

30 October 2017

ref: 17/02317/OUT

Dear Sir/Madam

Location: Owens Farm, Newnham Road, Hook Hampshire, RG27 9NG

The vision of the Whitewater Valley Preservation Society is to protect the River Whitewater and its valley. Our mission is to defend the valley from inappropriate development and its resultant impact on the river.

The Whitewater Valley Preservation Society (WVPS) strongly objects to the above application on the following grounds:

Environmental Impact

According to Natural England (ref 17/00857/EIA) the site is within, adjacent to or in close proximity to no fewer than the following designated sites:

- the Thames Basin Heaths Special Protection Area (SPA);
- eight (8) Sites of Special Scientific Interest (SSSIs): Hook Common and Bartley Heath SSSI, Basingstoke Canal SSSI, Greywell Fen SSSI, Butter Wood SSSI, Warnborough Green SSSI, Odiham Common and Bagwell Heath and Shaw SSSI, Bramshill SSSI, Hazeley Heath SSSI; and
- four (4) Sites of Importance for Nature Conservation (SINCs): College Copse, Hill Copse, Owen's Farm Meadow and The Strings, and the River Whitewater itself.

The National Planning Policy Framework (NPPF) s.118 establishes that proposed development on land within or outside a Site of Special Scientific Interest, likely to have an adverse effect on a SSSI, should not normally be permitted. There is no evidence that the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of these sites that make them of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest. On this basis, this application should be refused.

However, if permission for any development on this site is granted at any stage, for the purposes of Ecology and Nature Conservation, as pointed out by Hampshire and Isle of Wight Wildlife Trust, it is important that the function and location of ecological networks such as those used by more wide ranging species, for example the barbastelle bat *Barbastella barbastellus* are determined and protected through the ecological surveys and assessments.

Flood risk and drainage

A development of this size will have an adverse impact on the River Whitewater, part of the Loddon Catchment Partnership. The River Whitewater is one of Hampshire's chalkstreams, important at an international level, and is already failing to attain Good Ecological Status under the Water Framework Directive due to over-abstraction and pollution run-off. As such the drainage strategy should be shared in advance with the relevant authorities and the Hampshire and Isle of Wight Wildlife Trust (host of the Loddon Catchment Partnership) as they have requested, in order that they can assess the impacts of the proposals.

Designated Landscapes and Landscape Character

The National Planning Policy Framework (NPPF) s.115 states that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding National Beauty, which have the highest status of protection.

The chalk of the Hampshire Downs (National Character Area 130) gives rise to springs at the foot of a north-facing escarpment. Along this escarpment, there are species-rich chalk grasslands, hanging woodlands, parklands, historic monuments and springline villages. These downland areas are designated as nationally significant landscapes as part of the North Wessex Downs Area of Outstanding National Beauty (AONB).

The [Hart District Landscape Character Assessment](#) describes the Whitewater Valley landscape character area. This character area contains the channel and floodplain of the Whitewater River and its boundary is defined by the fringing farmland that clothes the valley sides or is associated with, and provides a setting for, the valley floor. The far northern and southern extremities are defined by the District boundary. Its main distinguishing features include:

- the distinctively riparian character of the flat, low-lying valley floor with its riverside pastures, willow-lined watercourses, fenland vegetation and well-treed character, which creates a sense of intimacy and enclosure;
- gentle valley sides, often quite open or denuded in character, which form a setting for the valley floor and are commonly framed by a backdrop of woodland;
- sheltered, pastoral and rural character
- few detracting influences except for overhead power lines, which are prominent within the northern and central sections of the valley;
- a sparse pattern of settlement, with roads and buildings located along the higher ground of the valley sides avoiding the wet valley floor.

Hart's Landscape Assessment sets out the main enhancement priorities are to restore landscape structure along these denuded valley sides, through planting of new woods, trees and hedgerows, and to encourage the restoration of more diverse wetland habitats within the valley floor. The main enhancement priorities include:

- management of existing woodlands, hedgerows and trees to secure their long-term presence within the landscape and maximise their landscape and ecological value
- new planting of woods, hedgerows and trees to form a stronger landscape structure in denuded valley-side areas and where roads or power lines cross the valley
- planting of willows and other appropriate species alongside watercourses within the valley floor where the typically intimate, riparian character of the floodplain has been weakened
- where possible, creation of a more diverse range of wetland habitats within the valley floor, including wet grasslands, seasonally flooded areas, marshes and wet woodland.

There is no evidence presented in the proposals for maintaining, enhancing or protecting the landscape character area of the Whitewater Valley as described above. The NPPF s.116 states that planning permission should be refused for major developments in these designated areas. There is no evidence of exceptional

circumstances, where it can be demonstrated that this development is in the public interest. Therefore this application should be refused on this basis.

However, if granted, this proposal, requires an assessment of any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated.

On a Greenfield Site

Hart can build sufficient houses on brownfield and already designated greenfield sites. Building on a greenfield site it is against Saved Policies RUR1, RUR2 and RUR3 of Hart Local Plan 2006. Note that the much smaller Hop Garden application for 48 homes was rejected on these grounds by both Hart and at appeal by Planning Inspectorate. It is also against draft new Local Plan Policy MG5 Development in the Countryside.

In the Hook to Newnham Local Gap

Building in the Hook to Newnham local gap is against Saved Policy CON21 of Hart Local Plan 2006. Note that the much smaller Hop Garden application for 48 homes was rejected on these grounds by both Hart and at appeal by Planning Inspectorate. It is also against draft new Local Plan Policy MG6 Gaps between Settlements.

Degrades Recreational Value of Hook to Newnham Footpath

Whilst the applicant intends to keep the footpath that runs through the middle of the site it will be through a housing estate instead of fields. This contravenes Saved Policy RUR 2, which states that development in the open countryside, outside the defined settlement boundaries, will not be permitted unless the Local Planning Authority is satisfied that it does not have a significant detrimental effect on the character and setting of the countryside by virtue of its siting, size and prominence in the landscape. Paragraph 160 of the draft new Local Plan describing policy MG6 highlights the extra importance of gaps such as this with public rights of way for recreation.

In summary, WVPS strongly believes this application should be refused on the basis of its unacceptable impact on the ecology and biodiversity of a network of designated Sites of Special Scientific Interest; on the landscape character of the Whitewater Valley Hampshire chalkstream important at international level. It fills the protected gap between Hook and Newnham, is on a greenfield site in the countryside outside settlement boundaries and will degrade the recreational value of an important rural footpath.

Yours sincerely

On behalf of the

Whitewater Valley Preservation Society

By email: ContactUs@WhitewaterValley.org.uk