

# **QEB CAMPAIGN GROUP**

## **SUMMARY PROOF OF EVIDENCE**

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

**April 2007**

#### ***Introduction***

This document forms part of the QEB Campaign's Proof of Evidence (the proof) in relation to the appeal by Taylor Woodrow (the developer) into the refusal by Hart District Council to grant planning permission for the development of the Queen Elizabeth Barracks & Wakefords Copse site.

We wish to draw the Inspector's attention to a number of aspects of concern to us, namely:

- i) Protection of the SPA & local conservation issues;
- ii) Operations at Farnborough Aerodrome;
- iii) The Settlement Boundary;
- iv) Development of Greenfield Land;
- v) Visual Impact of the Development;
- vi) The Design and Access Statement and the Local Plan;
- vii) Traffic and Transport.

#### ***Matters this proof of evidence will establish***

1. The mitigation measures proposed by the appellant to avoid an adverse impact on the Thames Basin Heaths Special Protection Area (SPA) are unproven, controversial and that their long term effectiveness is uncertain. Any restriction in capacity of the Bourley

Road car park is not a material benefit arising as a direct consequence of the proposals to develop the Queen Elizabeth Barracks (QEB) site.

2. The proposed QEB development site sits directly on the Farnborough Aerodrome runway centre line, just where it intersects Farnborough's Aerodrome Traffic Zone (ATZ). The Aerodrome operator (TAG Farnborough Ltd) has an obligation enshrined in Government policy to expand their operation beyond the current limit of 28,000 movements per annum. The UK Government's white paper on aviation has adopted the International Civil Aviation Organization's guidance as firm policy in that new residential developments should not be placed on the flight path of airports and aerodromes.
3. The site extends beyond the settlement boundary, contrary to Local Plan Policy DEV2. The proposed development site also includes land which is not classed as previously developed (brownfield) land, contrary to PPS3 (Housing). There are conflicts between the Design and Access Statement and the Local Plan.
4. The design of the proposed development will have an unreasonable visual impact and is out of keeping with the character of the area. The scheme as proposed does not comply with the Local Plan and will cause unreasonable impact on the local environment.
5. The proposed Highway solution is not in accordance with the Local Plan both in terms of (i) its reliance on parts of the Highway network which are already at capacity or will become so as a result of the proposed development and (ii) because of its impact on the surrounding residential areas.
6. There are incorrect assumptions, calculations and predictions in the information submitted by the developer that do not lead to a realistic prediction of the likely impact of the proposals on the local the Highway network. The proposed development will actually have an unreasonable impact on local transport.

### ***Detailed conclusions of this proof of evidence***

7. The user surveys conducted by the developer do not prove that the various "Visitor Management Strategy" measures will be effective. Reasonable doubt remains whether the number of visitors using the SPA would be reduced and would remain reduced in perpetuity.
8. There is no conclusive evidence, and indeed there are reasonable grounds to doubt that the closing of footpaths would prevent the proposed QEB development adversely affecting the integrity of the SPA. The effectiveness of such measures remains unproven.
9. The proposals of the developer will not prevent an increase in the number and severity of non-natural heathland fires. Therefore an adverse effect on the integrity of the SPA is likely to occur due to the development of the QEB site.
10. The provision of wardens will not be in perpetuity and thus will not fulfil the requirements of the Habitats etc Regulations 1994 for mitigation measures for the QEB development. The wardens will not have the jurisdiction and hence the ability to successfully manage the Bourley & Long Valley SPA/SSSI.

11. The proposed public education will not be effective and its provision in the long term is doubtful. Hence, such measures can not be relied upon to offer effective mitigation to act to reduce the impact of the proposed QEB development on the nearby Bourley & Long Valley SPA/SSSI.
12. The whole package of proposed mitigation measures is unsound. If monitoring indicates an adverse effect is occurring to the integrity of the SPA there will not be an effective and legally binding agreement to stop any further development and to take necessary steps to redress the cause of any damage.
13. The open space being offered by the developer is neither appropriate for purpose nor will it attract visitors away from the SPA.
14. Reducing the capacity of the Bourley Road car park will not prevent the proposed QEB development adversely affecting the integrity of the SPA.
15. The area off 'Beacon Hill Road' does not offer appropriate compensation for the loss of amenity to the local population due to restricting the capacity of the Bourley Road car park. Building a new car park on the Beacon Hill SINC (Site Important for Nature Conservation) will compromise the objectives of declaring that area as a SINC.
16. The proposal to build a roundabout (with any associated lighting) on Beacon Hill Road is an unacceptable urbanisation of the rural landscape.
17. The updated environmental statement is inadequate in addressing the developer's obligation to protect Dormice.
18. The proposed development is in a location directly under an area of airspace that demonstrably carries a higher than average collision risk for aircraft. It is not appropriate to build a high density housing estate in such a location.
19. Allowing the proposed development directly on the flight path into an aerodrome which has the potential for major expansion would contravene ICAO guidance. Further, it would be in direct contradiction to policies stated in the DfT's white paper on "The Future of Air Transport". The new residents would be subjected to an unacceptable level of annoyance from the noise of aircraft movements from Farnborough Aerodrome. This could well not be acceptable under the UK's impending new noise management regime.
20. A residential development on the QEB site has the potential to act as a constraint on the expansion of Farnborough Aerodrome this contravenes Government policy as laid out in the DfT's White Paper "The Future of Air Transport".
21. The development proposals are contrary to the Local Plan because they include areas outside of the settlement boundary which were specifically included in the site boundary to protect them from development.
22. The development proposals include significant amounts of greenfield land outside the settlement boundary and is contrary to the Local Plan.

23. The height of buildings on the site will be excessive and out of character with the local area. They will be visible from local and areas further afield where existing development cannot be seen at present. The impact of the proposed development on views both near and far will be out of Landscape Character for the locality.
24. There is inadequate topographical information in the application to assess the impact of the development on the residents of Humphrey Park and Aldershot Road, however, what little information there is gives great cause for concern.
25. The urban design character of the proposed scheme is flawed by using the wrong reference points which are out of character with the area. The form, scale and layout of buildings are not in keeping with the suburban character of the area.
26. There should be a control over the size and number of retail development allowed on this site to ensure that the development supports Fleet as its local town centre.
27. There are clear capacity and traffic growth problems that have not been addressed in the development proposals. The planning policy for this site makes it clear that the level of development on this site is constrained by these facts. These issues have not been addressed by the applicant and therefore the application should be refused.
28. The development will put an unreasonable burden onto the local highway network and will lead to unacceptably long queues, 'rat running' through residential areas and villages and will have an unreasonable impact on the amenities of the existing residential areas.
29. The TA under-calculates the traffic generated by new developments and does not make a realistic allowance for future traffic growth in the area.
30. The development will lead to increased road safety hazards around the site without adequate highway safety measures. In particular it will exacerbate the safety issues of the Gally Hill Road/Aldershot Road/ Sandy Lane junction, reduce road safety for cyclists by intensifying traffic on existing roads which cannot be widened to create safe routes.
31. The use of bus travel cannot be relied upon to provide a significant modal shift.
32. The development should be contributing to the provision of additional car parking in Fleet town centre.
33. There are inadequate measures to protect the amenities of surrounding residents from the impact of construction traffic.