



# Basingstoke and Deane Local Plan 2024 to 2042: Draft Spatial Strategy Regulation 18 Consultation (2025)

## Representation form

The Basingstoke and Deane Local Plan Draft Spatial Strategy consultation is currently open for comment for a period of eight weeks from **Friday 28 November 2025 until 5pm on Friday 23 January 2026**.

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

**Please respond online, via the council's consultation portal:** <https://consult.basingstoke.gov.uk/>

If you cannot use the consultation portal, representations can also be submitted by returning this form by email or by writing to Basingstoke and Deane Borough Council:

**email:** [local.plan@basingstoke.gov.uk](mailto:local.plan@basingstoke.gov.uk)

**post:** Planning Policy Team, Basingstoke and Deane Borough Council Civic Offices, London Road, Basingstoke RG21 4AH

In order to record your representation as duly made, you must provide a name and postal address. Please also state what document/chapter/policy, each of your comments relate to. If you wish to comment on a specific paragraph number or policy criteria please make this clear in your comment.

A single consultation response will be counted as one response, even if additional names are listed on it. Please encourage family members to make their own response if they wish to.

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](mailto:customerservice@basingstoke.gov.uk) or call the council's Contact Centre on 01256 844844.

### This form has two parts:

Part A – personal details

Part B – your representation(s)

## Part A – Personal details

<b>First Name:</b> [REDACTED]	<b>Last Name:</b> [REDACTED]
<b>Organisation:</b> [REDACTED] (if responding on behalf of an organisation)	<b>Job title:</b> Senior Planner (if responding on behalf of an organisation):
<b>Address:</b> [REDACTED] [REDACTED] [REDACTED] [REDACTED]	<b>Email address:</b> [REDACTED]
<b>Postcode:</b>	
<b>If you are an agent making a representation on behalf of someone else (a landowner or developer), please write your own details above and tell us the name of the person/organisation you are representing here:</b> Old Basing & Lychpit Parish Council	

### Are you responding as:

An individual	<input type="checkbox"/>	A town/parish council	<input checked="" type="checkbox"/>
A county/borough council	<input type="checkbox"/>	On behalf of an organisation/community group	<input type="checkbox"/>
A landowner/developer	<input type="checkbox"/>	A borough councillor/MP	<input type="checkbox"/>
Other	<input type="checkbox"/>		

## Part B – Representations 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 Draft Local Plan Updated Spatial Strategy you are commenting on:

<b>Title of document you are commenting on:</b>	Basingstoke and Deane Local Plan 2024 to 2042 Draft Spatial Strategy Regulation 18 Consultation November 2025
<b>Please quote relevant document, chapter, policy:</b>	Policy SPS5.4: Land at Whitmarsh Lane & paragraphs 5.90 to 5.114 plus Figure 5.8: Eastern Basingstoke Illustrative Concept Plan including SPS5.4, SPS5.5, SPS5.6 and SPS5.7 and Figure 5.9:

	SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan		
<b>Do you support, object or are you making a comment?</b>	<b>Support</b>	<b>Object</b>	<b>Comment</b>
		√	

## 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.

**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.**

Old Basing & Lychpit Parish Council strongly objects to the proposal to increase the allocation from 450 to 1,500 dwellings on Land at Whitmarsh Lane, which now includes the adjoining Lodge Farm site, incorporating education facilities, a mixed-use centre providing a range of retail, leisure, cultural, community, health, service and employment facilities and permanent Gypsy and Traveller Pitches (hereafter referred to as 'the proposed development'). This is on the grounds that it does not comply with the soundness tests set out in paragraph 36 of the National Planning Policy Framework (Dec 2024) (NPPF) and is therefore unsound. In particular it conflicts with the requirement for Local Plan proposals to be b) justified; c) effective and d) consistent with national policy.

With regard to these matters, we will address first its inconsistency with national policy and also where relevant local policy; and then consider why it is neither justified or effective.

### 1. Heritage

Paragraph 213 of the NPPF states that: *'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.'* Figure 5.9: SPS5.4: Land at Whitmarsh Lane Illustrative Concept Plan indicates that the proposed allocation contains several designated heritage assets including the Grade II listed Lodge Farm and barn, which is located in the centre of the proposed allocation, and parts of the Pyotts Hill Entrenchment Scheduled Monument and the northern extension of the Old Basing Conservation Area. Both the Pyotts Hill Entrenchment Scheduled Monument and the northern extension of the Old Basing Conservation Area run along the western perimeter, but the red line which delineates the proposed Site Allocation Boundary includes a large part of the Scheduled Monument and part of the narrow northern extension of the Conservation Area.

A recent reappraisal of the Scheduled Monument (N.Adam, Cultural Heritage Desk-Based Assessment of Land East of Basingstoke Property Services – Hampshire County Council report HA003, 2017) concluded that it is actually a defensive multivallate earthwork dating from the early medieval period. Basing has been suggested to be a royal estate in the Middle Saxon period, its status possibly connected to the occurrence of the Battle of Basing in AD 871, when a Danish army defeated King Aethelred of Wessex, and his younger brother Alfred. The Pyotts Hill Entrenchment may be linked to this incident. This refutes the previous assumption that the ditch was a park pale and substantially increases its historic significance. Based on the previous assumption that the Pyott's Hill Entrenchment was a park pale the Old Basing Conservation Area Appraisal refers to its 'national importance', and states that it has: *significant historic associations with Basing House and reflects the traditional function and character of the former Deer Park hunting ground land use here, some distance from Basing House itself. There has been minimal degradation of the Pyotts Hill Entrenchment Scheduled Monument and its legibility contributes*

*positively to the special character and appearance of the area.*' (p. 69). As the Pyotts Hill Entrenchment either comprised an early medieval defensive feature or the boundary of a medieval deer park and currently forms the boundary between Basingstoke and the agricultural land to the east its historic function of forming a boundary would be lost by the proposed development, as there would be development both sides of it as would its legibility and open setting. Indeed, given that it forms a barrier along the eastern boundary of the proposed allocation with only two pedestrian crossing points identified on the Concept Plan it is likely that it would be subject to substantial pedestrian pressure from people wanting to make a short cut and would therefore also suffer likely physical damage. There would also be pressure to widen and improve the existing pedestrian access routes across the Scheduled Monument, as shown below, to provide safe and accessible routes:



The Conservation Appraisal also makes clear that the Pyotts Hill Character Area of the Old Basing Conservation Area has an intimate relationship with the proposed allocation site stating in the section relating to Vistas and Views that: *'The rural setting of the village to the east can be appreciated from this character area (Figures 61 and 62). Public Footpaths No.4 and No.7 facilitate views out over the countryside to the east of the conservation area. There are views northwest up Pyotts Hill and southeast towards the River Loddon. Views or glimpsed views through vegetation are possible along the length of Pyotts Hill. Cumulatively the views create a sequential experience: someone travelling along the lane is aware of the farmland to the east.'* This rural setting and the views travelling up Pyotts Hill would be lost if the proposed allocation for 1,500 dwellings proceeds, which would mean that an important component of the conservation area that contributes to its special value will have been lost.

There is also a Roman Road which crosses the southern part of the site the location of which was identified in the current adopted Local Plan 2011 – 2029, but is not identified on 'Figure 5.9: SPS5.4: Land at Whitmarsh Lane Illustrative Concept Plan.' In addition to Lodge Farm and barn

there are also two Grade II listed buildings just outside of the proposed Site Allocation Boundary on Pyotts Hill.

Proposed draft Local Plan Policy SPS5.4 states that the Development Principles of the proposed development include seeking to:

*'i) Preserve or enhance the significance, setting, character and appearance of the Old Basing Conservation Area through the protection of views to and from the conservation area;*

*j) Preserve the significance of nearby listed buildings including the Grade II listed Lodge Farm and barn, through preservation of their setting. Opportunities should be taken to better reveal the significance of heritage assets within and in the vicinity of the site, safeguarding important vistas and views;*

However, this conflicts with the proposed developable area which shows development in close proximity to the Pyotts Hill Entrenchment and Conservation Area along much of the western boundary and development surrounding the listed buildings at Lodge Farm, which is the identified location for the mixed use centre and where potentially three storey buildings could be provided, while a vista described as 'an important wider view,' on the Conservation Area Appraisal Map would be blocked by the identified 'developable area' and identified location for the link road.

With regard to the archaeological remains, proposed draft Local Plan Policy SPS5.4 states that it will be necessary to: *k) Assess the full extent of any archaeological constraints and ensure that the layout responds positively to those constraints, and successfully mitigates any archaeological impacts. This includes providing for the retention and careful management of important archaeological remains within and adjacent to the site, including the Pyotts Hill Entrenchment Scheduled Monument along the western edge of the site and the Roman Road, in a manner appropriate to their significance, with a sensitive landscaping strategy.'* However, the proposed developable area and link road goes right across the route of the Roman Road and by extending close to the Pyotts Hill Entrenchment, the indication is that the proposed layout would not respond positively to this constraint.

In the view of Old Basing & Lychpit Parish Council the proposed development would result in harm and the loss of the significance of these designated heritage assets, and it is important to note that NPPF paragraph 206 makes specific reference to the potential for this to occur from 'development within its setting.' Paragraph 213 b) also states that 'Substantial harm to....assets of the highest significance, notably scheduled monuments.....should be wholly exceptional,' while clause 213 a) states that substantial harm to Grade II listed buildings 'should be exceptional.' The indications are that there would be 'substantial harm' to a range of heritage assets based on the 'developable area' shown on Figure 5.9: SPS5.4: Land at Whitmarsh Lane Illustrative Concept Plan.

The NPPF states in paragraph 202 that heritage 'assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.' This highlights their significance and indicates that a proposal that would cause substantial harm to the heritage significance of a range of heritage assets is in fundamental conflict with national policy and is therefore unsound.

Further information on the heritage implications of the proposed allocation is contained in the accompanying Heritage Report by Worlledge Associates and the WWA report relating to the Integrated Impact Assessment.

## 2. The Natural Environment – landscape & biodiversity

### i) Landscape

Paragraph 187 of the NPPF states that:

*'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) protecting and enhancing valued landscapes....*
- b) recognising the intrinsic character and beauty of the countryside, ...'*

In this case the proposed allocation would not achieve either of these objectives. In the previous Regulation 18 Local Plan proposed Policy ENV1 on Landscape states that:

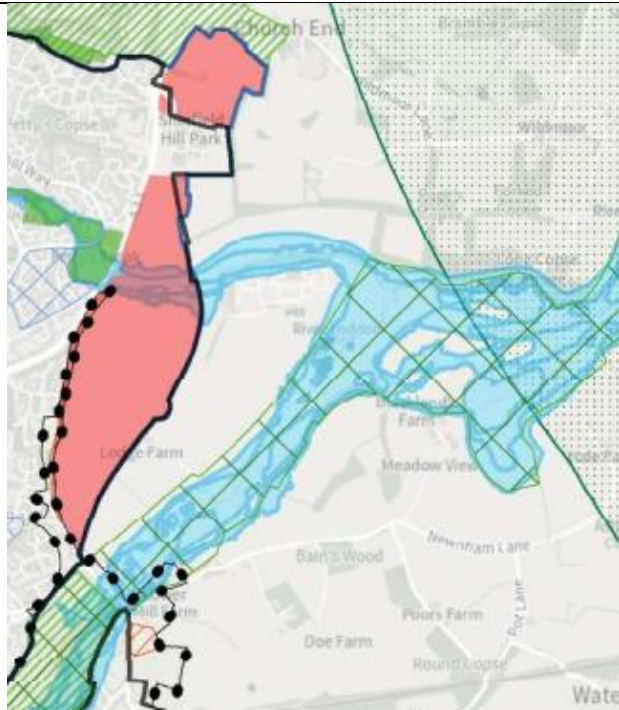
*'Landscapes of particularly high value outside of the National Landscape are identified as Valued Landscapes on the Policies map. Development proposals will only be permitted in these areas where they protect and enhance features that contribute to the character, quality and interpretation of these landscapes.*

*Valued Landscapes are shown on the Policies Maps and are:.....*

- Loddon Floodplain;'*

The Glossary defined Valued Landscapes as comprising *'Landscape areas identified as exhibiting special characteristics and distinctive qualities that elevate them above the rest of the countryside,'* and therefore worthy of protection.

Strangely, however, this important designation is omitted from both Illustrative Concept Plans in the current Draft Spatial Strategy Regulation 18 Consultation. Valued landscapes included in the key but not shown as relating to the flood plain of the River Loddon on the maps themselves, thus giving the impression that they would not be affected. However, the previous January 2024 Regulation 18 Local Plan Policies Map clearly showed the valued landscape applying to the flood plain of the River Loddon as indicated by the green hatching in the extract below:



Source: Extract from 2024 Regulation 18 Draft Policies Map

The Valued Landscape hatching is still shown on the overall Policies map that accompanies the current consultation, but in a more indistinct manner than shown in the 2024 consultation. In order to ensure that this policy is not overlooked it is therefore vitally important that it is clearly shown on all plans that relate to the land at Whitmarsh Lane.

From the above map extract it will be seen that the Valued Landscape designation comes right up to the boundary of the land at Whitmarsh Lane covered by the emerging policy SPS5.4. Now while it is true that the proposed protection only applies to areas within the valued landscape, in this case by increasing the proposed allocation from 450 to 1,500 dwellings it would be necessary to develop the slopes of Pyotts Hill right down to the Loddon flood plain as indicated by 'Figure 5.9: SPS5.4: Land at Whitmarsh Lane Illustrative Concept Plan.' This would remove the buffer zone function that the southern part of the land East of Basingstoke currently performs. The close proximity of the proposed additional development to the proposed valued landscape designation and its location on sloping land would also affect the visual amenity to and from the proposed landscape designation. Having a large development on what is currently agricultural land in this area would therefore significantly adversely affect the landscape quality of the valued landscape and not accord with the advice in paragraph 187 of the NPPF that planning policies '*contribute to and enhance the natural and local environment by:*

- a) *protecting and enhancing valued landscapes.'*

In addition, paragraph 187 requires planning policies to recognize '*the intrinsic character and beauty of the countryside.*' In this instance, there is wide visibility over the surrounding countryside because of the elevated nature of the southern part of the proposed allocation site which it would be necessary to develop if the site is allocated for 1,500 dwellings. The tranquility and beauty of the countryside in the view from Pyotts Hill is shown by the two photographs below. If this area is developed for a dense urban extension with a link road and mixed-use centre, with 2.5 and 3 storey buildings concentrated on this hillside it would have a very significant detrimental impact on the intrinsic character and beauty of the Loddon Valley. The degree to which it would be visible is shown by the zone of visual influence in the accompanying Landscape Report by Ecology

Solutions. It would also lead to a substantial visual degree of coalescence with Old Basing village, and thereby diminish its status as a distinct village and its heritage significance by eroding its historic character.



Photograph 1: View from Pyott's Hill looking east across Loddon Valley



Photograph 2: View from Pyott's Hill looking south-east across Loddon Valley

It is considered therefore that the proposed increase in the number of dwellings in the allocation would lead to a conflict with national policy in respect of protection of the intrinsic character and beauty of the countryside and both national and the Council's own aspiration to protect the valued landscape of the Loddon floodplain.

The impression is given in the emerging Policy SPS5.4 and the supporting text that a suitable transition to the adjoining countryside would be provided. However, when all components of the policy and Concept Plan are considered, it is clear that this would not be the case. Policy SPS5.4 states in paragraph c) that: *'The siting, density, scale, layout, character and hard and soft landscaping of the development must respond positively to, and take opportunities to enhance: the landscape qualities of the site and wider area; the context of the neighbouring built environment; and the local distinctiveness of the area. The design and layout of the development on its outward facing edges will enable a suitable transition to the adjacent countryside;*' while clause v) states: *'Maintain as open space the higher ground along the site's northern boundary, the eastern boundary with the River Loddon and in the southwest by the Pyotts Hill Entrenchment'*; while the opening sentence in paragraph 5.96 states that: *'In order to ensure there is an appropriate transition to adjacent countryside and to avoid a hard edge to development, the layout along the eastern edge of the site should be of a lower density and scale with greater separation between buildings.'*

In our view these statements are misleading. Figure 5.9: SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan shows the developable area extending hard up to the site boundary and also including the sloping valley side on the southern part of the site. The proposed mixed-use centre is also shown as being located adjoining Lodge Farm which is in an elevated location at the top of the valley slope. Paragraph 5.96 states that: *'New development should be predominantly 2-storeys in height with limited potential for some 2.5 and 3 storey buildings, especially in the*

*mixed-use centre.* This elevated location is therefore identified as the preferred location for the tallest buildings on the site. It would be extremely prominent with the combination of its high elevation and potentially three storey buildings resulting in significant and wide-ranging visual impact across the Loddon Valley and would also result in visual coalescence with Old Basing. The proposed development would therefore be extremely prominent in views from the adjoining areas of the Loddon Valley as indicated in the zone of visual influence in the accompanying Landscape Report by Ecology Solutions. Indeed, as the Concept Plan indicates where green space is to be provided and only a very narrow strip is shown on the south-eastern boundary, which it is not possible to measure as no scale is provided, but is shown as no wider than a single carriageway road width, it is clear that it would only be less than 10 metres in width. Given that it is located at the bottom of the valley side slope where the development is proposed, it would have minimal effect in screening the development from the valley of the River Loddon. This is confirmed by paragraph 5.96 which states that: *'Development will need to face out to the countryside to provide active frontages, with no rear gardens facing outwards.'*

It is clear therefore that the proposed development on land at Whitmarsh Lane would significantly and detrimentally affect the adjoining valued landscape and there would therefore be a fundamental conflict with the requirement of proposed policy ENV1 that: *'Development proposals will only be permitted in these areas where they protect and enhance features that contribute to the character, quality and interpretation of these landscapes.'*

Further information on the landscape implications of the proposed allocation is contained in the accompanying Landscape Review by Ecology Solutions and the WWA report relating to the Integrated Impact Assessment.

## ii) Biodiversity

A particular aspiration of the NPPF as stated in paragraph 192 b) is that plans should:

*'b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'*

In this instance the proposed development is in close proximity to the River Loddon, which is an internationally rare chalk stream which is a priority habitat. Important information about the ecological importance of the River Loddon is contained in a report by T. W. Hatton-Ellis & N. Grieve entitled *'Ecology of Watercourses Characterised by *Ranunculon fluitantis* and *Callitricho-Batrachion* Vegetation,'* which was published by English Nature in 2003. With regard to the technical terms used in this title, watercourses characterised by *Ranunculon fluitantis* are named after the dominant plant species, *Ranunculus fluitans*, which is commonly known as river water-crowfoot or river crowfoot. This vegetation type forms stands of submerged and floating vegetation in water courses and is characteristic of shallow, fast-flowing, and often calcium-rich rivers and streams.

The phrase *Callitricho-Batrachion* refers to the habitat type and this classification refers to a specific type of aquatic habitat characterized by plants like water crowfoots (*Batrachion*) and water-starworts (*Callitricho*) that grow on the surface of flowing water.

This publication characterises the River Loddon as comprising a 'CB1: Lowland, low-gradient *Potamogeton/Sagittaria* eutrophic river community.' *Potamogeton* is a genus of aquatic, mostly

freshwater, plants of the family *Potamogetonaceae*. Most are known by the common name pondweed. *Sagittaria* is arrowhead. Arrowhead is an aquatic plant of shallow water and slow-moving waterways. During summer it has small, white flowers, but it is the arrow-shaped leaves that are particularly distinctive.

The report states that: '*This vegetation type typically occurs on large, slow flowing lowland rivers with a stable base flow and a substrate consisting mainly of silts or clays. Potamogeton spp. and Myriophyllum spicatum [Eurasian watermilfoil or spiked water-milfoil] are particularly prominent within the plant community, while Ranunculus species are less noticeable than in many other CB types. The community is mainly restricted to southern and eastern Britain, and is rarely found north of the Humber or west of the Severn Estuary. The best examples are found in Type Ia (for example, lower sections of the Hampshire Avon and River Wensum candidate SACs, and tributaries of the Thames such as the Loddon and Cherwell).*'

The River Loddon is clearly considered to be a representative and good example of this type of river habitat as the accompanying photograph is of the River Loddon as shown below:



Nigel Holmes

**Type CB1 typically occurs on large, slow flowing lowland rivers with a stable base flow and a silt or clay substrate, such as the River Loddon (above). *Potamogeton* spp. and *Myriophyllum spicatum* are prominent.**

(Source: page 12 of Hatton-Ellis TW & Grieve N (2003). Ecology of Watercourses Characterised by Ranunculion fluitantis and Callitricho-Batrachion Vegetation. Conserving Natura 2000 Rivers Ecology Series No. 11. English Nature, Peterborough.)

It is also notable that two of the other rivers mentioned in this category, namely the Hampshire Avon and River Wensun have been designated as Special Areas of Conservation (SAC). In this

respect it is important to note that the particular habitat and species mentioned in the River Avon SAC citation are also present in the River Loddon. This includes the Annex 1 habitat which the SAC citation gives as the primary reason for the selection of this site which is: '3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation.' The citation also states that: 'The Avon in southern England is a large, lowland river system that includes sections running through chalk and clay, with transitions between the two.' This is also true of the River Loddon. The citation also lists the Annex II species which are a primary reason for the designation of the River Avon as a SAC, including: 1163 Bullhead *Cottus gobio*; 1095 Sea lamprey *Petromyzon marinus*; and 1096 Brook lamprey *Lampetra planeri*. Environment Agency fish data indicates that each of these species have also been recorded in recent years at Lodge Farm adjoining the proposed Whitmarsh Lane allocation. Another species listed for the Avon is 1016 Desmoulin's whorl snail *Vertigo moulinsiana*. According to the Council's 2010 'Biodiversity Assessment for the Local Development Framework Core Strategy (Stage 1)' there are historic records of Desmoulin's Whorl Snail, *Ashfordia granulata* (mollusc) at nearby Basing Fen, which is located upstream of the proposed allocation, and so they could also potentially be present in the section of the River Loddon adjoining the proposed Whitmarsh Lane strategic allocation. The only fish species listed for the Avon as being a primary reason for its SAC designation that is not present on the River Loddon at Lodge Farm is 1106 Atlantic salmon *Salmo salar*.

While clearly the River Loddon has not been assessed as being of sufficient interest to merit SAC designation, the presence of habitat and species which have been used to designate the Hampshire Avon as a SAC clearly indicates that it is of high conservation value. The Council themselves acknowledge its significance in the January 2024 Regulation 18 Local Plan stating in paragraph 7.25 that: '*The River Loddon is classified as a high-quality chalk and salmonid river and therefore requires special protection for its water quality, ecology and geology..... The river water quality is affected by abstraction, urban drainage, sewage works, effluent discharges and overflows, and agricultural run-off which in turn can affect the river's wildlife. The river and its catchment continue to be subject to development pressures due to Basingstoke being the principal town in the borough and the focus for new development.*' Having a large-scale development of 1,500 dwellings, mixed-use centre and link road which will drain into the River Loddon and Petty's Brook owing to the topography of the allocation site is therefore of significant concern as it could result in urban pollution and sediment particles entering the river from run off, particularly during construction, but also following completion as SuDS do not provide adequate protection in this respect as detailed in the accompanying River Loddon report by WWA which is submitted with these representations.

The development would therefore be unlikely to promote the conservation and enhancement of this priority habitat as required by the NPPF. It would also conflict with the January 2024 Regulation 18 Local Plan policy ENV1 relating to the River Loddon, Test and Enborne corridors, which states that:

*'Development proposals will respect and enhance the special qualities of the river corridors and tributaries within the borough (to include those of the River Itchen) in terms of their landscape quality and the water environment including its associated habitats. Development that is within or adjacent to the River Loddon, Test or Enborne corridors and their tributaries will be required to conserve and enhance:*

- *The natural characteristics of the river, its springs, headwaters and associated species*
- *Water sources and water quality*
- *The river corridor's ecosystem, geodiversity and ecological connectivity*
- *The natural functioning of the river through the seasons.'*

While it is true that proposed policy SPS5.4 does require development proposals to:

*'f) Protect and enhance the ecological network by ensuring adverse impacts on key species and habitats, including adjacent ancient woodland and onsite veteran trees, Sites of Importance for Nature Conservation (SINCs), Pettys Brook and the River Loddon chalk stream, are avoided, adequately mitigated, or compensated as a last resort, avoiding the loss or deterioration of irreplaceable habitat, and securing the creation and management of green open spaces and linkages that provide high levels of habitat connectivity within the site and to the wider green infrastructure network and respond positively to the opportunities identified in the Hampshire Local Nature Recovery Strategy;*

*g) Provide offsite habitat creation/restoration measures in order to adequately protect the River Loddon chalk stream and its floodplain from recreational impacts;'*

The Council has provided no biodiversity assessments to demonstrate that this is achievable and the evidence from Professor David Sear, Professor of Physical Geography at Southampton University, as detailed in the accompanying River Loddon Report is that development in such proximity to a chalk stream would lead to significant detrimental impacts from sedimentation and pollution. There would likely also be significant detrimental impacts from increased recreational pressure and predation and disturbance from domestic pets from 1,500 dwellings being located on land immediately adjoining the River Loddon chalk stream and its flood plain. The evidence cited in the accompanying River Loddon report therefore indicates that the biodiversity requirements of policy SPS5.4 would be unachievable on the land adjoining Whitmarsh Lane given the proposed scale of development in such a sensitive location and its proximity to the River Loddon.

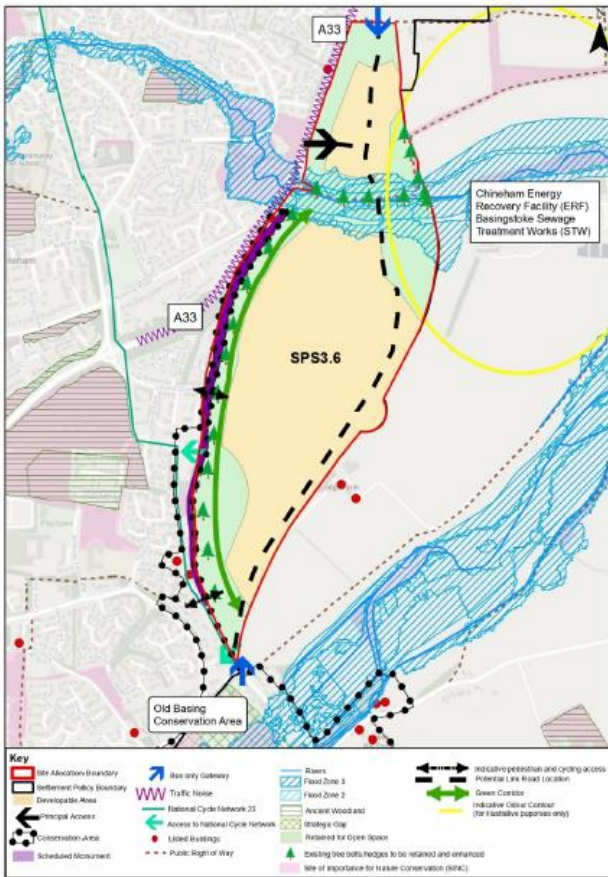
The development would also have a detrimental impact on priority species, including slow worm, common lizard, grass snake, adder, sky lark, cuckoo and yellow hammer, all of which are present on the site, by fragmenting and reducing their habitat, which is therefore contrary to the advice in paragraph 192 b) that plans should promote *'the protection and recovery of priority species.'*

The Council has declared an Ecology Emergency and granted personhood status for rivers. However, the allocation of land at Whitmarsh Lane does not give any evidence of giving due consideration to either of these matters.

### **3. Flooding & Sequential Test**

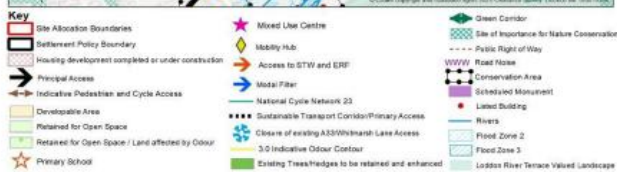
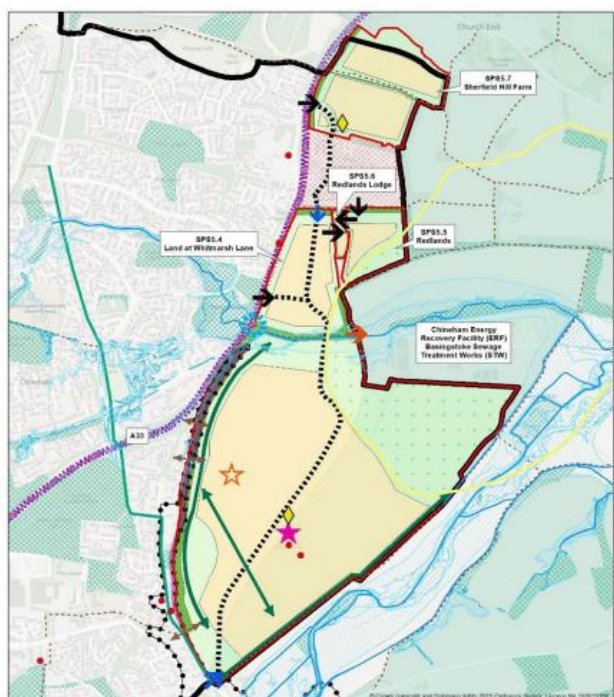
The sole vehicular access to the development (apart from the access to Pyotts Lane/Barton Lane, which is to be limited to access for public transport and emergency access) goes through the flood plain of the Petty's Brook. This was made abundantly clear in the previous Regulation 18 Local Plan on which consultation took place in 2024 as shown by Figure 6.7 below:

Figure 6.7: SPS5.6: Land to the East of Basingstoke Concept Plan



By contrast on the current consultation Figure 5.8 the flood zones are shown very indistinctly so that it is not so readily apparent that the one all-purpose vehicular access into the site will run through the floodplain as shown below:

Figure 5.8: Eastern Basingstoke Illustrative Concept Plan including SPS5.4, SPS5.5, SPS5.6 and SPS5.7



That the access into the site will need to go through the flood plain is explicitly acknowledged in proposed policy SPS5.4 with clause (m) stating ‘avoid development, **with the exception of points of access within flood zones 2 and 3,**’ [emphasis added]. Paragraph 5.100 states that: ‘further technical work will be required to demonstrate that safe access can be achieved. Appropriate flood risk management measures may be required to ensure essential infrastructure will be operational and safe in times of flood.’ It is clearly therefore acknowledged that this has not yet been demonstrated.

This is a significant issue as there is the potential for a large estate of 1,500 dwellings, education facilities and mixed-use centre providing a range of retail, leisure, cultural, community, health, service and employment facilities to have no access by car or delivery vehicles in a major flood event. This would also provide a significant potential burden to emergency services in such circumstances.

Paragraph 172 of the NPPF states that ‘All plans should apply a sequential, risk-based approach to the location of development.’ ‘The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source,’ (para 174).

Paragraph 175 states that ‘The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, **including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).**’ [emphasis added]

A development with its sole access through a flood plain therefore needs to be subject to the sequential test. The Council claims to have applied the Sequential Test in its '*Selection Report, including Sequential test for flood risk (Draft for Regulation 18 consultation, November 2025)*'. Table 7 a) details those 'Sites in Flood Zone 3 (not immediately passed the sequential test), that are proposed for allocation,' which includes both land east of Basingstoke and Lodge Farm and states that: '*The access infrastructure will need to cross flood zones 2 and 3 and therefore it will need to be demonstrated that the infrastructure is safe from flood risk and does not affect or increase the flood zone,*' (page 290 – 291). As a result, the report acknowledges that the Exception Test will also need to be applied and states that: '*The NPPF requires an exception test to be passed for essential infrastructure within Flood Zone 3 and in Flood Zone 3a. Essential infrastructure should be designed and constructed to remain operational and safe in times of flood. The development will be subject to a site specific flood risk assessment and the proposed site policy references the need for appropriate flood risk management measures. This will ensure that any access infrastructure should be designed and constructed to remain operational and safe in times of flood. A level 2 SFRA is being prepared for this allocation.*' This confirms that it has not yet been demonstrated that safe access can be provided to this proposed allocation, and this will not be known until the level 2 SFRA has been prepared. It is crucial that this level 2 SFRA provides the necessary level of detail to provide a definitive answer to the question of whether safe access can be provided to this development during major flood events, taking account of climate change. In the absence of such information the allocation is clearly unsound failing the soundness tests of being justified, effective and consistent with national policy (NPPF para 36 b), c) & d)).

#### **4. Safe Access for All Users**

Paragraph 115 of the NPPF states that '*In assessing sites that may be allocated for development in plans, ..it should be ensured that:...b) safe and suitable access to the site can be achieved for all users.*' A large residential estate accessed by one access route through a floodplain and which could also be blocked through an accident, a fire in the woodland through which it passes or another emergency such as the need to repair a gas or water main does not have safe and suitable access for all users and therefore conflicts with this component of national policy.

It is also considered that a site with only one access is not appropriate for Gypsy and Traveller Accommodation, given that it is likely that this would involve large vehicles passing through the residential development.

There are also bus gates proposed at both ends of the site, but there is evidence that other bus gates within the borough are abused as detailed in the 2024 Regulation 18 Local Plan representations by Old Basing & Lychpit Environment Campaign (OBLEC) in which they stated that: '*“Bus gate’ creates risk of abuse by motorists seeking shortcut, exacerbating ‘rat-running’.* Criticisms abound regarding ‘bus gates’ in the borough. Cllr. Minas-Bound at B&DBC EPH committee (28/9/23) stated: *“We have one in Rooksdown. They are a complete failure...Any site that relies on them to manage something [will] never deliver the promise.”* Four ‘bus-gates’ currently exist in borough. The images adjacent show abuse at them captured in a 10-minute observation period by OBLEC.’

Images: Abuse (without penalty) seen at existing 'bus gates' in borough

Norn Hill 'bus gate'

Alencon link 'bus gate'

Hospital 'bus gate'



Credits: T L-R Google Maps, F Biermann; B L-R A Noble

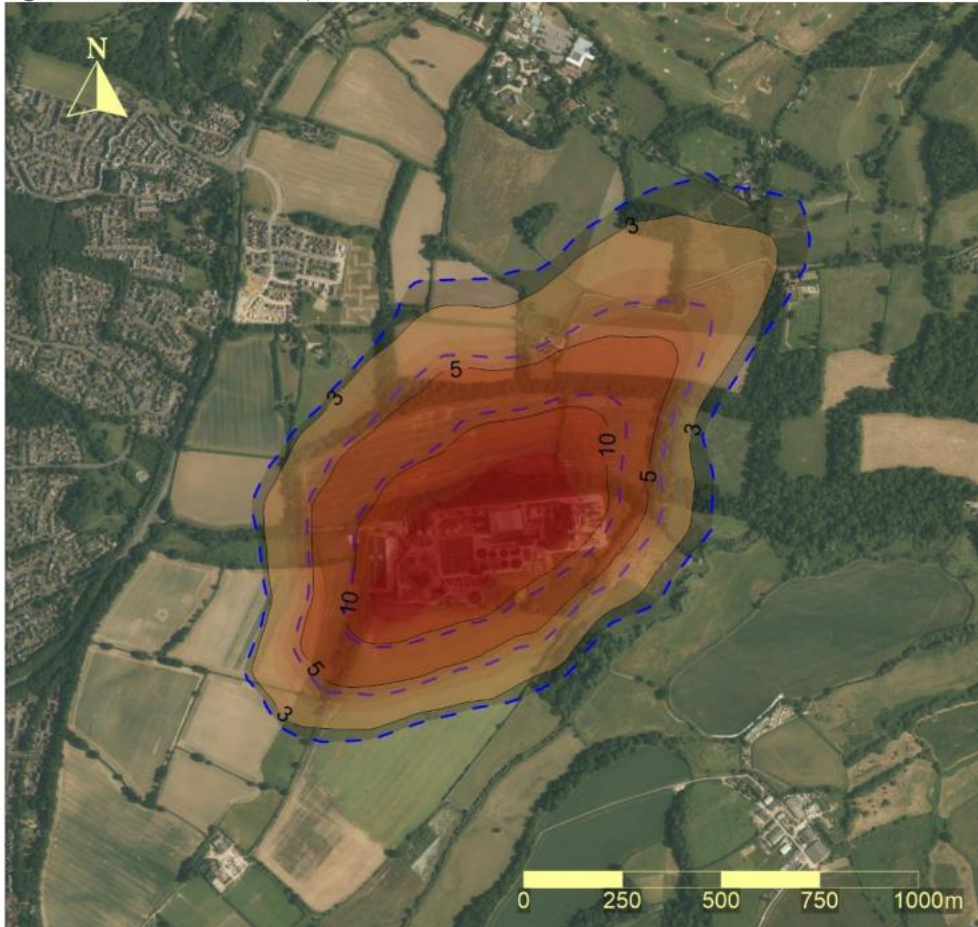
This is also likely to occur here as the southern bus gate would provide a short cut avoiding a lengthy detour and could be the only access into the site in an emergency. However, it accesses onto Pyotts Hill adjoining a sharp bend with Barton Lane where visibility is very limited and so would not provide safe and suitable access into the site.

## 5. Pollution

Paragraph 198 of the NPPF states that: *'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment,'* while paragraph 199 states that: *'Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the **plan-making stage**, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.'* [Emphasis added].

Given, therefore that land at Whitmarsh Lane is located adjacent to a sewage treatment works and incinerator it is therefore a matter of concern that no odour or air quality assessment has been included in the Regulation 18 Consultation material, given Government advice that these issues should be considered at the plan making stage. Local residents on existing housing in the vicinity of the site already experience odour. Odour is likely to be much worse in the new development given that it will be much closer to the sewage treatment works and incinerator. Indeed, a report by Olfasense for Thames Water (2025) submitted in relation to a planning application (Application No: 25/00883/CMA) for an increase in the sewage sludge treated, which is submitted, with these representations, indicates that while odour emissions would marginally improve under these application proposals a substantial part of the site would still have emissions above 3.00UEE/m<sup>3</sup>, and this would appear to extend further in a south-westerly direction toward Lodge Farm than is shown on the Illustrative Concept Plans in Figures 5.8 and 5.9, which will likely further reduce the developable area of the site. The relevant figure from the Olfanse report is provided below:

Figure 5: Scenario 1 model output



Source: Odour Report by Olfasense for Thames Water (2025) submitted in relation to a planning application Application No: 25/00883/CMA

On the above plan the previous contours reflecting the pre-application situation are shown by the dotted blue lines. A direct comparison with the odour contour on the Spatial Strategy Illustrative Concept Plans is not possible as the Local Plan Illustrative Concept Plans have no scale.

The findings of the Olfasense report are based on the prevailing atmospheric conditions. However, there is no discussion of what happens in those periods in the winter when there is an anticyclone and a temperature inversion preventing the upward movement of air and when the wind direction will often come from the east blowing the odours over the proposed new housing. Sometimes these anticyclones can be very persistent and last several weeks. These are likely to result in significantly elevated odours which, while they would only last for a small part of the year, would be unacceptable to a sensitive receptor such as a residential dwelling were it to persist for any substantial period of time. The analysis in the Olfasense report was based on meteorological data from 2019 – 2023 which were characterised by predominantly mild winters and did not include any prolonged anticyclonic cold spells with easterly winds.

Paragraph 5.104 also states that: *'To encourage use of the neighbourhood park, it should also be located outside of the 1.5 OUE/m<sup>3</sup> contour.'* As can be seen by comparing the above plan with the Illustrative Concept Plans the one large area of open space proposed is largely within the area above the 3.0 OUE/m<sup>3</sup> contour where there is significant odour and so the neighbourhood park would be precluded from being located here. The 1.5 OUE/m<sup>3</sup> contour will cover a much larger area of the site. This raises the issue of where the Neighbourhood Park, playing fields and allotments could be located and it would seem that they would have to be located within the

identified 'developable area,' which will significantly affect the capacity of the site to accommodate 1,500 dwellings.

The proposed Whitmarsh Lane development is also at significant risk from pollutants from the incinerator. It is understood that pollutants from incineration include particulate matter (PM), carbon monoxide (CO), acidic gases (i.e., NO<sub>x</sub>, SO<sub>2</sub>, HCl) and acidic particles, certain metals (cadmium, lead, mercury, chromium, arsenic, and beryllium), dioxins and furans, polychlorinated biphenyls (PCBs), and polyaromatic hydrocarbons (PAHs) and as it is proposed to locate residential dwellings, a primary school and allotments in close proximity it is important to establish the level of pollutants that would be emitted and whether it would be safe for people living in close proximity, especially if they would be eating produce which they have grown on the site.

The current evidence base does not therefore include the necessary assessments to demonstrate that development could take place on land at Whitmarsh Lane without significant odour and air pollution issues arising.

There are also potential noise issues arising from the A33, and the adjacent incinerator and sewage treatment works. However, the evidence base does not include any reports relating to this particular issue.

Paragraph 198 of the NPPF states that: '*Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.*' There is no robust body of evidence to demonstrate that it can be stated with confidence that the proposed site could be developed to the density necessary to accommodate 1,500 dwellings without pollution adversely affecting the health and living conditions of the future residents.

### **Not Justified or Effective**

As the proposal to increase the existing allocation of 450 to 1,500 dwellings conflicts in important respects with national policy, it cannot be justified (NPPF para 36 b)) as by definition given the very significant detrimental effects that would occur in relation to heritage assets, valued landscape, the priority species and internationally rare chalk stream habitat, an access crossing Flood Zones 2 and 3, no safe access and issues relating to pollution arising from the location of the site adjoining a sewage treatment works and incinerator, it cannot be the most appropriate strategy taking into account reasonable alternatives. It also does not meet the effectiveness test (NPPF para 36 c)) as it means that policy SPS5.4 is not deliverable as any application for development would conflict with national policy (NPPF para 36 d)) and the Council's own proposed Local Plan policies such as those relating to the protection of the River Loddon and valued landscapes and therefore there would be a fundamental obstacle to it being approved.

There is also the alternative more sustainable option of a more vigorous approach to increasing allocations on previously developed land as outlined in the representations relating to policy 'SPS5 Sites Allocated for Housing Development' and it is crucial that this is rigorously assessed prior to the publication of the Regulation 19 Local Plan.

As it is unsound, the proposed allocation of 1,500 dwellings and associated uses at Land at Whitmarsh Lane should be removed from the Local Plan.

## Local Plan mailing list

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

## Privacy policy and use of artificial intelligence

Basingstoke and Deane Borough Council is the data controller for the personal information you provide on this form.

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

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 contact the council by phone on 01256 844844, via email to [customer.service@basingstoke.gov.uk](mailto:customer.service@basingstoke.gov.uk) or by writing to us at Civic Offices, London Road, Basingstoke RG21 4AH. The council's Data Protection Officer can be contacted at [dpo@basingstoke.gov.uk](mailto:dpo@basingstoke.gov.uk).

Basingstoke and Deane Borough Council are developing their AI policy and are intending to use AI in relation to the responses to this consultation. Responses will be processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation ('GDPR') and all internal policies created by the council. Therefore, please note that any responses given may be assessed by AI in the future. This notice will be updated if this actioned. For the avoidance of doubt this will not include any of your personal data.