

**EXAMINATION IN PUBLIC OF  
THE BASINGSTOKE & DEANE LOCAL PLAN**

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**HEARING STATEMENT  
ON BEHALF OF  
DUMMER PARISH COUNCIL**

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**Hearing Session(s): Issue 5 - Greenfield Site Allocations**

**Hearing Dates: 21 October 2015**

**Addressing: Proposed Allocations at Basingstoke Golf Course (SS3.11), Hounsome Fields (SS3.12) and Kennel Farm (SS3.2)**

**Introduction**

1. Dummer Parish Council represents the 340 electors and the interests of other residents of the parish. The Parish Council comprises five councilors and the parish clerk. The Parish Council has a particular interest in the Examination in resisting the proposed development of Basingstoke Golf Course and Hounsome Fields and minimizing the detrimental impacts of the outline planning permission for development of Kennel Farm on existing infrastructure.
  
2. Dummer is located 8 kilometers south west Basingstoke. The parish has a Conservation Area Appraisal (February 2003) and a Village Design Statement (February 2004). The parish has yet to develop a Neighborhood Plan. All Saints Church is listed (grade I) and there are 28 listed buildings and structures (grade II) plus three historic monuments, milestones on the A30. One milestone is close to the entrance of Basingstoke Golf Club, the Southwood Farmhouse is close to the south west of Hounsome Fields and the Kempshott House Stable Block is south of the M3 opposite the southern corner of the Basingstoke Golf Course. All Saints church is one and a half kilometers from the Golf Course.
  
3. The Local Plan Paragraph 2.8

- O) states: *Proactively manage the borough's rich historic and built environment to protect and enhance its quality and distinctiveness while accommodating change. This highly varied resource ranges from conservation areas, to listed buildings including the large country houses to numerous brick, flint and timber framed farm buildings and cottages distinctive of our rural areas.*

Dummer has evolved during the current plan period. A group of six houses replaced the dairy unit at Manor Farm. A new house was completed two months ago and two others are under construction. Their construction includes brick and flint and clay tiles.

4. The parish has a Village Hall, a public house, The Queen Inn, and two golf courses: Basingstoke Golf Course designed by James Braid in 1928 and Dummer Golf Course designed by Peter Alliss in 1992. There are a number of start-up businesses in converted farm buildings. There are a variety of active social groups.
5. The Dummer Conservation Area has no speed limit, though a 20 mph limit is proposed, and no street lights or pavements. The narrow main streets are used daily by pedestrians and dog walkers.
6. The Wayfarers Walk, a nationally recognized long distance footpath passes through the centre of the village and skirts the south western boundaries of both Basingstoke Golf Course and Hounsome Fields. The Wayfarers Walk and other footpaths are important for the village viability as they bring tourists into the village to use the village public house.
7. The Parish Council is of the view that the allocation of the Basingstoke Golf Course and Hounsome Fields sites, which lie within the parish, renders the Plan unsound. The Plan could be made sound by allocating other alternatives assessed sites that are less harmful Sustainability Appraisal criteria (these sites are included in the BDBC Omission Sites - Issue 6).

8. Whilst the Inspector has sought submissions within Issue 5 paragraph 11 of his note of 17 July 2015, as to whether the allocations are “positively prepared, justified and deliverable” the Inspector will of course know that by s.20(5) Planning and Compulsory Purchase Act 2004 he is to determine whether the allocations are “sound”. The Government has supplied its definition of soundness at paragraph 182 NPPF which extends to whether the allocation is:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

9. Accordingly, these submissions shall address each of these factors, where relevant, so as to assist the Examination of the Plan as fully as possible.

10. Dummer Parish Council is of the firm view that greenfield allocations set out within policies SS3.11 (Basingstoke Golf Course) and SS3.12 (Hounsome Fields) are unsound for the following reasons:

- Both allocations would have a severe adverse impact on the intrinsic beauty and character of the countryside.
- Both allocations would undermine an important land-use function being performed by land to the south-west of the urban area, being the containment of urban sprawl of the urban area of Basingstoke.
- Both allocations would see the loss of significant amounts of the best and most versatile agricultural land.
- Both allocations would result in unsustainable and isolated settlements dependent on private car-based transport.
- Both allocations would undermine draft policy EP1 “Economic Growth and Investment”.
- Both allocations would be constrained by significant transport improvement works.

- Both allocations would have an effect on designated and non-designated heritage assets.
- Both allocations would result in increased traffic on the A30 and using M3 Junction 7 resulting in a severe impact on residents' ability to access the road network.
- Both sites threaten coalescence of the village with Basingstoke.
- Both sites restrict green corridors and wild life habitat.

11. We address each in turn.

**Issues 1 & 2 – Adverse impact on landscape character and loss of important functioning countryside**

12. The Parish Council supports the points expressed in SWAG's statement to the EiP.

13. In addition the Parish Council considers that development of the Basingstoke Golf Course and particularly Hounsome Fields will have a detrimental impact on the Dummer Conservation Area and the important views from Tower Hill.

14. Introducing the Local Plan the Council provides the context of Basingstoke and Deane.

15. Paragraph 1.21 states: *The borough of Basingstoke and Deane ... is surrounded by attractive rural areas, including small towns and villages with over 75% of the land within the borough defined as agricultural or woodland. This rural dimension is very important in shaping the character of the borough, its communities, economy and environment. The importance of agriculture and rural businesses, the prominence of landscape and countryside ... are all important issues. **The rural environment of the borough adds significantly to the quality of life enjoyed by urban residents and is a considerable asset for the area.***

16. Paragraph 1.23 states: *The natural environment of the borough is highly valued by residents and visitors to the borough, both for the quality and diversity of the biodiversity and also for the attractive setting and recreational opportunities that it provides. A key feature for Basingstoke, despite significant growth since the 1960s, is the accessibility and attractiveness of the surrounding countryside.*

17. The Parish Council considers that development of both sites will impact the footpath network to the north of the parish and particularly the Roman Road and the Wayfarers Walk by both allowing urban development to encroach on the surrounding of these routes and by increasing the dangers to pedestrians using the Wayfarers Walk when they cross the A30 near to the Southwood junction. This will impact the amenity of the town's rural surroundings and make them less accessible to residents of the south west of the urban area.

18. The Kit Campbell Associates Leisure and Recreation Needs Assessment Final Report: September 2008 recommended:

- Retention of existing provision and
- Support the further development of those courses or clubs closest to the town in order to minimise the need for golfers to travel to courses further away

An early draft policy recommending that the golf club must create a new course has been dropped though no clear rationale has been given. It is likely that any site would be further from residential development and be counter to the NPPF requirement to reduce the need to travel.

### **Issue 3 – Loss of best and most versatile agricultural land**

19. Paragraph 110 NPPF requires Plans to allocate “land with the least environmental or amenity value”. As such, paragraph 112 NPPF establishes a sequential test as follows:

*“Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”*

20. The NPPF Glossary defines “best and most versatile agricultural land” (“BMV”) as Land within Grades 1, 2 and 3a of the Agricultural Land Classification.

21. The SA confirms that within Basingstoke Golf Course 62% of the land is classified as Grade 2 and 1.31% is within Grade 1. In the case of Hounsme Fields 81% of the site is Grade 3a (with 9% un-surveyed). In comparison, the omission site at Lodge Farm (BAS103) has only 31% BMV Land, Poors Farm (BAS102) has only 36% BMV Land, with no BMV Land at Cufaude Farm (SS3.8).

22. The Council has therefore failed to demonstrate, in accordance with national policy, that it has allocated land of lesser environmental value.

**Issue 4 - Unsustainable and isolated settlements dependent on private car-based transport.**

23. Dummer Parish Council supports the points made by SWAG in their Statement to the EiP.

**Issue 5 – Potential to undermine growth strategy**

24. By allocating land furthest away from major employment uses, compared with omission sites, for residential use, the Council is potentially undermining the deliverability of its growth vision.

**Issue 6 – Transport constraints on the A30**

25. Dummer Parish Council supports the points made by SWAG in their Statement to the EiP.

26. The opportunity for cycling and walking as alternative modes of transport from these sites is severely compromised by their distance from employment and the town centre and the steep gradients that have to be negotiated. This is evidenced by the fact that the Census 2011 showed that Hatch Warren and Beggarwood Ward (the housing developments closest to the proposed developments) had the lowest percentage of residents travelling by bicycle or on foot to their employment (only 3.8% compared with a Borough average of 11.9%).

### **Issue 7 – Heritage Impact**

27. By s.66 Planning (Listed Buildings & Conservation Areas) Act 1990 when deciding whether to grant planning permission the Council shall pay “special regard” to the desirability of preserving the building or its setting. The Council’s SA notes that a Grade II farmhouse lies within the allocation at Hounsome Fields. Whilst the SA correctly observes that the setting of the building would need to be protected, no assessment is advanced in the evidence base of the EiP as to how this will be the case and the impact that this will have on the potential yield of the site.

28. As to Basingstoke Golf Course, Mr Napier and Mr Howe explain that it formed part of Kempshott Park and that its managed rural appearance was characteristic of its heritage. It will be borne in mind that the Glossary to the NPPF defines “heritage asset” as wider than statutory listed buildings or conservation areas, rather it includes:

*“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.”*

29. It is submitted that Basingstoke Golf Course, by reason of history as part of Kempshott Park and its sympathetic managed parkland appearance as a Golf Course, amounts to a “heritage asset” for the purposes of the NPPF. As such, the Council has failed to assess the impact that residential development, and consequential loss of managed parkland, would present for the purposes of paragraph 131 NPPF.

### **Issue 8 – Impact on Dummer residents’ ability to access the highway network**

30. Development of Basingstoke Golf Course and Hounsome Fields in addition to the Kennel Farm, Winchester Road site so close to the M3 will create dormitory developments with residents working in various centres along the Motorway, A30, A33, and A303. The traffic generated from these sites will have a dramatic impact on the queuing time for residents of the village of Dummer at both the junction of Tower Hill and the A30 and Junction 7 of the M3.

### **Issue 9 – Coalescence of Dummer with Basingstoke**

31. The Local Plan paragraph 3.6 States: *“Development will be located to maintain the integrity of settlements and prevent their coalescence. ... This approach will ensure that where ever possible we improve the quality of the environment for residents and visitors.”*

32. The development of Basingstoke Golf Course and Hounsome Fields will result in coalescence of Dummer with the urban area. Strategic Gaps protecting other settlements has resulted in distortion in the pattern of development in the south west of Basingstoke. Dummer (and North Waltham) require a Strategic Gap to prevent their coalescence with Basingstoke.

33. This Strategic Gap should include South Wood, Peak Copse and Kempshott Copse. See the SINC map in Appendix 1, the Areas liable to flooding on the Basingstoke Golf Course, Policy SS3.11 k) and the area identified in Policy SS3.12 g). This area extending 100 metres in the Statement of Common Agreement between Wates, BDBC and HCC does not afford sufficient protection for this listed building.

### **Issue 10 – Restriction of green corridors and wild life habitat**

34. Local Plan Paragraph 2.6 identifies:

- *The need to conserve and enhance the character of the borough's high quality natural and historic environment, in light of pressures for growth and change.*
- *The uneven distribution of the borough's green infrastructure resources and the need to ensure that the benefits of green spaces are realised through improved accessibility, better linkages, improved management and the provision of new green spaces.*
- *Important landscapes and biodiversity assets across the borough which need protection, and enhancement.*

35. Paragraph 3.10 states: *The Local Plan sets the framework for protecting, maintaining and enhancing the borough's green infrastructure network, the countryside and biodiversity to ensure residents and visitors alike continue to enjoy outdoor activities that promote health and well-being and that these assets are protected for their own sake. This includes protecting existing areas of open space which are highly valued by the community, restricting further fragmentation of the green infrastructure network and improving linkages between spaces, encouraging further access to the countryside and providing new high quality spaces in association with new development to meet growing and changing needs.*

36. The Dummer SINC map in Appendix 1 shows that the three sites SS3.2, SS3.11 and SS3.12 are surrounded by SINC's. Development of the sites even with new planting and landscaping (SS3.11 e. and SS3.12 e.) will not mitigate the combined impact on wildlife. Policy SS3.12 k. is in conflict with the objectives of the Plan and Policy SS3.12 e.

### **Conclusion**

37. For the above reasons Dummer Parish Council will submit that the Plan is not sound, but could be made sound by allocating less harmful alternatives.

38. As such, Dummer Parish Council will in due course invite the Inspector to recommend the housing distribution within the draft Plan is not the most appropriate strategy when

judged against reasonable alternatives for housing growth contrary to paragraph 182 NPPF.

39. A Strategic Gap should protect Dummer and North Waltham.

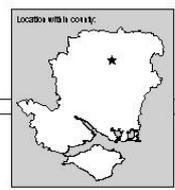
**Policy SS3 wording requires correction**

**Policy SS3.11**

*40. Include measures to improve accessibility by non-car transport modes, the ability to service the site by public transport and ensuring the external and internal connection of the site with existing cycle and pedestrian routes and Public Rights of Way network, including the upgrading of the cycle link to Dummer, improving the links to the existing Winchester Road bus stops and providing safe and convenient crossing points to facilities provided on Hounsome Fields (SS3.12).*

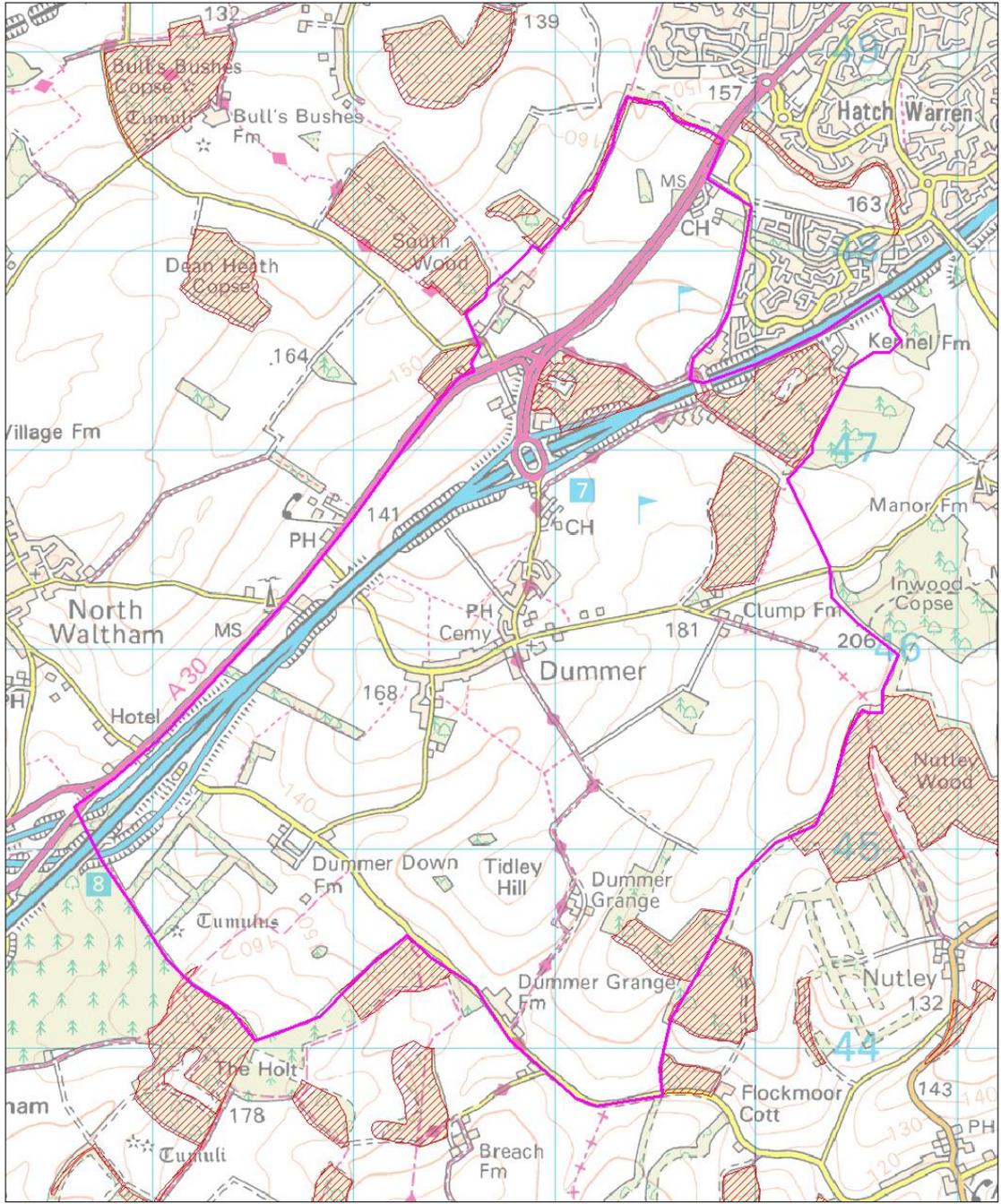
There is an existing pedestrian route to Dummer but not a cycle path. Reword to “provide a cycle link to Dummer”

There are existing bus stops on the Winchester road but no bus service. The increase in traffic on the A30 in recent years will require creation of lay-bys and links to existing bus stop locations.



**Dummer SINC's**  
 Ordnance Survey base map (1:10,000)  
 Scale 1:18000

Hampshire and Isle of Wight Wildlife Trust  
 Beechcroft House, Vicarage Lane  
 Curridge, Hampshire  
 SO32 2DP  

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 BAP Priority habitats, wildlife species and SINC data supplied by the Hampshire Biodiversity Information Centre on behalf of the H&I Wildlife Trusts 3 October 2011 by Amanda Legram  
 For enquiries relating to the Wildlife Trusts GIS data contact Deborah King, email [debbie.king@hwt.org.uk](mailto:debbie.king@hwt.org.uk), tel: 01489 774420.