

22 August 2007

Head of Planning
Test Valley Borough Council
Beechurst
Weyhill Road
Andover
SP10 3AJ

**Planning Application No: 07/01951/OUTN Land at Andover Airfield
Comments and objections by the Parish Council of Abbots Ann and
the Parish Council of Monxton.**

Dear Madam

The Parish Councils of Abbots Ann and Monxton have collaborated to produce these comments on and objections to the above application. They are submitted on behalf of both Councils and each Council should be recorded as having objected to the proposals on the grounds stated in this letter.

Nature of use

1. The development of the former Andover Airfield site for warehousing, in our opinion, is a tragic loss of opportunity to diversify employment opportunities in Andover. Furthermore, there is no evidence of a shortage of employment of the type that will be provided by large scale distribution and the Borough Local Plan says that this land is reserved for long term employment needs. We note that the Local Plan designation was imposed contrary to the advice of the Inquiry Inspectors.
2. Although the application includes, in outline, an element of B1 development, it is almost inconceivable that, following the construction of Unit 4 , a potential occupier will find this an attractive location, dominated, as it will be, by the over-bearing physical bulk and un-remitting traffic of the distribution warehouse. As far as we know, the developer has no intention of building the B1 element speculatively.
3. It may, regretfully, be the case that, because such development of the site is now proposed in the Local Plan, there is a presumption in favour of it and the opportunity that this site uniquely presented for widening the range of employment opportunities is irrevocably lost. It is all the more imperative, therefore, that if this economically unnecessary development is to take place, the planning authority is firm in ensuring that damage to the environment is minimised, that the impact of its traffic generation is fully taken into account, and that, given the prominence of the building, its architecture and landscaping enhances, rather than detracts from, the western approach to Andover. We therefore concentrate on these issues in the following comments.

Forecasts of traffic generation

4. The forecasts of traffic generated by the proposals have, we understand, been calculated by using the TRICS model. Whilst we understand this to be a well established and respected method, it is clearly only as accurate as the data used. It is particularly unfortunate that Tesco which is acknowledged to be the intended occupier of Unit 4, whilst admitting to having data specifically relating to traffic generated by its operations is not prepared to release it on grounds of commercial confidentiality.
5. We have discussed the forecasts submitted by the applicant with the officer dealing with the transportation aspects of the application at Hampshire County Council and we remain concerned that the predicted flows may be significantly understated. The buildings that have been used for comparison purposes are in some cases not food distribution centres and are therefore likely to generate lower traffic volumes per sq metre. Furthermore we believe that the sites may well have been operating at less than full capacity when surveyed. Please note that we are seeking further clarification from Hampshire County Council about the calculations and in the meantime we think that the forecasts should be treated with great caution.

Effect on the strategic road network

6. The application seeks to take advantage of changes in government guidance relating to the effect of planning applications on the strategic road system. It suggests that, in the light of Circular 2/2007, it needs to provide capacity at the point of contact with the strategic network that is compatible with the overall standard of the route of which it is part. It suggests that it does not need to accommodate “unrestrained traffic growth” at the first point of contact.
7. Circular 2/2007 was introduced to bring guidance into line with recent changes in the planning system and to acknowledge the greater emphasis now placed on the management of travel demands. This application, however, whilst paying lip-service to the importance of travel management, makes no attempt to limit the volume of heavy goods traffic that will be generated by it and, at least as far as freight is concerned, makes no concession to the policies in RPG9. It totally ignores, for example, the presence of a railway line adjacent to the site. We have not seen the comments of the Highways Agency but we suggest that, in making its comments, it is essential that it takes account of the full impact of the proposal on the network as a whole and especially on the capacity of the A303 through Andover.
8. We believe that the A303 as a 4-lane trunk road is quite unsuited to take the volume of traffic forecast and that the influx of this traffic at the 100 acre interchange, given the spacing of junctions and the number of lanes will be dangerous and will create serious congestion both on the A303 and on the roads leading to the interchange.

Interchange with the A303

9. The design of this interchange has to deal with local private car/cycle/pedestrian traffic, traffic to and from the A303 from the north and the continuous flow of heavy goods vehicles servicing the proposed Unit 4.
10. In our opinion, a distribution centre of regional significance generating the volumes of heavy goods traffic round the clock that the proposal will generate demands a discrete and direct access on to the strategic network which itself should be of sufficient capacity to take it.
11. The proposed interchange with its 4 lanes, continuous flow of HGVs and backing-up at the traffic lights and from the A303 slip-roads, will become a daunting obstacle for local traffic and create a serious obstruction to the free movement of traffic in this part of Andover.
12. Cycling is currently a viable means of transport from the villages to the south and west of the site and 100 acre junction provides the only reasonably safe route for cyclists into Andover across the A303. The proposals should seek to improve the route for cyclists but the interchange design falls short of that required by the Department of Transport's guidelines in LTN 1/04. The guidance places the needs of pedestrians and cyclists above those of motorised vehicles when planning new highway schemes and emphasises the importance of convenience to encourage cyclists away from the main carriageways.
13. As designed, the arrangements for cyclists will be much slower than the main carriageways because of the loss of priority at every junction and will therefore be ineffective.

Effect of traffic on villages

1. The villages of Monxton and Abbots Ann already suffer a significant amount of morning traffic cutting through the villages from various points on the A343 from Salisbury, and also traffic via Grateley, all of which ends up on the Monxton Road past the DE&S site. This through traffic is not compatible with the narrow village streets containing many listed buildings nor is it compatible with their conservation area status.
2. The application acknowledges this threat and relies heavily on a proposed vehicle identification system to identify vehicles arriving and departing the site via "prohibited" routes. We believe that such systems are largely untried in practice and we question their enforceability. We suggest that the Council's legal advisor be asked to comment on:
 - the enforceability of a rule purporting to restrict an employee's use of the public highway when travelling to and from work;
 - the enforceability of a lease covenant (against both an original and subsequent lessee) purporting to require the lessee to implement and maintain such a system.

Regardless of the legal position we think it highly unlikely that a requirement to run such a scheme would be enforced in practice. We call for traffic management measures to be made a requirement of the development so that traffic is prevented or strongly deterred from travelling to and from the site via the roads south and west of the A303.

3. The application makes a gesture towards this problem by preventing traffic leaving the site from turning right to Monxton Road. This may provide some deterrent but will probably not be effective when traffic heading for the A343 southbound is faced with congestion on the slip-road and A303. It does nothing to deter morning peak employment traffic from “rat-running” through the villages south and west of Andover. The combination of employment traffic generated by the development together with the expansion of the MoD site and the expected increase in congestion at the 100-Acre junction will result in this becoming an ever increasing problem.
4. To prevent this unacceptable increase in village traffic, robust traffic management measures must be introduced. In order of preference we suggest the following options:
 - A dedicated access from the airfield site to the A303 at the site of the old service station.
 - Closure of Monxton Road at some point between the development and Red Post Lane
 - Prohibition of left turns into the development from Monxton Road together with appropriate re-design of the configuration of the highway at that point.
 - Traffic calming measures in the villages.

Visual impact

1. By restricting Andover to its natural valley, planning policies over the years have ensured that distant rural views are available from most parts of the town whilst minimising the impact of the urban edge when viewed from the surrounding countryside.
2. The development lies outside the natural bowl of the town, but the development should not detract from the attractive distant westward views towards woods and downs from the 100-Acre junction and neither should the business park provide an unattractive front to those looking towards it from a broad westerly arc which largely comprises our parishes. Unfortunately in both respects the Unit 4 warehouse fails dismally. Based on the current visibility of buildings at DLO and/or West Portway, we believe that Unit 4 will be highly visible by day from:
 - footpaths around Bury Hill, Upper Clatford
 - parts of Dunkirt Lane, Abbots Ann
 - Abbots Ann to Monxton Road
 - footpath from Broad Lane to Grateley Road, Monxton

- Red Post Lane and Red Post Bridge
- northern end of Monxton Lane
- footpath running east from Sarson Lane to Monxton Lane
- footpath running north from Manor Farm, Monxton
- eastern half of footpath from Wiremead Lane to Sarson Lane
- parts of Weyhill Road west of 100 Acre roundabout
- A303
- roads near Charlton cemetery
- all parts of the new 100 Acre junction
- Monxton Road between 100 Acre junction and DLO roundabout

Many of the locations mentioned are footpaths where there will be fewer people than on roads but with more time to admire, or abhor, the view.

3. The Landscape and Visual chapter of the Environmental Statement is deficient in that it makes little comment on the visibility of the proposals at dusk or when dark. We understand that the Unit 4 will be operational 24-hours a day and 7 days a week. There can be no doubt that after dark this huge brightly-lit structure will dominate views from public roads and some houses during the dark evenings of autumn, winter and early spring, as well as at night.

Even where there is no direct light from the 44 12m-high light clusters, diffraction and reflection will producing an intense glow emanating from the site. It has been said that the warehouse walls will have a non-reflective coating but this does not mean there will be no backscatter of incident light. After all, Salisbury Cathedral has a non-reflective stone surface and yet can be seen for miles around at night.

4. When the site lights are on, Unit 4 will be visible from many places in addition to those listed in paragraph 2 including:
 - Church Path, Abbots Ann (whose rural outlook across the water meadows is especially mentioned in the village design statement as a view that should be protected)
 - top end of Abbots Hill and other higher parts of the village
 - Sunnybank area of Monxton
 - road between Penton and Clanville

We believe Unit 4 will also be visible from the above locations during daytime in the winter months when there are no leaves on intervening trees.

5. All of the above locations are within 3km of the site, but the warehouse will also be visible by day and especially by night from higher ground from a wide area around - as evidenced from the wide swathe of countryside that can be seen from the A303 in the vicinity of the site.

6. The building is enormous by any standards. It will dwarf into insignificance the DE&S building on the north side of Monxton Road, which is of attractive appearance and of appropriate scale. It will be a landmark feature from the A303 east-bound that will “brand” Andover. As such, it should be an opportunity for a high quality, strong, design statement. Instead we are offered a monolithic, tedious, rectangular shed, unrelieved by any architectural interest.
7. Regardless of the architectural merits or otherwise of the proposed buildings we think its impact generally and on the views from residential property to the west and south-west in particular should be reduced and softened and we suggest that the following modifications to the proposals are necessary:
 - Lower the slab of Unit 4 by 5m
 - Raise the height of the bunds by 2m to 7m above the slab
 - Extend the bunding around the southern corner of the site
 - Adjust the layout so that higher bunding can be accommodated without increasing its slope.

Lowering the slab and increasing the height of the bunds will bring the 12m light clusters below the height of the bunds so that they are hidden even in the winter months, although we realise this is still likely to leave the illuminated building very visible from higher ground, including the 100-Acre junction.

8. These measures should considerably reduce the visual impact of the building when viewed in daylight but it is important not to increase the angle of slope of the bunds, at least on the south and south west boundaries, so as not to further cut daylight off from the properties in Red Post Lane. It should be noted that the site slab is several metres above this part of Red Post Lane, potentially exposing residents to significant light from the elevated lamp clusters.
9. It is of course inevitable that development of the Airfield will change the character of the area. The Local Plan has a whole raft of policies concerned with ensuring that development respects its surroundings and enhances rather than detracts from the character of landscape and settlements. There are specific policies related to landscape and design in relation to the development of the Airfield and that aim to minimise the visual intrusion of development. PPS 1 says “Good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted.” The proposed development fails to satisfy any of these policies and in its present form should be rejected on these grounds alone.

Noise

10. We are most concerned about the noise that will be experienced at the residential properties in Red Post Lane, in Monxton Road in the vicinity of Red Post Bridge and at Sunnybank, Monxton Road which lies on the flank of the same shallow

valley that runs through the Unit 4 site and Red Post Lane. However, we also have a concern about noise caused to the wider community by the round-the-clock HGV movements and we are concerned that the prospects of Units 2 & 3 being used for anything other than B8 will be considerably diminished if their surroundings are noisy due to the presence of Unit 4.

11. The World Health Authority has produced a carefully researched report detailing the psychological and physiological damage that can be caused by community noise:

<http://www.who.int/docstore/peh/noise/Commnoise4.htm>

12. The report gives guidelines as to acceptable noise limits if harmful effects are to be avoided. Particular attention is given to sleep disturbance due to quite low levels of night-time noise and suggests that limits should be based on a combination of outdoor facade values of 45 dB LAeq,8h (i.e. for the 8 hours between 22:00hrs and 06:00hrs) and 60 dB LAmax. This is therefore not just a question of annoyance. The health of people is at risk. **If the developer cannot provide good evidence that night-time sound levels within these limits can be achieved then TVBC should impose the condition that there shall be no loading/unloading activities on the site between 22:00hrs and 06:00hrs.** If the night-time ambient noise at these properties is already found to be close to these limits, then the health considerations are an equally strong reason for stating that the noise levels should not be added to. The WHO guidelines also state that, to protect the majority of people from being moderately annoyed during the daytime, the outdoor sound pressure level should not exceed 50 dB LAeq .
13. Unit 4 of this development, the Tesco warehouse, will lie in a shallow valley sloping towards Red Post Lane and the dwellings mentioned above. The landscaping proposals include 5m high bunding along the south-west and north-west boundaries. There is no bunding in the corner facing these houses because of the location of the emergency road and exit at this point, and only a narrow hedge, which offers minimal noise attenuation (< 1dB) stands between the houses and the warehouse.
14. The applicant's noise assessment (EA Chapter 10) uses the following approach:
- notional receptors are set up at four sites,
 - at each receptor the mean noise levels due to existing road traffic are calculated using CRTN methodology,
 - the noise levels are recalculated taking into account the extra road traffic due to the business park, then
 - the two are differenced and it is concluded that there is a negligible increase in noise.

This assessment is totally inadequate:

- It takes no account whatsoever of operational noise from within the site.
- Ambient noise at the receptor sites should have been measured, rather than just estimated. Since these levels are going to be used to decide the

acceptable noise at people's houses due to the development, they should be based on the real surroundings of these properties rather than on an idealised geometry.

15. We believe the ambient noise calculated for the houses in Red Post Lane and close to Red Post Bridge (receptor 3) considerably overestimates the true noise for the following reasons:

- The distance assumed from the near side lane of the closest point of the A303 to the receiver (466m) is erroneous – it should be 820m
- The calculation fails to take account of the dip in Red Post Lane in which most of the houses lie and which has a noise screening effect.
- The prevailing wind is from the south-west, which considerably attenuates the A303 traffic noise (which is the dominant source) while the CRTN methodology pessimistically assumes a 2 m/s wind from the road to the receptor.

The overestimate in the ambient noise could easily be 12dB.

16. The noise assessment makes no attempt whatsoever to quantify the noise that will emanate from the operation of the warehouse. These noise sources are likely to include:

- heavy goods vehicles idling, revving up, moving off and changing gear;
- vehicles reversing; even if fitted with so-called hush reversal warning devices we believe they will be still be audible outside the site if they have to be loud enough to warn employees working in a moderately noisy environment;
- roll cages being loaded on and off the lorries;
- other loading/unloading operations;
- operation of air conditioning, refrigeration and biomass plants.

The applicant should be asked to provide noise measurements from the periphery of comparable distribution centres in order to quantify the disturbance to nearby residents and organisations such as DE&S.

17. In order to produce tolerable conditions for nearby residents we believe it is necessary to modify the proposed landscaping and also impose strict limits (as planning conditions and/or obligations) on the noise emitted from the premises.

18. The 5m-high bund on the south-west boundary stops short of the emergency exit onto Red Post Lane, thus exposing residents of the houses to direct line-of-sight noise from much of the Unit 4 warehouse. Hedges and fences provide negligible noise attenuation and an extension of the bund is required around the southern corner of the site. This would require the emergency road to either run outside the bunding or be rerouted.

19. Further attenuation of noise would be obtained by lowering of the slab of the warehouse by 5m, raising of the height of the bunds by a further 2m, and/or shifting the slab northwards so that the bunds to the south-west can be increased

in height without increasing the angle of the banks and further obstructing the skyline viewed from Red Post Lane.

20. Conditions on noise levels south-west of the site need to be imposed bearing in mind:

- the true ambient noise levels which, as discussed above, are likely to be considerably lower than those calculated by the applicant,
- the fact that background traffic noise is a muted continuous roar to which people become accustomed while noise from the warehouse site will be more sporadic in nature and potentially more intrusive at a given sound level; 5dB is the correction often applied to account for this effect and
- the health effects mentioned earlier.

Because of the intermittent, and perhaps even impulsive, nature of the site noise it would be reasonable to impose limits on both LAeq15min and LAmax.

LAeq15min will provide a tighter control on the emitted noise than LAeq,8hr, say. These limits need to be applied at the first floor facade of the relevant houses. In view of the preceding discussion, we believe it would be reasonable to impose the following limits.

time band	L _{Aeq,15min}	L _{Amax}
08:00 – 18:00 hrs Monday-Friday	50dB	70dB
22:00 – 06:00 hrs, every night	30dB	60dB
all other times	40dB	65dB

If instead the limits were applied at the south west boundary of the site, where they could be monitored with permanently installed noise meters, account would need to be taken of the fact that, depending on the height of the meter, the noise at the outside foot of the bunding could be lower than at window level in the houses.

If these limits are not achievable, even with extensive bunding around the site, then TVBC should conclude that the activities planned for this site are not compatible with its proximity to residential dwellings.

21. We further suggest that noise limits are specified around the other boundaries of the plot for Unit 4 so that intolerable or annoying noise is not imposed on the occupants of other units (where B1 or B2 use is desirable), on guests at the hotel, and employees at DE&S. It would truly be a tragedy for Andover if DE&S and/or HQLF were driven from the Monxton Road site by poor working environment due to the presence of a distribution depot. We note here that the applicant has already admitted (ES, para. 7.66) that the development will have a major adverse visual affect on the outlook from DE&S.

22. The applicant should also be asked to provide an estimate of the increase in traffic noise to be experienced by the residents living close to the 100-Acre roundabout,

due to the significant increase in HGV traffic using this roundabout and the stop-start nature of this traffic once traffic lights are installed. The noise levels here also need to be assessed in the light of the WHO night-time noise guidelines.

Air quality

23. We are concerned about the effects this development will have on air quality, as experienced by neighbouring houses and businesses, and also by the wider community. Our concern is increased by the fact that the application documents provide little evidence that the concentration of air pollutants arising from the operation of the site will be within acceptable limits, while our own rough calculations indicate that it will not be.

24. Chapter 9 in the Environmental Statement (Air Quality) is completely inadequate:

- It only takes into account the increase in pollution from the increase in traffic on the surrounding roads (principally the A303). Moreover this assessment is only made at four points around the periphery of the site and does not include sensitive locations that might be affected by traffic such as close to the 100-Acre junction.
- It makes no assessment whatsoever of emissions due to operations within the Unit 4 site.

It is these latter emissions that we are principally concerned about. Sources of pollutants could include the biomass incinerator but the most significant source is likely to be the large number of HGVs either manoeuvring around the site or else stationary with their engines idling.

25. We question the merits of the biomass plant and the motives for including it. We are not against the concept of incineration of sustainable biomass supplies but think that such a facility might be best operated on a larger scale and on a stand-alone site. Sited in this development it will add to the already substantial numbers of vehicle movements and we raise the following queries about its operation:

What guarantees are there as to the material to be incinerated?

Will the furnace type have the potential to burn other materials?

What traffic will be generated?

In this situation we suggest it might be better to have green power generated via large photovoltaic panels on the roof of the warehouse.

26. Andover, due to its isolation from large conurbations and lack of serious traffic congestion, currently has air quality that is generally good, although Test Valley's Air Quality Review and Assessment (Stage 3, 2003) showed there are places, notably on the Weyhill Road, where measured NO² levels have occasionally exceeded national targets. The houses in Red Post Lane and the villages south and west of Andover currently enjoy excellent air quality due to their low traffic levels and the vast areas of rolling downland which are passed over by the prevailing south-westerly breeze before it reaches them. No Air Quality Management Areas (AQMAs) are defined in the borough, unlike in the towns in

the north-east of the county or along its southern coastal strip. The ES (section 9.60) sees the lack of AQMAs as a reason why no special mitigation methods are needed to cope with emissions due to the development; in other words it is believed that in Andover there is plenty of fresh air to dilute them.

27. NO² and PM¹⁰ (nitrogen dioxide and particulates smaller than 10µ) are the pollutants of most concern that arise from road traffic and of these NO² seems to be the pollutant most likely to achieve levels that constitute a health concern. In high concentrations nitrogen dioxide impairs respiratory cell function and damages blood capillaries and cells of the immune system. It is believed to increase susceptibility to infection and aggravate asthma.
28. Monitoring carried out in Rushmoor (Air Quality Action Plan for Rushmoor Borough Council, May 2006) found that the 6% of traffic which constituted heavy duty vehicles (HDVs i.e. HGVs plus buses) gave rise to 45% of the NO² pollution, a figure which implies HDVs are 13 times more polluting than light vehicles (cars and vans) – a ratio which is of concern given the very high concentration of HGVs associated with this development.
29. When there is a breeze from the prevailing south-westerly direction, pollution from the site and from vehicles negotiating the 100-Acre junction will disperse over the town of Andover, possibly raising NO₂ levels near houses close to the 100-Acre junction, and around the Weyhill Road area, above acceptable limits. The applicant should be asked to provide a detailed assessment of NO² levels in these areas.
30. We have particular concerns about what may happen with respect to atmospheric pollution when calm anticyclonic conditions prevail. In these circumstances temperature inversions often occur in the atmosphere with air pollutants trapped between the ground and the top of the inversion layer. Inversion layers occur when an anomalous temperature gradient is present and, especially in winter, the trapping layer can be confined to quite low altitudes giving a considerably enhanced density of pollutants.
31. Elsewhere in this document we have described how Unit 4 lies within a shallow valley that slopes gradually down towards Red Post Lane and ultimately Monxton. It is our concern that in these atmospheric conditions NO² emissions will be trapped within the valley, inflicting unacceptable concentrations of NO² on
 - workers in Unit 4 and the other enterprises on the Business Park.
 - workers at DLO/HQLF.
 - occupants of houses in Red Post Lane and the eastern edge of Monxton village.
32. The government has specified a set of UK Air Quality Objectives which include limits on NO₂ emissions. We are not experts on air pollution, but there appears to us to be a priori reasons for believing that these limits could be considerably exceeded when temperature inversions occur.
33. Temperature inversions have a particular tendency to occur at night, when lighter winds mean less mixing of layers within the atmosphere, and are especially

prevalent on clear nights in winter when the ground surface can cool more rapidly than the air above it. Winter inversion layers also tend to have a lower ceiling within which pollutants can potentially be trapped.

34. This provides another reason why night-time loading/unloading operations should be prohibited on the Unit 4 site. An 8-hr period of no HGV activity between 10pm and 6am will prevent the build up of NO₂ during the most vulnerable hours and will give pollutant concentrations that have built up prior to 10pm time to disperse.
35. The proposed development appears to offer the prospect of inflicting high levels of air pollution on communities that up to now have enjoyed excellent air quality.
36. The applicant has failed to provide analysis or measured data from comparable sites to demonstrate that the levels of pollution arising from the on-site activities are acceptable and our rough calculations indicate that excessive concentrations of NO₂ will occur in some circumstances. The worst of the pollution could be avoided by prohibiting night-time loading/unloading operations.

Drainage

37. We think there are good grounds for believing that the proposed development will increase the risk of flooding in Red Post Lane and nearby properties. The proposals for handling surface water run-off appear inadequate as in adverse weather conditions a very considerable total volume of rain will be deposited on the site, whose topography takes the form of a shallow valley sloping towards Red Post Lane which forms the site's south-west boundary.
38. Despite improvements to the drainage in this road a few years ago, this low point in Red Post Lane is occasionally (once or twice a year) flooded following heavy rain. Our principal concern is that this flooding will become much more frequent and extensive when 42.5ha of the 46.7ha greenfield site is covered with impermeable surfaces (ref. para 12.57 of Chapter 12 of Environmental Statement). Any increased flooding would not only inconvenience local traffic but would threaten the properties on the opposite side of Red Post Lane.
39. Page 25 of Appendix 12.1 (by T R Collier and Associates) appears to suggest that the soakaway system will be designed to cope with 7 litres/sec/ha and this seems to us to be completely inadequate to cope with heavy rain. For example, a heavy storm depositing 25mm of rain in an hour will generate $0.025 \times 10^4 \text{ m}^3/\text{hr}/\text{ha} = 69.4 \text{ litres}/\text{sec}/\text{ha}$. Note that in 1999 Andover had 58mm of rain in under 3 hours – ref. http://www.nwl.ac.uk/ih/nrfa/monthly_summaries/1999/07/summary.html, so this is not implausible.
40. The application also mentions (para. 12.84 of Chapter 12) that depressions in the landscape strips, which run along two of the site boundaries, could contain any excess run-off. This seems infeasible to us for two reasons:
 - The volumes of water involved could be extremely large. e.g. 25mm of rain falling on 42.5ha within an hour will generate $0.025 \times 42.5 \times 10^4 \text{ m}^3 = 1.06 \times 10^4 \text{ m}^3$ of water – or a 1m deep pool over 1ha. Because of the topology of the site this pool would need to be near the south-west

boundary and we suggest that there is insufficient space for it, especially as earth bunding with woodland planting on top is proposed for the whole of this landscape strip (see site cross-section to Red Post Lane in Soft Landscape Proposals) which appears to exclude any possibility of a large temporary pond.

- There is a planned emergency road which exits the site into Red Post Lane at almost the lowest point of both the site and Red Post Lane. The likely effect of the bunding will be to channel water out of this emergency exit rather than contain it.

41. We are also concerned that in periods of heavy rainfall, surface pollutants from the site will not be adequately handled and might well:

- affect the properties mentioned above,
- affect the aquifer from which our drinking water originates, and
- affect the quality of the Pillhill Brook (a tributary of the world famous River Test) which runs through our villages.

We trust that the Council will take account of these comments and objections in determining the application

Yours faithfully,

Chairman

Abbots Ann Parish Council

Vice-Chairman

Monxton Parish Council