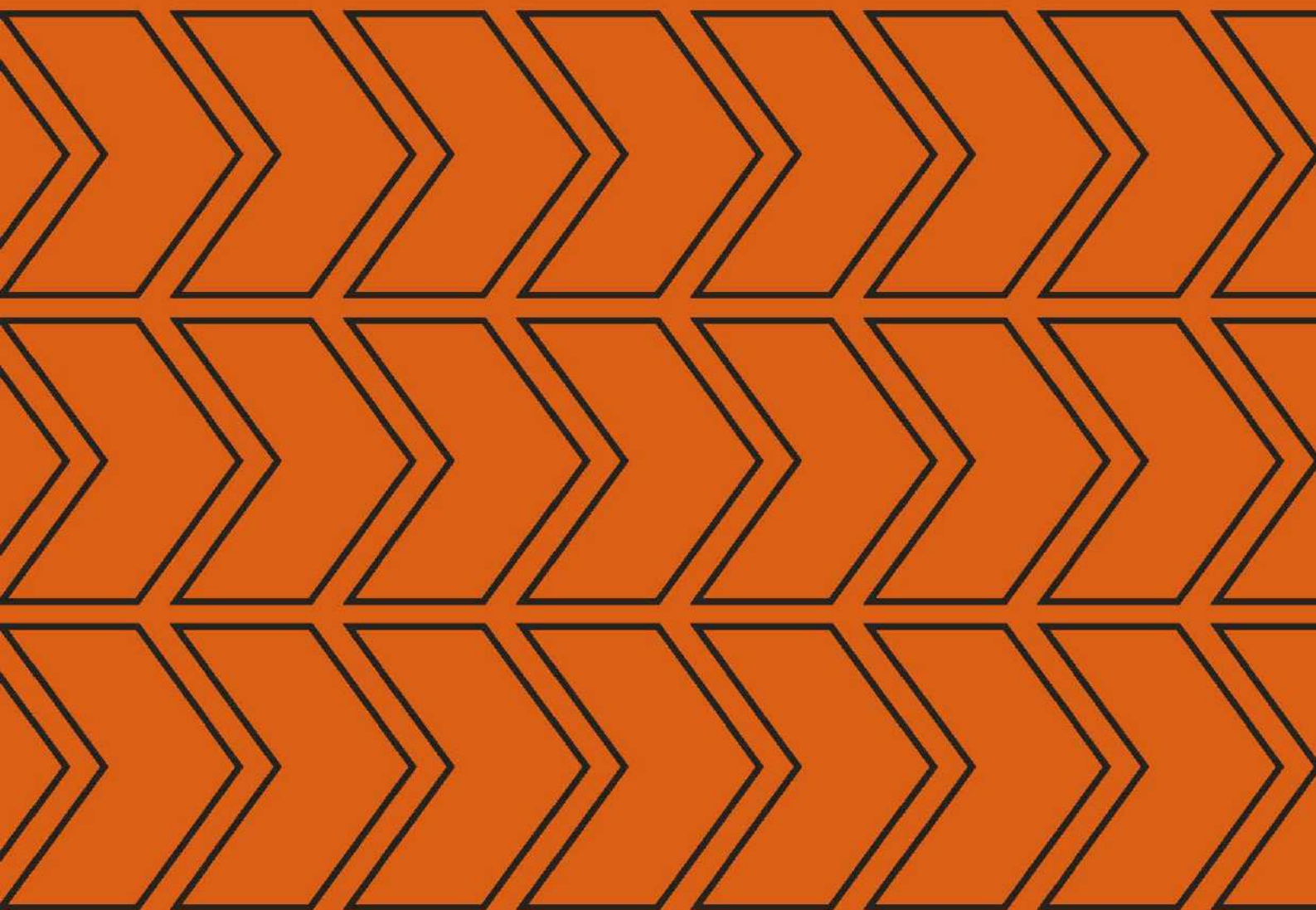


Representations on Basingstoke and Deane Borough Council's Draft Local Plan 2042 - Regulation 18 Consultation: Background report relating to Integrated Impact Assessment

January 2026



Background report relating to Integrated Impact Assessment representations on the Basingstoke and Deane Draft Local Plan (2024 - 2042): Draft Spatial Strategy Regulation 18 Consultation

In relation to the proposed allocation of land at Whitmarsh Lane for a total of 1,500 dwellings and other development including education facilities, mixed-use centre, providing a range of retail, leisure, cultural, community, health, service & employment facilities and gypsy & traveller pitches.

**On behalf of:
Old Basing & Lychpit Parish Council**

January 2026

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1 INTRODUCTION

- 1.1 The following report has been prepared for Old Basing and Lychpit Parish Council and assesses the environmental impacts of the proposed allocation for approximately 1,500 dwellings and other development including education facilities, mixed-use centre, gypsy & traveller pitches on land at Whitmarsh Lane (herein referred to as 'the Site') under proposed policy SPS5.4 in the Draft Spatial Strategy Regulation 18 Consultation. This would increase the existing allocation of this site in the current Local Plan by a further 1,050 dwellings.
- 1.2 Given that Old Basing is located very close to Basingstoke but is a distinct historic settlement with a large number of heritage and environmental assets, this proposed strategic allocation has the potential to significantly reduce its identity as a separate settlement and to adversely affect those environmental and historic features which make up its distinctive character.
- 1.3 This report describes the proposed allocation site; the evidence base that has been used in this assessment; reviews the Council's assessment of the likely impacts that would occur if residential development of the scale proposed does take place; followed by an overall assessment and conclusions.
- 1.4 This report should be read in conjunction with the representations made by Old Basing & Lychpit Parish Council and the supporting Landscape Review (Jan 2026) by Ecology Solutions, the Heritage Report (Jan 2026) by Worledge Associates and the River Loddon Report (Jan 2026) by West Waddy Archadia (WWA).

2 THE PROPOSED ALLOCATION SITE: LAND AT WHITMARSH LANE

2.1 As a full description of the Land at Whitmarsh Lane site has been provided in the Council's Site Selection Report (2025) the description below has been derived from this document, with modification where necessary. There are two components Land East of Basingstoke (OLD001) and Lodge Farm (OLD002). Each of these is described separately below:

SITE 1: OLD001 – Land to the East of Basingstoke

2.2 The site is located to the east of Basingstoke, incorporating the East of Basingstoke site allocation (Policy SS3.9 of the current adopted Local Plan). Old Basing is located to the south-west of the site. The site is irregularly shaped and existing land uses comprise arable farmland, streams, pasture and wet meadow. It is largely divided into open fields with several blocks of woodland and hedgerows of varying degrees of maturity and continuity. There are a number of designated woodlands within the site. Petty's Brook, a Site of Importance for Nature Conservation (SINC), flows through the north of the site. The surrounding land uses are agricultural, with the Basingstoke Sewage Treatment Works (STW) and the Chineham Energy Recovery Facility (ERF) to the north-east. A number of public rights of way (PRoW) dissect the site with a PRoW running along the western boundary. The topography of the site rises to a highpoint of Pyotts Hill at the southern end of the site.

SITE OLD002: Land at Lodge Farm

2.3 This part of the proposed allocation lies to the east of the settlement boundary of Basingstoke comprising, a large piece of arable farmland and mixed

paddocks stretching up to Whitmarsh Lane. The River Loddon and a public right of way run along the south-eastern boundary of the site. The site is located adjacent to the East of Basingstoke site allocation (Policy SS3.9 of the current adopted Local Plan, SHELAA site OLD001). The southern tip of the site is next to Pyotts Hill/Bartons Lane, where there are a number of residential properties. The buildings of Lodge Farm are located on Pyott's Hill and from here the site slopes down to the floodplain of the River Loddon. The River Loddon, which adjoins the site, is of high biodiversity interest as it is a chalk stream an internationally rare habitat.

Statutory and non-statutory Designations relating to the site

- 2.4 Land east of Basingstoke (OLD001) is already allocated under Basingstoke and Deane Local Plan 2022 to 2029 Policy SS3.9 for 450 dwellings. The current allocation, however, does not include Lodge Farm (OLD002).
- 2.5 The adopted Policies Map indicates that the Pyotts Hill Entrenchment, which is a Scheduled Monument runs along the western boundary and is partly within the site. The Grade II listed Lodge Farmhouse and an associated barn are located in a central position within the proposed allocation. Part of the western boundary also adjoins the boundary of the Old Basing Conservation Area and is in close proximity to a number of listed buildings within the Conservation Area, including two listed buildings to the west of the site, Compton Close and Hill Rise Cottage.
- 2.6 The Policies Map indicates that there is also an area of Flood Zones 2 and 3 with a moderate and high risk of flooding across the middle of the site adjoining Petty's Brook.

2.7 The Petty's Brook is also a Site of Importance for Nature Conservation, as is the River Loddon.

3 EVIDENCE BASE

3.1 The principal evidence that has been used in the compilation of this report is the Integrated Impact Assessment (IIA) Draft Local Plan (2024-42): Updated Spatial Strategy (2025) Regulation 18 Draft Report (October 2025) by WSP, and the evidence that it cites plus the supporting reports prepared for Old Basing & Lychpit Parish Council, namely the supporting Landscape Review (Jan 2026) by Ecology Solutions, the Heritage Report (Jan 2026) by Worledge Associates and the River Loddon Report (Jan 2026) by West Waddy Archadia.

3.2 The IIA includes an assessment of Policy SP5.4 Land at Whitmarsh Lane against the Council's thirteen sustainability objectives, which are:

Objective 1: Enable the provision of affordable, adaptable, and high-quality homes for all;

Objective 2: Ensure the creation of healthy, inclusive and safe communities, both in relation to the provision of new neighbourhoods, and the enhancement of existing places, including by supporting regeneration;

Objective 3: Reduce the need to travel, improve choice and access to sustainable transport options including walking and cycling as well as ensuring a safe and efficient transport system;

Objective 4: Reduce pollution (including minimising emissions of greenhouse gases to achieve zero net carbon), and support mitigation and adaptation measures required for the impact of climate change;

Objective 5: Minimise and improve the efficiency of resource use;

Objective 6: Conserve and where possible, improve biodiversity, including its connectivity;

Objective 7: Maintain and improve the quality of water resources, ensuring the sustainable management of water resources;

Objective 8: Reduce the risk of flooding and the resulting detriment to the local community, environment and economy;

Objective 9: Protect, and where possible enhance, the character and quality of the local landscape and geodiversity;

Objective 10: Protect, and where possible enhance, heritage assets;

Objective 11: Conserve and enhance the character of the borough's settlements through high quality design that maintains and strengthens local distinctiveness;

Objective 12: Ensure sustainable economic growth, supporting the diverse economy of the borough and enabling opportunities for new sectors, in order to maintain high levels of employment; and

Objective 13: Facilitate access to education facilities in order to improve educational attainment and increase opportunities for new skills and learning that meet the needs of the local workforce.

Objective 14: Ensure access to services and facilities in order to sustain the vibrancy of communities and enhance the attractiveness of town centres to visitors.

3.3 Under each of these objectives there are various criteria under which the

assessment is made. In each case, the Integrated Impact Assessment (IIA) lists the sources which have been used, which comprise either reports or information provided by statutory consultees.

3.4 The IIA is a key tool which the Council has used in assessing the social, economic and environmental effects of the proposed allocations and assessing one site against another. It is therefore of key importance to ensure that the assessment is accurate, because if it is not, either through a wrong assessment of a particular impact or a potential impact being overlooked, it could lead to a wrong decision being made.

3.5 The IIA has therefore been used as the key tool of the assessment and the review indicates those instances where it is considered that the assessment is wrong, or an impact has been overlooked.

3.6 Other sources that have been used include:

- Selection Report, including Sequential Test for Flood Risk (2025);
- Strategic Housing and Economic Land Availability Assessment (2025);
- Basingstoke and Deane Landscape Character Assessment by Hankinson Duckett Associates (May 2021);
- Basingstoke & Deane Landscape Sensitivity Study by Hankinson Duckett Associates (April 2021 & Addendum August 2025);
- Basingstoke and Deane Valued Landscape Study by Hankinson Duckett Associates (February 2023);
- Local Green Spaces Technical Paper (January 2024);
- Settlement Study (November 2025);

- Basingstoke & Deane Level 1 Strategic Flood Risk Assessment (November 2025) by AECOM;
- Strategic Gaps Study (November 2025);
- Interim Transport Assessment (January 2024) by Jacobs;
- Preliminary Transport Assessment by Jacobs (November 2025);
- Draft Infrastructure Delivery Plan (November 2025);
- Water Cycle Study by JBA Consulting (November 2025)
- East of Basingstoke and Redlands Development Brief Supplementary Planning Document
- Old Basing & Lychpit Neighbourhood Plan;
- Old Basing Conservation Area Appraisal and Management Plan Supplementary Planning Document 2020/2021;
- Biodiversity Strategy – The Loddon Catchment 2003 by Hampshire & Isle of Wight Wildlife Trust & Environment Agency.

3.7 The assessment of the particular impacts that allocation of the Land at Whitmarsh Lane for approximately 1,500 dwellings would have, are assessed in the following sections and then an overall assessment is provided in the conclusions.

4 SUSTAINABLE TRANSPORT & ACCESS

4.1 The Council's IIA states in relation to SA Objective 3 that the impact on transport from the proposed allocation of Land at Whitmarsh Lane would be 'strongly positive' when account is taken of the Local Plan policy requirements. An analysis of this particular issue and why Old Basing and Lychpit Parish Council do not consider that this provides a robust evaluation of the likely impact is set out below.

4.2 Access to this site would need to be from the adjoining A33. The adjacent section of the A33 is semi-rural in character typically without footways, dedicated cycle facilities, street lighting, etc., with a 50mph speed limit. The road will therefore create significant severance between the proposed allocation at Whitmarsh Lane and the rest of Basingstoke, especially as no pedestrian and cycle crossings are proposed over this busy road. The Council's draft IIA acknowledges that there would be a potential 'negative' impact in response to the question of whether or not there would be suitable highway access for all users, but then goes on to state in the Commentary at Site Assessment Stage column that: *'Given the overall scale of this development, the strategic and busy nature of the A33, the presence of the Chineham Energy Recovery Facility, Basingstoke Sewage Treatment Works, (that generate regular HGV trips), the various public footpaths, NCN 23, the surrounding existing communities and the potential development areas, the provision of safe and suitable access facilities for all users needs to be demonstrated by the Site Promoter's Transport Assessment (supported by a satisfactory Road Safety Audit), in agreement with the Local Highway Authority,'* (p. 375). The

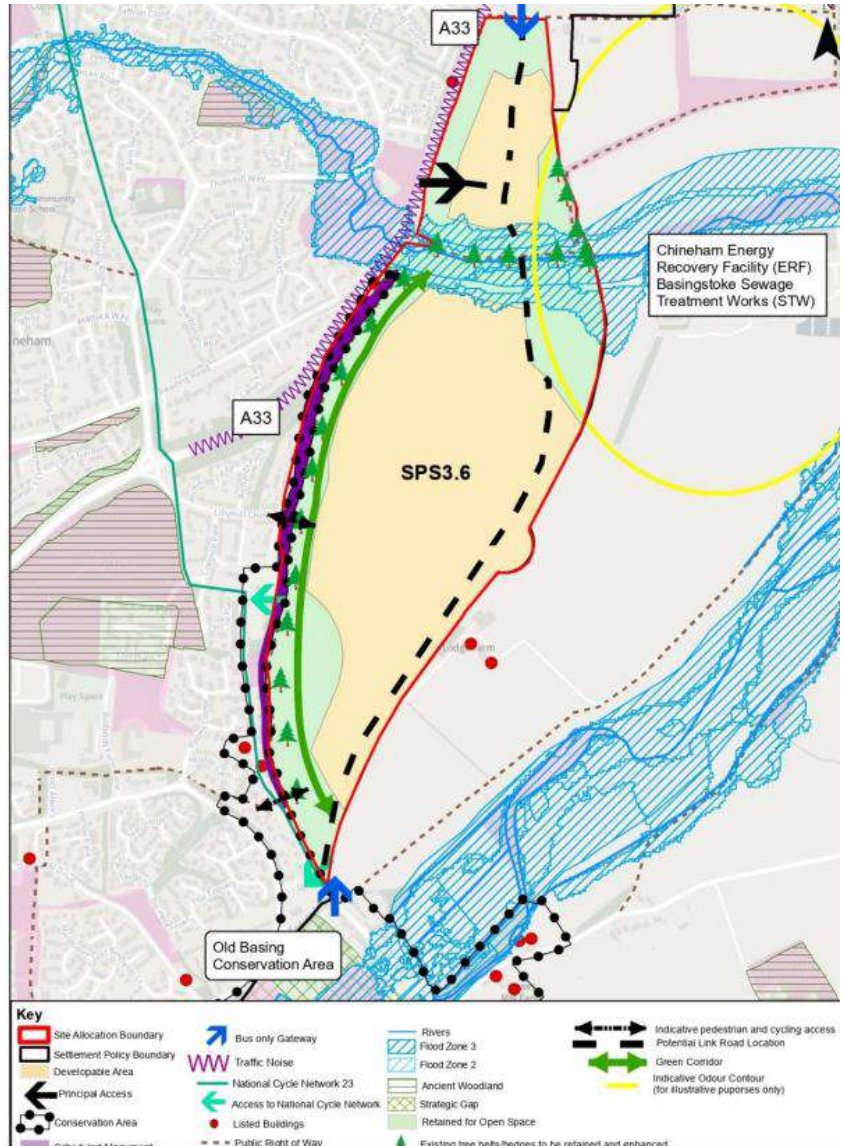
IIA then goes on to indicate that taking account of the proposed Local Plan policy the impact would be ‘neutral,’ on the grounds that the policy requires development proposals to demonstrate that *‘provide safe, suitable and convenient access for all users, including a new all-purpose access from the A33 together with the closure of the existing A33/Whitmarsh Lane access. Whilst also accommodating the vehicle movements (including HGVs) associated with the operation of the incinerator and sewage treatment works; ensure access to a genuine choice of transport modes; demonstrate that safe, suitable and convenient access to local facilities and services can be achieved via active travel and/or public transport services,’* (p. 375 - 376). However, the Transport Assessment will not be available until a planning application is submitted. Given that the access onto the A33 would have to accommodate approximately 1,500 dwellings whilst also accommodating the vehicle movements (including HGVs) associated with the operation of the incinerator and sewage treatment works, and this is the only proposed vehicular access into the development apart from two bus gates it is of critical importance that safe access can be provided. In our, view this needs to be demonstrated at the Local Plan allocation stage and would normally be something that the site promoter would be expected to provide. Without it the Council cannot demonstrate that there would be a ‘neutral’ impact in terms of there being suitable highway access for all users.

- 4.3 Having 1,500 dwellings and a significant amount of other development including a mixed-use centre, primary school, and gypsy & traveller pitches accessed from one access is also an extraordinarily large number. However, given the constrained nature of Pyotts Hill, which is the only other potential

access, and which is constrained by a narrow carriageway, on-street parking, overhanging trees and no pedestrian footway, as well as the other constrained roads extending through Old Basing, it would not be appropriate for an all-purpose access to be provided from Pyotts Hill.

- 4.4 Manual for Streets (2007) states in paragraph 4.2.5 that: *'Internal permeability is important but the area also needs to be properly connected with adjacent street networks. A development with poor links to the surrounding area creates an enclave which encourages movement to and from it by car rather than by other modes.'* This would be the case if Land at Whitmarsh Lane is allocated for 1,500 dwellings with only one vehicular access.
- 4.5 The IIA also states that providing a suitable highway access for all users: *'is likely to include the need for a safe and suitable primary all-purpose access via OLD001 from the A33 that is sufficient to support the long-term and comprehensive development of the surrounding area, including the operational requirements of the Chineham Energy Recovery Facility, Basingstoke Sewage Treatment Works. It is also likely that this will need to be located clear of the areas affected by flood zones 2 & 3.'* [Emphasis added] (p 376). However, this is not consistent with policy SPS5.4 which states in clause (M) *'avoid development, with the exception of points of access within flood zones 2 and 3,'* indicating that the construction of an access through flood zones 2 and 3 is clearly the intention. This is also confirmed by Figure 5.9 which contains the Land at Whitmarsh Lane Concept Plan which shows, albeit with very faint hatching, the access crossing a broad area of Flood Zones 2 and 3 adjoining Pettys Brook, which needs to be crossed in order to access the major part of

the land allocated for development which is south of the brook. This was shown with much more clarity in the previous 2024 Regulation 18 Local Plan as shown below by the concept plan provided in that consultation:



4.6 This graphically indicates that if a bridge is to be provided which avoids the flood zones it would need to be very long and with a clear span which would likely not be practical and could have significant landscape and biodiversity impacts.

4.7 There is also the potential impact that development would have on traffic levels on the local road network. In this respect the IIA indicates that without the Local Plan policy there would be a potential ‘negative’ impact and comments: *‘Given the overall scale of this development [1,500 dwellings], the strategic and busy nature of the A33, the edge of town location, the current lack of access to public transport services and limited opportunities for Active Travel [walking and cycling], including when crossing the A33, there is a risk that this development could generate a high proportion of private vehicle trips leading to congestion and delays upon the surrounding transport networks (especially in the event of other development traffic also affecting the A33 corridor). Therefore, the Site Promoter’s TA needs to demonstrate how future external vehicle trips (especially by the private car) will be minimised and replaced by internal trips, Active Travel [walking and cycling], public transport trips (bus/MRT), and that the remaining external trips will not have unacceptable impacts upon the surrounding transport networks. In the absence of this, at this stage it is not possible to conclude that these proposals would not have a severe impact upon the surrounding transport network (p. 378 - 379).* However, when account of the policy requirements is taken into account the impact is said to be ‘neutral,’ on the grounds that the policy requires the developer of the site to *‘ensure that the development will not have a severe adverse impacts on the highway network including the A33 corridor and the connecting routes or unacceptable impacts on highway safety, with the inclusion of suitable measures to mitigate the impact,’* (p. 379). However, no evidence is presented in the IIA to demonstrate that this is achievable and given the very significant severance provided by the A33 and the extremely limited pedestrian connectivity with the

adjacent settlement owing to the presence of the Scheduled Monument of the Pyotts Hill Entrenchment on the eastern boundary providing safe non-vehicular links to neighbouring parts of Basingstoke is likely to be problematical. Crossing this scheduled monument also necessitates going through a dense area of trees and shrubs with no direct route to any services and facilities, which will not encourage pedestrian use. The assessment that the impact would be 'neutral' and it would be possible to avoid travel being dominated by the private car is therefore considered to be unjustified and without any robust evidence. The mixed-use centre would also likely be small, with limited facilities, which retailers may be unwilling to occupy, and not address many service or employment needs necessitating car travel outside of the site. This also means that the assessment that there would be a 'strongly positive' impact with regard to the objective that: *'The site is accessible by a range of existing sustainable transport modes, or can realistically be made accessible, to key facilities and services including education, employment, medical centres and, town centres and community,'* (p. 367) is likely to be overly optimistic.

- 4.8 While it is agreed that the full detailed assessment will be carried out at the application stage, evidence to demonstrate that there would be no insuperable problems to providing safe access and that the site would be accessible by sustainable modes of transport and not be predominantly dependent on access by the private car needs to be obtained at the Local Plan allocation stage. Without it the Council cannot meet the soundness tests of demonstrating that the allocation is justified or deliverable.

5 BIODIVERSITY IMPACTS

- 5.1 The Environment Act 2021 has a target to halt decline in species abundance by 2030 and requires new developments to deliver a minimum 10% net gain in biodiversity. This is also the requirement of proposed draft Local Plan Policy SPS5.4 relating to Land at Whitmarsh Lane. The National Planning Policy Framework (Dec 2024) also states in paragraph 193 c) that *‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.’* Given that chalk streams are an internationally rare habitat with 85% of chalk streams being found in England (p. 2 of Chalk Stream Restoration Strategy 2021 and Implementation Plan 2022), and can therefore reasonably be regarded as an irreplaceable habitat, biodiversity impacts are therefore a key consideration in considering new development proposals in this location.
- 5.2 The IIA assesses the potential impact of development on Land at Whitmarsh Lane as being ‘neutral’ if no account is taken of the proposed Local Plan policy. The assessment states with regard to that part of the site which comprises OLD001 that: *‘Subject to a design which respects boundary features of ecological value and adequate protection, including buffering, of Petty’s Brook, natural flood zones and boundary ancient woodlands, it is anticipated that impacts on biodiversity could be satisfactorily mitigated. Normal good practice for considering biodiversity within the development control process will need to be undertaken and there is potential for habitat enhancements. However, any north-south access between parcels of land either side of the Petty’s Brook*

corridor would result in a loss of key habitat type and a barrier to movement along a recognised green corridor,' (p. 390).

- 5.3 However, when account is taken of the proposed Local Plan Policy SPS5.6 the impact is judged to be 'positive' with the IIA stating that: *'The policy identifies the need to 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 Hampshire Local Nature Recovery Strategy.*
- 5.4 *The policy identifies the need to provide offsite habitat creation/restoration measures in order to adequately protect the River Loddon chalk stream and its floodplain from recreational impacts.*
- 5.5 *The policy also identifies the need to achieve a minimum 10% biodiversity net gain with onsite and offsite habitat enhancements secured as appropriate under an overall Biodiversity Gain Plan (p. 390 – 391).*
- 5.6 However, stating that this is required is very different to demonstrating that it is achievable. Chalk streams are very sensitive to environmental impacts from development that would affect water quality, such as through increased siltation or pollution arising from run-off from urban surfaces; and potential impacts on water supply if increased development results in large scale hard surfaces

limiting or reducing replenishment of groundwater supplies and sewage disposal. The River Loddon arises from chalk springs within Basingstoke, but then the corridor through Old Basing is undeveloped. However, it is still in relatively close proximity to urban development. The river currently emerges into an open rural environment at Pyotts Hill where the proposed allocation for 1,500 dwellings on land at Whitmarsh Lane commences.

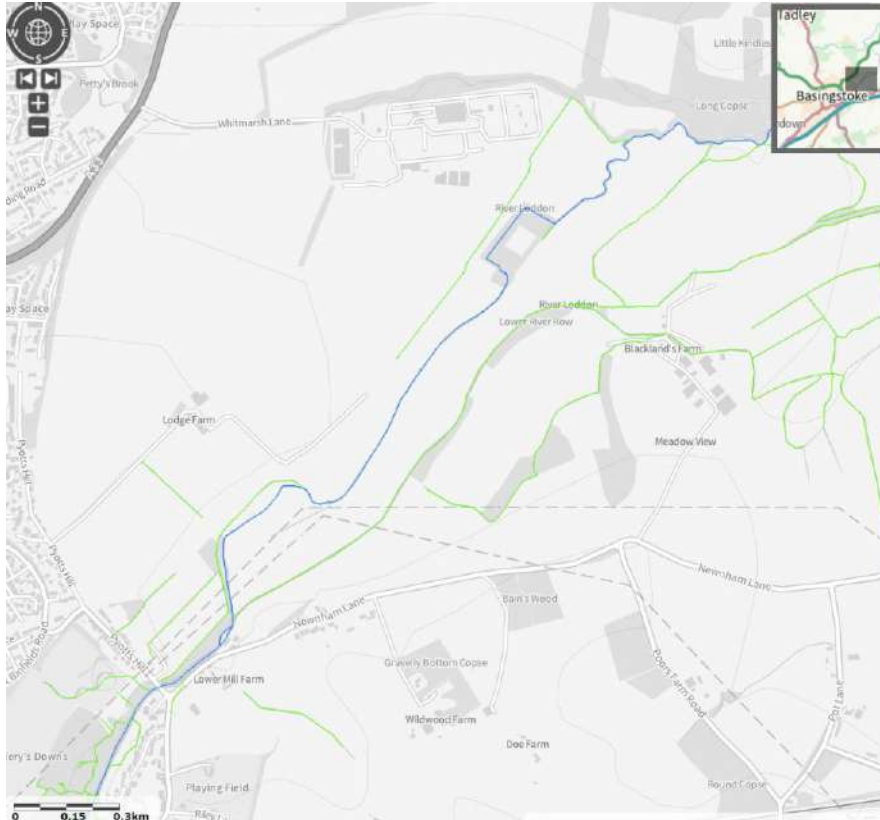
5.7 The River Loddon has also been designated by the Council as a Site of Importance for Nature Conservation and the 2024 Regulation 18 Local Plan proposes that it would be protected by the draft Policy ENV5 which relates to the River Loddon, Test and Enborne corridors and requires development proposals within or adjacent to these corridors 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.

5.8 Freshwater rivers, including chalk streams, are also a habitat of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Local authorities are legally required to have regard to the impact on such habitats in implementing their duty under section 40 of the NERC Act, to have regard to the conservation and enhancement of biodiversity in England when carrying out their functions. The river Loddon and its environs also form part of a Biodiversity Opportunity Area, where it has been

determined that there is the opportunity to enhance biodiversity value.

- 5.9 The DEFRA Magic Website identifies the following chalk streams in the vicinity of the land east of Basingstoke:



Source: DEFRA Magic Website

- 5.10 The key indicates that the blue line represents a chalk river of 'high certainty', whereas the green lines represent chalk rivers of 'low certainty.' However, it is noted that there is a potential chalk stream extending from the access road to Lodge Farm, which is within the identified developable area on the Illustrative Concept Plan (Figure 5.9). It would seem therefore that the southern part of the site may be underlain with chalk, and given its permeable nature, and the proximity of the development both to the river Loddon and other minor chalk watercourses there could be a direct route for pollutants and other impacts on

habitats of high ecological significance. The proposed development would come closer than 50 metres to the main channel of the river Loddon and would come closer to some of the potential subsidiary watercourses identified on the DEFRA Magic website, with no appreciable undeveloped buffer identified between the developable area and the boundary of the proposed allocation shown on Figure 5.9: SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan. The concept plan does not have a scale, so it is not possible to determine just how wide the small buffer would be, but it is very substantially narrower than the green corridors shown on the western edge of the development adjoining the Pyotts Hill Entrenchment Scheduled Monument and the Pettys Brook corridor. This is surprising given the international rarity of chalk streams and their environmental sensitivity.

- 5.11 With regard to OLD002 the IIA does acknowledge that: that: *‘there is uncertainty over the indirect negative impacts that development could have. In particular, assessment of the effects of possible development footprints on the hydrological regime of the River Loddon and associated wetland habitats would need to be investigated. Disturbance effects on wetland birds will also need to be taken into account,’*(p. 391 – 392). Precisely the same comments were made in the Housing Site Assessment appended to the Economic, Planning & Housing Committee Local Plan Update Report on the 2 September 2021 as stated in its assessment for Lodge Farm (p. 292 – 293), but it would appear that no further assessment has been undertaken into these important potential impacts over four years later. The IIA gives as a source of evidence ‘Biodiversity Assessments 2020 – 2025,’ but no such evidence is available as part of the Council’s consultation evidence base, with the only Biodiversity

Assessment available on the Council's website relating to this proposed site allocation being that prepared for the Local Development Framework Core Strategy (Stage 1) in February 2010.

- 5.12 Given that the proposed Land at Whitmarsh Lane would involve the construction of 1,500 dwellings and other significant development, and cover a large area with hard surfaces and extend to within 50 metres of the main River Loddon watercourse, and be even closer to minor watercourses feeding into the river, it is considered that further investigation of these hydrological matters is required before a decision is made to include the allocation in the Local Plan. This is particularly the case because the extension to the allocation on what was formerly described as Lodge Farm is on a slope which would facilitate the transportation of sediments and pollutants to the River Loddon and its flood plain.
- 5.13 The evidence presented in the supporting report by WWA on the River Loddon indicates that the impact on the hydrology and water quality of the river Loddon could be significant, particularly given the sensitivity of the habitat and these impacts could be irreversible. The allocation in the current Local Plan also avoids development on the southern slopes of the land East of Basingstoke where there is greatest potential for an impact on the River Loddon, so there would be a significant change in this respect with the proposed large-scale increase in the size of the proposed allocation. There is also a significant likelihood of increased disturbance and trampling of wetland habitat and disturbance of breeding birds close to the River Loddon, potentially degrading this habitat. Given these likely impacts, proceeding with this proposed

allocation would be contrary to the advice in paragraph 187 of the NPPF (Dec 2024) which states that *‘planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

5.14 Clause e) of the same paragraph also emphasises the importance of planning policies: *‘preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;’*

5.15 The impact on the internationally important River Loddon chalk stream could therefore be significant and further appraisal of the importance of this habitat and the potential impacts is given in the accompanying WWA River Loddon Report. It is important that the potential impacts are assessed prior to any decision being made on increasing the existing allocation on Land East of Basingstoke in order to determine whether an increase in the amount of development by 1,050 above the current allocation of 450 dwellings is deliverable without significant impacts on this internationally important habitat, which if they occur would be contrary to national and local planning policy and both the NERC Act 2006 and Environment Act 2021.

5.16 It is also important to note that evidence indicates that the proposed allocation

site itself may have some previously unappreciated biodiversity interest. The Old Basing & Lychpit Environment Campaign has undertaken a Citizen Science Survey and this has indicated that the site provides habitat for four species of reptile, namely slow worm, common lizard, grass snake and adder. The Froglife Advice Sheet Reptile Survey, states on page 9 that a site which supports 3 or more reptiles qualifies for a Key Reptile Site. In addition, all four of these reptile species are priority species. The reptiles were spread over the site, with a significant number in the southern part where the extra 1,050 dwellings would go. Even if habitat is retained on the site in accordance with the proposed policy, the increased fragmentation and recreational pressure, together with predation from domestic pets such as cats, would be likely to detrimentally affect this important area for reptiles and could lead to their disappearance from the site. The Citizens Science Survey also indicated that the site is used by farmland birds including cuckoo, skylark and yellowhammer. These are also all priority bird species. Therefore, in accordance with paragraph 192 b) of the NPPF it is a priority for the plan to promote the protection and recovery of priority species and the potential impact on these species therefore needs to be considered as part of the allocation process.

- 5.17 Given all of these factors there is clearly inadequate evidence to demonstrate that the IIA is correct when indicating a 'positive' impact when account is taken of the policy requirements of policy SPS5.4. No substantive biodiversity survey work has been made available by the Council to indicate either the current biodiversity interest of the site or its surroundings or how potential adverse impacts would be overcome.

6 HERITAGE IMPACTS

- 6.1 There are potentially significant heritage impacts arising from the proposed allocation, as there are a number of heritage assets within and adjoining the site, including the Old Basing Conservation Area; a number of listed buildings, including Lodge Farm and the adjoining barn which are Grade II; and the Pyotts Hill Entrenchment, which is a Scheduled Monument (SM) and medieval embankment. How these heritage assets would be potentially affected by the allocation on land at Whitmarsh Lane is analysed below.
- 6.2 In addition to the commentary below further evidence relating to the heritage impact of the proposed allocation is provided in the accompanying Heritage Report (January 2026) by Worledge Associates.
- 6.3 With regard to the IIA, in the column relating to the overall potential impact that development of the site would have in relation to SA Objective 10 which is to *'protect, and where possible enhance, heritage assets,'* the section of the assessment which assesses whether *'Development of the site would preserve or enhance the significance of designated or non-designated heritage assets, including any contribution made by their setting,'* the unmitigated outcome, which does not have regard to the proposed Local Plan policy requirements is said to be 'negative'. The commentary acknowledges that there are a number of important heritage assets that could be affected, including:

- 6.4 *'The western boundary of the site in which additional development is proposed abuts the Old Basing conservation area and is in close proximity to a number of listed buildings within the conservation area (including two Grade II listed buildings to the west of the site: Compton Close and Hill Rise Cottage). The Pyotts Hill Entrenchment, a SM, which runs along the western site boundary is an important feature of the conservation area. There is a Public Right of Way along the entrenchment. Two important vistas over the site are identified on the conservation area map. There are glimpsed views to the site from Pyotts Hill.*
- 6.5 *The site contains Lodge Farm farmstead which includes Grade II listed Basing Lodge Farmhouse and an associated barn, which is separately listed at Grade II. Part of the access track to the farm is within the site, and views over the site are afforded from it. The site is screened from the farmhouse by vegetation outside the site boundary. [WVA note: the listed buildings are now at the heart of the proposed allocation, and are not therefore outside the site boundary.] It is highly probable that all or part of the site has an historic association with the historic farm buildings. There are opportunities to improve the appearance of land occupied by modern agricultural buildings which are immediately next to listed buildings.*
- 6.6 ***Overall development would have an adverse impact on the significance of heritage assets as a result of development within the setting of such assets (our emphasis), and on the character and appearance of the conservation area. The quantum of development on the site which is acceptable may be limited by the need to mitigate adverse impacts,' [our emphasis] (p. 398 - 400).***

- 6.7 However, when account is taken of the proposed draft Local Plan policy the effect is said to change to ‘neutral.’ The commentary states that this is because: *‘The policy requires that the physical and visual sense of separation between the development and Old Basing is retained and that Old Basing’s separate and historic identity are retained. The policy also requires that the development maintains the strategic gap to the south.’*
- 6.8 *The policy requires that development preserves or enhances the significance, setting, character and appearance of the Old Basing Conservation Area through the protection of views to and from the conservation area.*
- 6.9 *It also requires that development preserves the significance of nearby listed buildings including the Grade II listed Lodge Farm and barn, through preservation of their setting.*
- 6.10 *The policy also states that 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.*
- 6.11 *The policy also more generally requires that development must respond positively to, and take opportunities to enhance the context of the neighbouring built environment; and the local distinctiveness of the area,’ (p. 399).*

6.12 However, merely stating in the policy that this is required does not ensure its achievement. The question is whether it is possible to achieve this objective while increasing the allocation on the site from 450 to 1,500 dwellings. In our view, based on the above analysis, it would not be possible, and this is further evidenced by the Heritage Report by Worledge Associates submitted with these representations. It is also evidenced by Figure 5.9: SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan in the Draft Spatial Strategy Regulation 18 Consultation which shows a relatively narrow Green Corridor adjoining the Pyotts Hill Entrenchment Scheduled Monument with development in close proximity which will destroy its current open setting and also its historic significance as either an early medieval defence feature or the boundary of a deer park. There would also be development in close proximity to the Conservation Area. At present, the Pyotts Hill boundary provides a green setting to the Conservation Area, with Pyotts Hill itself having a semi-rural character with a narrow roadway and many trees. However, this character would be substantially damaged as the proposed Sustainable Transport Corridor/Primary Access location extends right up to the boundary with the Conservation Area and a new bus gate is proposed, which would require substantial vegetation removal to accommodate the bus access and provide the necessary visibility splays.

6.13 There would also be a substantial negative impact on the setting of the two Grade II listed buildings namely, Lodge Farmhouse and an associated barn, as 'Figure 5.8: Eastern Basingstoke Illustrative Concept Plan including SPS5.4, SPS5.5, SPS5.6 and SPS5.7' shows both the link road and mixed-use centre in very close proximity, while the brown shaded developable area washes right over these listed buildings.

6.14 The Old Basing Conservation Area Appraisal and Management Plan Appraisal Map (2020/2021) also identifies a 'Vista – Important wider view,' at the Pyotts Hill end of the access track to Lodge Farm. In the written text the section relating to 'Character Area 5 Pyotts Hill,' states (p. 69) with regard to 'Views and Vistas' 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.'

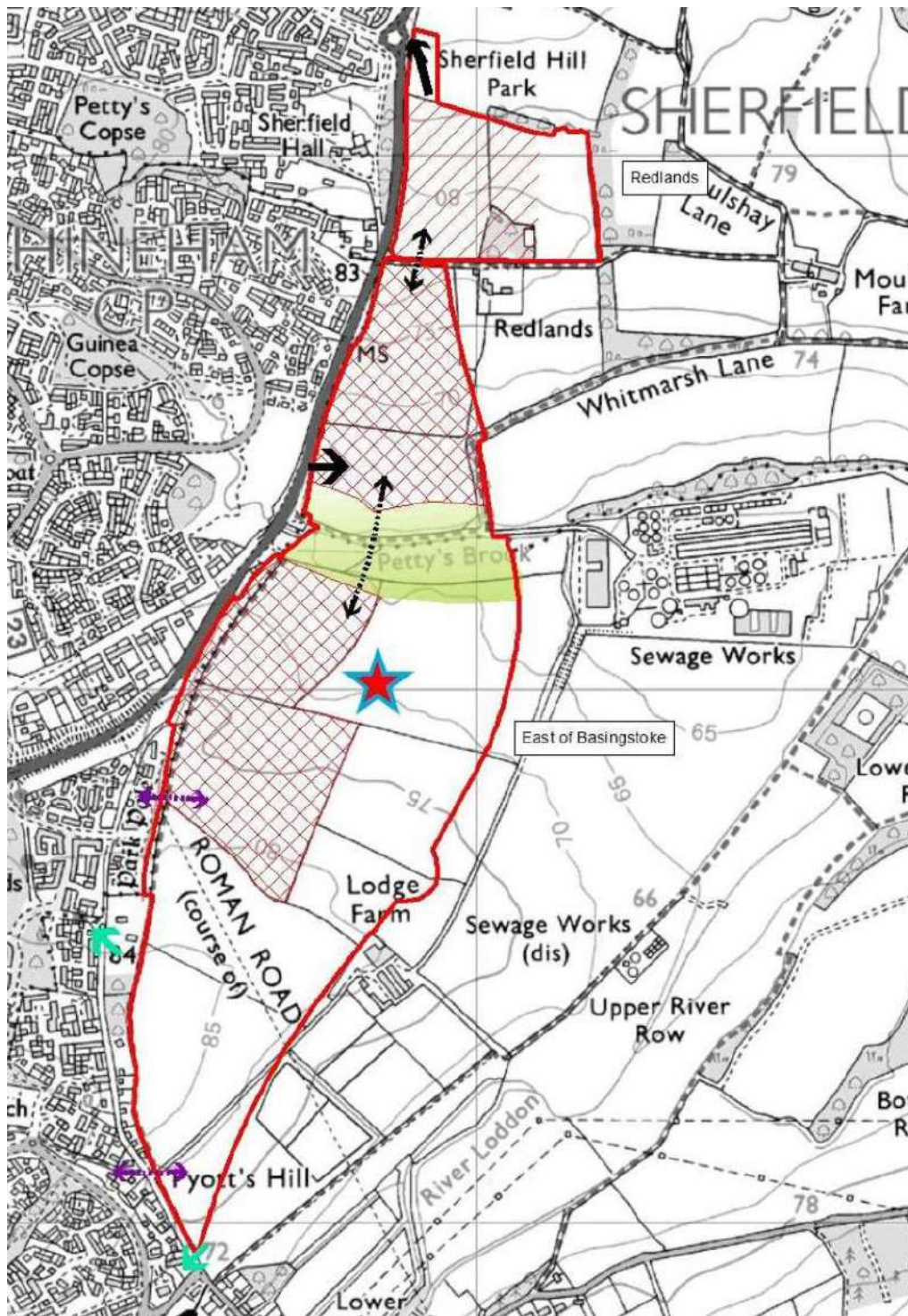
- 6.15 All of this sequential experience and glimpsed views would be lost by the proposed development of 1,500 dwellings on Land at Whitmarsh Lane. This also conflicts with Principle 5 relating to Views and Vistas in the Conservation Appraisal which states that: *‘Views into, out of and within the conservation area, where they contribute positively to the character, appearance or significance of the conservation area should be preserved or enhanced.’*
- 6.16 The supporting text to this principle (p. 78) states that: *‘Views and vistas into, out of and within the conservation area are important, they contribute positively to the character of the area. Care needs to be taken to ensure that where views and vistas contribute positively to the conservation area, they are not lost or compromised.’*
- 6.17 The loss of these important views and vistas would therefore be a significant negative impact that would be impossible to mitigate given the scale of the proposed development that is completely ignored in the IIA. Erosion of the rural setting of the conservation area and of the Scheduled Monument and listed buildings is therefore a key issue. Contrary to the claims of the IIA, development of the scale and layout proposed, as shown on the Illustrative Concept Plans, even with compliance with the policy requirements, would have a significant adverse impact on the setting and significance of heritage assets, including the Scheduled Monuments and listed buildings and on the character and appearance of the Old Basing Conservation Area.

6.18 The ‘justification for scoring,’ and ‘source of evidence’ columns do not list any heritage assessment that has been undertaken that demonstrates that 1,500 dwellings can be accommodated without adversely affecting the setting of heritage assets. Reference is made to ‘*Any statements of significance or site specific studies,*’ and there is a brief assessment in the Council’s ‘Heritage Impact Assessment Draft Local Plan (2024-2042) November 2025,’ pages 18 – 23. However, this is a very basic assessment with no evidence of field work or empirical evidence. Therefore, this change in the claimed impact from ‘negative’ to ‘neutral’ on account of the policy requirements is considered to be subjective and not based on any objective evidence that the extra 1,050 dwellings could be accommodated and that the heritage impact could be adequately mitigated. Indeed, from the ‘developable’ area, proposed link road and bus gate as shown on Figure 5.8: Eastern Basingstoke Illustrative Concept Plan including SPS5.4, SPS5.5, SPS5.6 and SPS5.7 the indications are that the negative impact could not be overcome, but there would be significant harm to these important heritage assets.

6.19 As previously noted, the proposed allocation of this site would increase the existing Local Plan 2011 – 2029 allocation under Policy SS3.9 from 450 to 1,500 dwellings and extend the site boundary to include the Lodge Farm site. Given that currently the site allocation plan shows that no development is proposed in the southern parts of the site where most of the heritage assets are located, with the proposed increase in numbers the potential for mitigating the impact on the heritage assets would seem to be very limited. Indeed, if the setting of the heritage assets are to be maintained it would severely limit the potential for any increase in the amount of development that could be accommodated on this site. Given that the assessment criteria includes ‘any contribution made by their setting,’ it would seem impossible for a development of 1,500 dwellings in close proximity to a scheduled monument, conservation area and listed buildings to have a ‘neutral’ impact. The assessed ‘neutral’ impact must therefore be judged to be without proper justification.

Archaeology

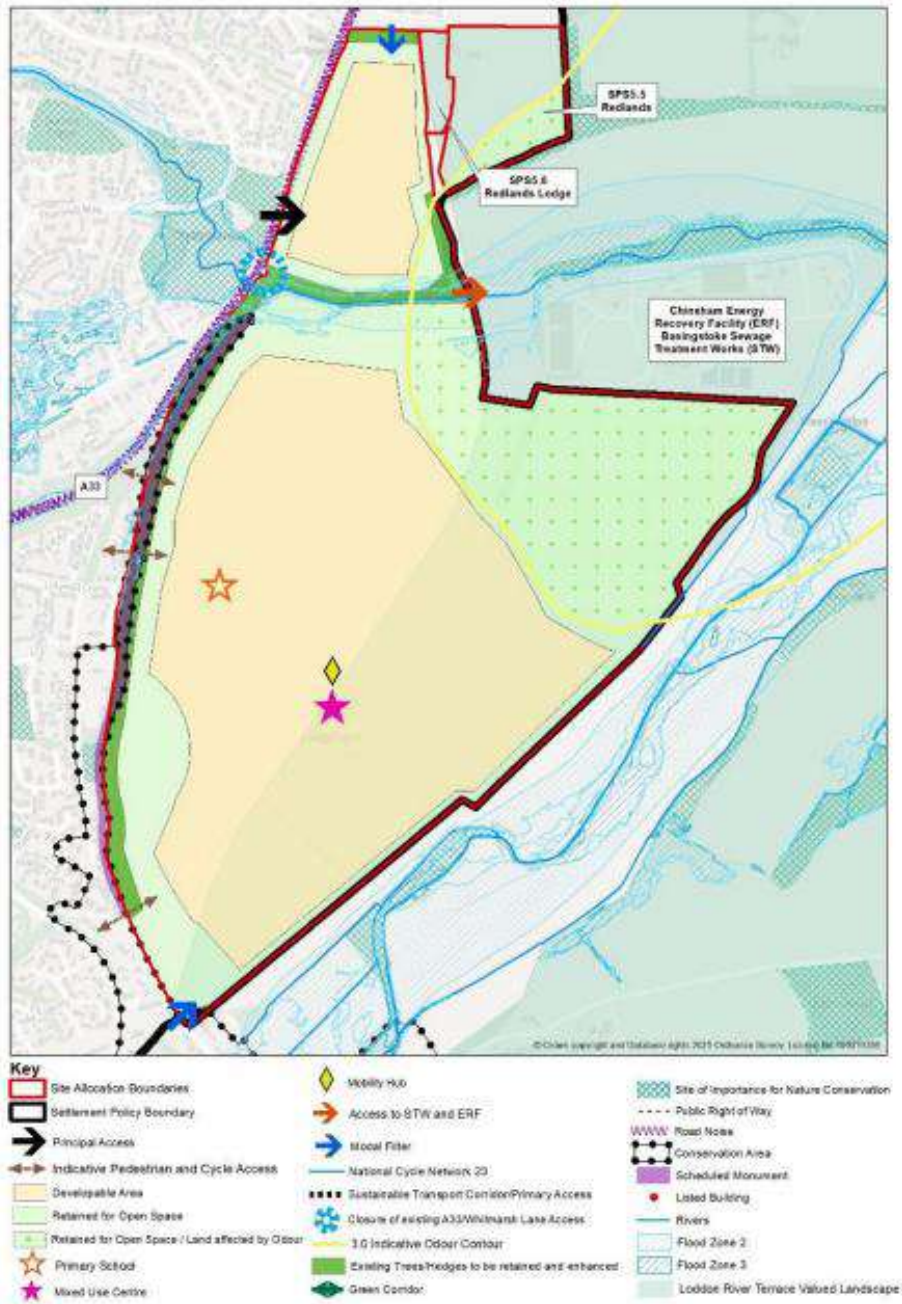
- 6.20 A similar situation applies with regard to archaeology, where the potential impact is said to be ‘negative,’ at Site Assessment stage. The comments column states with regard to that part of the site given the reference OLD001: *‘Medium potential for impact, although a Scheduled Monument borders the site which is a medieval embankment that runs along its western side, known as Park Pale. Archaeological concerns can be mitigated but some assessment of potential, possibly including fieldwork, should be undertaken before an application is submitted.’* It further adds that: *‘The setting of the Scheduled Monument is an important material consideration and will influence the development layout. The advice and opinion of English Heritage will be needed. The line of the Roman Road crosses the site. **Therefore, archaeology will be a very important consideration when establishing how to develop this site (our emphasis).**’* (p. 400 - 401).
- 6.21 However, Figure 5.9: SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan gives scant indication that this has been done. The current Local Plan 2011 – 2029 indicates on Policies SS3.7 and SS3.9 Inset Map the course of the Roman Road which goes right across the southern part of the site where development was not formerly proposed as shown below:



Source: Policies SS3.7 & SS3.9 Inset Map in Basingstoke & Deane Local Plan 2011 - 2029

6.22 However, with the proposed 1,500 dwellings the developable area is shown as including the area occupied by the Roman Road as demonstrated by comparing the current Local Plan 2011 – 2029 allocation as identified above with the proposed Local Plan Concept Plan which is provided below. It is true that the separate ‘Figure 5.8: Eastern Basingstoke Illustrative Concept Plan including SPS5.4, SPS5.5, SPS5.6 and SPS5.7’ does shown a green arrow indicating a green corridor going through the developable area, but this raises the issue that if this is an important policy requirement why it is not also shown on ‘Figure 5.9: SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan’. It would seem in any case that what is currently envisaged is some narrow gap between development that would not reflect the true significance of the Roman road which would therefore be lost from the site. This impression is further reinforced by the comment with regard to the part of the site referred to as OLD002 (Lodge Farm) where it is stated that: *‘The line of the Roman Road crosses the site and there may be some positive opportunity to reflect this in the site layout.’* It is not therefore considered to be an indispensable requirement of the development.

Figure 5.9: SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan



Source: Figure 5.9: SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan in Draft Spatial Strategy Regulation 18 Local Plan 2024 - 2042

- 6.23 With regard to OLD002 the assessment further states that: *'There is reported to be the site of a Roman villa close to the river, and there is a moated site. These are significant sites which need to be mitigated by design or recording. Preservation within open space design may marginally constrain the capacity of the allocation.'* This further indicates the archaeological potential of the proposed site allocation.
- 6.24 The column which takes account of the proposed draft Local Plan policy requirements states: *'The policy requires that development assesses the full extent of any archaeological constraints and ensures 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,'* but this seems unlikely to be achievable. Again, there is no evidence to justify the claimed 'neutral' impact once account is taken of the policy requirements.

6.25 Even if measures are taken to protect actual archaeological remains, the Old Basing Conservation Area Appraisal states that the Pyotts Hill Entrenchment is also known as the Basing House Deer Park Pale (p.8) which indicates that this was historically the boundary of a deer park, an alternative view detailed in the accompanying Heritage Report is that it is an early medieval defence feature. Whichever is right, constructing 1,500 dwellings in close proximity to it would fundamentally affects its setting and historical context and therefore its archaeological significance. The impact would therefore undoubtedly be negative as evidenced in the accompanying Heritage Report by Worlledge Associates.

7 LANDSCAPE IMPACTS

- 7.1 Much of the proposed allocation at Whitmarsh Lane is located in a prominent location above the valley of the River Loddon, with the site at its highest point being 85m AOD while the River Loddon is at approximately 65m AOD. Given that the proposed allocation at Whitmarsh Lane adjoins Basingstoke and is also located in close proximity to Old Basing and overlooks part of this historic settlement, there would also be a degree of coalescence, particularly perceived coalescence arising from the zone of visual influence of the new development.
- 7.2 The SA Objective relating to this matter is no 9: which is to *‘Protect and where possible enhance, the character and quality of the local landscape and geodiversity.’* The IIA does not consider there to be a significant impact in relation to these matters and indeed once again the impact both at the Site Assessment Stage and when taking account of the proposed Policy Requirements is judged to be ‘neutral’, but this is not considered to give a true reflection of the case for the reasons set out below.
- 7.3 In addition to the commentary below further evidence relating to landscape impacts and the Zone of Visual Influence is provided in the accompanying Landscape Review (January 2026) by Ecology Solutions.
- 7.4 The sub-category below objective 9 that is assessed in the IIA is that: *‘Development of the site would protect or enhance the borough’s landscape character and beauty.’* The commentary with regard to the part of the site given reference OLD001 is as follows: *‘The site is judged to have Low/Medium*

landscape sensitivity. This is an allocated site with a presumption of development. The site may have potential to accommodate housing development without significant character change or adverse landscape/visual effects, provided it is sensitive to the historic value of the site, and is supported by further detailed assessment.' (p. 397). This is a somewhat misleading assessment because while the site is currently allocated for 450 dwellings, the proposal is to increase this to 1,500 dwellings, which would necessitate building on the more sensitive southern and eastern parts of the site and also on the adjoining OLD002 land at Lodge Farm which on the adopted inset map for Policies SS3.7 and SS3.9 are shown to remain open.

- 7.5 With regard to OLD002 (Lodge Farm), the assessment states: *'The Landscape Sensitivity Assessment splits the site into three sections. The southern-most section is judged as being of low/medium sensitivity. The northern section, running up to the Basingstoke STW, is judged to be medium sensitivity. The south-eastern boundary of the site adjoins an area proposed to be designated as a valued landscape.'* (p. 398). This is a strange assessment, as the land in the vicinity of the Sewage Treatment Works is the lowest part of the site, being below 70 metres above sea level in height, whereas the southern part of the site exceeds this level and is on a slope and so is visible from the surrounding area as shown by the Zone of Visual Influence in the accompanying Landscape Review (January 2026) by Ecology Solutions. The Sewage Treatment Works and adjoining incinerator also significantly detract from the landscape quality of the northern part of the site, but are either invisible or have a much lower impact on the southern part of the site.

7.6 After account is taken of the proposed draft Local Plan policy the commentary states that: *'The policy requires 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 policy also requires that the design and layout of the development on its outward facing edges enables a suitable transition to the adjacent countryside.

The policy also requires that a holistic approach is taken to integrated buffers and ecological corridors into the south-eastern part of the site which forms part of the northern setting to the Loddon Valley and Floodplain Valued Landscape (L1).

The policy also requires development to retain the physical and visual sense of separation between the development and Old Basing, and retain Old Basing's separate and historic identity. The policy notes that the development will maintain the strategic gap to the south.' (p. 397 - 398).

7.7 However, this does not address the fundamental issue of whether the site can accommodate 1,500 dwellings without detrimental landscape impacts, however well they are designed and therefore does not justify the 'neutral' impact assessment given.

7.8 This assessment underplays the significant difference in topography on the site, which increases from just below 65 metres at Petty's Brook and increases up to 85 metres at the top of Pyotts Hill behind Lodge Farm, which is a prominent hilltop crossed by a public right of way, giving extensive views over

the countryside on the far side of the River Loddon around Poors Farm as shown by the two photographs below taken from the public footpath as it crosses Pyotts Hill looking to the east and south-east:



Photograph 1: View from Pyotts Hill looking east across Loddon Valley



Photograph 2: View from Pyotts Hill looking south-east across Loddon Valley

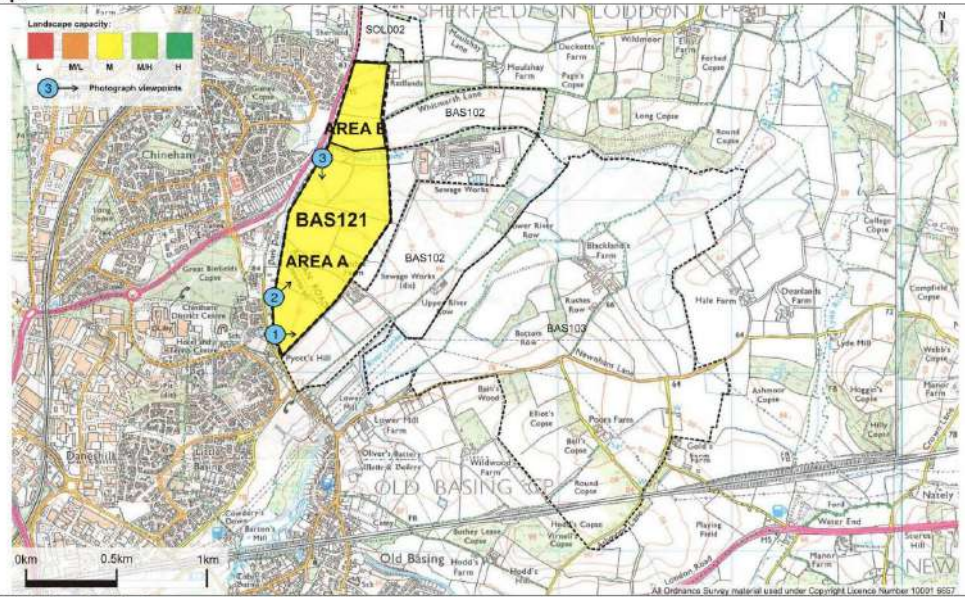
7.9 Currently the site allocation plan on page 49 of the Basingstoke and Deane Local Plan 2022 to 2029 shows development only on the north side of this hill. However, the proposed increase of the allocation by another 1,050 dwellings would necessitate also developing the eastern and southern slopes, thereby having a widespread significant visual impact on the rural landscape of the Loddon Valley to the east. Indeed, currently views back to Pyotts Hill from the opposite side of the Loddon Valley will not include any of the urban area of Basingstoke owing to the screening provided by the existing trees along the Pyotts Hill Entrenchment. The overall assessment of the likely impact as 'neutral' is not therefore consistent with the current topography and landscape characteristics of the site. This will also significantly erode the sense of separation between the development and Old Basing as shown by the Zone of

Visual Influence in the Landscape Review (January 2026) by Ecology Solutions.

- 7.10 As for the integrated buffers and ecological corridors which are required in the *'south-eastern part of the site which forms part of the northern setting to the Loddon Valley and Floodplain Valued Landscape,'* more weight would be given to this requirement if this was shown on the concept plan, which shows the developable area extending over the valley slopes in this part of the site.
- 7.11 The sources given include the Landscape Character Assessment 2021; and Landscape Sensitivity Study 2021 and updates; Valued Landscapes Study (2023); Green Infrastructure Strategy; National Landscape Management Plan & information from statutory consultees. However, it is important to note that the current adopted Local Plan 2011 – 2029 was supported by a different *'Landscape Capacity Study 2010: Site Options,'* by Terra Firma and Kirkham Landscape Planning Limited. This came to somewhat different conclusions about the land to the East of Basingstoke. In this assessment the western part of the site is referred to as BAS121, with the area south of Petty's Brook described as Area A: Pyotts Hill Farmland, with the assessment being on pages 95 – 99 as shown on the map below. The assessment does not cover the eastern part of the site at Lodge Farm, which as the contours on the map below shew are located on the sloping land leading down to the River Loddon.

SITE BAS 121

Site map:



Site BAS 121: Area A – Medium capacity; Area B – Medium capacity

7.12 This assessment states that: *‘Much of BAS 121 is visually prominent as it extends over open hillsides.’* (p. 96). It is further stated that: *‘In the extreme south-west, the site abuts the linear settlement at Pyotts Hill. This hamlet has a distinctive built form which distinguishes it from the estates in Basingstoke.’* (p. 96). It is further stated that the key landscape planning factors are: *‘The site immediately abuts Basingstoke and extends eastwards into open countryside. The site is not in an area designated for its landscape value but it provides a rural setting to the hamlet of Pyotts Hill. Area A lies within the local landscape character area BA 09 Pyotts Hill Farmland of the 2008 Study which identifies the area as having a **low landscape capacity**.’* (p. 96 Emphasis added). In terms of Visual Sensitivity this is stated to be Medium/High owing to:

- *‘Visually exposed upper slopes;*
- *Well used footpaths and some properties with open views over the site;*

- *Limited opportunities for screen planting without the loss of openness.*
(p. 98)

7.13 Overall, the landscape Sensitivity and Landscape Capacity were judged to be ‘medium.’ (p. 99). The definition of ‘medium capacity’ on page 1 of the Executive Summary is: *‘The Landscape character area could be able to accommodate areas of new development in some parts, provided it has regard to the setting and form of existing settlement and the character and sensitivity of adjacent landscape character areas. There are landscape constraints and therefore the key landscape and visual characteristics must be retained and enhanced.’* The assessment also notes that the Village Design Statement *‘identifies the general landscape value of the setting to Old Basing and the sensitivity of views in and out of the settlement.’* (p.99) The recommendations and comments include that *‘it is important that development respects the setting of the Park Pale where a buffer should be provided; the setting of the settlement at Pyotts Hill and Old Basing generally. The upper prominent slopes should be avoided and any development carefully designed to respond to the topography. It is recommended that the built form be well broken up by tree planting and open space to reduce the visual impact in views from adjoining settlements and the wider landscape.’* (p. 99)

7.14 As Figures 5.8 and 5.9: SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan shows the developable area now includes the highest parts of the site and the prominent south facing slopes that face Old Basing, with the Sustainable Transport Corridor/Primary Access and associated lighting also traversing this area, while development also extends into the southernmost part of the site

nearest Old Basing, whilst also only including a small, very narrow buffer on the boundary with the River Loddon floodplain but also narrow buffers with the Pyotts Hill Entrenchment and the Conservation Area, it is clear that it does none of these things. Given that nothing on the site and its surroundings has taken place which would affect this earlier assessment, the question must arise as to how can the IIA determine that there would be a ‘neutral’ landscape impact when the proposal is to increase the allocation to 1,500 dwellings, when this earlier assessment considered that much of this site was visually prominent and had a low capacity for development, especially as this means that those sensitive areas in the southern part of the site formerly identified to be kept open must now be developed and thereby do precisely what this earlier assessment advised against?

Land at Whitmarsh Lane & Coalescence

- 7.15 A closely related issue is whether the proposed development would lead to the coalescence of existing settlements. This is dealt with in relation to a sub-category of SA Objective 11 which is to ‘*Development of the site would not lead to the coalescence of existing settlements.*’ In this respect the IIA judges the impact in relation to coalescence to be ‘neutral,’ with the Commentary at Site Assessment Stage stating that: ‘*The development of this site would not lead to the physical coalescence of the settlements of Basingstoke with Old Basing. This extension of the settlement of Basingstoke onto the northern slopes of the valley of the River Loddon would lead to some erosion of the sense of visual separation of Old Basing from Basingstoke. There is potential to mitigate this impact through the siting, layout, scale, character and landscape design of the*

proposal hence the neutral assessment.’ (p. 404 – 405).

- 7.16 This seems a strange assessment as the one location where there is currently very nearly coalescence is at Pyotts Hill, where there is only a very small gap provided by the River Loddon and its immediate surroundings. If the whole of the land at Whitmarsh Lane is developed with 1,500 dwellings just to the north it would inevitably impinge on the separation between these two settlements and bring development much closer than under the current Local Plan 2011 – 2019 allocation under Policy SS3.9 which under the Policies SS3.7 and SS3.9 inset map on page 49 of the Local Plan leaves the whole of the southern part of the site adjoining Pyotts Hill undeveloped. Indeed, as much of the southern part of the site is at a substantial elevation of 20 or more metres above the River Loddon it would be visually prominent, and intrude into views from parts of Old Basing.
- 7.17 Ecology Solutions have undertaken an assessment of the Zone of Visual Influence of the proposed development on land at Whitmarsh Lane. This indicates that the development would be visible all along the river Loddon and on the slopes on the southern side of the valley leading up to the settlement of Old Basing. There would therefore be a strong perception of coalescence arising from the proposed development between Basingstoke and Old Basing and the ‘neutral’ impact has no basis in reality.
- 7.18 When account is taken of the proposed draft Local Plan policy requirements the commentary states: *‘The policy requires 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. It also requires that the design and layout of the development on its outward facing edges will enable a suitable transition to the adjacent countryside.

7.19 *The policy also requires that development proposals retain the physical and visual sense of separation between the development and Old Basing, and retain Old Basing’s separate and historic identity. It also requires that the development maintains the strategic gap to the south.’* (p. 404 – 405). However, as Figure 5.9: SPS5.4 Land at Whitmarsh Lane Illustrative Concept Plan shows the proposed developable area extending hard up against the southern boundary this would not be achieved.

7.20 Even if there is some form of green buffer provided on the southern boundary, given that the proposal is for potentially 1,500 dwellings this would necessitate many of these being located on the sloping ground that forms part of Lodge Farm and Pyotts Hill as no housing is to be provided around the sewage treatment works and incinerator, the potential for a significant degree of coalescence would be high.

Land at Whitmarsh Lane & its relationship to the existing settlement

7.21 With regard to the question of whether the proposal would relate *‘well to the existing settlement in terms of form, scale and character,’* which forms part of Sustainability Objective 11, the IIA identifies a ‘negative’ potential impact before account is taken of the policy requirements. It states that: *‘The north western part of this combined site, that comprises the ALP allocation known as East of*

Basingstoke (OLD001), lies within the Settlement Policy Boundary of Basingstoke as identified in the adopted Local Plan. However, the development of Lodge Farm (OLD002) in the south eastern part of this combined site would project distinctly eastwards of the existing built-up area of Basingstoke and as proposed to be extended through the housing allocation in the adopted Local Plan at East of Basingstoke. As such the site would not comprise a rounding-off of the built-up area and would not relate well to the existing settlement in terms of form, although its development in combination with OLD001 allows potential for partial mitigation.

7.22 *The limited size of the development compared with the large size of Basingstoke would relate well to this settlement in terms of scale. The development’s residential character in close proximity to other residential areas would relate well to the existing settlement in terms of character.’ (p. 402 – 403).*

7.23 This analysis, however, overlooks the very significant factor of severance between the proposed allocation on land at Whitmarsh Lane and the existing settlement. This severance is created by the very busy A33 and Pyotts Hill Entrenchment, which as it is a scheduled monument limits the potential to provide pedestrian connections across it. In addition, on its far side Pyotts Hill runs parallel to the site boundary for a substantial proportion of the site. This is a narrow vehicular access road with no footway and no lighting and is extensively overshadowed by trees. It will therefore be dark in the evenings and early morning for the darker six months of the year, and therefore provide a potentially threatening environment to pedestrians. The provision of lighting

or a footway would adversely affect the character of the lane and its contribution to the Old Basing Conservation Area. The provision of additional pedestrian links across Pyotts Hill Entrenchment would adversely affect the status of this Scheduled Monument. The indications are therefore that the proposed extension, although it would adjoin the existing settlement of Basingstoke would not relate well to it in terms of urban form but would form an isolated enclave separated by the A33 and Pyotts Hill Entrenchment from the adjoining settlement. This would be accentuated by there being only one all-purpose vehicular access serving the large area south of Petty's Brook. The development would therefore have low permeability with the existing town both in terms of pedestrian and vehicular links and physically would be separated from it by the Scheduled Monument and A33. Without adequate permeability the proposed allocation would poorly relate to the existing form of the settlement.

- 7.24 When account is taken of the proposed draft policy requirements the impact is given as 'neutral' and the assessment states that: *'The policy requires 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. It also requires that the design and layout of the development on its outward facing edges will enable a suitable transition to the adjacent countryside,'* (p.402) resulting in a claimed 'neutral' effect. However, no reference is made to the important issue of severance from the existing settlement and the significant issues arising from it. Given that no reference is made to severance and the

illustrative concept plan shows the developable area extending right down the valley slope from Lodge Farm, the indication is that the proposed allocation would not relate well to either the existing settlement or the adjacent countryside. There would therefore be a 'negative' impact rather than the 'neutral' one given in the IIA.

8 THE GREENFIELD STATUS OF LAND AT WHITMARSH LANE AND THE NEED TO PRIORITISE THE RE-USE OF PREVIOUSLY DEVELOPED LAND

- 8.1 The Council's IIA acknowledges that the land at Whitmarsh Lane is a greenfield site and therefore there would be a 'negative' impact in relation to re-use of previously developed land (p. 386). As Government policy in the National Planning Policy Framework (December 2024) is to maximise the use of previously developed land, with paragraph 124 stating that: *'Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land,'* this site and other greenfield sites should therefore only be allocated if there is no available previously developed land that could be allocated.
- 8.2 In this respect, it is important to note that the Regulation 18 Local Plan is very heavily focused on Greenfield allocations. Proposed Policy SPS5 identifies fourteen strategic housing allocations on sites which the IIA indicates are predominantly greenfield with the policy indicating that they would deliver a total of 13,470 dwellings during the plan period to 2042. These sites are SPS5.1, SPS5.2, SPS5.3, SPS5.4, SPS5.5, SPS5.7, SPS5.8, SPS5.9, SPS5.10, SPS5.11, SPS5.12, SPS5.14, SPS5.15, and SPS5.16. As regards previously developed land the total allocations are 500 dwellings in Basingstoke Town centre under policy SPS3; 1,000 dwellings at Basing View under policy SPS9; 1,000 dwellings under policy SPS2 through neighbourhood renewal plus 15 dwellings at Redlands Lodge under policy SPS5.6 and 6 dwellings at 65 New Road under policy SPS5.13. The total on previously developed land is

therefore 2,521. This represents only 15.8% of the total allocated. The vast bulk of these strategic allocations would therefore take place on greenfield land.

8.3 It is clear therefore that the vast majority of the allocations are on greenfield and the proposed strategy is heavily focused on greenfield land, which does not accord with Government policy or the Council's own key principles guiding the spatial strategy, one of which is that: *'The strategy will maximise opportunities for development within built up areas and on previously developed land, to minimise greenfield development and create sustainable communities.'* (para 4.2). If this key principle is to be followed through more attention will need to be given to identifying previously developed land for housing development.

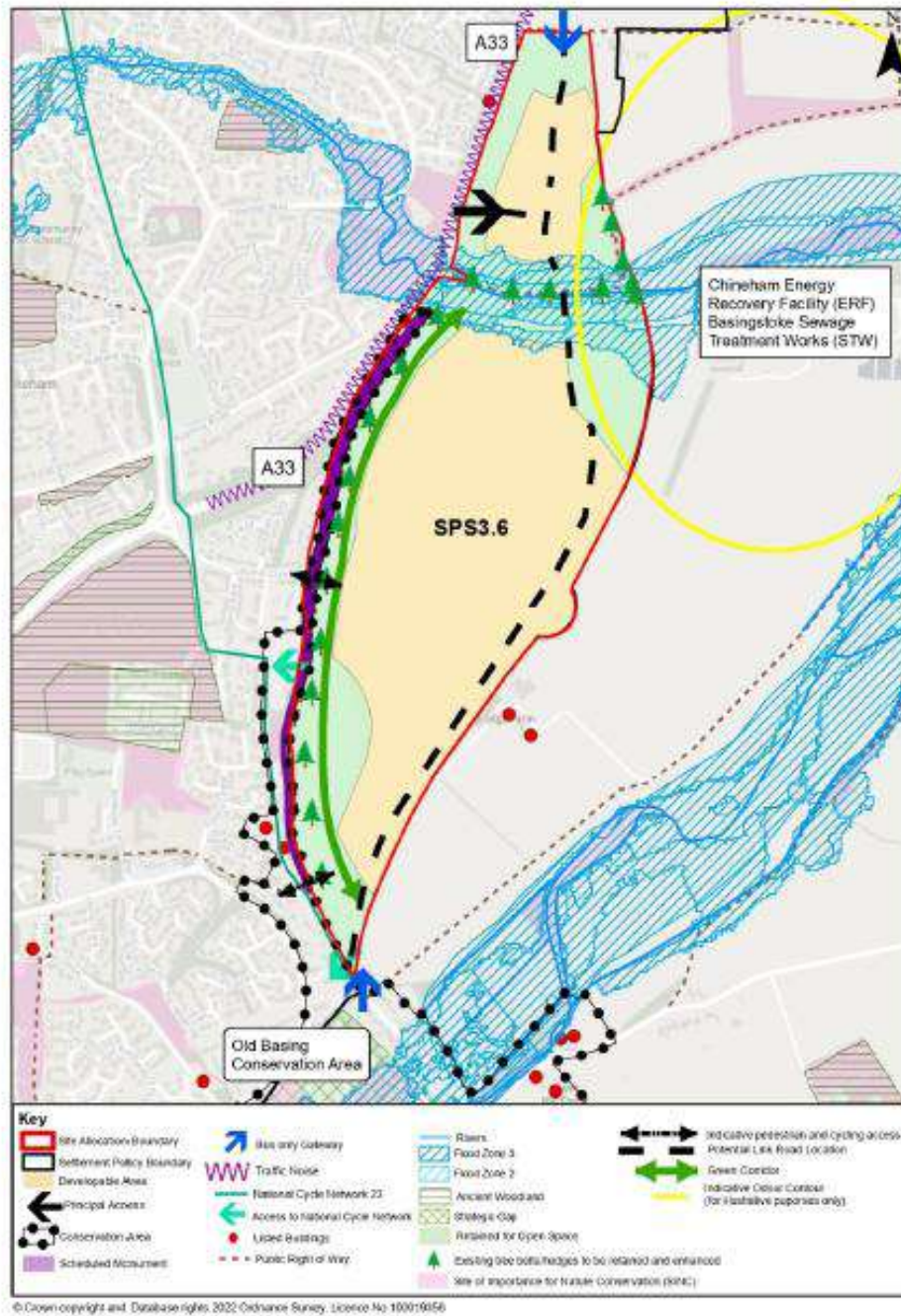
9 POTENTIAL IMPACT ON WATER RESOURCES INCLUDING FLOODING

9.1 With climate change resulting in more extreme storms and this forecasted to become more accentuated over time flood risk and water resource issues are of great significance.

Flood Risk

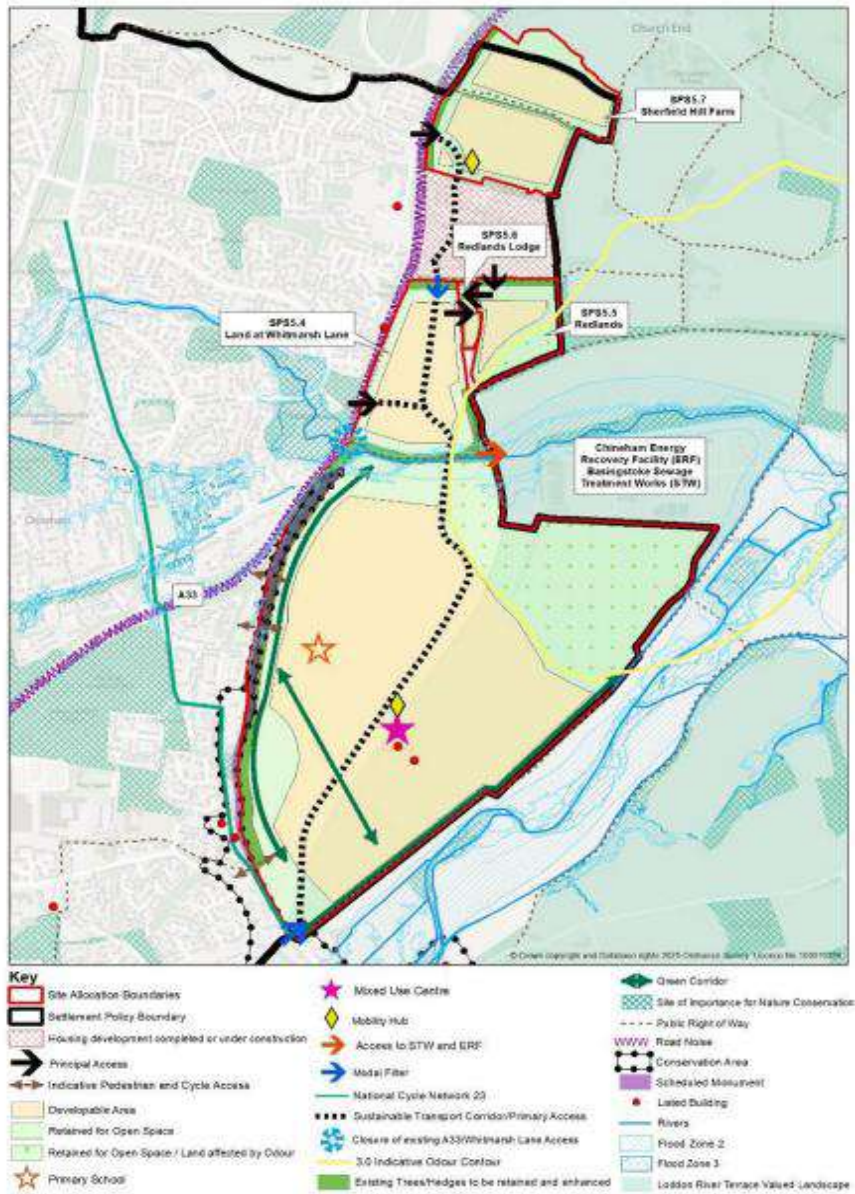
9.2 Flood risk is dealt with by Sustainability Appraisal Objective 8 which is to *'Reduce the risk of flooding and the resulting detriment to the local community, environment and economy.'* In relation to flooding the IIA identifies a potential 'strongly negative' impact at the site assessment stage for OLD001 and a 'negative' impact for OLD002. The commentary states that with regard to OLD001 *'96% of the site falls within Flood Zone 1; 3% of the site falls within Flood Zone 2 and 1% falls within Flood Zone 3.'* With regard to OLD002 it is stated that *'all of the site falls within Flood Zone 1.'* (p. 396). What it neglects to state is that Flood Zones 2 and 3 relate to the area around the Petty's Brook, which runs through the middle of the proposed site allocation as shown by the plan below and through which the sole all-purpose vehicular access into the site is proposed to go. The concept plan in the previous Regulation 18 Local Plan on which consultation took place in 2024 made it abundantly evident that the one and only vehicular access into the development (apart from the bus gate), went through the flood plain as shown by Figure 6.7 below:

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



9.3 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



9.4 The accompanying policy SPS5.4 acknowledges that the access will need to go through Flood Zones 2 and 3, stating in clause (m): ‘Avoid development, with the exception of points of access within flood zones 2 and 3.’ It is therefore a major omission from the IIA that in relation to SA Objective 8 no reference is made to the need for the site access road to go through Flood Zones 2 and 3.

- 9.5 It is not clear therefore how it is proposed to address this issue. If the access is subject to flooding, then potentially the residents of the majority of the proposed 1,500 dwellings could have no means of accessing or leaving their dwellings in major flood events. If a bridge is proposed it would need to be very lengthy and have a broad span as the floodplain is at least 150 metres wide where the link road is proposed and crosses a wooded green corridor and Site of Importance for Nature Conservation and so would have a significant negative environmental impact.
- 9.6 The reference in the IIA to 4 records of external sewer flooding, would seem to suggest that there is a potential problem in relation to this issue, but there is no commentary about this issue and how it is proposed to address the problem.

Water Quality

- 9.7 Sustainability Objective 7 is to *‘Maintain and improve the quality of water resources, ensuring the sustainable management of water resources.’* With regard to water quality the potential impact at site assessment stage is identified as ‘negative.’ In this case the commentary states: *‘The Water Cycle Study (WCS) indicates that growth in Basingstoke may result in a slight increase in watercourse phosphate concentrations in the River Loddon, but no reduction in Water Framework Directive (WFD) status classification. WFD target status can be achieved with improved treatment at the WwTW. This is being reviewed through the 2025 WCS’ (p. 392).* The source for this assessment is said to be *‘Water Cycle Study (2022 and 2025) and information from statutory consultees.’* After account is taken of the requirements of policy SPS5.4 and its requirement in clause (dd) for development to *‘provide or*

contribute to suitable infrastructure for sewage (on and off site), foul water and other utilities’ and for the requirement in clause (m) for the provision of SuDs ‘to avoid any polluting runoff into the watercourses,’ it is concluded that the potential impact after taking account of the policy requirements would be ‘neutral’.

9.8 However, the River Loddon is a sensitive chalk stream habitat which is an internationally rare and important habitat with 85% of chalk streams being found in England (p2 of Chalk Stream Restoration Strategy 2021 and Implementation Plan 2022). They are also very vulnerable to particulates and other pollutants entering into the watercourse from urban run-off, as are the species characteristic of such streams. The accompanying River Loddon Report by WWA provides evidence that SuDS provide imperfect protection from sediments and pollutants. Potentially pollutants could also enter the river from the new access road proposed across Petty’s Brook which flows directly into the River Loddon.

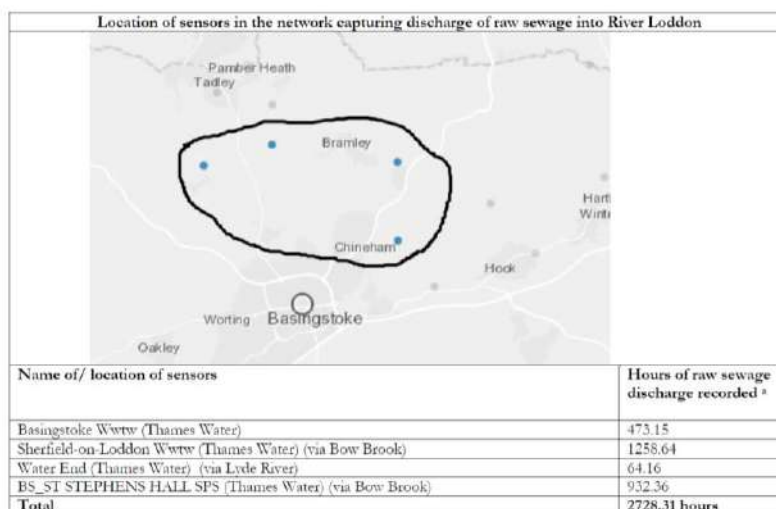
9.9 These issues were acknowledged in the 2024 Regulation 18 Local Plan which stated in paragraph 7.25 that: *‘The River Loddon is classified as a high-quality chalk and salmonid river and therefore requires special protection for its water quality, ecology and geology.... The river water quality is affected by abstraction, urban drainage, sewage work, 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.’* There is a particular risk from sedimentation during the

construction of the development, which given the scale of what is proposed, is likely to take place over a long period of time.

9.10 Given that the proposal is to erect 1,500 dwellings on a hill in close proximity to the River Loddon, with the access into the development crossing Petty's Brook a short distance from its confluence with the River Loddon, there is clearly potential for pollution of this internationally important habitat, and rather than indicating a 'neutral' impact, it is considered that a more objective assessment would be to acknowledge that there is the potential for a 'negative' impact, even if the policy requirements are met. Further details of the potential for adverse impacts on the River Loddon, are provided in the accompanying WWA River Loddon report.

9.11 Data obtained by the Old Basing & Lychpit Environment Campaign also indicates that between 2018/19 and 2022 the Basingstoke sewage infrastructure has, without the additional housing discharged 2,728 hours of raw sewage into the River Loddon as indicated in the table below:

TABLE E.3 Map of sensors capturing raw sewage discharge into River Loddon and their event monitoring data from 2018/19 to 2022



Notes:
^a 2018/19: <https://data.catchmentbasedapproach.org/datasets/therivertrust-event-duration-monitoring-storm-overflows-2018-19-england/explore>
 2020: <https://data.catchmentbasedapproach.org/datasets/therivertrust-event-duration-monitoring-storm-overflows-2020-england-and-wales/explore?location=51.74011%2C-1.02823%2C11.00>
 2021: <https://data.catchmentbasedapproach.org/datasets/therivertrust-event-duration-monitoring-storm-overflows-2021-england-and-wales/explore?location=51.76374%2C-0.99485%2C12.40>
 2022: <https://data.catchmentbasedapproach.org/datasets/therivertrust-event-duration-monitoring-storm-overflows-2022-england-and-wales/explore?location=51.70340%2C-0.99130%2C11.00>

9.12 More recent data is now available and this is provided in Table 7.3 in the Draft Water Cycle Study by JBA Consulting for the Council which is given below and indicates that in 2024 storm tank overflow frequency of operation occurred 82 times and that the duration of the overflow was for 938 hours. These levels are above the investigation threshold.

Table 7.3 Storm tank overflow frequency of operation and duration

Overflow (WC site name)	Map Ref.	Number of operations in 2022	Duration of operation in 2022 (hours)	Number of operations in 2023	Duration of operation in 2023 (hours)	Number of operations in 2024	Duration of operation in 2024 (hours)	Average number of Operations 2022-2024	Above investigation threshold? (Y/N)
Basingstoke WwTW		0	0	6	46	82	938	29.3	Y

9.13 While 2024 was an exceptionally wet year, climate changes is expected to significantly increase the number of large storm events, which will accentuate the problem. This indicates that there is a very significant current water quality issue and the proposed allocations have the potential to make this worse.

10 NOISE & AIR QUALITY ISSUES

- 10.1 Noise and air quality issues have the potential to cause significant amenity issues for the residents of the proposed development. These issues are addressed in the IIA in the section relating to Sustainability Appraisal Objective 4 which is to *'Reduce pollution (including minimising emissions of greenhouse gases to achieve zero net carbon), and support mitigation and adaption measures required for the impact of climate change.'*

Air Pollution

- 10.2 In relation to air pollution the site is given a 'neutral' rating in the commentary at site assessment stage. The comments state: *'There are no current site related concerns in relation to existing air quality in respect of the national air quality objectives. However, the introduction of an increased number of vehicles to the road network by future occupants of the site may contribute to changes in overall emission levels locally, and further afield. This will require detailed assessment and mitigation where appropriate.'* (p. 382). There is still a 'neutral' rating given after account is taken of the proposed policy with the commentary stating: *'The policy requires that, given the proximity of the energy recovery facility and sewage treatment works, development proposals must robustly demonstrate and ensure that odour and air quality standards that are acceptable to the LPA, can be met within homes and amenity area,'* (p. 382).

10.3 Air quality is not therefore perceived by the Council as representing a significant constraint. However, there are often concerns about emissions of dangerous dioxins from incinerators. Dioxins formed from incineration and combustion processes enter the environment through flue gas, fly ash, and even contaminated soil in the plant. Dioxins accumulate in the body and cause cancer. In this respect a particular matter of concern is that policy SPS5.4 clause (u) requires the provision of allotments, so residents will be encouraged to eat home grown produce. The only significant area of open space provision is proposed in the odour zone around the sewage treatment works and incinerator where no residential development is proposed. This is likely therefore to be the location where the allotments are proposed. However, this could potentially lead to the accumulation of dioxins in the bodies of those cultivating the allotments. This issue is not currently assessed in the IIA, but given the potential health implications it is vitally important that it is.

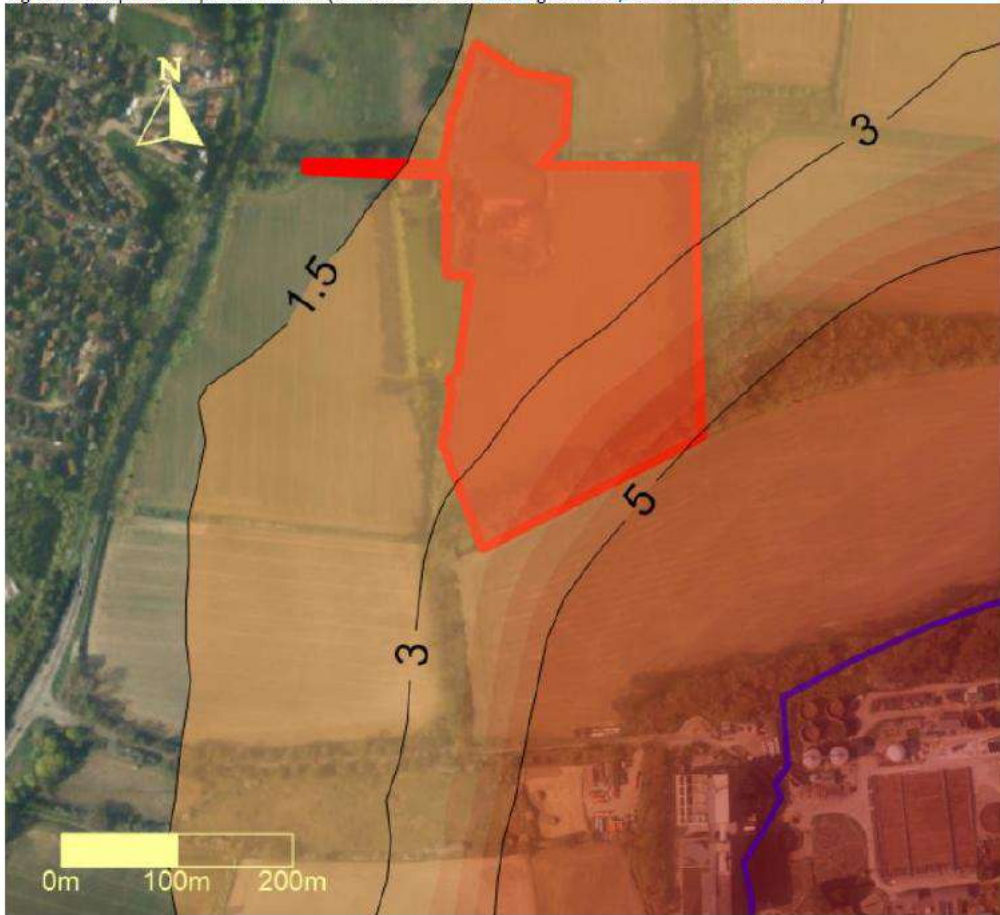
10.4 The next item considered in the IIA under SA Objective 4 is whether or not *‘development of the site would be compatible with nearby land uses.’* In this respect the Commentary at Site Assessment Stage gives a ‘negative’ rating and states: *‘The sites are located next to the Basingstoke STW and an incinerator. These uses do create some constraints in relation to developing the site for housing, which was considered in detail in respect of the Examination of the current Adopted Local Plan in which site OLD001 was allocated. However, the Inspector considered that the site was still suitable for allocation, and that the necessary mitigation measures could be achieved, even taking a very precautionary approach. Nevertheless, the development of the whole site may make it somewhat more challenging to address these constraints, as it will reduce the flexibility which was available previously to address the constraints referred to above. However, this is not likely to be to such a degree that the allocation of the site would be unsuitable. Parts of the site are very close to the sewage works and incinerator. There would be unacceptable odours from the sewage treatment works, and noise from vehicle movements, plant/equipment etc. arising from both. This explains the negative assessment. Through careful design/layout this could be mitigated for parts of the site. A large buffer zone between the odour and noise sources and future development would likely be necessary.’* (p. 383 - 384).

10.5 The Council has accordingly drawn an indicative odour contour on Figure 5.9: SPS5.4: Land at Whitmarsh Lane Illustrative Concept Plan, which would only exclude a relatively small part of the site from development. However, there is no odour assessment available as part of the Council's evidence base for the Regulation 18 Spatial Strategy consultation or listed as a source in the IIA, so there is no means of assessing whether this is a reasonable indicative delineation, or whether a wider part of the site would need to be excluded from development. A report by Olfasense for an application by Thames Water to Hampshire County Council (application ref: 25/00883/CMA), which is being submitted with these representations, indicates that the 3.0 Indicative Odour Contour extends somewhat further to the south-west in the direction of Lodge Farm. If this is the case, it could potentially make the proposed increase in the allocation from the current 450 dwellings to 1,500 unachievable given the heritage, landscape and biodiversity constraints on the southern part of the site. There is also often a lot of public concern about odour from the sewage works, with existing residents stating that in certain weather conditions they suffer from significant odour.

- 10.6 In this respect, while the incinerator and sewage treatment works are located to the east of the proposed housing allocation, and are therefore downwind when there are prevailing westerly winds, there are significant periods in the year when there are easterly winds or periods when there is little wind. Such events, particularly in the winter months are often associated with a temperature inversion, where the temperature increases with height and can persist for significant periods of time. This means there is no upward movement of air and all odours and air pollutants are trapped close to the ground level. This needs to be taken into account in assessing this allocation in the IIA as it could mean significant odour and air pollution is experienced at certain times of the year under particular atmospheric conditions. Experiencing significant odour for a week in a dwelling, which is classified as a sensitive receptor, is unacceptable even if this is a relatively infrequent occurrence.
- 10.7 It is also noteworthy that the previous draft 2024 Local Plan stated in paragraph 6.101 that *'The Concept Plan shows the 1.5 OUE/m³ contour outside of which sensitive uses such as housing and schools are to be located.'* The current consultation revises the contour for the highly sensitive uses such as housing and schools to 3.00UE/m³ as stated in paragraph 5.104 and shown on the Illustrative Concept Plan in Figure 5.9, which is a lower odour standard than previously proposed. However, it then goes on to state that: *'To encourage use of the Neighbourhood Park, it should also be located outside of the 1.5 OUE/m³ contour.'* The Olfasense report referred to above classifies in Table 2 playing/recreation fields as a 'medium sensitivity receptor.' This means the Council are proposing a higher standard of odour emissions for the neighbourhood park than for the highly sensitive peoples' dwellings.

- 10.8 The recent Olfasense report does not show the 1.5 OUE/m³ contour. However, there is also an extant previous odour report relating to odour emissions from the Basingstoke Sewage Treatment Works (STW) which was prepared by Olfasense Ltd for Thames Water in November 30, 2022 and is entitled ‘Odour impact assessment study for Basingstoke sewage treatment works.’
- 10.9 The overall objective of this previous Olfasense study was to assess the level of odour impact posed by the works on a proposed residential development site (Redlands) located to the northwest of the Sewage Treatment Works.
- 10.10 For this assessment odour sampling was conducted at the Basingstoke STW in 2019 and 2020. This data was used alongside operational data for the STW to define odour emission assumptions, and odour dispersion modelling was applied to assess the odour impact risk on the proposed development land.
- 10.11 The results of the odour dispersion modelling are shown by the plan below:

Figure 4: Output of dispersion model (RAF Odiham meteorological data, worst-case 2014-2018)



10.12 The above diagram shows that on the 1.5 OUE/m³ would exclude most of the northern part of the site. The diagram does not extend to the south of the sewage treatment works but logically it would be expected that the contours would continue a similar distance from the STW which would likely mean that a large part of the proposed allocation site would be above the 1.5 OUE/m³ contour and thus above the level proposed for the Neighbourhood Park.

- 10.13 The proposed text in paragraph 5.104 which states that: *'The Concept Plan shows an indicative 3.0OUE/m³ contour outside of which sensitive uses such as housing and schools are to be located. To encourage use of the neighbourhood park, it should also be located outside of the 1.5 OUE/m³ contour,'* is thus a very surprising amendment on two grounds.
- 10.14 Firstly, it means the odour contour previously considered to be necessary for residential development no longer applies and as shown by the contours on the Olfasense study a lower standard will apply allowing residential properties to be located substantially closer to the sewage treatment plant and incinerator than would previously have been the case under the 2024 Regulation 18 Local Plan. Secondly, it means that the original standard 1.5 OUE/m³ contour applies to the neighbourhood park meaning that it is subject to a higher standard than the residential dwellings and furthermore this would prevent publicly useable open space being located in this area.
- 10.15 This is a significant issue as Figure 5.9 shows the only large area of open space on the site within the 3.0OUE/m³ contour. Even if this is an error and the 3.0OUE/m³ contour should also apply to the Neighbourhood Park this would still prevent the neighbourhood park being located in the area covered by the Indicative Odour Contour. If this is unsuitable for a neighbourhood park due to odour levels, where is it proposed to be located and where is it proposed to locate the playing fields and allotments? The indication is therefore that the Neighbourhood Park and allotments will need to be located within the identified 'developable area,' which will significantly reduce its capacity and ability to accommodate 1,500 dwellings.

- 10.16 The implications of the Olfasense report and what would appear to be a confused application of the standard by the Council therefore indicates that the odour from the STW does present a constraint for residential development within areas of the SPS5.4 allocation and is likely to mean that the proposed 1,500 dwellings would not be achievable without exposing residents to unacceptable levels of odour emissions, both in their dwellings and the open space provision within the site. When these factors are taken into account the assessed 'neutral' impact when taking account of the policy requirements is not justified.
- 10.17 Historically, it is understood that the incinerator and sewage treatment works were located in this particular location outside of Basingstoke in order to isolate them from residential development and prevent the air pollution and odour problems associated with such facilities affecting local residents. This proposed allocation of 1,500 dwellings in close proximity to these facilities would remove this isolation and means that particular regard must be given to these environmental issues before when making a decision on whether to proceed with the allocation.

Noise Pollution

- 10.18 With regard to noise pollution the IIA gives a ‘negative’ rating in the Commentary at Site Assessment Stage. This states: *‘There will be noise from the A33, the incinerator and the sewage works from vehicle movements, plant and equipment. A detailed noise assessment would be required to ensure acceptable noise standards can be met within new homes and in amenity areas and further noise mitigation measures may be required – a large buffer zone between the noise sources and future development would likely be necessary.’* (p. 385). However, once regard has been given to the policy requirements, the verdict changes to a ‘neutral’ impact.
- 10.19 This is on the grounds that: *‘The policy requires that development proposals ensure that noise impacts arising from the A33 and adjacent incinerator, sewage treatment works and industrial uses are successfully mitigated through suitable measures.’* However, there are particular constraints on the type of noise mitigation that would be appropriate in this location. The most common form of noise mitigation is to erect acoustic fences but they would be particularly inappropriate at the point where the vehicular access into the site is located and indeed along the frontage of the development facing the A33. This would be unattractive visually and also have the effect of removing the visual integration of the proposed development with the nearby existing residential estates.

- 10.20 The access road to the incinerator and sewage treatment works is also shown as being relocated through the developable area, which would presumably be occupied by residential dwellings so erecting an acoustic fence along its perimeter would create a most visually unattractive entrance to the Whitmarsh Lane site and together with the movement of the lorries detrimentally affect the acoustic and visual amenities of the residents. When considering the capacity of the proposed allocation to accommodate the proposed additional dwellings regard does therefore need to be made as to how noise mitigation could be provided that would not have significant detrimental environmental and visual effects. This could necessitate the provision of a larger landscaped buffer to ensure sufficient separation from the proposed dwellings and the noise sources. This would likely reduce the development capacity of the site.
- 10.21 While therefore the identified need for a large buffer zone in the IIA is agreed, given the need for other substantial buffers to mitigate impacts on biodiversity, heritage assets, the landscape, odour and pollution it is evident that a substantial proportion is not suitable for development and this affects the overall capacity. The danger is therefore that if the policy is adopted in its current form corners will be cut and the noise and other impacts will not be adequately mitigated. Before the 'neutral' impact is accepted it is crucial therefore that the capacity of the site to accommodate 1,500 dwellings while acceptably mitigating all impacts is demonstrated.

11 OVERALL ASSESSMENT & CONCLUSIONS

- 11.1 The IIA has a section entitled Site Conclusions at the end of the assessment of Land at Whitmarsh Lane. This is given below:
- 11.2 *'The proposal would involve developing the rest of/the full area encompassed by the East of Basingstoke allocation, which already falls within the settlement policy boundary for Basingstoke, and therefore the principle of development is generally accepted for the western part of the site, although this is considered together with site OLD002 immediately to the east to comprise a larger development in terms of site area and yield. Whilst the site has the potential to be deliverable, this issue is a concern in light of the lack of progress with the existing allocation, however the increase in size and capacity could have the positive impact of making the site a more sustainable location and the required infrastructure (including the access) more deliverable.*
- 11.3 *The site is one of the best performing in relation to issues such as landscape sensitivity (which is low/medium due to the existing presumption of development).*
- 11.4 *Sites OLD001 and OLD002 lie in close proximity to the A33, sewage treatment works and incinerator with consequent noise and odour issues on parts of the site. It also receives negative scores in respect of heritage impact (close to Conservation Area, setting of listed buildings), archaeology and impact on the settlement character of Basingstoke. These constraints may be mitigated to an extent by site layout and buffering and will need to be considered further in the masterplanning process. There is also currently concern in respect of transport issues (capacity of A33) and healthcare services that will need to be considered*

along with other developments in the area.

- 11.5 *The potential impact on biodiversity has been identified as a concern given the proximity of the site to the River Loddon, its floodplain and the habitats within this area. Protection is necessary to safeguard an important area of opportunity for habitat restoration and creation that would contribute to Green Infrastructure objectives. The site also adjoins the Loddon floodplain which is proposed as a valued landscape in the LP.*
- 11.6 *Parts of the site also lie within Flood Zones 2 and 3 (and flood alert/warning areas), with smaller areas at risk of surface water flooding, and therefore the site is at higher risk of flooding, further technical work is required, and a level 2 SFRA. New housing will need to be provided on the part of the site that is not affected by flooding (which is the majority of the site) and essential infrastructure will need to be operational and safe in times of flood. The provision of healthcare services also needs to be considered further.*
- 11.7 *Overall, given that part of the site is already allocated and the larger site provides the opportunity to provide more housing in a comprehensive development it is concluded that it is appropriate for the allocation to be retained and its size and capacity increased to provide a comprehensive development of 1,500 homes. (p. 413 – 414).*
- 11.8 *This differs from the assessment given in the earlier IIA appended to the Economic, Planning and Housing Committee Meetings on 2nd September 2021 which stated: ‘Overall, given that the site is already allocated, and receives a number of positive scores, it is concluded that it is likely to be appropriate for the allocation to be retained and its capacity increased. However, the nature of*

the constraints mean that it may not be able to accommodate the level of increase in capacity which has been promoted (additional 450, so 900 in total).' (p. 280), especially given that 1,500 dwellings are now promoted. Given that there are still significant gaps in the evidence base in relation to heritage, biodiversity, odour, and noise and given the need for the access to cross the flood plain of the Petty's Brook it is not clear why this verdict has changed and the IIA can now be confident that 1,500 dwellings can be accommodated without significant environmental impacts. This is especially the case as most of the 1,500 dwellings would be served by one vehicular access which has to cross the floodplain of the Petty's Brook, so potentially making the development inaccessible by private car in a major flood event or other emergency.

- 11.9 Given that the existing adopted Local Plan 2011 – 2029 Policies SS3.7 and SS3.9 Inset Map (p.49) identifies that the existing 450 dwellings would be accommodated on the northern part of the site, this means that the only area where the proposed further 1,050 dwellings could go is on the more environmentally sensitive southern and eastern parts of the site which includes the course of a Roman Road and adjoins various heritage assets including the Old Basing Conservation Area, the listed buildings at Lodge Farm and a further length of the Pyotts Hill Entrenchment Scheduled Monument meaning that this early medieval defence feature or historic deer park boundary would be within an urban setting along its entire length. There would therefore be a significant heritage impact. As the land is at a significant elevation above the Loddon Valley it is visually exposed and would therefore urbanise the current rural nature of the valley east of Pyotts Hill and also lead to a substantial visual coalescence between Old Basing and Basingstoke. There is also a significant

odour issue with the Regulation 18 Spatial Strategy indicating that the one large area of retained open space on the site would be unsuitable for a neighbourhood park and by implication sports pitches and allotments because it exceeds the relevant odour contour. Most significant of all, the development would lead to 1,500 dwellings, education facilities and mixed-use centre providing a range of retail, leisure, cultural, community, health, service and employment facilities being located in close proximity to the River Loddon, which is an internationally rare chalk stream, likely creating problems with sedimentation, pollution, and recreational disturbance and diminishing its value for biodiversity.

- 11.10 There would therefore be a significant environmental impact if the allocation is increased as proposed.
- 11.11 We therefore strongly disagree with the generally positive assessment of the potential impact of the development as set out in the IIA, particularly with regard to what is said when regard is given to the proposed policy requirements. These assessments are based on unproven assumptions and often without any supporting evidence. The Council's own IIA originally was sceptical that the site could accommodate 900 dwellings without a significant environmental impact given the constraints relating to the site. Based on the current evidence base we can see no justification for revising that assessment.
- 11.12 The key test for the Basingstoke & Deane Local Plan at the forthcoming Examination will be to demonstrate that the plan is sound. The current soundness tests as set out in paragraph 36 of the National Planning Policy Framework are that the plan is:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

11.13 In respect of these soundness tests a key requirement is that in order to be justified the plan must contain ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.’ Based on our assessment of the currently available evidence in relation to Government policy and legislation we do not consider that the proposed allocation of the land at Whitmarsh Lane would constitute sustainable development, as there would be significant detrimental environmental effects, and therefore the proposed allocation would be unsound.

11.14 In conclusion, the existing allocation of 450 dwellings in the adopted Local Plan 2011 – 2029 should not be increased as the Land at Whitmarsh Lane is an

environmentally sensitive site which is heavily constrained. While it is acknowledged that further housing is required to meet government housing targets, greater consideration needs to be given to identifying previously developed land in accordance with Government advice and thereby avoiding increasing the allocation on Land at Whitmarsh Lane which would have long-standing and probably irreversible significant detrimental environmental impacts, not only on the site, but the surrounding area too, that it would not be possible to mitigate.