.3.5. In summary, it is difficult to believe the jobs figures provided by the applicant when compared to other logistics operations.

5.4. Employee availability to fill the job vacancies

5.4.1. The applicant refers to an enormous job catchment area (from the Solent to the M25), based on a 30-minute travel time (by car), and is suggesting that there are a significant number of unemployed people that will be interested in working at the warehouses. It is a rather simple and flawed assessment as it assumes that everybody has the available funds / means to travel easily in a timely manner (and no choice closer to their place of residence). This is at a time when planning policies are encouraging sustainable forms of transport.

5.4.2. When looking on a map it is very evident that Basingstoke is surrounded by a significant amount of rural countryside. From the site – Andover is 16 miles away, Winchester is 14 miles away, Hook is 10 miles away, Fleet is 19 miles away, Reading is 23 miles away. Timely travel to the site from these locations will most probably need a car and public transport will be costly and impractical.

5.4.3. Whilst it is accepted that some people will travel from outside of Basingstoke to work at Oakdown Farm it should not be assumed that everybody has the means to travel by car over the distances involved. The following is extracted from the above referenced Prologis report relating to distance travelled to work showing that 69% of workers travel less than 10 miles to work.

< 2 Miles	2-5 Miles	5-10 Miles	10-20 Miles	< 20 Miles
17%	25%	27%	22%	9%

5.4.4. Basingstoke is constantly referred to as a High Wage / Low Unemployment Environment. Average pay rates in Basingstoke are more than 5% higher than the average rates for the whole of the Southeast. Moreover, compared with all other surrounding local authority areas, only the more affluent residential areas of Winchester and Hart have higher pay rates than Basingstoke. Source www.nomisweb.co.uk (data provided by the ONS).

5.4.5. Furthermore, only 3.5% of Basingstoke’s workforce is currently employed in the Transportation & Storage sector, compared with an average of 4.8% for the whole of the Southeast and, most importantly, when compared with the percentages in the areas to the south and west along the A303 and M3 where Test Valley has 10% of its workforce employed in Transportation & Storage and Eastleigh has 7.5% working in that sector. Source www.nomisweb.co.uk.

The following table published by HCC shows the location of those unemployed in BDBC by ward.

Unemployed Claimants and Residential Unemployment Rate: November 2023

Basingstoke & Deane

2021 Electoral Ward	Males		Females		Total	
	Number	%	Number	%	Number	%
Popley	210	5.4	175	4.6	385	5.0
South Ham	150	4.9	135	4.1	285	4.5
Brighton Hill	125	3.8	125	3.6	250	3.7
Norden	140	4.2	105	3.2	250	3.7
Brookvale & Kings Furlong	140	3.6	105	3.0	245	3.3
Eastrop & Grove	125	3.9	85	2.9	210	3.4
Sherborne St John & Rooksdown	100	3.0	105	3.1	205	3.0
Kempshott & Buckskin	105	3.5	75	2.3	180	2.9
Tadley North, Kingsclere & Baughurst	70	2.3	65	2.1	135	2.2
Winklebury & Manydown	70	3.4	55	2.6	130	3.0
Bramley	55	2.0	50	1.8	105	1.9
Whitchurch, Overton & Laverstoke	55	1.9	50	1.7	105	1.8
Chineham	50	1.5	50	1.4	100	1.5
Hatch Warren & Beggarwood	50	1.7	40	1.1	90	1.4
Evingar	40	1.5	45	1.6	85	1.5
Oakley & The Candovers	45	2.1	35	1.6	85	1.8
Tadley & Pamber	45	1.4	40	1.3	85	1.3
Basing & Upton Grey	40	1.4	30	1.0	70	1.2
Basingstoke & Deane	1,620	2.8	1,365	2.3	2,985	2.5
Hamphire (CC)	10,175	2.4	8,905	2.1	19,080	2.2
United Kingdom	872,660	4.2	681,910	3.2	1,554,570	3.7

The sum of ward claimant counts may not sum to the total due to rounding to nearest five claimants by DWP

Sources:

Claimant Count Unemployment Data: Office for National Statistics

Note:

The residential unemployment rate is defined here as the proportion of the working age population (16-64 for males and females).

5.4.6. The following is extracted from the above referenced Prologis report relating to salaries:

>£20k	£20–30k	£30–50k	£50–150k
11%	36%	38%	15%

5.4.7. The applicants also reports that self-containment for B&D (i.e. the proportion of residents who live and work in the same local authority area), at 62.9%, is better than other local authorities along the M3/A303 corridor. Further they report that car-based journeys account for 47% of all travel modes in the case of B&D residents. This appears to suggest (along with the Prologis information referenced above) a need to actively consider how the travel needs of BDBC residents that might wish to work at the site are addressed.

5.4.8. It is noticeable that unemployment rates in the Wards in the vicinity of the Oakdown Farm site (Hatch Warren & Beggarwood and Oakley and the Candovers) are significantly lower than the unemployment rates in areas of the Borough further away from the site (Popley, South Ham, Brighton Hill and Norden). This places considerable doubt on the applicant’s active travel ambitions.

5.4.9. Given that Basingstoke has primarily a Hub and Spoke Bus System, how will the extra cost / time need to travel from the other parts of the Town impact the available pool of labour? The Travel Plan refers to a bus route from the centre of town but of what use is that to those not on the bus route including those working on the late shift. If we are to provide further employment opportunities to those that are seeking work the available transport method should be capable of providing a timely and easy to use service from

where they live. What will be the effect on pedestrians / cyclists who are expected to work at night?

5.4.10. The above statistics on unemployment rates, average wage rates and types of employment demonstrate that potential warehouse operators at the J7 site will either have to pay more than the industry average to attract local workers from what is a smaller proportion of local people experienced in the Transportation & Storage sector or, as is more likely, given the convenient access to the M3 and A303, they will import their workforce from surrounding areas, especially from Andover (Test Valley) and Eastleigh where there are workers with lower pay expectations and existing experience in the sector. These “imported” workers will inevitably commute by car to J7, adding to congestion and pollution to the detriment of local residents and Basingstoke’s attempts to reduce carbon emissions.

5.5. What is happening to the Strategic Employment Areas?

5.5.1. Within the applicant’s submission, the BDBC ENA and even within the draft policies of the Emerging Local Plan Update there are many references to the unsuitability of the current logistics / warehouse building stock in the SEA’s for current needs. The Draft Local Plan policies refer to the need for regeneration but there is no specific policy that addresses this for the SEA’s.

5.5.2. It seems too easy to solve this problem by building on a greenfield site. This does not contribute to the regeneration of sites to ensure their continued contribution to the economy in BDBC. These SEA sites have good road links, are accessible by established public transport and are closely related to major housing locations and as can be seen in the table in O appear to have many unemployed people living locally.

5.5.3. Sites such as Oakdown Farm appear likely to encourage more long-distance car travel and congestion.

5.5.4. We see a danger in that the SEA’s will continue to age and more greenfield sites will be required unless some specific regeneration policies are created and enacted that could encourage active travel methods for those living close to the existing locations.

6. OTHER COMMENTS RELATED TO THE APPLICATION AND ITS IMPACT

6.1. Foul Drainage

6.1.1. In the applicant’s Drainage Strategy, it is stated *“The foul drainage for the eight plots will discharge to spurs and drain by gravity into a pumping station for the overall Basingstoke Gateway site. The flow in turn will discharge to the public system approximately two kilometres northeast of the site”* and refers to an agreement from Thames Water that connection to the public sewer has been agreed.

6.1.2. However, all the correspondence in Appendix A7 relates to discussions that took place in April – September 2021. The applicant also admits that *“The Development Phasing Plan (for downstream upgrade works) cannot be provided by Thames Water prior to a planning consent being granted, however given the upgrade works by Thames Water*

have been defined and agreed, the risks associated with our development are low. ". None of the correspondence submitted in Appendix A7 indicates that the necessary upgrade works have been "defined and agreed".

Thames Water has now commented to BDBC that it "has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available".

6.1.3. The risk cannot therefore possibly be described as "low" and there are significant risks that foul drainage cannot be achieved in a timely manner or that downstream overflows will occur in areas of the sewerage system between the site and the Chineham treatment works.

6.1.4. We consider this to be an issue of such importance that we believe that the Condition required by Thames Water in their comments should be more stringent and should be worded as follows (our recommended changes from the Thames Water condition are emboldened and underlined): *"The development shall not be **commenced** until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be **commenced**. Where a development and infrastructure phasing plan is agreed, no **construction** shall take place other than in accordance with the agreed development and infrastructure phasing plan."*

6.2. BDBC review of the applicant's Industrial and Logistics and Labour Market documentation

Given the significant differences between the BDBC Economic Needs Assessment and the applicants documentation and what it proposes we assume that BDBC will be commissioning a full assessment of their submission as part of the application review process.

6.3. Safeguarding of land along the A30

We have already raised questions with BDBC about the safeguarding of land along the A30 corridor for longer term development needs in support of the Local Plan Update process (as requested in 2022 by HCC), and the need to support the plans for a cycle route along the A30 as defined in the BDBC Local Cycling and Walking Infrastructure Plan (Route 260). We assume that these items will be considered as part of the application review process.

Yours sincerely

Karen Ross

Karen Ross (Mrs)
Clerk to Dummer Parish Council