

Mrs M Winter  
Head of Planning  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover

**Re: PLANNING APPLICATION NO 07/01951/OUTN**

9<sup>th</sup> November 2007

Dear Mrs Winter

I am writing on behalf of the STOP! Campaign to say that we:

- (1) support appropriate development at the Andover Airfield site but
- (2) object to the revised plans that have been submitted by Goodman on behalf of TESCO.

Our objections to the Revised Plans are based on the following:

1. The **substantial increase** in overall floor space over that granted in the Outline Planning Permission and the dominance for B8 (warehousing/distribution) use on the site.
2. The proposed development **does not comply** with the local plan or regional and national strategies for development and freight distribution.
3. The **cumulative impact** of the development will adversely affect the local environment and quality of life of the residents of Andover and district.
4. The assessments submitted by Goodman and Tesco regarding the impact of the development, and the data on which these assessments rely, are incorrect, unreliable and inconsistent, particularly with regard to the traffic, which are at best confusing and at worst designed to mislead.

Summary details of objections, distilled from the thousands of objections gleaned through our consultation with local residents are as follows:

1. **Increase of overall floor space and B8 dominance**
  - The existing Outline Planning Consent (OPC) limits the total floor space that can be built to **69,000 square metres**; 137,000 square metres is sought in the revised plan. Whilst acknowledging that there has been a decrease from the original application figure of 148,000 sq m (July 2007) there is no justification for granting permission for **double** the floor space contained in the OPC and we object to this massive increase.

- **B8 use** in the revised plan for the whole site is **82.95%** of the overall floor space - **an unjustifiable increase in** intensification of B8 use when compared with the OPC granted for development on this site.
- Only **12.32% of floor space is allocated for office use**, an insignificant percentage, zoned for Phase 2 so may never be built.
- There is a substantial risk, acknowledged by the Applicant at Para 7.35 of the original Traffic Assessment, that if full planning permission is granted for B8 on the scale requested, only other B8 tenants will be attracted to the remaining parts of the site. Office units, Hotel and Conference Centre will not materialise; ***the result an industrial estate dominated by B8 use, contrary to the Local Plan.***

2. **Non-compliance with the local plan, regional and national strategies for development**

The Andover Airfield is a prime site, earmarked in the Test Valley Local Plan 2006 as a Business Park. Its development as a freight distribution centre is **completely at odds with national and regional guidance on sustainable and responsible planning.**

The Local Plan took 6 years to agree and was developed with the needs of the whole community and the Council's wider corporate aims and objectives in mind. **This development brushes aside the aspirations set out in the Local Plan and the community-wide consultation that led to its acceptance as a Statutory document.**

This proposed development **disregards Regional Planning Guidance (RPG)** as follows:

Para 9.19: "Freight distribution should not be at the expense of the wider community and the environment."

Policy T6: "Integrated freight distribution system should be promoted which makes the most efficient and effective use of road, rail, inland waterways and coastal shipping" [*note the recent Dept of Transport investment of £43 million to improve the rail freight corridor Nuneaton-Southampton to reduce dependence on road transport – Oct 2007*]

RPG 9: "Economic opportunities should be increased by raising skills levels"

Policy RE9: "High value added activities should be actively encouraged."

Policy RE 11: "Economic diversity should be encouraged facilitating small and medium-sized enterprises and supporting the growth of a variety of economic sectors."

**The Test Valley Local Plan reflects all these aspirations.** The Goodman/TESCO proposed development works against all these aspirations.

***Additionally, contrary to the Local Plan to the west of the site the revised plan encroaches on the local gap – on designated countryside – to the size of 40m wide x c.1 kilometre (the length of Unit 4) to accommodate the landscaping strip.***

**3. The cumulative impact of the proposed development on the local environment and lives of residents**

This all day, all night, seven days a week, 364 days a year B8 operation, ***the size of 16,740 double decker buses*** will impact in the following ways:

- **Increased volume** of HGV and other traffic on the local road system will have a detrimental impact on all local road users, whether residents, visitors or existing businesses  
***Original estimates of HGV movements were ‘fanciful allowances’*** – revised figures supplied are inconsistent and inaccurate (see below)
- **Road safety** will be compromised for all users – vehicles and pedestrians, cyclist and horse-riders  
*The local Road Safety Council have objected to the proposal for that reason*  
*The applicant has not considered highways safety further despite acknowledging higher volumes.*  
***A full and independent traffic assessment must be called for by TVBC.***
- **Construction traffic** – no amendments have been made to the original figures submitted ***which were again based on ‘fanciful allowances’***. Restrictions on routing of construction traffic included in the amended papers ***are not enforceable.***
- **Air quality** will be affected  
*Proximity to sites and roads with heavy traffic has been scientifically proven to increase prevalence of respiratory conditions especially in children.*  
*Consultation with the local health services must be conducted in order to assess this threat to the health of Andover residents.*
- Unacceptable **24 hour noise levels** will be generated affecting adversely the quality of life of people in Andover and causing sleep disturbance for those living in closer proximity  
*ES Addendum 10 concludes that the increase in noise levels on site due to HGV activities for Plot 4 is considered as a major significant increase. However, the figures used for the revised noise assessment bear no relation to the site traffic levels confirmed by the applicant.*

*An independent and realistic noise assessment must be called for by the Council as **no reliance can be placed on the Applicant's own figures or assessment.***

- **Light pollution** from the B8 building and site will be of unacceptable levels  
*The skylights in the new plans will let out significant light  
No assessment has been made of the effect of this 24 hour highly lit building on residents or the environment*
- Raised on a platform the building will be visible from all points resulting in **massive loss of visual amenity**  
*The landscaping proposals are inadequate and as **confirmed by the Applicant** will take at least 15 years to reach enough maturity to mitigate the impact – if the vegetation has not been affected by ‘stunted growth syndrome’ commonly found at sites with heavy HGV usage*
- Despite the addition of a scalloped green roof, this is still an **industrial metal-clad steel building** – a MEGAshed. It is not a landmark building as required in the Test Valley Local Plan for this important and historic site.

#### 4. **Unreliable and inconsistent assessments:**

TVBC Planning Officers have to work with the figures and assessments that are provided by the Applicant. On examination, the assessments, and the statistics on which those assessments have been based, provided by Goodmans and Tesco, we have found they do not stand up to close scrutiny. They are inconsistent, incomplete and incorrect.

***The assessments and figures provided must not be taken on face value and we urge the Planning Officers and all stakeholders to scrutinise rigorously all data supplied. Independent and realistic assessments must be called for. Examples follow that illustrate this point.***

#### ***Projections of HGV Movements :***

In the first Traffic Assessment, the figures given for HGV movements at the morning peak hour 100 – one every 36 seconds – and in the afternoon peak 280 – one every 13 seconds. Hampshire Highways in their first response stated clearly that the ‘consented plans’ for the revised A3903 junction would not cope with this heavy traffic flow.

In the revised Traffic Assessment document, the Applicant states that the previous figures were ‘fanciful allowances’ and has now submitted much lower estimates – 40 in the morning peak hour and

50 in the afternoon peak – without reducing the overall capacity of the building, although there appears to be an increase in the number of loading bays cited.

***These new figures conveniently fit the projections of just under full capacity of the new roundabout scheme as suggested Hampshire Highways.***

The Applicant has provided a chart of 24 hour traffic flows to provide evidence for this down-sized estimate of traffic. It is based on comparative figures from another B8 development and on an estimate per 100 square metres with assumptions on peak hours.

On examination we believe that this chart provides misleading and inaccurate information and detailed questions asked of the developer and tenant to provide clarity continue to remain unanswered, for example:

- What is the seasonal variation in this traffic flow? Experts tell us that the flow will increase substantially especially at Christmas.
- Goodmans have stated previously that the peak hour will be 2-3am. The chart on which their evidence relies says 8-9 am and 3-4 pm. Which is right?
- What are the variations for weekend use?

***We urge the Council and Councillors to press for detailed answers to these questions – and to stress-test the overall ‘evidence’ that has been provided - so that we can all be clear about what the MEGAshed will look, feel and sound like in real life.***

***We urge the Council to consult closely with Hampshire Highways and the Highways Agency on this matter. Currently we believe that the submitted information is inaccurate and therefore misleading.***

As already submitted in detailed objection letters the following impact assessments are deemed inadequate:

***Air*** – the full extent of the pollution generated by a development of this nature has not been accurately assessed

***Noise*** – we understand the revised assessment has already been sent back to Goodmans as totally inadequate, incorrect and misleading

***Light*** – no impact assessment has been provided

***Road Safety*** – no accident risk assessment during construction or operation has been provided

***Personal safety*** – with staff changeovers at unsocial hours the underpass and cycle pathways compromise personal safety

**Green Travel Plan** – commendable but impractical due to patterns of shift work on this site (para 5.2.6 Travel Plan – 80% of employees will arrive too early/too late for public transport)  
**Parking** – ratios of staff parking are inadequate  
**Landscaping** – misleading information re: effectiveness  
**Habitat Survey** – no information on birds, bats or badgers;  
**Ecological** – largely desk-top data has been provided  
**Biodiversity** – insufficient data collected to establish biodiversity  
**Reptiles** – survey based on 5 site visits with data collected outside the preferred time for such surveys  
**Brown Hare Survey** – 1.5 hour survey only in January in an inappropriate season and for an insufficient time  
**Hawk Conservancy** – no assessment of the impact on this award-winning business e.g. on the Red Kite breeding pair

***Disconcertingly, we have indications that Goodman has been investigating local sources to help clear the site of wildlife that may hinder development on the site e.g. nesting birds. Evidence exists that such practices are common e.g. rare water voles being removed from the Goole site.***

The objections detailed above provide a clear evidence-base for the Council and Councillors to refuse permission for this over-sized, 24/7 development which bears no relation to the mixed Business Park envisaged when outline permission was granted. We are confident that there was no intention in the minds of Councillors, when delegated powers were given to Planning Officers to grant outline permission on this site, to allow in 'by the back door' one of the largest buildings of its type in Europe. By operating continually day and night and generating continuous air, light and noise pollution, increasing the overall HGV and other traffic volume by a significant percentage, by creating mostly low-skill jobs of indeterminate number, this development will deliver 'planning blight' to the whole area.

We would remind the Council that permission for this kind and size of building has been refused in a number of different areas in the interests of their residents and constituents. We ask TVBC to put first and foremost the current and future interests of their residents and constituents, those who pay their salary or have voted them into their positions of trust and privilege, when deciding to allow or refuse permission for this development.

Experts and consultants with whom STOP! has consulted have advised that there are valid grounds on which this Application can be refused if the Council is so minded. If permission were to be refused on 3<sup>rd</sup> December and the matter taken to Appeal by the developer, experts with whom we have consulted have also stated that there are sound grounds on which such an Appeal can be quashed.

STOP! would remind Council that fear of the matter being taken to Appeal, and the costs that may be associated with such an Appeal, are not valid grounds for granting permission for this development.

The proposed development and the nature of the business to be conducted on the Airfield Site will impact on the quality of life, and potentially the Human Rights of all living and working in and around Andover.

The support network that has come together to form the STOP! Campaign and STOP! Alliance against this proposed development has gathered this information based on considerable research and consultation that challenges the case presented by the developers. We are happy to provide further information and clarification.

Yours faithfully

Rhonda Smith  
***For and on behalf of***  
**The STOP! Campaign & STOP! Alliance**