

Ref: 17/03029/FUL

The Deer Park: Land on the North side of Dunleys Hill, Odiham

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 and its valley.

The Whitewater Valley Preservation Society (WVPS) objects to the above application on the basis that it contravenes the following planning regulations and would harm the natural environment of River Whitewater and its valley.

The Odiham and North Warnborough Neighbourhood Plan (NP), a statutory plan adopted in June 2017, also identifies the strategic policies of the Hart District Local Plan (Hart policies), which would be contravened by this proposed development.

Wildlife and Biodiversity

NP Policy 12 (i) requires development to protect and enhance wildlife areas, including Sites of Special Scientific Interest (SSSI) and locally designated Sites of Interest to Nature Conservation (SINC). The River Whitewater is a rare chalk stream, important at international level. The development would adversely affect the nature conservation value of - and fails to identify measures to avoid adversely affecting - sites of special scientific interest (SSSIs) along the River Whitewater and the Basingstoke Canal and the site of importance to nature conservation (SINC) which runs throughout the length of the River Whitewater. This is contrary to Hart policies CON2 and CON3.

Riverine Environment

NP Policy 12 (vii) requires that development affecting water courses should ensure *inter alia*

- No adverse effects from increased runoff or access causing bank erosion and increased sedimentation;
- No adverse impacts on water quality.

The development would have an adverse impact on the nature conservation and landscape value of riverine environments, which include the River Whitewater and its valley, and hence should not be permitted, also according to Hart policy CON7.

The River Whitewater is already failing to meet Good Ecological Status under the Water Framework Directive. The Whitewater Valley Preservation Society commissioned a Riverfly Census, which was conducted professionally by Salmon and Trout Conservation UK and conducted in Spring and Autumn 2017. The number of riverfly species present is a fundamental measure of river ecological health. Invertebrate scores were low for this type of chalkstream river environment. The results showed that all 5 sites surveyed fail on both of two key counts of a healthy system. This is likely due to a combination of factors including runoff, which increases sedimentation. Such adverse impacts would only be increased by development in the Deer Park, due to increased runoff from hard surfaces directly upstream and flowing into the River Whitewater.

Flood Risk

NP Policy 12 (vi) requires that developments include mitigation measures ... and shall not increase flood risk elsewhere.

The Flood Risk Assessment (FRA) merely corrects the mistake made in the earlier, withdrawn, application where it was stated that the watercourse running across the site discharges into the Basingstoke Canal. Whilst the revision states that the watercourse in fact goes beneath the canal via a culvert, it fails to address that in doing so, the resulting discharge regularly flows into the already ecologically stressed River Whitewater and floods areas of North Warnborough. The proposed development is likely to exacerbate this further.

It was pointed out in comments on the original application that these historic flooding events were omitted from the original FRA and that the Summary Flood Risk table underestimated both current and future flood risk. There are no available updates or revisions to this data.

The Flood Risk Assessment also ignores the revised assessment of baseline data that was noted in the previous application as necessary by the Council's Drainage Engineer. It has not been properly updated, but rather has hand amendments whose authorship is unclear. It cannot be relied upon for an adequate assessment of the impacts of proposed development on surface water and flooding either on site or downstream of the site.

Hart District Council's Flood Forum has been concerned to address flooding issues downstream of this site, which reinforces the need to carry out a proper Flood Risk Assessment. Indeed, Hart DC has recently applied to the Environment Agency for a small-scale surface water flood alleviation scheme using a pioneering natural flood risk management approach directly downstream of the site on the River Whitewater at Mill Corner, North Warnborough. The aim of the scheme, in addition to flood alleviation, is to enhance natural processes and to improve the condition of the Warnborough Green SSSI. The development proposal would instead increase flood risk to these sites downstream from surface water runoff and discharge.

Conservation Areas

NP Policy 12 (ii) states that developments should not adversely affect the distinctive local character of the open landscapes of the Parish or harm valued public views and vistas. The Odiham Conservation character area describes the Basingstoke Canal and Old Deer Park as (*inter alia*) "attractive landscaped area on undulating land dropping down towards the valley of the river Whitewater". The development would not meet the objectives of conserving or enhancing the character of this conservation area, and hence should not be permitted, as it is contrary to Hart saved policy CON13.

In summary, WVPS believes this application should be refused on the basis of its unacceptable impact ...

- on the quality of the riverine environment of the River Whitewater, a chalkstream important at international level;
- on the ecology and biodiversity of a network of designated Sites of Special Scientific Interest, and a Site of Interest to Nature Conservation;
- by increasing flood risk in the adjacent North Warnborough Conservation Area including many Listed Buildings, which is already subject to flood risk and a flood alleviation scheme;
- on the landscape character and open green space, including views and footpaths, between the three Odiham, North Warnborough and Basingstoke Canal Conservation Areas.

On behalf of the

Whitewater Valley Preservation Society

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