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29 September 2005

Tel. 01252 661736

Dear Miss Evans,

Town and Country Planning Act 1990

**Public Inquiry into the Proposed QEB and Wakeford Copse Developments and Associated Applications
Appeal References APP/N1730/A/05/ 186859, 186860, 186861 and 186862.**

1. We wish to have the opportunity to make comments and to respond to and question evidence provided by other contributors to the Inquiry. We therefore ask that you grant the following expert members of our group (who presented to the HDC Planning Committee which made the decisions which are being appealed) an opportunity to speak at the inquiry :

Kenneth Blockwell CEng, MI MarEST [infrastructure and amenity]
Alison Macallan BSc (Hons) [ecology]
Andrew Macallan BSc (Hons), BArch, RIBA [traffic]
James Storey CEng, FIChemE, CEnv. [ecology]

2. We may have a small number of other experts whom we feel can help the Inspector. We would hope that we could make arrangements with him for them to speak, if appropriate

3. Additionally we ask to be informed of the decision of this inquiry in writing.

4. We respectfully ask that the inquiry is scheduled to avoid the school holidays. We are concerned that the Appellant has asked for the inquiry to be held in a period which covers our local school holidays. We feel this would place unnecessary, additional pressures on us and the people we represent, to make ourselves available to the inquiry. It would also make it more difficult for us to collect local information at short notice which would be pertinent to help the Inspector.

5. We hereby formally submit the following comments to this inquiry which summarises many of the numerous individual objections which were made against the four planning applications which were rejected by Hart District Council (HDC) and are now being appealed.

Introduction

6. We are submitting these written comments to the above inquiry on behalf of the QEB Campaign Group. We are a single issue group formed in 2003 as the direct response to the proposals which are the subject of these appeals. We represent the views of many local people who will be affected if these proposals are given permission to proceed. You will note that over a thousand of these people have also made their own written objections to the proposals.

7. We have been successful in keeping these people informed of the issues that have arisen with the proposed developments. We have helped ensure that they have had the opportunity to participate in the process of determining the planning applications for the proposals.

8. We have raised many pertinent issues with the Officers of Hart District Council and other organisations with an interest in this matter. In fact we were asked by HDC to coordinate the comments from the objectors who spoke against the proposals at the Planning Committee meeting which was attended by over 700 concerned residents of Church Crookham and Fleet. You will find more about us @ www.qeb.org.uk.

Comments on the Details of the Appeals

All Appeals - Technical Issues

9. We note that the Appellant has stated in paragraph 5, the section “Appropriate Assessment of the SPA”, of each of the four appeals that “appropriate assessment ... has been carried out on behalf of the Appellant”. This is incorrect. Appropriate Assessment of a plan or project under the Habitats Regulations 1994 is carried out by a competent authority, in this case Hart District Council.

All Appeals - Grounds of Appeal

10. The Grounds of Appeal and the Report to Committee, fail to acknowledge the most important material consideration, namely the Habitats Regulations.

11. The Appellant’s Grounds of Appeal for all four of these planning applications begins by stating that each application complies with the Development Plan. The Appellant gives this priority and clearly places weight upon it. However, the most important material consideration for these applications, is that the Habitat Regulations are UK law and over-ride all types of development plan.

12. Additionally, the Grounds of Appeal for each application rely on and place considerable weight upon the Officer’s Report to Committee. However, in important and critical sections of the Report to Committee such as Section Two - Policy Background and the conclusions of the Executive Summaries on pages 53 to 56 and the Assessment of the Key Issues in Section Seven on page 73, the Report gives priority to compliance with the Local Plan instead of acknowledging that the Habitat Regulations are the most important material consideration.

13. The Report to Committee failed to convey or discuss any of the valid planning issues raised by members of the public in their formal objections. Also there is no discussion or logical argument in the report of the pros and cons relating to the planning issues.

Appeal Reference APP/N1730/A/05/ 186859 (Planning application 04/02305/FUL)

Reason for Refusal 1

14. The Appellant disagrees with HDC’s conclusion that the mitigating effect of the proposal is “not plainly established and is controversial”. They state that various bodies with an interest in conservation matters are satisfied with the Appellant’s proposals. However, we note that the various bodies with an interest in nature conservation matters will continue their objections if the mitigation measures are not ‘*practically deliverable and fully implemented*’ We note with interest that the Appellant does not quote Hampshire Wildlife Trust as being satisfied with the proposals.

15. We agree with the HDC’s conclusions on the proposals. The various bodies with an interest in conservation matters may have a duty to give HDC their opinion. But it is for HDC, as the competent authority, to weigh up all the evidence presented to them, including that presented to them by us. The Council was correct to refuse the proposals because there is no evidence to show that the proposed mitigation will work. The mitigation measures must be capable of being delivered and fully implemented. The Habitat Regulations require certainty that there must be no adverse effect on the SPA. The mitigation measures are very complex and are untried and untested. They will not work for the following reasons :

The reduction of the Bourley Road car park will cause people to disperse to other parts of the SPA in Fleet and Church Crookham where they can freely park in a great many residential roads. This is not mitigation it simply moves people to other parts of the SPA

The Appropriate Assessment concentrates on access by car. This flawed reasoning does not take account of unaccompanied children who arrive by bicycle, some of whom will cause deliberate fires.

Map 7 from the Visitor Management Strategy illustrates another flaw. This map shows the closure of a large number of footpaths. How will it be possible to close footpaths in open heathland where there are no fences?

16. The judgement in the ADT Auctions case sets a precedent on applying the precautionary principle. The High Court Judge said that planning permission should be withheld if the decision maker is uncertain whether or not a proposed development will adversely affect the integrity of a protected site. (ref. ADT Auctions Limited v Secretary of State for the Environment, Transport and the Regions and Hart D C [2000] JPL1155).

17. Cobbetts Lane, Yateley is a landmark Habitats Regulations case. The application proposed alternative open space but was refused. The Secretary of State dismissed the appeal as there was no certainty that the alternative space would divert new residents away from the SPA. Ref: (Appeal, SoS APP/N1730/A/94/239274).

18. There was another aspect of the information which was supplied for the appropriate assessment which was seriously flawed. Guidance on Appropriate Assessment requires the in-combination effect of all relevant plans and projects to be taken into account. There is a proposal in Rushmoor District for a very major development which has been called "Project Connaught". This will be on MoD land close to the A325 and this is close enough to the SPA to require its effects to be taken into account, in-combination with those of the proposals which are the subject of these appeals. This has not been done.

19. The Appellant states that the Appropriate Assessment prepared for HDC concludes that the Development will not adversely affect the SPA. HDC did not adopt this report, presumably because they disagreed with its conclusion. The Habitats Regulations require that the planning authority shall only grant planning permission once they are sure that permission will not adversely affect a protected site. This is a very strict test and there must be certainty that there will be no adverse effect. In fact, in the body of the Appropriate Assessment prepared for HDC it states that effects will (*sic* only) be reduced to insignificant or *de minimus* through the provision of mitigation. This is not enough to satisfy the test required by the Habitats Regulations and so HDC had no option but to refuse to give permission for the proposed development.

Reason for Refusal 2

20. The appellant states that they will enter into suitable legal agreements in due course to ensure the future management of the countryside interests affected by the proposals. This is not sufficient. There needs to be a legal commitment on the Appellant to effect adequate (and we believe that currently proposed is not) mitigation to ensure the requirements of the Habitats Regulations are met. Otherwise the Appellant could just walk away from their proposals and HDC would be in breach of the Regulations. We would like to question how it is possible for the appellant to rely on effective mitigation in perpetuity on land they neither own or control.

Appeal Reference APP/N1730/A/05/ 186860 (Planning application 00/00522/OUT)

Reason for Refusal 1

21. The Appellant states that their Information for an Appropriate Assessment takes forward their considered position, which was agreed with HDC's ecological advisor, English Nature and the RSPB, and would result in residual pressures on the SPA as being positive or *de minimus*. We disagree with this conclusion, as stated in paragraphs 15 to 19 above. We support HDC's apparent view which is to disagree too, despite the alleged agreement of their ecological advisor, English Nature, and the RSPB.

22. The Appellant points out that English Nature and the RSPB withdrew their objections subject to legal agreement being in place to secure the proposed mitigation measures (which we believe are not adequate anyway). The Appellant also alleges that Hampshire Wildlife Trust have expressed support for the proposed mitigation measures subject to legal agreement. But there is no legal agreement in place yet and the Appellant could just walk away from their proposals. In their letter dated 25 November 2004 English Nature clearly state that if they are not satisfied that the terms of the agreements provided for the securing of practically deliverable mitigation measures then its objections would continue. English Nature further note that there remain a number of practical issues to be agreed including securing the long term funding of the proposed visitor management measures. Thus we believe the requirements of those bodies have yet to be satisfied. This is not just a question of agreeing the terms of legal agreements. The mitigation measures must be capable of being delivered in full and there must be certainty that they will work. The Habitat Regulations do not allow for any other circumstances. The Habitat Regulations are UK law and English Nature and the other conservation bodies do not have the authority to agree with proposals that do not comply with the Habitat Regulations.

23. The Appellant states that the Appropriate Assessment prepared for HDC concludes that the Development will not adversely affect the SPA. We have countered that statement at paragraph 19 above.

24. The Appellant notes that at paragraph 7.31 of the HDC's officer's report it recommends that the Appropriate Assessment prepared for HDC is adopted. That Appropriate Assessment concludes that the Development will not adversely affect the SPA. Either directly or by virtue of their refusal for permission for the development, HDC have rejected that conclusion and have not adopted the Appropriate Assessment report as written. The Appropriate Assessment does not provide a robust analysis of the proposed mitigation. It does not adequately deal with the issue of heathland fires.

25. The Appellant notes that at paragraph 7.39 of the HDC's officer's report "it is considered that there will be adequate protection for nature conservation in line with the policies in the Development Plan". This is irrelevant. The Habitats Regulations take precedence over any local policies HDC may have.

26. The Appellant notes that HDC's lack of satisfaction that the proposed mitigation would be sufficient is unsubstantiated and unsupported by consultees and its own Officers. We were consultees also and we support HDC's decision. We have presented evidence to HDC which substantiates its lack of satisfaction (see above at paragraphs 15 to 19). We believe the views of those consultees with conservation interests was flawed and that HDC's officers were poorly advised by their ecological consultants.

Reason for Refusal 2

27. The Appellant notes that the Site is allocated for development in the Local Plan. This is irrelevant. The Habitats Regulations take precedence over any Local Plan. In fact the Local Plan is flawed as the Local Plan Inspector was not told of the proximity of the SPA when he considered the suitability of QEB for housing. The Local Plan thus did not take into account the requirements of the Habitats Regulations when it was developed. Nor did the Local Plan Inspector anticipate the loss of amenity to existing residents that would result.

28. The transport strategy for the development of this site is constrained by policies in the Local Plan. Firstly, the transport strategy should not contravene the general planning policies in the Local Plan which apply to all developments. In this case Policies GEN1, GEN5 CON1, CON2 and CON3 of the Local Plan are of particular importance. The allocation of the site in the Local Plan does not mean that the access solution proposed by Taylor Woodrow is the right one taking into account all of the other criteria.

29. The Appellant is wrong to state in paragraph 13 that the Planning Committee's reason for refusal is 'perverse and unsupported by technical evidence' as their refusal of the roundabout and car park was based on nature conservation and environmental issues listed in the refusal notice for application HDC 04/02304 and not on those matters agreed with Hampshire County Council. Without a roundabout the Planning Committee could not approve development of this site as it would not have an adequate means of access and would be contrary to T14 of the Local Plan and T5 & 6 of the Structure Plan. We support the Planning Committee's view that the proposed roundabout and car park will have an unreasonable effect on nature conservation interests including the SINC, ancient woodlands as well as providing easier access to new areas of the SSSI and SPA. The Highway Consultants for Taylor Woodrow have looked at this roundabout as a highway solution only and have not taken proper account of the other criteria which need to be met. Consequently the car park and roundabout are not an appropriate balanced approach to the access of the site.

30. Secondly, the Local Plan under Policy DEV2 states that the scale of development is subject to the capacity of the existing highway network to accommodate growth. We understand this to mean that you have to assess the road capacity before you can calculate how many houses you can build. This has not been done.

31. Although the Planning Committee has not refused this application on technical highways grounds, we believe that the ability of the existing roads to accept the level of traffic generated by the proposed development does not accord with the Local Plan policies.

32. The Transport Assessment Report (TAR) for this development includes both housing applications for a total of 1,132 houses and there is no separate TAR for this site on its own. The capacity of the existing highway network for the combined development has not been properly considered by the TAR because it failed to follow the Institute of Highways Transport Guidelines. It does not assess junctions that will be severely adversely affected by this development. It is our contention that study of these junctions would have shown that the level of development proposed would have exceeded the capacity of critical junctions. Further, the TAR fails to show that Reading Road South has adequate capacity to accept development. The existing road network in Fleet and Church Crookham has not fundamentally changed in the last 50 years and there have been no new 'access routes' despite considerable development in the area. We believe Hampshire County Council acted unreasonably and were wrong to agree to a limited study of the existing road network which excluded roads and junctions that they already knew were likely to give rise to insoluble problems. The approach of the County Council has been to 'mitigate' the impact of development whereas the local plan clearly states it should be 'accommodated within the existing capacity'.

33. We fail to comprehend paragraph 12 of the Appellant's grounds of appeal. This states that there is only one access to this site; off Naishes Lane. Are they now saying they do not need the roundabout off Beacon Hill? The TAR clearly states that the roundabout was to be the main access to the site; without this the TAR does not make sense. The transport data is no longer valid and Hampshire County Council have not, as far as we are aware, considered these proposals based on a single access. The Appellant appears to be confused about his transport strategy for the site; whichever way this is approached there are significant problems that have not been addressed.

Reason for Refusal 3

34. We accept that this reason for refusal is a 'technical' reason relating to the agreement and signing of the Section 106 Agreements. We agree that it is absolutely essential that these developments should make appropriate contributions and we are not, of course, questioning the need for such contributions. However, some of the proposed contributions do not compliment existing facilities or the existing infrastructure. The way some contributions are being proposed for implementation may have the unexpected effect of harming the sustainability of existing residential areas. We are not saying we do not want the contributions, we are saying that further work needs to be done to analyse the implementation of contributions to ensure that the QEB development is integrated into the existing community without harming existing infrastructure. We will develop this argument and give examples at the inquiry.

Appeal Reference APP/N1730/A/05/ 186861 (Planning application 04/02304/FUL)

Reason for Refusal 1

35. The roundabout together with its lighting will obviously have an urbanising impact on the countryside and for the Appellant to state this is not the case is patently untrue. The only argument can be over the acceptability of this impact and we agree with the Planning Committee that the impact is too great. When the site was allocated in the Local Plan it was not envisaged that the main access would be off Beacon Hill, in a wooded area between Ancient Woodland, and SINC's. Although this location for a roundabout may be a technical highways solution to the problem of accessing this site, it is environmentally damaging to ecological interests. The works will extend urban features (street lighting, signs, road kerbs, long vision splays, road bell mouths and markings) a considerable distance into the countryside outside the existing settlement and will significantly harm the character of this approach into Church Crookham which is currently of a very rural nature.

Reason for Refusal 2

36. The nature conservation value of the SINC has been under-estimated by Officers at HDC, HCC and by nature conservation bodies. The provision of a car park adjacent to an area of former heathland capable of recovery is directly contrary to Structure and Local Plan Policies. The Officers have compromised their credibility by failing to take into account their own policies and objectives for the nature conservation of SINC's. Thus the Appellant cannot rely upon the conclusion of Officers that the proposal is acceptable.

37. The Appellant alleges that the effectiveness of the ecological mitigation measures for the reduction of Bourley Road car park is plainly established by agreement with HDC and HCC Officers, ecological consultants, English Nature and the RSPB. However, the effectiveness of the mitigation can only be judged by reference to the Habitat Regulations. Other bodies or individuals do not have the authority to over-ride the Habitat Regulations and mistakes have been made in their interpretation to this case.

Reason for Refusal 3

38. The Appellant alleges that the Appropriate Assessment considered both 'alone and in combination' effects. This is not correct. It is clearly stated in Paragraph 6.1 of the Appropriate Assessment that 'it has been agreed with English Nature and the RSPB that if a proposal has no measurable impact (de minimis) or indeed it has a positive impact, then there is no requirement to consider it in combination'.

39. It is vital to note that neither English Nature nor the RSPB (nor anybody else) have the authority to make such agreements which over-ride the Habitat Regulations. They do not have the authority to over-ride or circumvent UK law.

40. The Appellant notes that HDC has no evidence that the proposed mitigation would not be sufficient and indeed that consultees and its own Officers believe that the proposed mitigation would be sufficient. We agree with HDC view on the mitigation measures and support its decision. We have presented evidence to HDC which substantiates its view (see above at paragraphs 15 to 19). We believe the views of those consultees with conservation interests was flawed and that HDC's officers were poorly advised by their ecological consultants.

Reason for Refusal 4

41. The Appellant points out that HDC wrongly believes that a legal agreement is required to secure funding in perpetuity to implement the Visitor Management Strategy. We agree with HDC. As part of the VMS the SINC needs protecting in perpetuity and the Appellant should have the responsibility to implement the proposed mitigation measures (which we believe are not adequate anyway). There is no legal agreement in place yet and the Appellant could just walk away from their proposals.

Appeal Reference APP/N1730/A/05/ 186862 (Planning application 00/00930/OUT)

Reason for Refusal 1

42. We have dealt with the Appellant's grounds in our comments on Appeal Reference APP/N1730/A/05/ 186860.

Reason for Refusal 2

43. The Appellant's grounds for appeal have been largely dealt with in our comments on Appeal reference APPN/N1730/A/05/186860, however there is a difference in wording of the Appellants grounds for appeal that we fail to comprehend. In paragraph 12 it states there are 'two principle accesses directly into the Site'. No reference is made to the roundabout off Beacon Hill, however the TAR states this was to be the principal access to the development. The Appellant's grounds for appeal states that the access off Sandy Lane is to be the principal access to the development. This has not been considered in the TAR submitted with the Planning Application and we do not believe this sub-standard mini roundabout is suitable for use as a principle access to this size of development. The TAR fails to assess the impact of the development on the junction of Sandy Lane/Aldershot Road and Gally Hill Road with the principal access in Sandy Lane. We therefore question whether Hampshire County Council support the highway solution without the roundabout at Beacon Hill as the main access.

44. The Appellant's note that the Highway solution has been 'developed in a manner that does not compromise safe operation'. We question this assertion in relation to the Sandy Lane/Aldershot Road/Gally Hill Road junction which has not been assessed as a compound junction, the risks to cyclists on roads around the development and the safety of the proposed cycle route from the site into Fleet. However, the safe operation of the transport solution is not the only issue to be considered. Other issues are the impact on nature conservation, the impact of 'rat running' through existing residential areas and questions of sustainability of the development proposals (i.e. the lack of existing infrastructure in the adjacent residential areas) the lack of public transport in this particular area (which has been cut further recently).

Reason for Refusal 3

45. The intrusion of development into the defined Local Gap will be unreasonably intrusive and will not allow screening of the development. It is an important characteristic of Fleet and Church Crookham that the existing housing is practically invisible from the wider views from the countryside. The necessary protection of views from the south west as envisaged by the Local Plan Inspector and the Local Plan are not achieved by this planning application. Further reasons why this is unacceptable are given below in the next section.

Reason for Refusal 4

46. We note that the Appellant does not dispute that the proposal would result in development outside the Fleet/Church Crookham settlement boundary, contrary to the Local Plan!

47. The Inspector's report on the current Local Plan considered the allocation of this site. His report made specific reference to the two areas of this site which are outside the settlement boundary. He believed it was important to control these areas. Firstly he noted that the area of land adjacent to Humphrey Park could provide screening of the proposed development from the countryside. Secondly, the triangular area at the apex of the site was a 'significant part of the Local Gap' and he believed there were 'environmental reasons for not developing that area. The objectors (MoD) accepted that.' These two areas were specifically included within the development site BUT drawn outside the settlement boundary in order that the future of the land should 'be certain'. Specifically ensuring that they should be retained as open space or used for screening the development. It is therefore ironic that these two areas are now proposed for development *because* they were included in Policy DEV2 which specifically sought to exclude them from the development for the very reasons given by the Inspector. In fact, in allocating the site the Local Planning Authority has attempted to reinforce the protection of these areas through the supporting text of policy DEV2 which clearly states 'it is not envisaged these two areas will contain development *per se* (other than the access road)'.

48. The Appellant alleges that the development will not affect detrimentally the character and setting of the countryside. Although this is an Outline application without the benefit of an adopted development brief, a lot of detail has been provided that indicates the intention of the Appellant to ignore HDC policies and the specific recommendations of the

Local Plan Inspector where the development may impact upon the character and appearance of rural and semi-rural parts of the District. This is not a town centre site and three and four storey development on the rural edge is not appropriate.

49. The proposed development will also affect the wider countryside. Three and four storey development is proposed on prominent slopes and peaks. This visual intrusion will be seen from Well, Long Sutton and the North Downs. This is unacceptable.

50. In Chapter 12 of the Environmental Statement the Appellant describes three and four storey development as the 'worst case'. The outline application comprises large areas of such high development. We would consider that using a phrase such as the 'worst case' is a good way of describing the total unacceptability of proposing such a type of development for this location. The appellant notes that 'three and four storey development will visually affect a large proportion of the landscape' and 'there will be a major change over a large proportion of the view'. This is unacceptable.

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Other Matters Relating to the Development Proposals

The Public Safety Zone for Farnborough Airport

51. The QEB site straddles the extended centre line of the runway at Farnborough airport. Aircraft passing overhead are operating in either a landing or a take off phase. These phases are universally recognised as the most dangerous phases of flight.

52. HDC's and Taylor Woodrow's consideration of third party risk has been limited to a brief reference to the existing Public Safety Zone (PSZ) and to PSZ policy. The risk of a crash being centred at any given point on the ground gradually reduces with distance from the runway threshold, and the extended runway centreline. It does not abruptly drop to zero at the PSZ boundary. Levels of third party risk beyond the PSZ perimeter can, in some circumstance, exceed the levels within a PSZ. In reaching judgements on the tolerability of third party risk a balance has to be struck between the probability of a crash occurring and the numbers of people likely to be killed, the latter being a function of both the distribution and density of populations.

53. The airport operator has made no secret of the fact that approval to expand operations will be sought. Government policy is that before further runway capacity is pursued, existing airports should be allowed to expand to the maximum of their capacity to meet projected demand. It is therefore probable that in due course the airport operator will secure local authority approval, or Government approval on appeal, to uplift the current movement ceiling. The uncertainty surrounding future levels of flying, and therefore levels of risk to the local population, should be fully investigated by Taylor Woodrow. This should be fed into the decision-making process for the development they and the MoD are proposing for the QEB site.

The Loss of Public Amenity Resulting from the Proposed Closure of the Bourley Road Car Park

54. Local walkers groups have used the Bourley Road car park on a regular basis for 30 years or more. Individuals have used the facility for even longer. The Bourley Road car park is the only centrally positioned car park serving the MoD lands in the area. Over the years thousands of local people have enjoyed walking in this area and have appreciated the natural beauty and diversity of the landscape. It would be a perverse step if that enjoyment were to be taken away. We believe that these people strongly support the protection of the environment, and that includes SPAs, – if it works. But this must not be to the detriment of the current local population at large and that is what the current proposal will be.

55. The recent Countryside and Rights of Way Act (CRoW Act) requires Highway Authorities to produce Improvement Plans. Hampshire has recently published its Draft Countryside Access Plan for this area and one of the major issues raised by the review of the draft plan has been the need for more parking to enable access to the countryside. The planning application for Bourley Road car park goes completely against the intent of access legislation and current public opinion.

Brownfield Developments

56. We question the suitability of QEB for the amount of housing proposed. In other parts of the country Local Plan Inspectors have recently dismissed large brownfield sites owned by the MOD and have acknowledged that being brownfield does not give carte blanche for development. In the case of an Inquiry in Huntingdon the Inspector recognised that some brownfield land performs poorly against criteria in PPG3. There is now far greater emphasis in Government policy and guidance on sustainability. This was not very apparent in 1996 when the Hart Local Plan Inquiry began.

57. An analysis of the QEB site for large scale housing development, taking into account the lack of social and economic infrastructure in Hart District has never taken place. For example, if QEB is built we will still have to travel a round trip of 30 miles by car to larger towns for entertainment and leisure facilities. The only public swimming pool in the whole District will still only be available part-time and be a shared facility with a school. It is not sustainable to add a further 1,132 homes to an area deficient in infrastructure.

58. These application sites include significant areas of land which, under the definition in Annex C of PPG3, should be classed as green-field land. This land includes the two areas of land outside the settlement boundary referred to above and also land for access and road junctions etc. Although the Local Plan allows some land swap we do not believe this was ever intended to include land outside the settlement boundary in an area identified as a strategic gap. Nor do we believe it was intended to be interpreted so widely. In any event the use of green field land for whatever reason does not change the fact that it is against the general planning policy to use it to provide sustainable development.

The Historical Value of the Engineering Works of the Water Catchment Area

59. The proposed new car park at Beacon Hill Road would result in public access to an area of MOD land currently signed as ‘Out of Bounds’. There are two issues to consider:

i) The area contains a historic water works and associated structures that was built between 1863 and 1866 to supply drinking water to the British Army and is listed as a Hampshire Treasure. Water from springs is collected by 10 miles of open glazed channels and 7 miles of ditches and conveyed to 4 impounding reservoirs. There are also other features that are intact. The open glazed channels are vulnerable to damage, even by pedestrians. As it is in an area ‘Out of Bounds’, the existence of this historic structure is not widely known. Its existence was brought to the attention of Hampshire County Council’s archaeologist who in his letter dated 26th November 2004 recommended an assessment of this structure, including its historic potential. The Appellant is fully aware of this recommendation but no assessment has taken place.

ii) The Appellant has not provided any information to show that the water catchment area is no longer required. The newspaper article dated 21st July 2005 at Appendix 1 shows that the water catchment is still in use including as a public drinking water supply.

60. The water is collected via open channels and 2 of the reservoirs are open with notices saying ‘NO DOGS DRINKING WATER’ How can the Appellant reconcile the opening of this area to dog walking and public recreation when the water collected is open to contamination and is used by two schools and army homes as drinking water? In the light of current water shortages in the South East of England, which will worsen with time, surely this water catchment facility is a valuable resource.

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Please do not hesitate to contact me if we can be of any further assistance in this matter.

Yours faithfully

Kenneth Blockwell

Coordinator, QEB Campaign Group