

## Notice of Meeting

# Northern Area Planning Committee

**Date:** Thursday 5 December 2019

**Time:** 5.30 pm

**Venue:** Upper Guildhall, High Street, Andover, Hampshire SP10 1NT

**For further information or enquiries please contact:**

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**Legal and Democratic Service**  
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Andover, Hampshire,  
SP10 3AJ  
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The recommendations contained in the Agenda are made by the Officer and these recommendations may or may not be accepted by the Committee.

### **PUBLIC PARTICIPATION SCHEME**

*If members of the public wish to address the meeting they should notify the Legal and Democratic Service at the Council's Beech Hurst office by noon on the working day before the meeting.*

### **Membership of Northern Area Planning Committee**

#### **MEMBER**

#### **WARD**

Councillor C Borg-Neal (Chairman)	Andover Harroway
Councillor P Lashbrook (Vice-Chairman)	Bellinger
Councillor I Andersen	Andover St Mary's
Councillor Z Brooks	Andover Millway
Councillor T Burley	Andover Harroway
Councillor C Donnelly	Andover Downlands
Councillor C Ecclestone	Andover Millway
Councillor V Harber	Andover St Mary's
Councillor L Lashbrook	Charlton & the Pentons
Councillor N Lodge	Andover Downlands
Councillor N Matthews	Andover Romans
Councillor R Rowles	Andover Winton
Councillor A Watts	Andover Millway

## **Northern Area Planning Committee**

Thursday 5 December 2019

### **AGENDA**

**The order of these items may change as a result of members  
of the public wishing to speak**

- 1 Apologies**
- 2 Public Participation**
- 3 Declarations of Interest**
- 4 Urgent Items**
- 5 Minutes of the meeting held on 3 October 2019**
- 6 Information Notes 4 - 9**
- 7 18/00936/FULLN 10 - 89**

**(OFFICER RECOMMENDATION: REFUSE)**

SITE: Bourne Park Airfield, Bourne Park Estate,  
Hurstbourne Tarrant, SP11 0DG, **HURSTBOURNE  
TARRANT**

CASE OFFICER: Miss Emma Jones

- 8 Waste to Energy Harewood Incinerator 90 - 129**

**(OFFICER RECOMMENDATION: OBJECTION)**

SITE: Land to the west of the Raymond Brown Waste  
Solutions, A303 Enviropark, Drayton Road, Barton Stacey,  
Andover, SO21 3QS, **BARTON STACEY**

CASE OFFICER: Mrs Samantha Owen

## **ITEM 6**

### **TEST VALLEY BOROUGH COUNCIL**

### **NORTHERN AREA PLANNING COMMITTEE**

### **INFORMATION NOTES**

#### **Availability of Background Papers**

Background papers may be inspected up to five working days before the date of the Committee meeting and for four years thereafter. Requests to inspect the background papers, most of which will be on the application file, should be made to the case officer named in the report or to the Development Manager. Although there is no legal provision for inspection of the application file before the report is placed on the agenda for the meeting, an earlier inspection may be agreed on application to the Head of Planning and Building.

#### **Reasons for Committee Consideration**

The majority of applications are determined by the Head of Planning and Building in accordance with the Council's Scheme of Delegation which is set out in the Council's Constitution. However, some applications are determined at the Area Planning Committees and this will happen if any of the following reasons apply:

- Applications which are contrary to the provisions of an approved or draft development plan or other statement of approved planning policy where adverse representations have been received and which is recommended for approval.
- Applications (excluding notifications) where a Member requests in writing, with reasons and within the stipulated time span, that they be submitted to Committee. A Member can withdraw this request at any time prior to the determination of the application to enable its determination under delegated powers
- Applications submitted by or on behalf of the Council, or any company in which the Council holds an interest, for its own developments except for the approval of minor developments.
- To determine applications (excluding applications for advertisement consent, listed building consent, and applications resulting from the withdrawal by condition of domestic permitted development rights; Schedule 2, Part 1, Classes B, C, D, E, F, G, and H of the Town and Country Planning (General Permitted Development) (England) Order 2015 or as amended) on which a material planning objection(s) has been received in the stipulated time span and which cannot be resolved by negotiation or through the imposition of conditions and where the officer's recommendation is for approval, following consultation with the Ward Members, the latter having the right to request that the application be reported to Committee for decision.



## **Public Speaking at the Meeting**

The Council has a public participation scheme, which invites members of the public, Parish Council representatives and applicants to address the Committee on applications. Full details of the scheme are available from Planning and Building Services or from the Committee Administrator at the Council Offices, Beech Hurst, Weyhill Road, Andover. Copies are usually sent to all those who have made representations. Anyone wishing to speak must book with the Committee Administrator within the stipulated time period otherwise they will not be allowed to address the Committee.

Speakers are limited to a total of three minutes per item for Councillors on the Area Committee who have personal interests or where a Member has pre-determined his/her position on the relevant application, three minutes for the Parish Council, three minutes for all objectors, three minutes for all supporters and three minutes for the applicant/agent. Where there are multiple supporters or multiple objectors wishing to speak the Chairman may limit individual speakers to less than three minutes with a view to accommodating multiple speakers within the three minute time limit. Speakers may be asked questions by the Members of the Committee, but are not permitted to ask questions of others or to join in the debate. Speakers are not permitted to circulate or display plans, photographs, illustrations or textual material during the Committee meeting as any such material should be sent to the Members *and* officers in advance of the meeting to allow them time to consider the content.

## **Content of Officer's Report**

It should be noted that the Officer's report will endeavour to include a summary of the relevant site characteristics, site history, policy issues, consultations carried out with both internal and external consultees and the public and then seek to make a professional judgement as to whether permission should be granted. However, the officer's report will usually summarise many of the issues, particularly consultations received from consultees and the public, and anyone wishing to see the full response must ask to consult the application file.

## **Status of Officer's Recommendations and Committee's Decisions**

The recommendations contained in this report are made by the officers at the time the report was prepared. A different recommendation may be made at the meeting should circumstances change and the officer's recommendations may not be accepted by the Committee.

In order to facilitate debate in relation to an application, the Chairman will move the officer's recommendations in the report, which will be seconded by the Vice Chairman. Motions are debated by the Committee in accordance with the Council's Rules of Procedure. A binding decision is made only when the Committee has formally considered and voted in favour of a motion in relation to the application and, pursuant to that resolution, the decision notice has subsequently been issued by the Council.

## **Conditions and Reasons for Refusal**

Suggested reasons for refusal and any conditions are set out in full in the officer's recommendation.

Officers or the Committee may add further reasons for refusal or conditions during the Committee meeting and Members may choose to refuse an application recommended for permission by the Officers or to permit an application recommended for refusal. In all cases, clear reasons will be given, by whoever is promoting the new condition or reason for refusal, to explain why the change is being made.

## **Decisions subject to Completion of a Planning Obligation**

For some applications, a resolution is passed to grant planning permission subject to the completion of an appropriate planning obligation (often referred to as a Section 106 agreement). The obligation can restrict development or the use of the land, require operations or activities to be carried out, require the land to be used in a specified way or require payments to be made to the authority.

New developments will usually be required to contribute towards the infrastructure required to serve a site and to cater for additional demand created by any new development and its future occupants. Typically, such requirements include contributions to community facilities, village halls, parks and play areas, playing fields and improvements to roads, footpaths, cycleways and public transport.

Upon completion of the obligation, the Head of Planning and Building is delegated to grant permission subject to the listed conditions. However, it should be noted that the obligation usually has to be completed sufficiently in advance of the planning application determination date to allow the application to be issued. If this does not happen, the application may be refused for not resolving the issues required within the timescale set to deal with the application.

## **Deferred Applications**

Applications may not be decided at the meeting for a number of reasons as follows:

- \* The applicant may choose to withdraw the application. No further action would be taken on that proposal and the file is closed.
- \* Officers may recommend deferral because the information requested or amended plans have not been approved or there is insufficient time for consultation on amendments.
- \* The Committee may resolve to seek additional information or amendments.
- \* The Committee may resolve to visit the site to assess the effect of the proposal on matters that are not clear from the plans or from the report. These site visits are not public meetings.

## **Visual Display of Plans and Photographs**

Plans are included in the officers' reports in order to identify the site and its surroundings. The location plan will normally be the most up-to-date available from Ordnance Survey and to scale. The other plans are not a complete copy of the application plans and may not be to scale, particularly when they have been reduced from large size paper plans. If further information is needed or these plans are unclear please refer to the submitted application in the reception areas in Beech Hurst, Andover or the Former Magistrates Court office, Romsey. Plans displayed at the meeting to assist the Members may include material additional to the written reports.

Photographs are used to illustrate particular points on most of the items and the officers usually take these. Photographs submitted in advance by applicants or objectors may be used at the discretion of the officers.

## **Human Rights**

The European Convention on Human Rights" ("ECHR") was brought into English Law, via the Human Rights Act 1998 ("HRA"), as from October 2000.

The HRA introduces an obligation on the Council to act consistently with the ECHR.

There are 2 Convention Rights likely to be most relevant to Planning Decisions:

- \* Article 1 of the 1st Protocol - The Right to the Enjoyment of Property.
- \* Article 8 - Right for Respect for Home, Privacy and Family Life.

It is important to note that these types of right are not unlimited - although in accordance with the EU concept of "proportionality", any interference with these rights must be sanctioned by Law (e.g. by the Town & Country Planning Acts) and must go no further than necessary.

Essentially, private interests must be weighed against the wider public interest and against competing private interests. Such a balancing exercise is already implicit in the decision making processes of the Committee. However, Members must specifically bear Human Rights issues in mind when reaching decisions on all planning applications and enforcement action.

## **Natural Environment and Rural Communities Act 2006 (NERC)**

The Council has a duty under the Natural Environment and Rural Communities Act 2006 as follows: "*every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*".

It is considered that this duty has been properly addressed within the process leading up to the formulation of the policies in the Revised Local Plan. Further regard is had in relation to specific planning applications through completion of the biodiversity checklists for validation, scoping and/or submission of Environmental Statements and any statutory consultations with relevant conservation bodies on biodiversity aspects of the proposals. Provided any recommendations arising from these processes are conditioned as part of any grant of planning permission (or included in reasons for refusal of any planning application) then the duty to ensure that biodiversity interest has been conserved, as far as practically possible, will be considered to have been met.

### **Other Legislation**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that determination of applications be made in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the Borough comprises the Test Valley Borough Revised Local Plan (2016), and 'made' Neighbourhood Plans. Material considerations are defined by Case Law and includes, amongst other things, draft Development Plan Documents (DPD), Supplementary Planning Documents (SPD) and other relevant guidance including Development Briefs, Government advice, amenity considerations, crime and community safety, traffic generation and safety.

On the 19<sup>th</sup> February 2019 the Government published a revised National Planning Policy Framework (NPPF). The revised NPPF replaced and superseded the previous NPPF published in 2018. The revised NPPF is a material consideration in planning decisions.

So that sustainable development is pursued in a positive way, at the heart of the revised NPPF is a presumption in favour of sustainable development. Decisions should apply a presumption in favour of sustainable development. This does not change the statutory status of the development plan as a starting point for decision making. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Where a planning application conflicts with an up to date development plan, permission should not usually be granted. Local planning authorities may take decisions which depart from an up to date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

For decision-taking, applying the presumption in favour of sustainable development means:

- Approving development proposals that accord with an up to date development plan without delay; or
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- The application of policies in the revised NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- Any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised NPPF when taken as a whole.

Existing Local Plan policies should not be considered out of date because they were adopted prior to the publication of the revised NPPF. Due weight should be given to them, according to their degree of consistency with the revised NPPF (the closer the policies in the Local Plan to the policies in the revised NPPF, the greater the weight that may be given).

## ITEM 7

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<b>APPLICATION NO.</b>	18/00936/FULLN
<b>APPLICATION TYPE</b>	FULL APPLICATION - NORTH
<b>REGISTERED</b>	06.04.2018
<b>APPLICANT</b>	Mr. J Martin and Mr. R Wood
<b>SITE</b>	Bourne Park Airfield, Bourne Park Estate, Hurstbourne Tarrant, SP11 0DG, <b>HURSTBOURNE TARRANT</b>
<b>PROPOSAL</b>	Demolition of buildings associated with Bourne Park Airfield, and removal of existing airstrip and outdoor storage areas; Erection of detached dwelling and outbuildings; with associated parking, turning, landscaping, access, private amenity space and ecological enhancements
<b>AMENDMENTS</b>	Additional information received: <ul style="list-style-type: none"><li>• 22.08.2019</li><li>• 23.08.2019</li><li>• 21.10.2019</li><li>• 29.10.2019</li></ul>
<b>CASE OFFICER</b>	Miss Emma Jones

Background paper (Local Government Act 1972 Section 100D)

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### 1.0 INTRODUCTION

- 1.1 The application is being presented to the Northern Area Planning Committee (NAPC) following the resolution of the Planning Control Committee (PCC) on 30 April 2019 to defer the application in order to request the applicant to submit a noise assessment. The applicant submitted a noise assessment on the 23 August 2019, and this is provided at Appendix C of this report.
- 1.2 The Officer report to the PCC on the 30 April 2019, which also includes the Officer report to the NAPC on the 28 March 2019, is provided at Appendix A of this current report. The Officer update report to the PCC on the 30 April 2019 is also provided at Appendix B of this current report.

### 2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The application site is located on the Bourne Park Estate, which is situated within the countryside and the North Wessex Downs Area of Outstanding Natural Beauty to the north of Andover. The site is to the east of the A343 between the settlements of Enham, 1.9km to the south and Hurstbourne Tarrant, 1.6km to the north. Stoke and St Mary Bourne (located outside of the Borough) are 2.9km and 5km to the east respectively.
- 2.2 The site comprises of a grass airstrip used by light aircraft and helicopters, groups of trees and open grassland. The airfield has been in use since at least 1993 and is aligned east/west. It is supported by 4 buildings, some of which have been converted from agricultural use, in which the storage and

maintenance/repair of aircraft is performed. The buildings are currently occupied by Falcon Aviation Ltd, which is a company that specialises in the restoration of Gazelle helicopters.

- 2.3 The wider estate contains three dwellings close to the application site; Bourne Park House to the south of the buildings on the application site, The Bungalow to the south west and Doles Lodge to the south west on the access from the A343. The wider estate has several groups of trees upon it that connect to Rag Copse. Immediately to the north of the estate is Doles Wood.

3.0 **PROPOSAL**

- 3.1 The proposal is to remove the airstrip and all but one of the associated buildings (to protect the bats within), and to construct a detached dwelling with associated outbuildings and a residential curtilage. Landscaping and ecological enhancements would also take place as part of the scheme.
- 3.2 The house would be a large two storey dwelling. It would be set behind a courtyard that would be framed by two symmetrical “L” shaped outbuildings to either side of the entrance. Around the dwelling and its outbuildings would be a private amenity area shown on plan as residential curtilage.
- 3.3 The planting of new trees and landscaping would take place immediately adjacent to the proposed buildings and courtyard. A significant amount of tree planting would take place to the west of these to connect the existing block of trees with Doles Wood to the north and the groups of trees on the estate to the south that themselves connect to Rag Copse.
- 3.4 A noise assessment has been submitted by the applicant, as required by the PCC. In response to recent Natural England guidance, a Technical Note on Nutrient Neutrality has also been submitted.
- 3.5 Since the PCC meeting, the applicant has submitted additional comments in respect of the proposals/the site, summarised as follows;
- Falcon Aviation, our airfield tenants, have just purchased six additional helicopters ex services. As is their business I expect them to re-furbish them and then to either operate them from here or sell them to private buyers and then service them here. Either way we can expect more activity and possibly more amenity disturbance;
  - Comments made in respect of specific paragraphs of the submitted Sustainable Acoustic report (provided at Appendix C of this current report) as follows;
  - Paragraph 3.2.1 – The limits set at the time of granting permission are no longer effective. Peoples tolerances have changed;
  - Para. 3.2.2 – We are trying to contribute...you are not;
  - Para. 7.3.10 – They (current occupiers) have already bought six more helicopters. Old Sarum closing;
  - 8.1.8 – Under existing permissions they can increase by a factor of 3 or 4;
  - Specifically highlighted paragraphs 3.2.3, 7.3.9, 8.1.7 and 8.1.9;

- Right from the start of this application we made TVBC aware that an acoustic survey would be impractical and inconclusive. Always the best evidence of nuisance was going to come from the local residents. TVBC seemed to accept this and did not insist on a survey before sending us to committee. That committee found in our favour. We now have a survey and, as predicted, it is inconclusive. A couple of microphones cannot demonstrate what people are feeling!! The Environmental Protection Officer has read it one way and I another. The extracts state clearly that our activities are, or could, have an adverse effect on the amenity of the area thus satisfying part b of LE10;
- On the matter of potential loss of an employment site, as previously stated, Falcon Aviation, the occupiers, have only one full time employee. He is 64 years of age and coming up for retirement. They also have three part timers who all have jobs elsewhere;
- The building of the proposed house will employ many skilled workers for about two years. The new owners will then surely then employ domestic help both inside the house and in the grounds. Then there is the small matter of planting about 12,500 trees on 17 acres. How long do you think that will take, and when finished there are still two kilometres of hedging to be planted. The woodland will need to be tended for 15 years until established in accordance with good forestry practice. So I maintain there will be more rather than less employment and further it is certain that the new occupiers will bring more economic benefit to the area than the current occupiers ever did;
- I would draw your attention to ecological benefits of the large amount of planting we proposed. You are in danger of not giving enough importance to it and to remind you that it was this that caused the first committee to find in our favour. Since then ecology has come even more to the fore. Forestry Commission figures indicate that our planting, when mature, will sequester in excess of 3,000 tonnes of carbon and in the light of the current climate concerns this opportunity must not be missed;
- Andover Trees United work with over 25 local schools. They are supported by TVBC and they are aware of our plans and are keen to involve children from some of those schools.

#### 4.0 **HISTORY**

4.1 Refer to section 4.0 of the Officer report to Northern Area Planning Committee on 28 March 2019, which can be found in Appendix A of this current report.

#### 5.0 **ADDITIONAL CONSULTATIONS SINCE PREVIOUS REFERRAL TO NAPC AND PCC**

5.1 **Environmental Protection;** Comments in response to the submitted noise report;

- Whilst there have been a small number of intermittent complaints to Environmental Health in the past about noise from the airfield, we have not substantiated a nuisance associated with the ground based activities from the airfield (non ground based activities fall to the Civil Aviation Authority) and have not been provided with significant evidence to accompany the complaints received;



- I have spent time in the area to monitor the activities from the airfield and it is impossible not to notice the large amounts of overflying of the area and along the Bourne Valley. As well as private helicopters based at properties in Bourne Valley itself there are planes and helicopters from Thruxton and Popham airfields as well as military flights, which are a feature of the area. In fact the noise report provided essentially states that at residential receivers the activities from the airfield cannot be identified separately to the overflights made by civilian and military aircraft in the area;
- It is notable that extrapolation and assumption have been necessary in attempting to reach a conclusion and this implies that the overall findings indicate the activities currently taking place are not causing significant harm. I am unconvinced on the basis of this report that significant adverse harm is likely, it is certainly not inevitable but I cannot rule this out as if engine testing were to be substantially increased then there may be some notable impact, but it is not clear from the results of this particular assessment. Clearly the intention of the planning conditions on the airfield is to strike a suitable balance;
- From my perspective there is nothing to suggest that the current use of the airfield significantly impacts amenity and the noise report does not effectively demonstrate that operating to the full extent of their permission would without question cause an unreasonable impact, particularly given the number of caveats involved and the very limited dataset. It is obviously the case that if the airfield use were not there then a small number of the flights within the locality would be located elsewhere, removing also associated ground based activity.

**6.0 ADDITIONAL REPRESENTATIONS SINCE PREVIOUS REFERRAL TO NAPC AND PCC Expired 11.05.2018**

**6.1 TVBC Leisure; Comments;**

- The team within Community and Leisure Service are leading the Test Valley Dormouse Project which covers the north of the borough. The project seeks to map the distribution of dormouse and work to link fragmented landscapes through woodland, hedgerow and tree planting to enable wider distribution. The project team includes the Woodland Trust, Peoples Trust for Endangered Species, Farm Wildlife Advisory Group (FWAG) and Hampshire Dormouse group;
- The site of the application is located within the project area and is within close proximity to a known population of dormouse which has been surveyed for the last 5 years as part of the National Dormouse Monitoring Project (NDMP). The proposal for the new woodland and hedgerow planting as part of this application will link the woodland of Doles Wood and Rag Copse and once established will connect these via wooded corridors. The additional woodland planting and species mix would deliver against the objectives of the Test Valley Dormouse Project and therefore would like to register support for this application;

- As a service who manage large areas of woodland, we would be pleased to be involved with discussions to agree the detailed specification and long term management of these new habitats if planning permission is granted.

**6.2 North Wessex Downs AONB; Comments;**

- Aware of the history of the site and the application and the issue of noise which seems to be of particular importance to local residents;
- No objection to the principle of a new dwelling to replace that of the industrial units but do have concerns over the scale, design and location of the dwelling. Would prefer the dwelling be located either on the site of the buildings to be demolished or on a parcel of land to the NE of Doles house which would provide sufficient space for a large family home rather than the manor style property currently proposed;
- The design is overly confusing adopting a few styles but principally Georgian, yet the principles of Georgian architecture are simplicity, the current design is cluttered and overpowering. The building could easily be scaled down by simplifying the proportions of the buildings (remove projections) and particularly the outbuildings. Another alternative is to create the character of a farmstead on the site of the existing buildings and have multiple barn style buildings set in a U shape which could be sub divided to create 3-4 modest family dwellings or retirement properties that are more likely to meet local demand;
- The AONB does support the woodland planting within and along the perimeter of the site which would bring together the 2 existing woodlands bordering the site. Planting of trees is a positive approach but often difficult within the AONB as a large proportion of the landscape is characterised by openness and the lack of trees, this locality is wooded in character and therefore an appropriate location for native species to be planted. The woodland planting would also act as biodiversity corridor for foraging and new habitats. Would request a slight change to the planting arrangement by thinning out the northern section of Area C (Landscape and ecological Enhancement Strategy Plan) to not appear too heavy on the ridge and to plant some more loosely within the front parcel (between Area B and F) which would help establish a parkland setting more in keeping with the title of Bourne Park. Do think there is also the opportunity to create a natural dew pond in the landscape which would further enhance the opportunity for biodiversity gain on the site.

**6.3 1 x letter; Support from Andover Trees United, with comments;**

- Writing in support of the planning application at Bourne Park and in particular the significant tree planting that the application will afford;
- Our aim at Andover Trees United is to support tree planting both for biodiversity improvement and in mitigation of climate change. Our ambition to involve children, young people and local residents offers opportunities for educating about both of these issues through practical action, highlights the inseparability of human actions and the health of the natural world and supports the UN Sustainable Development Goals;

- Our strategic aims state clearly that after 2021, by which time Harmony Woods will be planted, our own tree planting work will be through the creation of green corridors: *"The establishment of a network of green corridors linking existing woods and copses within 'X' miles of Harmony Woods"*. The distance will be formally agreed in strategic planning next year but currently stands at 15 miles, a manageable distance for travel and transport (see *Vision Statements and Business Plan page 10-11*). We became involved in the Bourne Park project as it will provide opportunities for tree planting, the creation of green corridors and public engagement beyond the decade of creating Harmony Woods;
- Given the local authority's recent declaration of a 'Climate Emergency' and the urgent and overwhelming need for more tree planting, coupled with the opportunities that this planning application affords us as a local charity actively seeking new opportunities to connect the community to the creation of green corridors, we hope that this application will proceed as swiftly as possible. Opportunities for extensive new woodland and hedgerow planting are not easy to find, especially when they also propose to connect areas of existing woodland and when they present themselves, we hope you will agree, should be wholeheartedly embraced.

6.4 **1 x letter**; Comments from Falcon Aviation Ltd, Bourne Park (occupiers of application site);

- Bourne Park Airfield is located 3 miles north east of Andover within Bourne Park Estate. A 750 metre long grass runway lies along the northern edge of the airfield, adjacent to Doles Wood. Access to Bourne Park is via the A343 which passes along its western boundary with mature farmland to the south & east;
- The former farm buildings are now workshops with the addition of a steel framed, aluminium clad hangar in 2009. The buildings are approved and meet the standards required by the Civil Aviation Authority for aircraft maintenance facilities. Aircraft maintenance was first established at Bourne Park over 30 years ago by Aerofab Restorations, including in particular the restoration of historic aircraft;
- Falcon Aviation Limited (FAL), an ex-military Gazelle helicopter maintenance company, also specialising in the restoration of this type of aircraft, has been based at Bourne Park since 2005. FAL will typically re-build two aircraft per year for onward sale in both the UK market and overseas, returning between £250,000 to £300,000 per aircraft to the local economy;
- In addition, the company has a customer base of 18 Gazelle helicopter owners located around the UK generating further operating income. During this period the number of technicians employed has grown to 12 and is expected to continue to increase with customer demand for this highly sought after aircraft;

- Bourne Park Aviation Limited (BPAL) has successfully operated from Hangar 1 during the past 7 years until its lease ended earlier this year. This company specialised in the maintenance of both fixed wing and rotary wing maintenance with annual turnover peaking at over £300,000. FAL has taken over the lease of Hangar 1;
- Bourne Park is also the home of The Gazelle Squadron Display Team (GSDTL), which was formed in 2014. During the preceding years there had been rapidly increasing local interest in the Gazelle helicopter amongst friends and associates who may have either been involved in their maintenance or even flown them during their military service. The Gazelle Squadron now has 35 members who dedicate themselves to providing helicopter support to numerous Charity Fund Raising events, Historic Military events and Air Shows in their spare time;
- With turnover for the three businesses during 2018 exceeding £750,000 there are inevitably strong connections with other local business eg:  
BP Rolls Ltd – aircraft painting/refinishing,  
John Jackson (Bodytech) – aircraft component painting/refinishing,  
Roger Hawkins (CLH Transport) – aircraft haulage,  
Andover Forklift Trucks – forklift sales and maintenance;
- Further aviation support is required in the local area, for example:  
Aircraft Interior Upholstery  
Aircraft Interior Carpet Installation  
Aircraft Avionics;
- With the end of our lease approaching, we are having to find suitable alternative accommodation and may reluctantly have to consider moving away from the area.

## 7.0 **POLICY**

### 7.1 Government Guidance

National Planning Policy Framework (NPPF)

National Planning Practice Guidance (NPPG)

### 7.2 Test Valley Borough Revised Local Plan (2016)(RLP)

COM1: housing provision 2011-2029

COM2: settlement hierarchy

COM7: affordable housing

COM15: infrastructure

LE10: retention of employment land and strategic employment sites

E1: high quality development in the borough

E2: protect, conserve and enhance the landscape character of the borough

E5: biodiversity

E6: green infrastructure

E7: water management

E8: pollution

LHW1: public open space

LHW4: amenity

T1: managing movement

T2: parking standards

7.3 Supplementary Planning Documents (SPD)

TVBC Local Biodiversity Action Plan

8.0 **PLANNING CONSIDERATIONS**

8.1 The main planning considerations in respect of the proposals can be found within the Officer reports that have previously been referred to the NAPC and PCC, which can be found in Appendix A and B of this current report.

8.2 Since this application was referred to the NAPC and PCC, additional supporting information has been submitted by the applicant to address the following planning considerations, and these are discussed in more detail below;

- Principle of development;
- Biodiversity and Pollution.

8.3 **Principle of development**

The application site is located in the countryside outside the boundary of any settlement. Policy COM2 sets out that development outside the boundaries of settlements will only be permitted if:

- a) It is appropriate in the countryside as set out in the Revised Local Plan policy COM8-COM14, LE10, LE16-LE18; or
- b) It is essential for the proposal to be located in the countryside.

8.4 Policy LE10 of the RLP sets out that on existing employment sites, which the application site is, development for an alternative use will be permitted provided that:

- a) the land is no longer required to meet economic development needs of the area; or
- b) the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents; and
- c) it would not have a significant detrimental impact on the operation of the remaining occupiers of the site.

8.5 As set out within the previous officer reports to the NAPC and PCC (see Appendix A and B of this current report), the application has not engaged criterion a) of RLP policy LE10 by marketing the employment site or providing any demonstration that the local economy would not be harmed as a result of the proposed change of use. Criterion c) of RLP policy LE10 is not considered to be relevant given that there would be no remaining occupiers of the application site. With regard to criterion b) of RLP policy LE10, the application has not demonstrated that the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents. Paragraph 6.52 of the supporting text to policy LE10 that is relevant to criterion b) states that:

*“In some cases the particular existing uses on site may be causing such serious environmental harm that their removal may be desirable and redevelopment of the site for more appropriate business activities may be justified. It would need to be demonstrated that the displaced uses would not be seeking an alternative site which would simply mean the relocation of the environmental problem to another location.”*

The application has not explored other business activities or demonstrated that the displaced uses of an un-evidenced environmental problem would be displaced to another location. The application therefore fails to satisfy criterion b) of RLP policy LE10. The proposal therefore also represents non-essential development within the countryside that is contrary to RLP policy COM2.

- 8.6 It has previously been acknowledged by the LPA within the officer reports presented to the NAPC and PCC that the proposed landscape and ecological enhancements to be carried out at the site are considered to be benefits of the scheme. Three additional representations (set out at paragraphs 6.1-6.3 above) have been received in respect of the application which also support this. However, these enhancements could be carried out without resulting in the loss of an existing employment site and general aviation airfield in a suitable location, and without the need to construct a non-essential isolated dwelling in the countryside. The enhancements could, for example, be carried out as part of a redevelopment of the site for other business activities. It is therefore considered that these benefits would not outweigh the conflict that the proposal has with an up-to-date development plan.
- 8.7 Since the application was referred to the NAPC and PCC, a representation has been received from the current occupiers of the application site – Falcon Aviation Ltd (see paragraph 6.4 above). This sets out details of the business operations being carried out at the site, and explains that “*the number of technicians employed has grown to 12 and is expected to continue to increase with customer demand for this highly sought after aircraft*” (the Gazelle helicopter). They have also provided details of other local businesses that provide services to them and thus also benefit economically from this existing employment site, including in respect of aircraft painting and haulage. Therefore the proposed loss of this existing employment site would not result in the loss of just one full time employee, as has been asserted previously by the applicant (refer to update paper presented to the PCC at Appendix B of this current report and in paragraph 3.5 above). The existing employment site is therefore considered to make an important contribution to the economic development needs of the Borough. The current occupiers of the application site have also identified that further aviation support is required in the local area. This may of course provide additional employment opportunities, whether that is at the application site or elsewhere (subject to planning and the individual merits of any future proposal being considered).
- 8.8 The PCC resolved to defer the application in order to request the applicant to submit a noise assessment in order to demonstrate compliance with criterion b) of RLP policy LE10. A noise assessment report has been submitted by the applicant and is provided at Appendix C of this current report.

In summary, the report advises that “*The Bourne Valley is...affected by noise from general and military aviation unrelated to Bourne Park. The only other significant source of noise is road traffic on the A343. Other ambient noise could come from agricultural operations. The soundscape is otherwise made up from natural sources*” (paragraph 2.1.5). The report sets out that a survey was undertaken in May 2019 (between Friday 17 until Tuesday 28) with two

monitoring stations operating throughout; one at a reference position adjacent to the operations area outside the hangars at Bourne Park airfield itself and the other, first at a location towards the eastern end of the airstrip (until the 20 May), and then in an orchard in front of Windmills (from the 20 May), which is a residential property just over 1km to the north west.

- 8.9 In the “Conclusions” section, the report states that *“the only practicable methods for extracting results from the resulting substantial database have been manual sifting and statistical analysis”*, and that *“conclusions may reasonably be drawn from the analysis within probably a wide margin for uncertainty”* (paragraph 8.1.2). Furthermore, the report concludes that *“the analysis has shown that third-party over-flights can significantly influence the day-to-day ambient soundscape in the more remote parts of the area. At Windmills the principal influences on the day-to-day ambient soundscape were unclear and could have included road traffic and agricultural operations. Aviation noise did not significantly contribute”* (paragraph 8.1.4). Indeed, at paragraphs 6.2.7 and 6.2.9 of the report, it is set out that there were five days during the survey in which movements on the airfield itself contributed significantly to the ambient sound level logged on the airfield monitor, however no contributions from local airfield movements were discernible in the results from the monitor at Windmills. It is concluded at paragraph 6.2.9 that *“these results tend to suggest that airfield activity did not influence the daily average resultant ambient sound level at Windmills”*. Furthermore, at paragraph 7.2.1, it is set out that some aircraft movement events logged at the airfield during the survey did appear to last a long time – for example a Gazelle helicopter landing in the afternoon of 25<sup>th</sup> May, which generated elevated sound levels at the airfield over a period of 30 minutes – however this was not discernible in the record from Windmills.
- 8.10 In respect of noise from ground running for maintenance or testing, it is set out within the “Conclusions” section of the submitted report that this was not identified in the survey record, but that a speculative estimate of ground running noise was derived from the known helicopter movement noise values. The report concludes that *“ground-running noise could be capable of being perceived as having an adverse or significant adverse impact”* at the main house at Bourne Park, Windmills (north west), Stokehill Farm (east) and Frenches Farm (east). The report also concludes that *“the potential effect of full operation of the airfield, using all of the movements permitted in its operating conditions and adding in ground-running as well, has been estimated for the same group of receivers by calculation. The results show that under the maximum possible intensity of operation the airfield could significantly influence the daytime ambient noise level across the area, principally through contributing relatively low altitude overflight noise”*.
- 8.11 The Council’s Environmental Health Officer has reviewed the submitted report, and has raised concerns in respect of its content. In particular, whilst there have been a small number of intermittent complaints to the Council’s Environmental Health service in the past about noise from the airfield at the application site, the Council has not substantiated a nuisance associated with the ground based activities from the airfield (non ground based activities fall to

the Civil Aviation Authority), and have not been provided with significant evidence to accompany the complaints received. The Council's Environmental Health Officer has spent time in the area to monitor the activities from the airfield, and during these times the large amounts of overflying of the area and along the Bourne Valley has been noted. As well as private helicopters based at other properties in the Bourne Valley itself, there are aeroplanes and helicopters from Thruxton and Popham airfields, as well as military flights, which are a feature of the area. Indeed the noise report provided essentially states that at residential receivers the activities from the application site cannot be identified separately to the overflights made by civilian and military aircraft in the area. It is notable that extrapolation and assumption have been necessary in attempting to reach a conclusion and this implies that the overall findings indicate the activities currently taking place are not causing significant harm. On the basis of the submitted report, it is therefore not considered that significant adverse harm is likely, and it is certainly not inevitable. Although it is acknowledged that this cannot be ruled out, because if engine testing were to be substantially increased then there may be some notable impact, it is not clear from the results of this particular assessment. Clearly the intention of the existing planning conditions restricting the activities at the application site is to strike a suitable balance. There is nothing to suggest that the current use of the application site significantly impacts amenity and the submitted noise assessment report does not effectively demonstrate that operating to the full extent of the planning permissions in relation to the site would cause an unreasonable impact, particularly given the number of caveats involved and the very limited dataset. It is obviously the case that if the airfield use were not there then a small number of the flights within the locality would be located elsewhere, removing also associated ground based activity. Whilst it is acknowledged that this is indeed a tranquil area, it is a tranquil area which contains an existing small airfield with associated industrial use, and this forms part of the nature of the area. The existing operations at the site, as restricted by appropriate conditions, were not considered to cause adverse impacts on character or amenity at the time of granting planning permission. It is also indicated within the submitted noise assessment, as mentioned above, that the Bourne Valley is characterised by aviation noise, unrelated to Bourne Park.

- 8.12 On the basis of the information that has been submitted, it is considered that it has not been sufficiently demonstrated that the current activity at the application site is causing, or could cause significant harm to the character of the area or the amenities of residents, and the proposals continue to fail to accord with criterion b) of RLP policy LE10. The proposal therefore also represents non-essential development within the countryside that is contrary to policy COM2.

8.13 **Biodiversity and pollution**

Policy E5 of the RLP requires development within the Borough to conserve, and where possible restore and/or enhance, biodiversity. This policy sets out that development that is likely to result in a significant effect, either alone or in combination, on an international or European nature conservation designation,



or a site proposed for such designation, will need to satisfy the requirements of the Habitat Regulations. Policy E8 of the RLP sets out that development will be permitted provided that it does not result in pollution which could cause unacceptable risks to, among other things, the natural environment.

- 8.14 There are high levels of nitrogen and phosphorus in the water environment of the Solent caused by wastewater and this is causing dense mats of algae which are harmful to protected habitats and bird species within the Solent. Natural England's advice of June 2019 (issued following the referral of this application to both the NAPC and PCC meetings in March and April 2019) states;

"The Solent water environment is internationally important for its wildlife and is protected under the Water Environment Regulations<sup>1</sup> and the Conservation of Habitats and Species Regulations<sup>2</sup> as well as national protection for many parts of the coastline and their sea.<sup>3</sup> "

1 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

2 Conservation of Habitats and Species Regulations (England and Wales) Regulations 2017 (as amended)

3 Including Wildlife and countryside Act 1981 as amended, Countryside and Rights of Way Act 2000, Marine and Coastal Access Act 2009, Natural Environment and Rural Communities Act 2006

"There is uncertainty as to whether new growth will further deteriorate designated sites. This issue has been subject to detailed work commissioned by local planning authorities (LPAs) in association with Natural England, Environment Agency and water companies. This strategic work, which updates early studies, is on-going. Until this work is complete, the uncertainty remains and the potential for future housing developments across the Solent region to exacerbate these impacts creates a risk to their potential future conservation status."

Natural England advises "... local planning authorities to be precautionary as possible when addressing uncertainty and calculating nutrient budgets."

- 8.15 The Natural England advice states;

"Achieving nutrient neutrality is one way to address the existing uncertainty surrounding the impact of new development on designated sites. Natural England advises that a nitrogen budget is calculated for new developments. This will show that development either avoids harm to protected sites or provides the level of mitigation required to ensure that there is no adverse effect. Natural England recommends that the proposals achieve nitrogen neutrality by securing the required mitigation in compliance with the Habitats Regulations."

- 8.16 Information has been submitted by the applicant in relation to waste water created from the proposed development, and this demonstrates that the proposed development would have a nitrogen load associated with it. The information then seeks to calculate the existing nitrogen losses from the current land use, as per the Natural England advice, in order to calculate the net change in land use, with the advice noting that the nitrogen loss from the current land use would be removed and replaced by that from the proposed

development land use. The submitted information identifies the application site (approx. 23.8 hectares as identified by the submitted red edged site location plan) as being lowland grazing, which has lead to a conclusion that there is a net deficit in the nitrogen load as a result of the development, meaning that mitigation is not required to achieve nutrient neutrality.

However, the Natural England advice sets out that;

“It is important that farm type classification is appropriately precautionary. It is recommended that evidence is provided of the farm type for the last 10 years and professional judgement is used as to what the land would revert to in the absence of a planning application”.

- 8.17 The application site has been used as an airfield for in excess of 10 years, and there is no evidence to support the contention that it has been used for lowland grazing or indeed any other agricultural use/s for the last 10 years.

The Natural England advice states;

“There may be areas of a greenfield development site that are not currently in agricultural use and have not been used as such for the last 10 years. There is no agricultural nitrogen input onto this land and these areas should not be included in...the calculation”.

Furthermore, it is advised “where development sites include wildlife areas, woodlands, hedgerows, ponds and lakes, these areas should also be excluded from the calculation as there is no existing agricultural nitrogen input onto this land”.

It is noted that the application site does contain an area of existing woodland, which would need to be discounted from the calculation.

- 8.18 Clarification in respect of the agricultural use of the land for the last 10 years has been requested from the applicant, and any information provided will be included in an update paper. It is considered that in the absence of any evidence to the contrary, the proposed development would not result in the loss of agricultural land in perpetuity in order to remove more nitrogen loss from this source than the proposed development would create. As such, it has not been demonstrated that the proposed development would result in nutrient neutrality and that the proposal will not have a likely significant effect on the internationally designated sites in the Solent. The development proposed is therefore not in accordance with policies E5 or E8 of the RLP in this respect.

## 9.0 **CONCLUSION**

- 9.1 The application has not demonstrated that the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents. Furthermore, the application has not explored other business activities or demonstrated that the displaced uses of an un-evidenced environmental problem would not be displaced to another location. The application is therefore contrary to policy LE10 of the Test Valley Borough

Revised Local Plan DPD. The proposal would result in the unjustified loss of an employment site and would result in an isolated dwelling in the countryside contrary to policy COM2 of the Test Valley Borough Revised Local Plan DPD. The proposal would result in the loss of a noise source where there are anecdotal accounts that noise from the site is having adverse impacts. The proposal would also deliver significant ecological and landscape enhancements through new planting. However, these material considerations do not outweigh the conflict with an up-to-date development plan.

- 9.2 Furthermore, whilst information has been submitted in relation to waste water created from the proposed development, this does not demonstrate that the proposed development would result in nutrient neutrality. The application site has been used as an airfield for in excess of 10 years, however the submitted information identifies the site as lowland grazing. The proposal would therefore not result in the change of use of agricultural land in perpetuity in order to remove more nitrogen loss from this source. As such, it has not been demonstrated that the proposal will not have a likely significant effect on the internationally designated sites in the Solent. The proposed development is not in accordance with policies E5 or E8 of the Test Valley Borough Revised Local Plan DPD.

## 10.0 RECOMMENDATION

### **REFUSE for the reasons:**

1. **The application has not demonstrated that the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents. Furthermore, the application has not explored other business activities or demonstrated that the displaced uses of an un-evidenced environmental problem would not be displaced to another location. The application is therefore contrary to policy LE10 of the Test Valley Borough Revised Local Plan DPD.**  
**The proposal would result in the unjustified loss of an employment site and would result in an isolated dwelling in the countryside contrary to policy COM2 of the Test Valley Borough Revised Local Plan DPD.**  
**The proposal would result in the loss of a noise source where there are anecdotal accounts that noise from the site is having adverse impacts. The proposal would also deliver significant ecological and landscape enhancements through new planting. However, these material considerations do not outweigh the conflict with an up-to-date development plan.**
2. **Whilst information has been submitted in relation to waste water created from the proposed development, this does not demonstrate that the proposed development would result in nutrient neutrality. The application site has been used as an airfield for in excess of 10 years, however the submitted information identifies the site as lowland grazing. The proposal would therefore not result in the change of use of agricultural land in perpetuity in order to remove more nitrogen loss from this source. As such, it has not been demonstrated that the proposal will not have a likely significant**

**effect on the internationally designated sites in the Solent. The development is not in accordance with policies E5 or E8 of the Test Valley Borough Revised Local Plan 2016.**

**Note to applicant:**

- 1. In reaching this decision Test Valley Borough Council (TVBC) has had regard to the National Planning Policy Framework and takes a positive and proactive approach to development proposals focused on solutions. TVBC work with applicants and their agents in a positive and proactive manner offering a pre-application advice service and updating applicants/agents of issues that may arise in dealing with the application and where possible suggesting solutions.**
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Appendix A - Officer Report to Planning Control Committee on 30 April 2019  
(incorporating Officer Report to Northern Area Planning Committee 28 March 2019)

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<b>APPLICATION NO.</b>	18/00936/FULLN
<b>APPLICATION TYPE</b>	FULL APPLICATION - NORTH
<b>REGISTERED</b>	06.04.2018
<b>APPLICANT</b>	Mr. J Martin and Mr. R Wood
<b>SITE</b>	Bourne Park Airfield, Bourne Park Estate, Hurstbourne Tarrant, SP11 0DG, <b>HURSTBOURNE TARRANT</b>
<b>PROPOSAL</b>	Demolition of buildings associated with Bourne Park Airfield, and removal of existing airstrip and outdoor storage areas; Erection of detached dwelling and outbuildings; with associated parking, turning, landscaping, access, private amenity space and ecological enhancements
<b>AMENDMENTS</b>	
<b>CASE OFFICER</b>	Mr Oliver Woolf

Background paper (Local Government Act 1972 Section 100D)

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**1.0 INTRODUCTION**

1.1 This application is referred to the Planning Control Committee as the Northern Area Planning Committee (NAPC) at their meeting on 28.03.2019 was resolved to grant planning permission where the Head of Planning and Building advised that there was a conflict with policy contrary to the development plan. The Case Officer's recommendation to the NAPC was for refusal, as the proposal was contrary to policy LE10.

1.2 The NAPC was minded to grant planning permission for the following reason:

**The application does not demonstrate that the existing employment site is, or could cause significant harm to the character of the area or the amenities of residents, and would not therefore comply with policy LE10 and policy COM2 of the RLP. However the proposal would result in the loss of a noise source where there is significant anecdotal evidence that noise from the site is having adverse impacts. The proposal would also deliver significant ecological and landscape enhancements through new planting. These material considerations would outweigh the conflict with policy in this case and justify granting permission.**

1.3 Conditions recommended by the Head of Planning and Building are attached as Appendix A.

1.4 The report to the NAPC is attached as Appendix B.

2.0 **PLANNING CONSIDERATIONS**

2.1 The main planning consideration is whether the material considerations of the proposal would outweigh the conflict with the development plan in being contrary to policies LE10 and COM2.

2.2 *Material consideration – anecdotal accounts of noise*

At the meeting of the NAPC it was raised by speakers and Councillors that ground based helicopter engine testing took place on the site and that helicopter flights from the site (which would be limited to three a day under condition 3 of application 08/01924/FULLN if the helicopters were taking off and landing (each a movement) from the site) often make loops around the area and overfly dwellings. It was put forward that this results in constant noise in the area when helicopters from the site are in the air compared to the significant amount of military helicopters and other air traffic that passes through the area.

2.3 The anecdotal accounts presented at NAPC were not supported by any documentary evidence. As set out in section 8.14 of the NAPC report, the application is also not supported by any evidence. Speakers at NAPC stated that they ring the airfield when helicopters fly over. As part of application 08/01924/FULLN the applicant stated that:

*“in the two years that helicopters have been flown into and out of Bourne Park, there has only been one single complaint”*

2.4 At that time at least, a record of complaints and action to address complaints appears to have been made. For example the supporting statement to application 08/01924/FULLN that was for the helicopter repair building (August 2008) states that:

*“A number of specific restrictions on the use of the building are proposed and these include the following:*

- ii. *There would be no overflying of the village of Hurstbourne Tarrant, Stoke, St Mary Bourne, Smannell and Little London.”*

2.5 Following NAPC the Case Officer has requested evidence of noise complaints made to the applicant and the airfield. However, no evidence or log of complaints has been provided. Nor has any evidence been provided to demonstrate that the situation and control of activities on the site exerted by the applicant to limit the impact on the area has changed since 2008. The flight logs during the period of time provided show that there was an average of 11.23 movements per week from Bourne Park. If each of these movements (a take off or landing) were a flight originating from and returning to Bourne Park this would be less than one flight per day compared to the five to ten flights over the area per day from Middle Wallop alone amongst the significant amount of air traffic observed by members of the public that have made representations to the application. It is considered that the low number of movements from Bourne Park that are logged and evidenced would result in some noise in the area. However, it is considered that the evidence points toward this not resulting in significant harm to the character of the area or the amenities of residents.

- 2.6 With specific consideration of ground based helicopter engine testing the Environmental Health Officer consulted as part of the application makes it clear that the Local Planning Authority can deal with the impact of aircraft on the ground. However, the last complaint to the Environmental Protection team in relation to the use of helicopters on the site was in 2014. If the current activities on the site, including the ground based helicopter engine testing, were causing significant harm to the character of the area or amenities of residents it is expected that the number of complaints to the Council would be both more recent and higher in number, especially if as the speaker from Hurstbourne Tarrant Parish Council claimed, the ground based helicopter engine testing was happening on most Sundays.
- 2.7 Also worthy of consideration is that the applicant is the owner of the airfield and it is understood that they live on Bourne Park, closer to the airfield than any member of the public. It is considered not unreasonable to suppose that the impact of ground based helicopter engine testing noise would be greater on the residents of Bourne Park and the applicant than any member of the public. The applicant has stated in previous applications (section 8.13 of the NAPC report) their control of activities on the site and the action taken when complaints are received. If ground based helicopter engine testing were causing significant harm to amenity of residents that would be most apparent to applicants it is considered not unreasonable to presume that the applicants would seek to control this activity as well.
- 2.8 In conclusion, anecdotal accounts of the impact that the activities taking place on the application site and in the air were presented at NAPC in addition to those received in representations made to the application. It is acknowledged that the activities of the site do produce noise. This noise must be considered in the context of other noise sources in the area that include traffic on the A343 and the significant amount of air traffic observed by members of the public that have made representations to the application. However, no evidence of the noise produced by activities of the application site, whether this noise is harmful and whether the level of harm is significant with regard to criterion b) of policy LE10 has been presented at any time during the application. Whilst the proposal would result in the loss of a noise source insufficient evidence has been provided to demonstrate that this is causing significant harm and it is considered that the anecdotal accounts that support the application can only be given limited weight as a material consideration. The RLP is up to date and full weight must be given to the test within criterion b) of policy LE10 which the application does not overcome. The application conflicts with policy LE10 and therefore policy COM2 of the RLP.
- 2.9 Material consideration – new planting  
Section 8.43 of the NAPC report sets out that the substantial tree planting that would be performed as part of the proposal would be of benefit to the landscape character of the area, ecology and green infrastructure and that this can be given significant weight. Members were minded to grant permission because the weight to be given to the tree planting would outweigh the conflict with the development plan.

- 2.10 However, it is considered that the new planting as a material consideration would not outweigh the unjustified loss of an employment site and general aviation airfield in a suitable location and the conflict with an up-to-date development plan.

3.0 **CONCLUSION**

- 3.1 The application has not demonstrated that the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents. Furthermore, the application has not explored other business activities or demonstrated that the displaced uses of an un-evidenced environmental problem would not be displaced to another location. The application is therefore contrary to policy LE10 of the Test Valley Borough Revised Local Plan DPD.

The proposal would result in the unjustified loss of an employment site and would result in an isolated dwelling in the countryside contrary to policy COM2 of the Test Valley Borough Revised Local Plan DPD. The anecdotal accounts provided at NAPC can only be given limited weight as a material consideration. Combined with the weight given to the new planting, the material considerations of the proposal do not outweigh the conflict with an up-to-date development plan.

4.0 **RECOMMENDATION OF NORTHERN AREA PLANNING COMMITTEE: PERMISSION subject to conditions and notes recommended by the Head of Planning and Building for the reason:**

1. The application does not demonstrate that the existing employment site is, or could cause significant harm to the character of the area or the amenities of residents, and would not therefore comply with policy LE10 and policy COM2 of the RLP. However the proposal would result in the loss of a noise source where there is significant anecdotal evidence that noise from the site is having adverse impacts. The proposal would also deliver significant ecological and landscape enhancements through new planting. These material considerations would outweigh the conflict with policy in this case and justify granting permission.

(See Appendix A for conditions and notes recommended by the Head of Planning and Building.)

5.0 **REVISED RECOMMENDATION OF THE HEAD OF PLANNING AND BUILDING:**

**REFUSE for the reason:**

1. The application has not demonstrated that the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents. Furthermore, the application has not explored other business activities or demonstrated that the displaced uses of an un-evidenced environmental problem would not be displaced to another location. The application is therefore contrary to policy LE10 of the Test Valley Borough Revised Local Plan DPD.



The proposal would result in the unjustified loss of an employment site and would result in an isolated dwelling in the countryside contrary to policy COM2 of the Test Valley Borough Revised Local Plan DPD.

The proposal would result in the loss of a noise source where there are anecdotal accounts that noise from the site is having adverse impacts. The proposal would also deliver significant ecological and landscape enhancements through new planting. However, these material considerations do not outweigh the conflict with an up-to-date development plan.

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## **Appendix A**

### **Suggested conditions and notes recommended by the Head of Planning and Building**

#### **SUGGESTED CONDITIONS**

1. The development hereby permitted shall be begun within three years from the date of this permission.  
Reason: To comply with the provision of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.
2. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:  
161034~104 B  
161034~105 E  
161034~106 C  
161034~107 B  
161034~109 A  
Reason: For the avoidance of doubt and in the interests of proper planning.
3. No development shall take place above DPC level of the development hereby permitted until samples and details of the materials to be used in the construction of all external surfaces hereby permitted have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.  
Reason: To ensure the development has a satisfactory external appearance in the interest of visual amenities in accordance with policy E1 of the Test Valley Borough Revised Local Plan DPD.
4. No development shall take place above DPC level of the development hereby permitted until the existing buildings on the application site, with the exception of the part building to be retained shown on drawing 161034~105 E, have been completely removed,

**Reason:** To improve the appearance of the site and enhance the character of the area in accordance with policies E1 and E2 of the Test Valley Borough Revised Local Plan DPD.

5. The development hereby permitted shall proceed in accordance with the measures set out in section 6 'Landscape and Mitigation Strategy' of the Landscape and Visual Impact Assessment and Fig.7 (WH Landscape rev: C October 2018).

The planting required by section 6 and Figure 7 shall be carried out in the same or first planting season following occupation of the development hereby permitted, whichever is sooner.

**Reason:** To enhance the development through landscape and ecological enhancements in accordance with policies E2 and E5 of the Test Valley Borough Revised Local Plan DPD.

6. The development hereby permitted shall not be occupied until a schedule of landscape implementation, management and maintenance for a minimum period of 15 years has been submitted to and approved in writing by the Local Planning Authority. The schedule shall include details of the arrangements for the phasing of the implementation, management and ongoing maintenance during that period in accordance with appropriate British Standards or other recognised codes of practice. Development shall be carried out in accordance with the approved schedule.

**Reason:** To ensure the provision, establishment and maintenance to a suitable standard of the approved landscape designs to create and maintain the appearance of the site and enhance the character of the development in the interest of visual amenity and to contribute to the character of the local area in accordance with policies E1 and E2 of the Test Valley Borough Revised Local Plan DPD.

7. The development hereby permitted shall proceed in accordance with the measures set out in Section 6 'Mitigation and Enhancement' of the Ecological Appraisal with Mitigation and Enhancement Strategy report (Malford Environmental Consulting, May 2018), with the identified bat roost and ecological enhancement features being permanently retained and maintained.

**Reason:** To avoid impacts to protected species and to conserve and enhance biodiversity in accordance with policy E5 of the Test Valley Borough Revised Local Plan DPD.

8. The development hereby permitted shall proceed in accordance with the provisions set out within the Wessex Woodland Management report of 7th September 2018; specifically the Method Statement at part 3 and the accompanying Tree Protection Plan or as may otherwise be agreed in writing with the Local Planning Authority.

**Reason:** To ensure the enhancement of the development by the retention of existing trees and natural features during the construction phase in accordance with policy E2 of the Test Valley Borough Revised Local Plan DPD.

9. No external lighting shall be installed on the building or within the application site until details of the location of any lighting and its specifications have been submitted and approved in writing by the Local Planning Authority.

**Reason: To avoid adverse impact on the character of the area and AoNB in accordance with policies E1 and E2 of the Test Valley Borough Revised Local Plan DPD.**

**Note to applicant:**

1. In reaching this decision Test Valley Borough Council (TVBC) has had regard to the National Planning Policy Framework and takes a positive and proactive approach to development proposals focused on solutions. TVBC work with applicants and their agents in a positive and proactive manner offering a pre-application advice service and updating applicants/agents of issues that may arise in dealing with the application and where possible suggesting solutions.

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## **Appendix B**

### **Officer Report to Northern Area Planning Committee on 28 March 2019**

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<b>APPLICATION NO.</b>	18/00936/FULLN
<b>APPLICATION TYPE</b>	FULL APPLICATION - NORTH
<b>REGISTERED</b>	06.04.2018
<b>APPLICANT</b>	Mr. J Martin and Mr. R Wood
<b>SITE</b>	Bourne Park Airfield, Bourne Park Estate, Hurstbourne Tarrant, SP11 0DG, <b>HURSTBOURNE TARRANT</b>
<b>PROPOSAL</b>	Demolition of buildings associated with Bourne Park Airfield, and removal of existing airstrip and outdoor storage areas; Erection of detached dwelling and outbuildings; with associated parking, turning, landscaping, access, private amenity space and ecological enhancements
<b>AMENDMENTS</b>	Amended plans and additional information received 08.10.2018 and 11.02.2019
<b>CASE OFFICER</b>	Mr Oliver Woolf

Background paper (Local Government Act 1972 Section 100D)

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#### **1.0 INTRODUCTION**

- 1.1 This application is presented to the Northern Area Planning Committee because the Head of Planning and Building considers it to be of significant local interest or impact.

#### **2.0 SITE LOCATION AND DESCRIPTION**

- 2.1 The application site is located on the Bourne Park Estate, which is situated within the countryside and the North Wessex Downs Area of Outstanding Natural Beauty to the north of Andover. The site is to the east of the A343 between the settlements of Enham, 1.9km to the south and Hurstbourne Tarrant, 1.6km to the north. Stoke and St Mary Bourne (located outside of the Borough) are 2.9km and 5km to the east respectively.

2.2 The site comprises of a grass airstrip used by light aircraft and helicopters, groups of trees and open grassland. The airfield has been in use since at least 1993 and is aligned east/west. It is supported by 4 buildings, some of which have been converted from agricultural use, in which the storage and maintenance/repair of aircraft is performed. One of the buildings is home to a maternity bat roost.

2.3 The wider estate contains three dwellings close to the application site; Bourne Park House to the south of the buildings on the application site, The Bungalow to the south west and Doles Lodge to the south west on the access from the A343. The wider estate has several groups of trees upon it that connect to Rag Copse. Immediately to the north of the estate is Doles Wood.

### 3.0 **PROPOSAL**

3.1 The proposal is to remove the airstrip and all but one of the associated buildings (to protect the bats within), and to construct a detached dwelling with associated outbuildings and a residential curtilage. Landscaping and ecological enhancements would also take place as part of the scheme.

3.2 The house would be a large two storey dwelling. It would be set behind a courtyard that would be framed by two symmetrical "L" shaped outbuildings to either side of the entrance. Around the dwelling and its outbuildings would be a private amenity area shown on plan as residential curtilage.

3.3 The planting of new trees and landscaping would take place immediately adjacent to the proposed buildings and courtyard. A significant amount of tree planting would take place to the west of these to connect the existing block of trees with Doles Wood to the north and the groups of trees on the estate to the south that themselves connect to Rag Copse.

3.4 The application has been amended to re-position the proposed dwelling, outbuildings and residential curtilage. Updated landscape and ecological information has also been received.

### 4.0 **RELEVANT HISTORY**

4.1 **TVN.00845/8: Retrospective application - provision of landing strip, and use of land and 2 agricultural buildings for plane storage and repair. Permission 23.07.1997**

Condition 3:

The repair and maintenance of aircraft shall take place only within building 'A' as marked on the approved plan.

Reason: to avoid inappropriate use and protect the amenities of the area.

Condition 5:

Aircraft shall not use the landing strip other than in association with the repair workshop use in building 'A' on the site and in any event not outside the hours of 07:30 to 18:00 weekdays and 08:00 to 13:00 Saturdays with no flying on Sundays or Public Holidays.

Reason: to avoid inappropriate use and protect the amenities of the area.

**4.2 08/00533/FULLN: Change of use of land for the storage of 14 fixed winged aeroplanes in Building B and the use of the existing airstrip and parking area in association with the aeroplanes. Permission 28.05.2008**

**Condition 2:**

There shall be no more than ten aeroplane movements in any one day (a movement being a take-off or landing).

Reason: In the interests of neighbouring amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

**Condition 3:**

The use of the airstrip shall be limited to leisure or recreational purposes only. The airstrip should not be used for commercial carriage of goods or passengers, flying instruction, circuits and bumps, flying displays, testing of aircraft and other non-recreational uses.

Reason: In the interests of neighbouring amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

**Condition 4:**

The use of the airstrip hereby permitted shall be restricted to single piston engine, light fixed wing aeroplanes only.

Reason: In the interests of neighbouring amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

**Condition 5:**

The use of the landing strip hereby permitted shall be limited to the hours of 08:00am to 21:00pm 7 days a week.

Reason: In the interests of neighbouring amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

**4.3 08/00617/VARN: Partial relaxation of requirement that use shall only enure for benefit of Aerofab (Relief of condition 2 of permission TVN.0845/8 Retrospective application - provision of landing strip, and use of land and 2 agricultural buildings for plane storage and repair). Permission 28.05.2008**

**Condition 1:**

The repair and maintenance of aircraft shall take place only with Building "A" by Aerofab as marked on plan TVBC.08/00617/VARN.Plan01.

Reason: In the interests of residential amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

**Condition 3:**

There shall be no more than ten aeroplane movements in any one day (a movement being a take-off or landing).

Reason: In the interests of residential amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

Condition 4:

The use of the airstrip shall be limited to leisure or recreational purposes only. The airstrip should not be used for commercial carriage of goods or passengers, flying instruction, circuits and bumps, flying displays, testing of aircraft and other non-recreational uses.

Reason: In the interests of neighbouring amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

Condition 5:

The use of the airstrip hereby permitted shall be restricted to single piston engine, light fixed wing aeroplanes only.

Reason: In the interests of residential amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

Condition 6:

The use of the landing strip hereby permitted shall be limited to the hours of 08:00am to 21:00pm 7 days a week.

Reason: In the interests of residential amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

4.4 **08/01924/FULLN: Erection of building for the storage and repair of helicopters. Permission 10.11.2008**

Condition 3:

There shall be no more than 6 helicopter movements in any one day (a movement being a take-off or landing).

Reason: In the interests of residential amenity in order to minimise undue noise and disturbance in accordance with Test Valley Borough Local Plan policy AME 04.

5.0 **CONSULTATIONS**

5.1 **TVBC Policy – Objection.**

Comments

The application site lies outside the defined settlement boundaries and therefore falls within the countryside. On this basis the proposal would need to satisfy either criteria a) or b) of COM2. The submission refers to policy LE10, which is one of the policies listed under criterion a).

It is noted that the planning history for the site has given consideration to character and amenity issues, with planning conditions restricting the number of aircraft movements, the type of airplanes that can use the landing strip and the hours of its use.

Additional comments

Apart from the repositioning and reorientation there does not appear to be any further changes to evidence submitted and therefore there would be no further or additional response from Policy to the original response submitted 30 April 2018.

**5.2 TVBC Landscape – No Objection subject to conditions.**

The re-siting has resulted in a the new dwelling and associated buildings being more tucked behind existing woodland copses, screening it from most views from the PROW north west and south.

Planting shown in area E, will remove any residual views in 5 -10 years.

**5.3 TVBC Environmental Protection – No Objection subject to conditions.**

We have had no complaints in the last three years. We had a complaint in 2014 with regards to the use of helicopters on the site.

For reference, we can only deal with aircraft on the ground. As soon as they take off it is the responsibility of Civil Aviation Authority.

We have no objection to the application, we would though recommend conditions.

**5.4 TVBC Design Review Panel – Comments.**

The new planting does not appear to relate specifically to the positioning and design of the new house, rather appears instead to divide the site into two halves.

The Panel were concerned that there appeared to be no design rationale or detailed site analysis undertaken for the positioning of the proposed property. Despite there being a Landscape Assessment undertaken by WH Landscape, this appears to relate to the entire site rather than focusing on the setting of the new house. The Panel would have liked some further information reasoning how the building relates to the site and why the specific location was chosen.

No elevations have been provided showing the house and the outbuildings in context. The Panel agreed that further additional information would help inform the overall massing of the proposal, as currently the outbuildings appear disproportionally large compared to the main house. It was also agreed that the relationship between the buildings is essential to the success of the design.

Generally it was agreed that the designs are somewhat muddled and require greater simplification to bring them in line with the high quality detailing expected of a bespoke house such as this, particularly given its setting.

Officer note

The applicant has submitted amended drawings, including a drawing that shows the house and outbuildings in context, following these comments.

**5.5 HCC Ecology – No Objection subject to condition.**

I have no major concerns over this development, and indeed it would appear to deliver substantial net gains in biodiversity.

I welcome the clarification provided as Appendix H in the amended ecology report. I would agree with the assessment that great crested newts (GCN), reptiles, and dormice are unlikely to be affected by the development, and I welcome the clarification over the bat issues previously raised.

I would have no further concerns over this and would refer you to my suggested condition wording in my response of 27 June 2018.

**5.6 TVBC Trees – No Objection subject to conditions.**

Proposed new structures remain clear of existing trees.

Potential for works to result in accidental damage to trees. This can be controlled by the straight forward expectation of providing robust barriers during works. The submission is accompanied by a report from Wessex Woodland Management that sets out appropriate tree protection measures.

Extensive new tree planting proposed, which is welcomed. Study of the proposed planting tables reveals canopy cover tree species planting density at some 150 plants per hectare. This seems exceptionally low. I would encourage this to be revisited again with Wessex Woodland Management.

If this progresses it would be appropriate to impose conditions as drafted above to help safeguard trees to be retained from harm during execution of the project.

**5.7 TVBC Highways – No Objection subject to conditions.**

Proposed number of parking spaces meets policy T2. Access already exists and would not increase the intensity of use of the site.

**5.8 TVBC Environmental Services (Refuse & recycling) – No Objection.**

**6.0 REPRESENTATIONS Expired 11.05.2018**

**6.1 Hurstbourne Tarrant Parish Council – Support (28.01.2019)**

Councillors discussed this application at a public parish council meeting on 16th April 2018. The applicant explained that the application was for a new 5bedroomed house on the site of the current aircraft business. He was aware that 2 or 3 people had been vocal about the disruption caused by the airfield and the business conducted there. As the landowner, he felt he could either allow the business to continue, but there would probably need to be an increase in air traffic for it to remain viable. The employees were either part time or worked at Middle Wallop and other sites. The business lease was due to end in 12 months time. The company was in a position to relocate to other premises where it already operated, and there would be no loss of jobs, an in particular no local residents would lose jobs. The applicant stated that with his advancing age, he wished to ensure his children's future financial security by investing in this project.

The applicant's proposal was to build a new house, remove non-native trees and replace with native species and create a wildlife corridor between Doles Wood and Rag Copse. The house would be of brick and flint construction with a courtyard, tiled roof and an east-west orientation. When built, in approximately 2 years' time, it would be sold on to a private buyer. There would be no impact on the Right of Way at the edge of the land. The building would not be seen by other residents at Bourne Park. One Councillor did query whether any thought had been given to smaller properties to give opportunities



for perhaps local families to remain in the area. The applicant felt that a single property would be more acceptable and less impactful to others living at Bourne Park. Councillors agreed that there were no apparent reasons to object to this application, and in light of the comments given by the applicant during the meeting, as outlined above, they felt they could give their unanimous support to the application.

**6.2 115 representations have been received from 96 members of the public.**

51 of these representations object to a 'helicopter service station'. For clarity, there has not been an application for a helicopter service station. There is overlap between the points identified and raised as support and objection. Representations have been taken together and are summarised below.

**6.3 63 representations – support**

39 addressed from Windmills x5, Manor Farm x2, Juniper Cottage x2, Church Cottage x2, Shepherds Cottage x1, Ibthorpe Tower x2, Swift Cottage x1, Upton Manor x1, Slade Bottom House x1, 2 Cale Street London x1, Swallowdale x2, Horseshoe Cottage x1, Bridge Cottage x1, Apsley House x1, Grove House x1, Ibthorpe Farm House x1, Upton Farm x1, The White House x1, Stoke House x2, Stoke Hill Farm x1, 1 C Church Street x1, Unit 66 Basepoint, Business Park x1, Dalton House x1, Dunley Manor x1, Vernham Manor x1, Windmill Farmhouse x1, Pill Heath House x1, Horseshoe Barn x1, Craignish x1) and 24 not addressed.

**51 representations – objection to a 'helicopter service station'**

16 addressed from Hurstbourne Park Estate x1, Hurstbourne Park x1, The Old Laundry x2, Slade Bottom House x2, Upper Wyke Manor x1, Elm Cottage x1, Upton Dean x1, Keepers Cottage x1, Bridge Cottage x1, Upton Cottage x1, Winfield x1, Middlewyke Farmhouse x1, Cowdown House x1, 1 Wayside Cottage x1 and 35 not addressed.

- Noise from existing helicopters is: pretty awful / a nuisance / a constant aggravation / I am fed up with it / totally disruptive / even our children comment on it / a pestilential nuisance / unpleasant / unacceptable and increasing / has increased dramatically over recent years / invasive and intrusive.
- The Council has directed complainants to the CAA regarding helicopter noise.
- Whereas a fixed wing airfield may have existed for 20 years one predominantly featuring helicopters has not. It has been the change of use of the airfield for helicopter repair, training and local flying which I and other residents have been objecting to. This has not been part of the fabric of the area.
- Helicopters from Bourne Park, generally the same ones, perform routine flights at low level over the surrounding area generating significant noise pollution. This is on top of a hectic military schedule.
- The conditions limiting helicopter movements to 6 a day is routinely broken. I fear we face an appalling increase in noise and traffic if this application is unsuccessful.
- A significant amount of the present Bourne Park activity ignores airfield landing approach instruction.

- I have had occasion to call the airfield to object to the noise of aircraft over my house to complain about what I believe have been abuses of their licence in terms of the number of aircraft movements and the duration of flights in a single vicinity.
- Although I live about a mile from the airfield site, when the prevailing South-west wind is blowing, my wife and I are frequently annoyed by the noise of aircraft engine testing on the airfield site and as such it has a negative impact on the enjoyment of our home in this Area of Outstanding Natural Beauty.
- Horses are often spooked by the helicopters from Bourne Park. They fly very low over our house. Both my children have had falls.
- Granting of permission will prevent the further increase in helicopter noise and light aircraft activity from Bourne Park airfield which is damaging the local environment where there is already a considerable amount of essential military activity.
- The development will remove noisy and potentially polluting engineering activities from the countryside.
- No increase of any aircraft movement in an Area of Outstanding Natural Beauty must be permitted.
- A sympathetic, well designed house of architectural merit built discreetly and out of sight poses no impact on an Area of Outstanding Natural Beauty and would be less intrusive to the present use.
- By denying planning will just hand the issue back to local residents and will create a huge problem going forward. This application will rid the area of a long term nuisance and replace it with buildings and a use that would benefit the landscape and secure its future for ever.
- It will enhance the local ecology and environment.
- Removal of the hard standing will improve drainage run off
- We live next door to Bourne Park at Stoke Hill farm. Over the years we have been constantly bothered by helicopters and light aircraft. Sometimes they fly so low, that my horses have been traumatised by them in the field. Often at the weekend, there are numerous light aircraft either approaching so low over our house to land, or v low over the house having taken off. We are also constantly bothered by helicopters flying so low, they have nearly hit our trees. We have made various complaints but to no avail.
- We live in Stoke and are constantly woken up and disturbed by the volume of helicopters flying low over the village.
- We live in the middle of St Mary Bourne and face the frequent inconvenience and noise of regular helicopter action over the house. It has a bad effect on us and all the animals in the nearby fields. Plus I run a business and it can be quite annoying when you are on the phone.
- The helicopters that currently fly over us make our (very old) cottage shake.
- There are enough airstrips in far more suitable locations.
- The removal of the airstrip represents the lesser of two evils
- Horses, riding and game bird rearing and shooting are just a few activities that are already affected by very busy air traffic.

- Living on the training flight paths for Middle Wallop has its downsides but introducing more helicopters to an area would be an even bigger impact on our lovely area.
- We have a large number of helicopters flying over us at all hours of the day and night as it is – whether Chinooks, Apaches or civilian helicopters. There is so much helicopter activity in this area already.
- We are already subject to considerable air traffic, including low flying helicopters both civil and military as well as small aircraft from Popham.
- We already have significant, if not recently increased, helicopter traffic from the MoD over our heads in the day time but also in the middle of the night. Coupled with this we also see and hear light aircraft traffic too regularly, and to a disturbing scale.
- We have more than enough aircraft noise from the MoD helicopters in the surrounding area, and the added activities from the current airstrip add to the noise pollution in an AoNB.
- We already have too many helicopters flying over us. We get Chinooks from Odiham all the time and Apaches from Middle Wallop. We can just about tolerate those because we support the military but otherwise even those would be unacceptable.
- The area already suffers from the military helicopter movements from Middle Wallop and Boscombe Down as well as commercial flights from Thruxton, over which there can be little control, so that the additional flights from Bourne Park are now constituting an aggravating nuisance to local residents.
- There is already a huge amount of military helicopter activity over us. They fly at any time of day or night - and often very low. However we have noticed increased commercial traffic of in the last 2-3 years which is very unwelcome. It is also highly frustrating that much of this commercial activity seems to happen unnecessarily close to the house - and often seems to involve circling for no reason whatsoever.
- The noise levels are worse than those we experienced under the flight path in Wandsworth.
- Both traffic into and out of the facility will create recurrent and intrusive levels of noise as will the large number of ground runs which form an essential part of helicopter servicing.
- There is an excellent helicopter servicing centre at Thruxton Airfield.
- Constant air traffic flying about disrupts the AoNB.
- There should be a policy for no additional aircraft noise in the valley. To preserve this area as an AoNB in both sight and sound should be a priority for the planners. Being plagued by commercial flights is surely not commensurate with an AoNB.
- The noise and air pollution will be significant and it may well seriously alter the value of our houses.
- Bourne Valley is one of the few places in this area of Hampshire unpolluted by the continuous traffic noise from trunk roads. Defence service requirements were a sound reason for helicopter invasion when the Army Air Corps operated from Middle Wallop: to introduce regular civil helicopter flight into the valley would be a damaging decision. We already have several of helicopters flying over our house every day, sometimes very

low, causing consternation with livestock and any further noise and disruption would be very distressing.

- I have been informed that, if the Planning Application is refused then, it is likely that the aircraft operating company will buy the airfield. We are very concerned that, if the airfield is bought by the operating company, it would enable the expansion and/or more frequent use of the airfield, the number of low flights and subsequently to more noise pollution.

6.4 **1 representation – objection (unaddressed):**

The loss of the highly skilled jobs provided on this site of aircraft maintenance and servicing is something that is to be regretted.

Another country house is not a pressing need; three are sufficient already.

The bulk of aircraft noise comes from The Army Air Corps training flights from Middle Wallop and the helicopter flights from school at Thruxton (Heli Air Thruxton) who both practice over Hurstbourne Tarrant, and from passing traffic in and out of Thruxton and Popham, and from low flying military flights supporting army exercises on Salisbury Plain. (In addition we are under the circuit of Boscombe Down which occasionally adds to the overall noise budget.)

It is being put about that if this Planning Application fails then the aircraft company will buy the airfield and greatly increase the number of flights. However this can be discounted because any such significant growth would require further buildings which would in turn require planning permission.

7.0 **POLICY**

7.1 Government Guidance

National Planning Policy Framework (NPPF)

National Planning Practice Guidance (NPPG)

7.2 Test Valley Borough Revised Local Plan DPD

COM1: housing provision 2011-2029

COM2: settlement hierarchy

COM7: affordable housing

COM15: infrastructure

LE10: retention of employment land and strategic employment sites

E1: high quality development in the borough

E2: protect, conserve and enhance the landscape character of the borough

E5: biodiversity

E6: green infrastructure

E7: water management

E8: pollution

LHW1: public open space

LHW4: amenity

T1: managing movement

T2: parking standards

7.3 Supplementary Planning Documents (SPD)  
TVBC Local Biodiversity Action Plan

8.0 **PLANNING CONSIDERATIONS**

8.1 The main planning considerations are:

- Principle of development
- Design and landscape
- Biodiversity
- Trees
- Other
- Material considerations and the planning balance

8.2 **Principle of development**

The application site is located in the countryside outside the boundary of any settlement. Policy COM2 sets out that development outside the boundaries of settlements will only be permitted if:

- c) It is appropriate in the countryside as set out in the Revised Local Plan policy COM8-COM14, LE10, LE16-LE18; or
- d) It is essential for the proposal to be located in the countryside.

8.3 Section 4 sets out the planning history of the site. There have previously been permissions for employment use within the application site (storage and repair of aircraft). The application makes the case that the proposal satisfies policy LE10. Policy LE10 requires that on existing employment sites, allocated employment sites, or sites with planning permission for employment use, which have not yet been fully implemented, development for an alternative use will be permitted provided that:

- a) The land is no longer required to meet economic development needs of the area; or
- b) The current activity is causing, or could cause significant harm to the character of the area or the amenities of residents; and
- c) It would not have a significant detrimental impact on the operation of the remaining occupiers of the site.

8.4 Residential use is an alternative use for the purpose of policy LE10. For policy LE10 to be engaged, the proposal must be located on an employment site. The position of the proposed dwelling, outbuildings and residential curtilage has been adjusted during the application. In drawings received 11.02.2019 the position of the dwelling and residential curtilage has been amended to be wholly within the red line of the previous permissions on the site that are set out in section 4.

8.5 LE10 a)

The applicant has not engaged LE10 a) by marketing the employment site or providing any demonstration that the local economy would not be harmed as a result of the proposed change of use with regard to a) and paragraph 6.51.

8.6 LE10 b)

The applicant makes an argument that, with regard to criterion b), the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents. The application has received a large number of public representations that express dis-satisfaction with the existing noise from helicopters and aeroplanes in the area. A large number of these representations also set out that the area is currently subject to considerable amounts of essential military helicopter activity. Representations make note of the different types of military helicopter that operate from different airfields. The Case Officer has informally contacted the Airfield Manager at Middle Wallop Airfield who described that the area around Bourne Park is used by military aircraft for movements between a number of airfields and to exercises on Salisbury Plain. The Airfield Manager also described the Bourne Valley as a navigable feature to the training areas toward Marlborough and Hungerford, and estimated that between 5-10 flights per day in the area per would originate from Middle Wallop alone.

- 8.7 Members of the public are able to lodge complaints about aviation noise, low and unsafe flying to the Civil Aviation Authority (CAA) who will investigate if there is sufficient evidence. The CAA also advises that complaints concerning aircraft flying to or from a specific airport should be directed to the airport concerned. Complaints about military aircraft must be made to the MoD. Outside of restrictions via the planning process, Local Authorities do not have the legal power to take action on matters of aircraft noise.
- 8.8 The current activity on the application site is informed and established by the planning history of the site. The site has been used as an airfield, according to a supporting statement to application 08/00617/VARN dated March 2008, since 1993. Helicopters have been using the site, according to a supporting statement to application 08/00533/FULLN, since at least 2005. Activities on the site granted planning permission include the storage, maintenance and repair of aircraft along with flights of light fixed wing aeroplanes and helicopters. It is acknowledged that these activities produce noise. It is considered that this type of noise, because of the period of time these activities have been occurring and in conjunction with airborne military traffic, forms part of the character of the area. Noise originating from the application site is partly controlled by conditions attached to the applications that have been granted planning permission. Residential amenity was considered as part of all previous planning applications and the impacts of noise assessed, having regard to the information submitted to support those applications. As a result, conditions relating to the generation of noise within acceptable limits were attached to the permissions granted in the interest of residential amenity and to minimise undue noise and disturbance.
- 8.9 The conditions to previous applications limit the number of combined aeroplane (10) and helicopter (6) movements (a take-off or landing) to a maximum of 16 per day, approximately 480 per month. As an example, a flight originating from and landing at Bourne Park would count as two movements.

Light fixed wing aeroplanes can take off and land between the hours of 08:00 to 21:00 on any day of the week and the repair of these aeroplanes must take place within a building. There is no restriction on when helicopters can take off and land or where the repair of helicopters can take place. Flight logs supplied by the applicant on 27.06.2018 show that between the dates of 26.02.2018 to 27.05.2018 there were 146 movements from Bourne Park, an average of 11.23 per week.

- 8.10 The applicant and agent have been the same throughout the planning permissions for the site set out in section 4. As such, it is considered that both would have a clear understanding of the contents of those applications and the activities taking place on the application site. Statements submitted with previous applications illustrate how the applicants control the activities taking place on the site and the route of aircraft in the air. The supporting statement to application 08/01924/FULLN (August 2008) states that:

*“there would be no overflying of the village of Hurstbourne Tarrant, Stoke, St Mary Bourne, Smannell and Little London”.*

- 8.11 Appendix A of that statement states that:

*“a building used by helicopters needs to be away from centres of population and our proposed site, being secluded and beyond public view is ideal”.*

- 8.12 The statement continues:

*“whilst we make every effort to limit the effect of noise it can be appreciated that landing and taking off of helicopters is best done in a secluded area such as Bourne Park”.*

- 8.13 Similar supporting statements are included with applications 08/00617/VARN and 08/00533/FULLN that emphasise how the applicants have changed their operating procedures following a single complaint. A letter to the Environmental Protection Officer for application 08/00533/FULLN states that:

*“after safety, our golden rule is ‘take off and go away’. We do not allow our users to fly in the locality for fear of upsetting our neighbours”.*

- 8.14 The Environmental Protection Team has not recorded any noise complaints related to the site since 2014, although as explained in paragraph 8.10 enforcement of noise from aircraft in the air is the responsibility of the CAA. The Council’s Planning Enforcement team has investigated five complaints between the dates of July 2008 and April 2017 regarding noise and associated activity at the application site. However, these investigations have not yet established that the current use is taking place outside of the terms of the current planning restrictions. This application is not supported by any evidence or reference to noise guidance and legislation. No noise assessment or evidence has been submitted with the application from any isolated dwellings or settlements in the vicinity to assess the noise produced by the activities on

the site and from movements to and from the site against background noise levels, for example vehicles on the A343 and the noise produced by other planes and helicopters that includes considerable amounts of essential military helicopter activity. The applicant has argued that it would be difficult to differentiate between the various aircraft noise sources. However, no expert evidence has been submitted to corroborate this. This needs to be taken into account when considering how the existing airfield operation contributes to the overall character of the surrounding noise environment.

- 8.15 Representations received state that helicopters can scare horses and animals, that the present Bourne Park activity ignores airfield landing approach instruction and that the airfield is in breach of its licence. These particular matters are outside of the control of the site by condition, but are controlled by the airfield itself as evidenced in paragraphs 8.11 to 8.13. Although those comments were made in support of applications made in 2008, it is considered that there is no evidence to suggest that the operation of the airfield has changed since these permissions were granted. Neither the application nor representations are evidenced or are clear about the specific impacts from Bourne Park airfield compared to other sources of noise, which includes the considerable amount of military helicopter traffic.
- 8.16 The application site is located 1.6km from the nearest settlement. It is considered that the application site is relatively secluded and is a suitable location for an airfield and associated repair and storage activities because of the separation distances to settlements in the vicinity. Additional to this is the current volume of plane and helicopter movements from the airfield, the applicant's control of activities taking place on the site and the route of aircraft in the air and the lack of any evidence that supports the application in terms of the noise generated from the site. Within the context that plane and helicopter noise forms part of the character of the area and AoNB and that there is considerable military helicopter and other civilian helicopter and plane activity in the area, it is considered that it has not been demonstrated that the current activity is causing significant harm to the character of the area or the amenities of residents.
- 8.17 LE10 b) also requires consideration as to whether the current activity could cause significant harm to the character of the area or the amenities of residents. Residential amenity was considered as part of the planning history of the site and conditions attached in that interest to limit the activities and plane and helicopter movements taking place to acceptable levels. Paragraph 8.9, sets out the capacity of the site allowed by planning conditions in terms of the number of plane and helicopter movements originating from and to it. The flight logs supplied demonstrate that the current activity is under the capacity allowed by planning conditions. Concern has been raised by public representations about the intensification of the use of the site. It is considered that the lawful use is acceptable. Any departure from the limits set by condition would be enforceable and would require planning permission. Any new buildings on the site would also require planning permission. Thus the Local Planning Authority is able to exert control over any future proposed use or development outside of that allowed at present. For the same reasons as



paragraphs 8.15 and 8.16 above, it is considered that it has not been demonstrated that the current activities, in accordance with planning conditions, could cause significant harm to the character of the area or the amenities of residents. In addition, it is considered that expansion of the operation of the site is likely to require new buildings or variation to the conditions that control the site at present. If this were to be the case the Council would be able to consider the residential amenity impacts and control them accordingly.

8.18 LE10 c)

The proposal involves the removal of the airstrip and associated buildings. Therefore there would be no remaining occupiers of the site that could be impacted. Criterion c) is not relevant in this case.

8.19 LE10 conclusion

The application has not satisfied criterion a) and criterion c) of policy LE10 is not relevant. With regard to criterion b), the application has not demonstrated that the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents. Paragraph 6.52 of the supporting text to policy LE10 that is relevant to criterion b) states that:

*“In some cases the particular existing uses on site may be causing such serious environmental harm that their removal may be desirable and redevelopment of the site for more appropriate business activities may be justified. It would need to be demonstrated that the displaced uses would not be seeking an alternative site which would simply mean the relocation of the environmental problem to another location.”*

8.20 The application has not explored other business activities or demonstrated that the displaced uses of an un-evidenced environmental problem would be displaced to another location. The application fails to satisfy criterion b) or its supporting text. The application is in conflict with policy LE10. The proposal therefore also represents non-essential development within the countryside that is contrary to policy COM2.

8.21 **Design and landscape**

Design

The proposed dwelling would be two storey, approximately 9.8m in height, 29m in width and 22.3m in depth. It would be set behind its outbuildings which as a group would form a courtyard with vehicular access between the two outbuildings. The outbuildings would be symmetrical, 'L' shaped buildings that would have 'towers' in the corner of the 'L' approximately 7.3m in height. The application has been updated to provide contextual drawings showing how the outbuildings and dwelling would relate to one another following the Design Review Panel comments.

- 8.22 All proposed buildings would combine brick and flint detailing. The proposed dwelling would also introduce render on selected parts including beneath the semi circular porch supported by columns at the front. Two roundels would be either side of this. In critiquing the proposed design the Test Valley Design Review Panel stated that *"the designs are somewhat muddled and require greater simplification to bring them in line with the high quality detailing expected of a bespoke house such as this, particularly given its setting"*. It is considered that the proposed dwelling combines design elements in a confused manner. However, views of the front of the proposed dwelling, which is considered to be the most confused in design terms, would only be possible within the courtyard and as such would have no adverse impact on the character of the area.
- 8.23 Contextual drawing 109 illustrates how the outbuildings, dwelling and walls would relate to one another. Roof pitches would be shared, as would design details like window designs and proportions. When viewed together it is considered that the elements of the proposal combine in a cohesive manner.
- 8.24 If the proposal were otherwise acceptable, it is considered that conditions could secure samples and details of materials and joinery details so that the design could be realised. Subject to conditions the proposal would integrate, respect and complement the estate character.
- 8.25 Landscape  
The proposed dwelling and outbuildings would be set to the east of a stand of existing mature trees that are located to the north of the existing buildings on the site. New trees and landscaping would be planted immediately adjacent and a significant amount of tree planting would take place in three main blocks; along the access, west of the existing block of trees and on the eastern edge of the application site. Together the proposed planting would connect Doles Wood to the north with the groups of trees on the estate to the south that themselves connect to Rag Copse.
- 8.26 It is considered that the proposed tree planting would provide additional screening once mature. Whilst distant glimpses of the proposed dwelling and its outbuildings might be possible through and over the existing trees from the Public Right of Way (PRoW) (Hurstbourne Tarrant Footpath 3) to the west, it is considered that public views would be almost completely removed as a result of the currently proposed position compared to that previously proposed.
- 8.27 The agricultural buildings on site were reused for plane storage and repair, which was formalised within application TVN.00845/8. It is considered that these buildings, when viewed from the west from the Public Right of Way (PRoW) (Hurstbourne Tarrant Footpath 3) do not appear out of character with the otherwise agricultural landscape that the PRoW crosses. As such, it is considered that replacing the buildings with a dwelling and outbuildings in a different location would have a neutral landscape impact.

- 8.28 If the proposal were otherwise acceptable, it is considered that conditions could secure the removal of the existing buildings, implementation, longer term management and maintenance of the proposed tree planting and landscaping around the proposed dwelling and elsewhere on the application site. Subject to conditions the proposal, would integrate with the estate setting, would not interrupt important views and would not have a detrimental impact on the landscape character of the area and AoNB with regard to policies E1 and E2.
- 8.29 **Biodiversity**  
Policy E5 states that *“development in the Borough that will conserve, and where possible restore and/or enhance biodiversity will be permitted”*. Policy E6 states that *“development will be permitted provided that it protects, conserves and where possible enhances the Borough’s Green Infrastructure network”*. The TVBC Local Biodiversity Action Plan provides a framework for the conservation, enhancement and restoration of the biodiversity of the Borough with the aim of maintaining and enhancing the biodiversity of Test Valley.
- 8.30 The application is supported by a thorough ecological appraisal (Malford Environmental Consulting, May 2018), which assess the value of various ecological features at the site and presents detailed recommendations for ecological enhancements.
- 8.31 The key ecological feature at the site is a maternity roost for brown long-eared bats in one of the existing buildings. The majority of existing buildings on site (which have negligible bat roost suitability) would be removed, with the section supporting the roost being retained. In retaining the building, the flight lines in and out of the roost will also be maintained, and the overall scheme will result in enhancements to the adjacent habitat. The proposals also include further biodiversity enhancements, particularly extensive areas of new woodland / tree planting and grassland that would help to connect Doles Copse and Rags Copse. These are replanted areas of ancient woodland that are also Sites of Importance for Nature Conservation (SINCs).
- 8.32 Subject to a condition to secure that the recommendations in the ecological appraisal are implemented, the proposal would enhance biodiversity and the Borough’s Green Infrastructure in accordance with policies E5 and E6, together with the Biodiversity Action Plan.
- 8.33 **Other**  
Residential amenity  
The proposed dwelling would be well separated from any other dwelling on the estate. It is considered that the location of the proposed dwelling would ensure that there would be no adverse impact on the privacy, amenity, light and noise that would be experienced by future occupants of the proposed dwelling and other occupants of the estate with regard to policies LHW4 and E8.

8.34 Trees

There are a large number of trees on the site that are to be retained. The application is supported by an *Arboricultural Impact Assessment and Method Statement* (Wessex Woodland Management Ltd, September 2018). This document includes a tree protection plan that shows the location of tree protective fencing and the report sets out appropriate tree protection measures. Subject conditions to secure tree protection, the proposal would enhance biodiversity in accordance with policy E2.

8.35 Highway safety

The proposal would not result in an intensification of the site from a traffic generation perspective and there would be parking provided that would exceed the standards within Annex G. The proposal is in accordance with policies T1 and T2.

8.36 Flood risk

The application is supported by a Flood Risk Assessment (UK Flood Risk Consultants, September 2018). Policy E7 states that “*development will be permitted provided that it complies with national policy and guidance in relation to flood risk.*”

8.37 The proposed development is ‘more vulnerable’ compared to the ‘less vulnerable’ classification of the existing buildings on the site. However, all elements of the proposal would be located in flood zone 1, which has the lowest probability of flooding. It is considered the proposal would be in accordance with national policy and guidance in relation to flood risk and therefore policy E7.

8.38 Planning obligations

Policy LHW1 requires development where there is a net increase in population to provide either on-site public open space or off-site provision in the form of an alternative site or financial contribution. Policy T1 requires development to minimise its impact on the highway network. Policy COM15 permits works and/or financial contributions to mitigate the impact on existing infrastructure. Policy COM7, as worded in RLP document dated January 2016, sets out that on housing sites of a net gain of up to 4 dwellings a financial contribution will be sought for off-site affordable housing provision.

8.39 In light of the material changes to National Planning Guidance limiting when such contributions should be applicable, the Council has reviewed its position in respect of infrastructure and affordable housing contributions for small schemes and an updated version of policy COM7 has been agreed which raises the thresholds for affordable housing provision. Having regard to the NPPG, this scheme falls below the relevant thresholds and therefore no contributions are required.

8.40 On the 1<sup>st</sup> August 2016 the Council implemented its CIL charging schedule. All relevant planning applications determined after this date are levied.

**8.41 Material considerations and the planning balance**

The application conflicts with policies COM2 and LE10 of the Test Valley Revised Local Plan DPD. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 2 of the NPPF set out that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise. Paragraph 12 of the NPPF provides clarification that “*Where a planning application conflicts with an up-to-date development plan..., permission should not usually be granted.*” The Council considers that the RLP is up to date and consistent with the requirements of the 2018 NPPF.

**8.42 Benefits**

The proposal would have benefits in the provision of a single dwelling. The provision of an inclusive mix of housing, including large homes is a benefit. It is also considered that the construction of the proposed dwelling would contribute toward employment and the New Homes Bonus and as such, provide economic benefits for the area. However, in light of the Council’s 5 year housing land supply, it is considered that the provision of one dwelling in an isolated location can only be given very limited positive weight.

8.43 The substantial tree planting would allow the connection of woodland that would be of benefit to the landscape character of the area, ecology and green infrastructure. In addressing the aims of policy, it is considered that these benefits can be given significant weight.

8.44 The proposal would result in the loss of the airstrip and associated noise and activity. The cessation of activities and associated noise from the site may be of benefit to residents in the vicinity. However, without evidence of the level of existing noise emanating from the site or noise measured from outside the site that can be directly attributed to the site it is considered that this cannot be given great weight.

**8.45 Planning balance**

The unjustified loss of an employment site and general aviation airfield in a suitable location would conflict with an up to date local plan and the revised NPPF. The proposal would result in an isolated dwelling in the countryside that would not be in a sustainable location. It is considered that this harm identified can be given significant weight.

8.46 The proposal would have benefits in providing a single dwelling with landscape and ecological enhancements, and the displacement of an un-evidenced amount of noise. It is considered that the only benefits that can be given significant weight are the landscape and ecological enhancements. The benefits of the proposal as material considerations do not outweigh the harm identified and the conflict with the development plan described above.

**9.0 CONCLUSION**

9.1 The benefits of the proposal do not outweigh the harm identified and the conflict with policies COM2 and LE10 of the Development Plan. Therefore the application should be refused planning permission.

**10.0 RECOMMENDATION**

**REFUSE for the reason:**

- 1. The application has not demonstrated that the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents. Furthermore, the application has not explored other business activities or demonstrated that the displaced uses of an un-evidenced environmental problem would not be displaced to another location. The application is therefore contrary to policy LE10 of the Test Valley Borough Revised Local Plan DPD.**

**The proposal would result in the unjustified loss of an employment site and an isolated dwelling in the countryside contrary to policy COM2 of the Test Valley Borough Revised Local Plan DPD.**

**Note to applicant:**

- 1. In reaching this decision Test Valley Borough Council (TVBC) has had regard to the National Planning Policy Framework and takes a positive and proactive approach to development proposals focused on solutions. TVBC work with applicants and their agents in a positive and proactive manner offering a pre-application advice service and updating applicants/agents of issues that may arise in dealing with the application and where possible suggesting solutions.**
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Appendix B – Officer Update Report to Planning Control Committee on 30 April 2019

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<b>APPLICATION NO.</b>	18/00936/FULLN
<b>SITE</b>	Bourne Park Airfield, Bourne Park Estate, Hurstbourne Tarrant, SP11 0DG, <b>HURSTBOURNE TARRANT</b>
<b>COMMITTEE DATE</b>	30 April 2019
<b>ITEM NO.</b>	7
<b>PAGE NO.</b>	10 - 43

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**1.0 ADDITIONAL INFORMATION**

**1.1** The applicant has provided some further information:

- There is only one full time employee and that has been the case for many years.
- Any owners of the new house will employ a gardener/groundsman or home help or nanny or possibly all three. There will also be many highly skilled craftsmen building a quality home for the best part of 2 years.
- In addition the tree and hedge planting will give employment during the planting stage and thereafter for the next 15 years until they are established.
- This amounts to rather more than the employment status quo and will also bring more cash benefit to the area than the present occupiers ever did.

**2.0 REPRESENTATIONS**

**2.1 1 email of support, no address given.**

- Occupiers are in favour of this proposed planning application.

**3.0 PLANNING CONSIDERATIONS**

**3.1** At the NAPC meeting speakers mentioned that if there were noise issues from the airfield they complained directly to the airfield rather than to the Council. Various points were also made about engine testing taking place on the ground, including at weekends, and the disturbance this caused. Following the NAPC meeting the applicants were asked if they were able to provide evidence of complaints having been made to them as owners of the airfield. No further information has been submitted by the applicants on this matter. Therefore no evidence has been presented to the LPA that the applicants have received complaints about noise from the airfield in recent years.

**3.2** The only further information provided by the applicants refers to the number of employees. The applicant suggests that the new dwelling will provide economic and employment benefits compared to the existing use.

**3.3** Local Plan policies seek to avoid the loss of land currently in employment use to alternative uses which can increase existing problems such as out-commuting and the lack of certain types of employment. The supporting text to policy LE10 in paragraph 6.50 makes this clear, and identifies that in rural areas, such sites may be difficult to replace. The applicant has advised that the existing business would be likely to move out of the Borough should

permission be granted for redevelopment of the site. The scheme may result in the loss of a business that has only one full time employee at present, but also the ongoing employment and economic benefits to the local area permanently, with no likelihood of replacement elsewhere in the Borough.

- 3.4 The NPPF supports economic growth and sets out an economic objective for the planning system to help build a strong, responsive and competitive economy (paragraph 8) and sets out that, *“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”* (paragraph 80). Paragraph 82 sets out that, *Planning policies and decisions should recognise and address the specific locational requirements of different sectors*. The application site is in the countryside and meets the specific locational requirements of this type of employment use, and fulfils a need which is unlikely to be easily met elsewhere.
- 3.5 The applicant therefore sets out information in relation to number of employees but does not address the matter of principle in hand, that is the loss of employment land and the ongoing importance of economic development for the Borough. The applicant has not sought to make a case that the employment land is no longer required for the economic development needs of the Borough which is a potential case under policy LE10.
- 3.6 **Planning balance**  
As set out in the PCC Agenda report, no evidence is presented as part of the application to demonstrate that noise from the site causes, or could cause significant harm to the character of the area or the amenities of residents. The applicants have not provided any further evidence of complaints or issues raised with them. As such it has not been demonstrated that the proposal complies with criterion b) of policy LE10. It has not been demonstrated that it complies with criteria a) either and as such the proposed loss of the employment site is contrary to policy LE10. Where there is conflict with the development plan it is necessary to consider other material considerations and whether they justify granting permission contrary to the plan.
- 3.7 Paragraphs 8.42 to 8.44 of the NAPC report and the assessment in the PCC Agenda report set out and assess the benefits of the scheme, including that the construction of the development, the planting and the ongoing occupation of the dwelling will generate employment and benefits to the local economy as well as delivering landscape and biodiversity benefits. These are material considerations which carry weight.
- 3.8 The landscape and ecological enhancements are considered to carry significant weight. There are anecdotal accounts of noise from the application site and the impacts it has on local residents. However the applicants have not provided any evidence to assess the noise from the site, despite this on occasions apparently being from ground activities. There is no evidence of complaints to the Council about these matters in recent years or of complaints directly to the airfield. The loss of the employment site is likely to result in some reduction of noise, however without evidence to substantiate the degree of impact of the site, and of its removal, this can only be given limited weight.



- 3.9 It is considered that policy LE10 of the RLP is consistent with national policy in the NPPF and as such can be given full weight. The material considerations in this case demonstrate some benefits from the scheme but it is not considered that these would outweigh the unjustified loss of an employment site and general aviation airfield in a suitable location and the conflict with an up-to-date development plan.

4.0 **RECOMMENDATION**  
**No change.**

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Sustainable Acoustics

Mr J. Martin

BOURNE PARK AIRFIELD

Investigation of ambient noise and the  
contributions of airfield activity and  
other aviation to it

Report No. 18-0087-0 R01 03

Mr J. Martin

## BOURNE PARK AIRFIELD

### Investigation of ambient noise and the contributions of airfield activity and other aviation to it

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Report No.: 18-0087-0 R01 03

Date: 15 August 2019

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Prepared by:

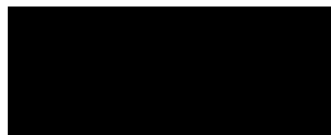
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## 0 EXECUTIVE SUMMARY

- 0.1.1 Test Valley Borough Council has asked for a noise assessment to be submitted to support planning application reference 18/00936/FULLN. The matter specifically to be addressed is that of whether Bourne Park Airfield is capable of generating serious environmental harm, such that its redevelopment might be justified in the light of employment Policy LE10.
- 0.1.2 The planning officer's proposal that airfield and third-party civil and military aircraft overflights could be identified by observers is not a practicable one given both the day-to-day variability in numbers and the variability in flight paths. The time and therefore cost involved in observed sampling over a sufficient number of 16-hour days to obtain an adequate sample for noise analysis would be immense. Overflights of civilian and military aircraft cannot be identified by any measurable characteristic and it has been found impracticable to identify them from airfield flight logs.
- 0.1.3 The only practicable approach is statistical. The contribution of airfield activity to the ambient soundscape in the area around the airfield has been evaluated through a survey and subsequent analysis of a substantial database of results. Aircraft movements to and from Bourne Park airfield are easily distinguishable in the record from a monitor located on the edge of the operations area. The data from a second monitor, located first at the eastern end of the airfield and then at Windmills, a residential property 1.3km to the north-west, provide a parallel record.
- 0.1.4 Aircraft movements have been identified by pattern recognition, allowing the local and third-party overflight sound incidents to be extracted and quantified. No incident of ground-running, engine testing or noisy maintenance at the airfield was captured during the survey.
- 0.1.5 The analysis has focused on the extraction of the daily ambient and background sound levels. The individual aircraft contributions have selectively been extracted to identify the ambient sound levels that would prevail in the absence of the airfield itself and also in the absence of third-party overflights.
- 0.1.6 The extracted aircraft movement and overflight statistics have been analysed to derive representative noise source level values for take-offs, landings and overflights for use in calculations.
- 0.1.7 An estimate of helicopter ground-running noise has been evaluated by the relevant British Standard procedure (BS4142:2014) to show that it could represent an adverse or significant adverse impact on a set of residential receivers chosen to represent the closest neighbours in different directions from the airfield.
- 0.1.8 The ambient sound has been re-constructed assuming that Bourne Park airfield is operated to the maximum allowable within its conditioned constraints, to include the maximum permissible numbers of helicopter and fixed-wing movements all modelled as take-offs. This scenario could not happen in reality on successive days but does represent a hypothetical 'worst case'. Ground-running has also been included in that model, the result of which shows that the airfield could, at its maximum capacity, add about 10dB to the ambient noise level in the area.
- 0.1.9 While it is acknowledged that the assumptions underlying these calculations deliberately synthesise a worst case outcome and that the statistical approach necessarily incorporates a margin of uncertainty, the results do suggest that the airfield could generate noise sufficient to represent harm to the amenity of a tranquil rural area of outstanding natural beauty. Irrespective of numerical analysis, the airfield presents a source of noise in an area of outstanding natural beauty.



## 1 INTRODUCTION

- 1.1.1 The consultant has been appointed by Mr J. Martin of Bourne Park, to whom this Report is addressed.
- 1.1.2 A planning application has been made to Test Valley Borough Council on behalf of Mr Martin and Mr R. Wood proposing to close down the existing private airfield at Bourne Park and to replace it with a substantial house (planning reference 18/00936/FULLN). The Council's Case Officer has recommended refusal on the grounds that the benefits of the proposal do not outweigh the harm identified and the conflict with policies COM2 and LE10 of the Development Plan.
- 1.1.3 The requirement for a noise survey and report stems from the alleged conflict with policy LE10. The Officer's Report concludes that:
- “The application has not satisfied criterion a) and criterion c) of policy LE10 is not relevant. With regard to criterion b), the application has not demonstrated that the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents. Paragraph 6.52 of the supporting text to policy LE10 that is relevant to criterion b) states that:*
- “In some cases the particular existing uses on site may be causing such serious environmental harm that their removal may be desirable and redevelopment of the site for more appropriate business activities may be justified. It would need to be demonstrated that the displaced uses would not be seeking an alternative site which would simply mean the relocation of the environmental problem to another location.”*
- 1.1.4 The issue seems to be that although a very large number of local residents commented favourably in support of the application, citing the noise arising from the activity on the airfield as a serious environmental harm, no objective evidence demonstrating that harm had been provided. The purpose of the present report is to make good the deficit of objective evidence.
- 1.1.5 A glossary of technical terms is provided at Appendix A.



## 2 SITE DESCRIPTION

- 2.1.1 Bourne Park is a large estate lying to the south of Hurstbourne Tarrant at the western end of the Bourne Valley. The airfield is comprised of a grass airstrip orientated roughly east-west, three principal out-buildings dedicated to airfield use at the south western end of the airstrip and a grassed area between the buildings and the airstrip on which a number of helicopters are usually parked and from which helicopter movements are made. The restrictions imposed through past planning permissions limit the numbers of fixed-wing and helicopter movements to 10 and 6 per day, respectively, with a restriction on operating hours applying only to fixed wing movements.
- 2.1.2 The planning history of the airfield and its operation is set out concisely in the officers' reports to Test Valley Borough Council's planning committee, e.g. <sup>1</sup>. No constraints on the operation of the airfield or the use of its buildings are known to the author other than those set out in the planning conditions referenced in that report.
- 2.1.3 The two dwellings closest to the airfield on the Bourne Park Estate are owned and occupied by the business partners who own the airfield. The lodge at the entrance to the estate from the A343 lies about 500 metres to the south west of the airfield buildings, screened from them visually both by the downslope and by a dense tree belt. The closest 'third-party' residential occupancies to the airfield are at Windmills, about 1.3km to the north-west of the airfield buildings and at Doles Farm about 1.1km a little south of west. Frenches Farm is a similar distance to the south east and Stokehill Farm lies 2km a little south of east of the airfield buildings. Rising ground to the north forms a topographical barrier between the airfield itself and the Bourne Valley, with the centre of Hurstbourne Tarrant about 1.6km to the north on the other side of the ridge.
- 2.1.4 When contacted by the Council's planning case officer the Airfield Manager at Middle Wallop Airfield (Army Aviation Centre and Flying Corps training site) described the area around Bourne Park as one used by military aircraft for movements between a number of airfields and to exercises on Salisbury Plain. The Airfield Manager also described the Bourne Valley as a navigable feature to the training areas toward Marlborough and Hungerford, and estimated that between 5-10 flights per day in the area per would originate from Middle Wallop alone. It is assumed that most of those flights would be of military helicopters. Civilian general aviation includes private light fixed-wing aircraft movements from and to Thruxton and Popham airfields and could include flights from any number of private airstrips and airfields within flying range.
- 2.1.5 The Bourne Valley is therefore affected by noise from general and military aviation unrelated to Bourne Park. The only other significant source of noise is road traffic on the A343. Other ambient noise could come from agricultural operations. The soundscape is otherwise made up from natural sources.

<sup>1</sup> Officer Report to Northern Area Planning Committee on 28 March 2019.

SITE: Bourne Park Airfield, Bourne Park Estate, Hurstbourne Tarrant, SP11 0DG, HURSTBOURNE TARRANT.  
APPLICATION NO.: 18/00936/FULLN. CASE OFFICER: Mr Oliver Woolf. Background paper (Local Government Act 1972 Section 100D)





### 3 PLANNING

#### Case Officer's comments

- 3.1.1 In an email dated 01 May 2019 and addressed to Mark Pettitt, the Planning Case Officer at the time, Laura McKay, asked for a noise assessment to be submitted to support planning application 18/00936/FULLN.
- 3.1.2 The assessment would be expected to include “...all noise coming from the employment site, not just the helicopters.” The components of that assessment would be expected to include background, “...aircraft noise in the air and noise from ground-based activities”.
- 3.1.3 In response to the observation that it would be hard to distinguish where aircraft in the air are coming from, Ms McKay says “... it was very apparent from ... the information provided by both Mr Buckley and Mr Martin that it possible to visually distinguish between military aircraft and those from Bourne Park, and that their altitude, flight paths and flying pattern also differ. Therefore I would expect that noise measurements could be correlated with observations ...” or with flight logs.
- 3.1.4 It has not been possible practicably to obtain flight logs. Private airfields are reluctant to provide them, and in any case the civil general aviation flights over the Bourne Valley could originate from any of a number of private farm airstrips as well as civil airfields within easy flying distance. Military flight logs are publicly available online but in a format that cannot easily be interpreted. To sift out helicopter paths over the Bourne Valley would be an immense, time-consuming and therefore impracticable task.
- 3.1.5 Ms McKay continues: “The assessment would need to cover a representative period, so it will be important to make sure that the amount of activity is “normal” i.e. not busier or quieter than usual. This may involve surveying for a period or on a number of occasions.”
- 3.1.6 Ms McKay offers that the noise consultant engaged to carry out the survey could be referred through her to the relevant Environmental Protection Officer for technical discussions. To that end the consultant did contact Ms McKay's successor as case officer but on receiving no response in an interregnum following her departure, contacted Mark Lee, Environmental Health Manager, setting out the survey method already by then in place as time was pressing. That method was discussed at a meeting between the applicant, consultant and members of the Council's Planning and Environmental Protection teams at Beech Hurst on 28 May 2019.
- 3.1.7 At that meeting Lorna Taylor, attending for Environmental Protection, implied that the survey should be continuously staffed by an observer. The consultant explained that to staff such a survey would be impracticable on cost grounds and that a statistical approach, surveying over an extended period and using event time history characteristics as a marker, would be the best that could practicably be achieved. Ms Taylor indicated that she would expect the Bourne Park airfield events to be distinguishable in the record and that they could therefore be extracted and their partial contribution extrapolated (implicitly to estimate a ‘worst case’ outcome) from the available data.
- 3.1.8 Aircraft movements at Bourne Park can be identified in the survey results but not attributed to any particular aircraft. The calculation anticipated by Ms Taylor has been possible and is reported below.

### 3.2 National planning and noise policy

- 3.2.1 The aim of national planning policy on noise set out in the Noise Policy Statement for England is to:



*Promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development<sup>2</sup>.*

3.2.2 To that end the NPSE states its aims as:

*Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:*

*avoid significant adverse impacts on health and quality of life;*

*mitigate and minimise adverse impacts on health and quality of life; and*

*where possible, contribute to the improvement of health and quality of life.*

3.2.3 Further, “*The protection of quiet places and quiet times as well as the enhancement of the acoustic environment will assist with delivering the latter aim.*”

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<sup>2</sup> Noise Policy Statement for England (NPSE). March 2010. Department for Environment Food and Rural Affairs  
<https://www.gov.uk/government/publications/noise-policy-statement-for-england> (accessed 09 August 2019)



## 4 SURVEY METHOD

- 4.1.1 The objects of surveying the ambient sound in the area were to attempt to identify the contributions to the overall ambient sound level of activities at Bourne Park Airfield and of other aviation sources. Two logging sound level meters with synchronised clocks were deployed from Friday 17<sup>th</sup> May until Tuesday 28<sup>th</sup> May 2019, yielding ten full and two part days' data. The weather was mild to warm throughout the survey with some bright and some overcast days with light drizzly rain, but there were no episodes of strong winds or heavy rain.
- 4.1.2 One monitoring station was established for the entire duration of the survey on the edge of the helicopter parking and operations area immediately to the south-east of the airfield buildings. The other was initially established towards the eastern end of the airstrip, on the Bourne Park Estate but as far to the east as possible within it. This 'remote' monitor was moved on Monday 20<sup>th</sup> May to Windmills, a private residential property to the north-west of the airfield on the opposite side of the A343. The survey locations are indicated in Figure 1.
- 4.1.3 The intention of the survey design was that airfield activities would be distinguishable by absolute sound level and time history. These would be logged on the airfield monitor and might or might not be replicated in the records from the 'remote' monitor. Overflights would be distinguishable by level and time histories from logs captured on both monitors. A-weighted sound levels and unweighted frequency (third-octave) spectra were continuously logged in 1-minute samples. The 63Hz component time-histories were extracted from the logs as a further aid to distinguishing aviation from other sound sources.
- 4.1.4 The two monitoring systems were identical, comprised of a Svantek 958 class 1 four-channel sound & vibration analyser housed in a weather-proof case with a weather-proof outdoor microphone assembly. Equipment and calibration details are provided in Appendix B.
- 4.1.5 Notes of some airfield and some overflight events were made over the course of the survey by Mr Martin but these amount to a far-from-complete record. To have deployed an observer to identify all movements and overflights throughout would have been impracticably onerous.





Figure 1: Survey locations and receiver locations

Survey locations: ★

R1 : long term monitor at corner of operations area

R2.1: first remote location at east end of air-strip

R2.2: second remote location at Windmills

Receiver locations for propagation calculations: ★





## 5 ANALYSIS

- 5.1.1 A first sweep of the data was made to produce overall A-weighted hourly and daily ambient sound levels (LAeq,1hr and 16hr, 07:00 to 23:00hrs) from the monitor records from all three locations. Results were also derived for the permitted airfield fixed-wing operating period (13hr, 08:00 to 21:00hrs) and found to be similar to those for the standard planning 'day'. All further analysis was therefore undertaken for the standard day. Uncertainty was quantified by deriving the standard deviations of the period values derived from hourly samples. Hourly and period average background (LA90,t) values were also obtained.
- 5.1.2 The overall A-weighted and 63Hz third-octave time histories were resolved from the 1-minute samples for each day of the survey (07:00 to 23:00hrs) and plotted graphically. These were compared in the combinations:
- Airfield LAeq,1min with Remote LAeq,1min
  - Airfield Leq,1min 63Hz with Remote Leq,1min 63Hz
  - Airfield LAeq,1min with Airfield Leq,1min 63Hz
  - Remote LAeq,1min with Remote Leq,1min 63Hz
- 5.1.3 Mr Martin's observations provided a start for pattern-recognition. Three types of event could be distinguished with a practiced eye from daily graphical and numerical series:
- Airfield aviation-related events
  - Overflights (presuming that no other type of event would be picked up on both monitors)
  - 'Other' events local to one or other monitor
- 5.1.4 Four copies of pairs of numerical data series ('Airfield' with 'Remote') from each day's log were set out in parallel columns of 1-minute quanta, and one left unedited to represent the whole day. The unedited daily 1-minute sample results were summed and cross-checked for consistency against the period values (day, 16-hour) obtained at stage 1.
- 5.1.5 Then each series was scrutinised visually, both in graphical and in numerical forms, to identify first the 'other', non-aviation events in the airfield record. The blocks of 1-minute values representing 'other' events local to the Airfield, probably representing mowing, were edited out from the second and further series (both from 'Airfield' and from 'Remote' sets) to yield cleaned daily resultants (LAeq,16hr). 'Other' events could not be identified in the 'Remote' series as they could not be attributed.
- 5.1.6 The third and fourth series were further edited in like manner to eliminate 'Airfield events', attributed to flight movements on the airfield. An attempt to distinguish helicopter movements from fixed-wing movements by time history was found not to be reliable.
- 5.1.7 Finally, the fourth series was further edited to eliminate 'overflights'. These were identified by assuming that any event coincident within a minute or so in both records and exhibiting a peak in both the A-weighted and 63Hz octave time series was probably an overflight.
- 5.1.8 The blocks of 1-minute 'event' sample values representing 'Airfield events' and 'overflights' were themselves analysed event-by-event to obtain the LAeq,event values for every Airfield movement and every overflight event.





- 5.1.9 The daily resultants were then summed from each edited series. These show the influence of each class of event over the daily period LAeq,16hr in both the airfield and the ‘remote’ monitoring locations. A simple comparison between the cleaned (‘minus ‘other’) and edited daily period LAeq,t (16hour) resultants resolves the actual contributions of Airfield aviation events and of overflights to the measured daily ambient sound values at both sampling locations throughout the monitoring period.
- 5.1.10 The specific airfield aviation event statistics were averaged and multiplied by the maximum permissible movement numbers allowed under the airfield’s operating conditions to develop an estimate of the maximum contribution that Bourne Park Airfield operations could make to the daily ambient sound levels adjacent to the airfield itself and further afield at the remote monitoring locations if every permitted movement occurred.
- 5.1.11 Finally, with assumptions about its characteristics, an assessment has been made of helicopter maintenance/testing by ground-running noise applying the procedure prescribed in BS4142.



## 6 RESULTS

### 6.1 Un-differentiated headline

- 6.1.1 All of the results presented here and discussed in subsequent sections refer solely to the daytime period defined in planning practice, 07:00 to 23:00hrs (16 hours). Although there is no local prohibition by condition of helicopter movements at night, such a prohibition might be imposed in effect through the Civil Aviation Act provisions for visual navigation. It can be assumed that Bourne Park airfield does not and would not operate at night.
- 6.1.2 The unedited headline survey results highlighting ambient (LAeq,t) and background (LA90,t) sound levels are set out in Table 1.

DAILY SUMMARY LAeq,1hr mean and LA90,1hr mean, 07:00 - 23:00hrs

		LAeq,1hr	STDEV.P	LA90,1hr	STDEV.P	LAeq,1hr	STDEV.P	LA90	STDEV.P
		AIRFIELD	E. END OF RUNWAY						
Saturday	18-May-19	62.3	11.8	33.9	1.0	46.1	5.2	33.5	0.5
Sunday	19-May-19	53.8	6.7	34.6	1.0	53.1	7.6	33.8	0.5
Monday (part)	20-May-19	59.6	10.7	36.1	1.9	44.0	3.8	35.2	1.0
	MEAN	58.6	9.7	34.8	1.3	47.7	5.5	34.1	0.7
		WINDMILLS							
Monday (part)	20-May-19	42.1	2.1	34.0	1.1	41.8	2.5	34.1	0.5
Tuesday	21-May-19	44.8	3.2	35.3	1.8	49.0	3.9	35.1	1.2
Wednesday	22-May-19	59.5	10.1	34.3	1.2	47.6	3.2	36.2	1.5
Thursday	23-May-19	43.4	3.5	34.5	1.2	48.2	4.2	36.2	1.2
Friday	24-May-19	46.5	5.0	35.1	1.6	48.4	4.3	35.7	1.3
Saturday	25-May-19	58.0	9.4	34.6	1.1	47.9	4.3	35.4	1.0
Sunday	26-May-19	42.3	3.3	35.5	1.6	47.0	4.4	37.0	1.9
Monday	27-May-19	45.6	3.4	37.3	2.5	48.0	3.4	38.2	2.6
Tuesday	28-May-19	59.5	9.0	39.1	1.4	46.4	2.6	36.3	1.2
	MEAN	49.1	5.4	35.5	1.5	47.1	3.7	36.0	1.4
WHOLE SURVEY MEAN		52.1	6.7	35.4	1.5				

Table 1: Unedited daily summary results, Airfield and Remote monitoring locations

- 6.1.3 The headline ambient levels (mean LAeq,1hr) are both higher and more variable at the airfield monitor than at either remote location. This is the consequence both of flying movements at the airfield and of non-flying ‘other’ noise. The influence of both is visible in the standard deviations, which are much higher when the overall mean LAeq,1hr is higher precisely because events on the



airfield have governed the mean on those days. The influence of such events is visible but less influential at the east end of the runway and not visible at all at Windmills.

## 6.2 Source differentiation

6.2.1 Through the manual editing processes described in section 5, the known aircraft movement (both from the airfield itself and overflying) and ‘other’ contributions can be eliminated. The results are presented in Table 2:

### ANALYSIS of MONITORING DATA - Comparing airfield ref with off-airfield

Breakdown of source contributions LAeq,16hr dB, 07:00 - 23:00hrs

DAY	DATE	AIRFIELD MONITOR			REMOTE MONITOR				
		Unedited	Minus Other	Minus Airfield	Minus Overflights	Unedited	Minus Other	Minus Airfield	Minus Overflight
						E.END OF RUNWAY			
Saturday	18-May-19	62.3	62.3	52.4	41.4	46.1	46.1	45.1	42.3
Sunday	19-May-19	53.8	53.8	43.2	42.6	53.1	53.1	48.3	41.4
Monday	Part day	59.4	59.4	42.3	42.3	43.9	43.9	41.6	41.6
Monday	20-May-19	56.7	56.7	42.2	42.0				
						WINDMILLS			
Monday	Part day	42.1	42.1	42.1	41.8	42.2	42.2	42.2	42.2
Tuesday	21-May-19	44.8	44.8	44.8	42.3	49.0	45.7	45.7	45.0
Wednesday	22-May-19	59.4	59.6	56.9	40.5	47.6	47.7	47.7	46.6
Thursday	23-May-19	43.4	43.4	43.4	42.1	48.2	48.2	48.2	46.6
Friday	24-May-19	46.6	46.6	44.2	41.7	48.4	48.4	48.4	48.2
Saturday	25-May-19	58.0	58.0	41.6	40.8	47.9	47.9	47.9	47.5
Sunday	26-May-19	42.3	42.3	42.3	40.7	47.1	47.1	47.1	46.6
Monday	27-May-19	45.6	45.6	44.0	43.1	47.9	47.9	48.0	47.9
Tuesday	28-May-19	58.9	39.3	39.3	38.7	47.7	42.4	42.4	40.9
Survey mean									
Airfield	Whole surv	52	50	45	41				
	StDev	7.1	7.6	4.9	1.2				
Remote at E.end		59	59	46	42	48	48	45	42
	StDev	3.5	3.5	4.6	0.5	3.9	3.9	2.7	0.4
Remote at Windmills		49	47	44	41	47	46	46	46
	StDev	7.0	6.7	4.7	1.2	1.9	2.3	2.3	2.4

Table 2: Daily summary results edited progressively to eliminate source contributions





- 6.2.2 The daily summary mean LAeq,1hr values in Table 1 and the ‘unedited’ summed LAeq,16hr values in Table 2 should correspond within a small margin. The slight differences between them are the result of different methods of averaging.
- 6.2.3 By successive elimination, the corresponding summed 16-hour values are revealed in Table 2 with first, the ‘other’ (i.e. non-flying) contributions to the daily ambient values removed, then with the airfield movements removed (these values represent the ambient with overflights, as if the airfield itself was not active), and finally with the overflights removed. The last column, with overflights edited out represents the soundscape as if free of any aircraft or airfield contribution at all.
- 6.2.4 It can be seen that on the airfield itself, ‘other’ sources contributed significantly to the mean ambient level on Tuesday 28 May, interpreted as evidence that on this day the airfield operations area was mown.
- 6.2.5 The differences between the corresponding values at any one of the three locations (Airfield, East end of runway, Windmills) show the contributions of local airfield movements and of overflights to the overall mean daytime ambient sound levels. The estimates obtained by that subtraction are presented in Table 3.
- 6.2.6

Breakdown of source contributions									
		Overall Ambient		Implied source contributions, partial					
		LAeq,dB (16hr day)		Flight movements [1]		Overflights [2]			
		Airfield	Remote	Airfield	Remote	Airfield	Remote		
Part 1: Remote monitor at East end of runway									
Saturday	18-May-19	62	46	62	39	52	42		
Sunday	19-May-19	54	53	53	51	34	47		
Monday	Part day	59	44	59	40	nil	nil		
Part 2: Remote monitor at Windmills									
Monday	Part day	42	42	nil	nil	30	nil		
Tuesday	21-May-19	45	46	nil	nil	41	37		
Wednesday	22-May-19	60	48	56	nil	57	41		
Thursday	23-May-19	43	48	nil	nil	38	43		
Friday	24-May-19	47	48	43	nil	41	35		
Saturday	25-May-19	58	48	58	nil	34	37		
Sunday	26-May-19	42	47	nil	nil	37	37		
Monday	27-May-19	46	48	40	nil	37	32		
Tuesday	28-May-19	39	42	nil	nil	30	37		
Survey mean									
Remote at E.end		59	48	58	44	44	42		
Remote at Windmills		47	46	43	nil	41	38		

[1] from Table 2: 'Minus other' minus 'Minus airfield'

[2] from Table 2: 'Minus airfield' minus 'Minus overflights'

Table 3: Estimated source contributions at the airfield and at the remote monitor location



- 6.2.7 On Saturday 18<sup>th</sup> May, Sunday 19<sup>th</sup>, Monday 20<sup>th</sup> (morning), Wednesday 22<sup>nd</sup>, and Saturday 25<sup>th</sup> comparison between the ‘Minus Other’ and ‘Minus Airfield’ daily results shows that on those days movements on the airfield itself contributed significantly to the ambient sound level logged on the airfield monitor. The contributions indicated on Friday 24<sup>th</sup> and Monday 27<sup>th</sup> are significantly lower and might not represent aircraft movements.
- 6.2.8 Corresponding contributions at the east end of the runway were lower but significant. The difference is, of course, a result of most of the movements being of helicopters taking off from the operations area and not from the runway itself. A fixed-wing light aircraft landing and later taking-off account for the higher flight movement contribution shown at that location on Sunday 19<sup>th</sup> May.
- 6.2.9 However, no contributions from local airfield movements are discernible in the results from the ‘remote’ monitor when it was located at Windmills. These results tend to suggest that airfield activity did not influence the daily average resultant ambient sound level at Windmills.
- 6.2.10 The calculated contributions from overflights, including both military and civilian origins, exclude overflights from the airfield itself. On the airfield itself, both at the airfield monitor and at the remote monitor when it was located at the east end of the runway, it can be seen that overflights contributed further to the daily average resultant ambient sound level (from the survey mean values – the daily resultants are less clear). At Windmills that comparison shows a slightly greater difference, but not statistically significantly. The overflight contributions might be expected to be about the same at all three locations as a helicopter flying over, for example, flies over all three points even if its precise path is closer to one than the other two. The differences between the ‘survey mean’ overflight contribution figures are about the same within rather wide standard deviations.

### 6.3 Implied baseline conditions

- 6.3.1 The mean ambient sound levels in the ‘pristine’ state with all flight contributions including both local airfield movements and overflights eliminated might be expected to converge. These are summarised as survey mean values in Table 4.

Ambient sound levels in the absence of aircraft			
		Survey mean dB	
		LAeq,16hr std.dev	
Bourne Park:			
Present airfield ops area		41	1.2
East end of runway		42	0.4
Windmills		46	2.4

Table 4: Estimated baseline ambient sound levels

- 6.3.2 The two Bourne Park results do, indeed, converge whereas at Windmills the edited resultant remains significantly higher. This might be the result of topography, proximity to roads (the A343



and the local road at the bottom of the drive) or to factors during the survey such as the prevailing wind direction, agricultural operations on nearby fields and domestic activities.

- 6.3.3 The background sound levels<sup>3</sup> prevailing in the area are unaffected by transient sources and can be taken directly from the measurements made during the survey. These provide the foundation for the BS4142 assessment described below, and are presented in Table 5

Background sound levels		Survey mean dB LA90,16hr std.dev	
Bourne Park:			
Present airfield ops area		35	1.5
East end of runway		34	0.7
Windmills		36	1.4

Table 5: Measured background sound levels

## 6.4 Specific noise levels

- 6.4.1 Through the manual editing processes described in section 5, aircraft movement contributions both from the airfield itself and overflying can be identified. The origins of a few events, including limited numbers of airfield movements and a very few ‘third-party’ overflights, were noted during the survey by Mr Martin and can be used as a basic template for identifying others like them in the 1-minute numerical data series.
- 6.4.2 By this means the identifiable airfield movement and overflight statistics have been brought out of the data series and tabulated. Some are specifically identified, the majority assumed by reference to those templates.
- 6.4.3 The key local airfield movement results are presented in Table 6. All of the listed events occurred while the ‘Remote’ monitor was at the east end of the runway. The helicopter take-off and landing are a worst case from several. The fixed wing take-off and landing were the only examples of fixed wing movements logged in the whole survey.
- 6.4.4 The statistical overflight results are presented in Table 7. The overflights can be expected to affect all ground locations similarly, though in reality any particular overflight will affect a footprint on the ground below specifically as a result of its unique path.

<sup>3</sup> The background sound level is a statistical description of the underlying sound in the overall ambient sound climate. It is different from the ambient sound level, which incorporates both natural and man-made transient sources. See Appendix A for more information.



	Airfield (ref d=50m)		Remote		Airfield (ref d=50m)		Remote
	L <sub>Aeq,event</sub>	t min	L <sub>Aeq,event</sub>	t min	Max L <sub>Aeq,1min</sub>		
Gazelle take-off worst case	81	6	60	3	85		65
Gazelle landing worst case	79	5	59	3	83		64
Fixed wing taxi and take-off	74	8	72	9	83		80
Fixed wing landed	52	5	44	5	67		59

Table 6: Airfield event sound levels

		Airfield		Remote			Airfield		Remote
		L <sub>Aeq,event</sub>	t min	L <sub>Aeq,event</sub>	t min		L <sub>Aeq,1min</sub>	L <sub>Aeq,1min</sub>	
		dB		dB			dB	dB	
Arithmetic mean		54	4	52	6		57	56	
Max		78	22	77	22		79	77	

Table 7: Overflight sound levels



## 7 SPECULATIVE ANALYSIS AND DISCUSSION

- 7.1.1 Occupiers at Windmills and at Stokehill Farm have commented in correspondence both with Mr Martin and with Test Valley Borough Council that noise from airfield operations significantly disturbs their amenity. A number of other local respondents have commented that the airfield materially affects the amenity of the Bourne Valley. To investigate the roots of the claims the individual aircraft movement data can be examined in isolation. Airfield movement and overflight sound levels can be added back in to the ambient sound climate stripped of such events (Table 4) to estimate the resultants of a scenario that did not occur during the survey, the full operation of the airfield within its permitted constraints.
- 7.1.2 Calculations have been undertaken for Windmills, Stokehill Farm, Frenches Farm as the closest ‘third-party’ dwelling to the airfield and the main house at Bourne Park itself as the closest dwelling of all.

### 7.2 Ground running noise

- 7.2.1 Although some aircraft movement events logged at the airfield during the survey did appear to last for a long time (a known event, a Gazelle helicopter landing late in the afternoon of Saturday 25 May, for example, generated elevated sound levels at the airfield over a period of 30 minutes), there were no reported or implied incidents of ground running, engine testing or any other extended local noise incident. The ‘other’ noise events logged at the airfield on Tuesday 28 May, for example, lasted for around 2 hours in two incidents but exhibited varying levels consistent with, and interpreted as mowing. Neither day’s event was discernible in the record from Windmills.
- 7.2.2 It can be speculated that engine testing could generate a similar absolute noise level to that of a Gazelle taking-off in the worst case. During the survey the highest 1-minute sample values logged on the airfield monitor during Gazelle movements (both take-off and landing, noted and reported by Mr Martin) lay in the range 82 to 85dB LAeq,1min (Table 6). Allowing for a reference distance for that measurement of about 50m, the result can be extrapolated to any receiving location and the resultant can be assessed as a commercial source by the procedure prescribed in BS4142, as ground-running can be described as noise of an industrial or commercial nature.
- 7.2.3 A worst-case value of 85dB at the reference distance has been propagated to representative receivers with attenuation with distance and barriers alone<sup>4</sup>. Allowing ground-running to last for 1 hour, which would equate with a worst case based on anecdotal evidence (a complaint to Mr Martin from a local resident in June or July 2019); the resultant rating noise levels (free-field, penalised by 3dB for character), background sound levels (Table 5) and level difference are presented for four representative receivers in Table 8.

<sup>4</sup> The CONCAWE outdoor noise propagation method would predict significant further attenuation over soft ground along propagation paths of the order of a kilometre; ground effect has been ignored in this rough calculation. This, together with the worst case source level assumed in the assessment, are counter-balanced by the application of arguably a low character penalty for helicopter engine noise.



#### BS4142 Assessment Summary

Source assumptions:	Level	85 dB							
	Duration	60 min							
	Ref distance	47 metres							
Receiver:	Background	Rating							
	level LA90	level							
Receiver: Bourne Park main house	35 dB	76 dB						41 dB	
Receiver: Windmills	36 dB	49 dB						13 dB	
Receiver: Stokehill Farm	34 dB	56 dB						22 dB	
Receiver: Frenches Farm	34 dB	62 dB						28 dB	

Table 8: Speculative ‘worst case’ assessment of ground-running noise

- 7.2.4 An excess of rating level over background level of around +10 dB or more is likely to be an indication of a significant adverse noise impact, depending on the context. A difference of +5dB is likely to indicate an adverse impact.
- 7.2.5 By the BS4142 standard for noise of an industrial or commercial nature, then, ground-running could be interpreted as likely to represent a significant adverse noise impact on the nearest representative third-party residential occupiers to the airfield.

## 7.3 Airfield operations in the wider Bourne Valley

- 7.3.1 The effect of the airfield on the ambient noise climate in the wider Bourne Valley can be estimated from a combination of measured results and reasonable ‘worst-case’ assumptions.
- 7.3.2 In order to estimate the ‘worst case’ effect of airfield operation in the soundscape of the Bourne Valley it will be assumed that it operates to its full conditioned potential. That would mean six (6) helicopter movements together with ten (10) fixed-wing aircraft movements in a single day. All could potentially be take-offs, as there is no restriction by condition on the numbers of aircraft that can be parked on the site overnight and a ‘movement’ can be either a take-off or a landing. The ‘worst case’ helicopter ground running scenario tested in s.7.2 above (source assumptions as for Table 8) has been added in, as has the estimated underlying daytime ambient level (Table 4).
- 7.3.3 The noise associated with a fixed-wing aircraft taking off is hard to define by measurement as there is no single reference distance from any fixed point. The resultant level at a single reference location can be defined but clearly, would be different at another location. For the purpose of the present calculation the reference distance for a fixed-wing aircraft take-off has been taken as 50m, with the value obtained at the airfield monitor during the one known example of such a movement during the survey (Table 6). This represents, therefore, the maximum engine start and taxi-out sound levels and a take-off from side-on to the runway, though at a greater average and perpendicular horizontal distance
- 7.3.4 Helicopter movements can be related to the reference measurement location at the airfield. The ‘worst-case’ take-off value has been taken as the 1-minute maximum (Table 6).



- 7.3.5 The effect on the ambient sound level of ‘third-party’ military and civilian overflights has been incorporated by adopting the measured mean ambient sound levels obtained after ‘other’ and ‘airfield’ events had been stripped out (Table 2). New overflights generated by the activity on the airfield itself have been added in using the maximum overflight value from either ‘remote’ monitor (Table 7) as a 1-minute contribution per overflight.
- 7.3.6 Adding together all sources in the maximum capacity scenario, the maximum outcomes at third-party receivers (Bourne Park main house, Windmills, Stokehill Farm, Frenches Farm) are presented in Table 9, along with the existing (by measurement and calculation) ambient values representing the soundscape with third-party overflights included but excluding any local airfield activity (Table 2, all but overflights eliminated).

Existing ambient with airfield activity stripped out			
Estimated ambient with airfield activity added in as			
if at maximum capacity:			
Source values for calculation:			
	L <sub>Aeq,t</sub> dB	t <sub>min</sub>	Number
Ground running noise:	85	30	2
Helicopter movements	81	6	6
Fixed-wing movements	74	9	10
Additional overflights	77	1	6

Results	Ambient sound level L <sub>Aeq,16hr</sub>	
	Without airfield	Predicted with airfield
Airfield reference position	45 dB	74 dB
Bourne Park main house	45 dB	62 dB
Windmills	46 dB	56 dB
Stokehill Farm	45 dB	56 dB
Frenches Farm	45 dB	56 dB

Table 9: Speculative ‘worst case’ evaluation of maximum contribution to ambient noise from Bourne Park airfield operating at maximum capacity

- 7.3.7 The resultant 56dB is uniform across the more remote receivers as it is dominated by the airfield movement overflight noise. This assumes in effect that all of the departing helicopters would head in the same direction, and all over the receiver in question. In reality, of course, all departing helicopters might head in the same direction but if they did, only the receiver under their flight-path would be affected to this degree.
- 7.3.8 The additional overflights are assumed to result in a higher resultant on the ground than ‘third-party’ overflights (based on real sample values, Table 7) as the locally-originated flights are probably still gaining in height as they pass over the local area whereas the existing ‘third-party’ military and civilian overflights are already at cruising altitude. Only locally-originated helicopter overflights have explicitly been included in the calculation as the survey could not yield a specific



value for fixed-wing aircraft overflights. That omission to some extent counter-balances the ‘worst-case’ assumption for helicopters.

- 7.3.9 These speculative outcomes suggest that if operated at its full permitted capacity, and given certain ‘worst-case’ assumptions about the nature of the activity that would be generated, Bourne Park airfield could generate ground-running and aviation noise that could elevate the ambient sound level in the area by up to 10dB. This proposition is caveated with the acceptance that it embodies a number of assumptions and as such, represents a particular rather than a general scenario.
- 7.3.10 This speculative outcome demonstrates the possibility that at full presently permitted capacity the operation of the airfield could significantly contribute to the ambient sound level and intrude significantly into the soundscape of the Bourne Valley more widely.

## 7.4 Uncertainty

- 7.4.1 The entire analysis has been founded on the results of the survey conducted between 17 and 28 May with two monitoring stations. The results from two ‘remote’ locations, surveyed sequentially, have been related to the results from one fixed location adjacent to the airfield operations area.
- 7.4.2 To have sampled more widely across the Bourne Valley and/or over a longer time interval would have been impracticable. The survey results do show that at the frequencies of movements both of locally generated aircraft and of ‘third-party’ overflights, the day-to-day variation is considerable. On some days there are no locally generated movements from Bourne Park at all and there may be few overflights. In these circumstances the deployment of human observers would have been impracticable. The employment of human observers to identify every aviation event during the course of the survey would have been prohibitively expensive.
- 7.4.3 There is uncertainty in the results of any survey, given that any survey is a sampling exercise and it is impossible to know for certain how the sample relates to a ‘true’ record. The best practicable method for analysing survey results in these circumstances is to gather the largest possible database and to use statistical techniques to sift out the relevant results from it.
- 7.4.4 The database comprised of 1-minute sample values is substantial and has resisted attempts to identify aircraft by any programmable pattern recognition technique. The results have been scrutinised by eye. There is uncertainty in the accuracy of the analysis, insofar as event noise has probably been extracted reasonably completely but event identification is uncertain. Locally-originated airfield movements have probably been identified with reasonable certainty but overflights may be confused with other sources, and distant overflight paths leave weak traces in the numerical data.
- 7.4.5 In the use of ‘worst case’ resultants from a limited database, an assumption is embodied in the subsequent calculations, especially of speculative outcomes. Attention has been drawn to the principal points of uncertainty in the foregoing analysis.
- 7.4.6 A numerical uncertainty budget would be very difficult to compile and would itself be uncertain. It is reasonable to propose that the principal results presented above are set within wide margins of uncertainty, but represent realistic possible outcomes from which broad conclusions may reasonably be drawn.





## 8 CONCLUSIONS

- 8.1.1 A survey was undertaken in May 2019 with two monitoring stations operating throughout, one at a reference position adjacent to the operations area outside the hangars at Bourne Park airfield itself and the other first, at a location towards the eastern end of the airstrip and then in the orchard in front of Windmills just over 1km to the north-west.
- 8.1.2 The only practicable methods for extracting results from the resulting substantial database have been manual sifting and statistical analysis. Conclusions may reasonably be drawn from the analysis within probably a wide margin of uncertainty.
- 8.1.3 The numbers of flight movements both at the local airfield and overhead fluctuated markedly from day to day during the survey. The contributions of local airfield events and of third-party military and civilian overflights were separated out in the data analysis yielding estimates of the underlying ambient sound levels at the survey locations. Background sound levels were derived directly from the survey data.
- 8.1.4 The analysis has shown that third-party overflights can significantly influence the day-to-day ambient soundscape in the more remote parts of the area. At Windmills the principal influences on the day-to-day ambient soundscape were unclear and could have included road traffic and agricultural operations. Aviation noise did not significantly contribute.
- 8.1.5 With reference to notes provided by Mr Martin it was possible to identify local airfield movements and to attribute some of them specifically to Gazelle helicopters taking-off and landing and to a fixed-wing aircraft taking-off and landing. No ground running for maintenance or testing was identified in the survey record.
- 8.1.6 Overflight event noise levels and maxima were extracted from the database by pattern recognition enabling single movement noise values to be identified. These cannot be attributed to any aircraft type or origin.
- 8.1.7 A speculative estimate of ground-running noise was derived from the known helicopter movement noise values. Distance and barrier effects were included in a propagation calculation to a set of nominal receivers including the main house at Bourne Park itself, Windmills to the north-west, Stokehill Farm to the east and Frenches Farm, which is the closest ‘third-party’ dwelling to the airfield, also to the east. The resultants have been evaluated against the relevant background levels by the BS4142 method, showing that ground-running noise could be capable of being perceived as having an adverse or significant adverse impact at all of those locations.
- 8.1.8 The potential effect of full operation of the airfield, using all of the movements permitted in its operating conditions and adding in ground-running as well, has been estimated for the same group of receivers by calculation. The results show that under the maximum possible intensity of operation the airfield could significantly influence the daytime ambient noise level across the area, principally through contributing relatively low altitude overflight noise.
- 8.1.9 The aims of Government policy on noise in the context of sustainable development are to avoid significant adverse impacts and to mitigate and minimise adverse impacts on health and quality of life, and where possible, contribute to the improvement of health and quality of life. The elimination of a potential noise source in favour of a less noisy use of land would conform with those aims.



# APPENDIX 1 Glossary of Technical Terms



## Decibels

Noise is conventionally measured in decibels (dB). The decibel is a logarithmic unit and decibel levels do not add and subtract arithmetically. An increase or decrease of 3dB in the level of a steady noise is about the smallest that is noticeable. It represents a doubling or halving of noise energy. An increase or decrease of 10dB represents a tenfold change in noise energy, and is perceived as a doubling or halving of loudness. The threshold of hearing for a typical young, healthy adult is 0dB A-weighted (see below) sound pressure level. An A-weighted noise level of 140dB can cause physical pain. Most people listen to their televisions at about 60 to 65dB (A-weighted). Alongside a busy main road the ambient noise level may be in the 70 to 80dB (A-weighted) range; on a quiet day in the country it might be as low as 30dB, in town 40 to 50dB (A-weighted).

## Decibel addition

If two similar noise sources operate together their combined noise level at an observer's position some distance away is 3dB higher than the noise level generated by just one of them. If two further machines are switched on the noise level generated by all four at the observer's position is 3dB higher than the level generated by the two. If the number of machines is again doubled, to eight, the noise level increases by another 3dB, and so on.

## A-Weighting

The human ear is not equally sensitive to all frequencies of sound. It is relatively much less sensitive to very low frequencies such as 'mains hum', and to very high frequencies such as the call of a bat, than to the 'mid-frequencies' important for human voice communication. In order to make sound level meters, which would otherwise be indiscriminate in registering sound pressures, respond in a way which reflects human perception of sound they are usually fitted with a set of filters to progressively filter out the high and low frequency energy. The filters are made to an internationally standardised specification and the filtered noise level is said to be 'A-weighted'. Sometimes A-weighted decibel levels are denoted 'dB(A)', but the correct, internationally standardised format for reporting requires the 'A' to be appended to the noise descriptor (see below) e.g.  $L_{Aeq,t}$ ,  $L_{Amax}$  etc.

## Sound Pressure Level, $L_{PA}$

The sound pressure level is the simplest representation of the level of noise at a point. The simplest form of sound level meter just registers the instantaneous  $L_{PA}$  from moment to moment. If there is a dominant, steady source such as a nearby fan or motor the  $L_{PA}$  will not vary very much from moment to moment and an average value can be estimated.

In the absence of a dominant steady source the sound level at a point, indoors or outdoors, varies continuously. The variation may be over a few dB about an average value in a quiet room, or over 10dB or more in a noisy outdoor environment. In order to define a level to represent the noisiness of the space it is necessary to define that average value. The most common averaging methods are energy averaging ( $L_{Aeq}$ ) and statistical averaging ( $L_{AN}$ ).



### **Equivalent continuous A-Weighted Sound Pressure Level, $L_{Aeq,t}$**

The 'equivalent continuous A-weighted sound pressure level' is an average of the fluctuating sound energy in a space. It is the value of the A-weighted sound pressure level of a continuous, steady sound that, over the specified time period,  $t$  seconds, has the same root mean square sound pressure as the varying sound. It can be likened to the mean petrol consumption of a car over a specific journey during which the instantaneous consumption peaked during periods of acceleration and fell during periods of coasting or braking.

### **Statistical average A-Weighted Sound Pressure Level, $L_{AN}$**

The value  $L_{AN}$  is the A-weighted sound level that is exceeded for  $N\%$  of the time over a given period. A useful way of imagining this quantity is to think of a varying sound level as being made up of a vast number of short samples occupying a series of boxes, each 2dB 'wide'. In one instant the sound level sample might fall into the 30-32dB box, and in the next it might fall into the 32-34dB box. After an hour, a day, or some other defined period the series of boxes will be filled to different levels with just a single sample in the lowest box (the minimum sound level), one in the top box (the maximum sound level) and varying numbers in the boxes in between. It then becomes possible to say that  $N\%$  of all of the samples lie in boxes above  $X$ dB, and  $X$ dB is the value of  $L_{AN}$ . The  $LA_{90}$ , or level exceeded for 90% of the time, is a useful quantity as it appears to reflect people's view of the basic tranquillity or noisiness of an area. It is often taken as representative of the background noise level of an area.

### **BS4142 terminology**

**Specific noise:** the noise from the plant or process of interest, distinct from noise from any other source. The level of this noise is rated to determine likelihood of complaint. Characterised by the  $L_{Aeq,t}$ .

**Ambient noise:** the whole noise in the environment, including the specific noise and 'contaminating' residual noise. Characterised by the  $L_{Aeq,t}$ .

**Residual noise:** the noise in the environment which is not contributed by the specific source. Characterised by the  $L_{Aeq,t}$ .

**Background noise:** the steady constant background, the level of which is the  $LA_{90}$  of the residual noise.



## APPENDIX 2 Survey equipment details




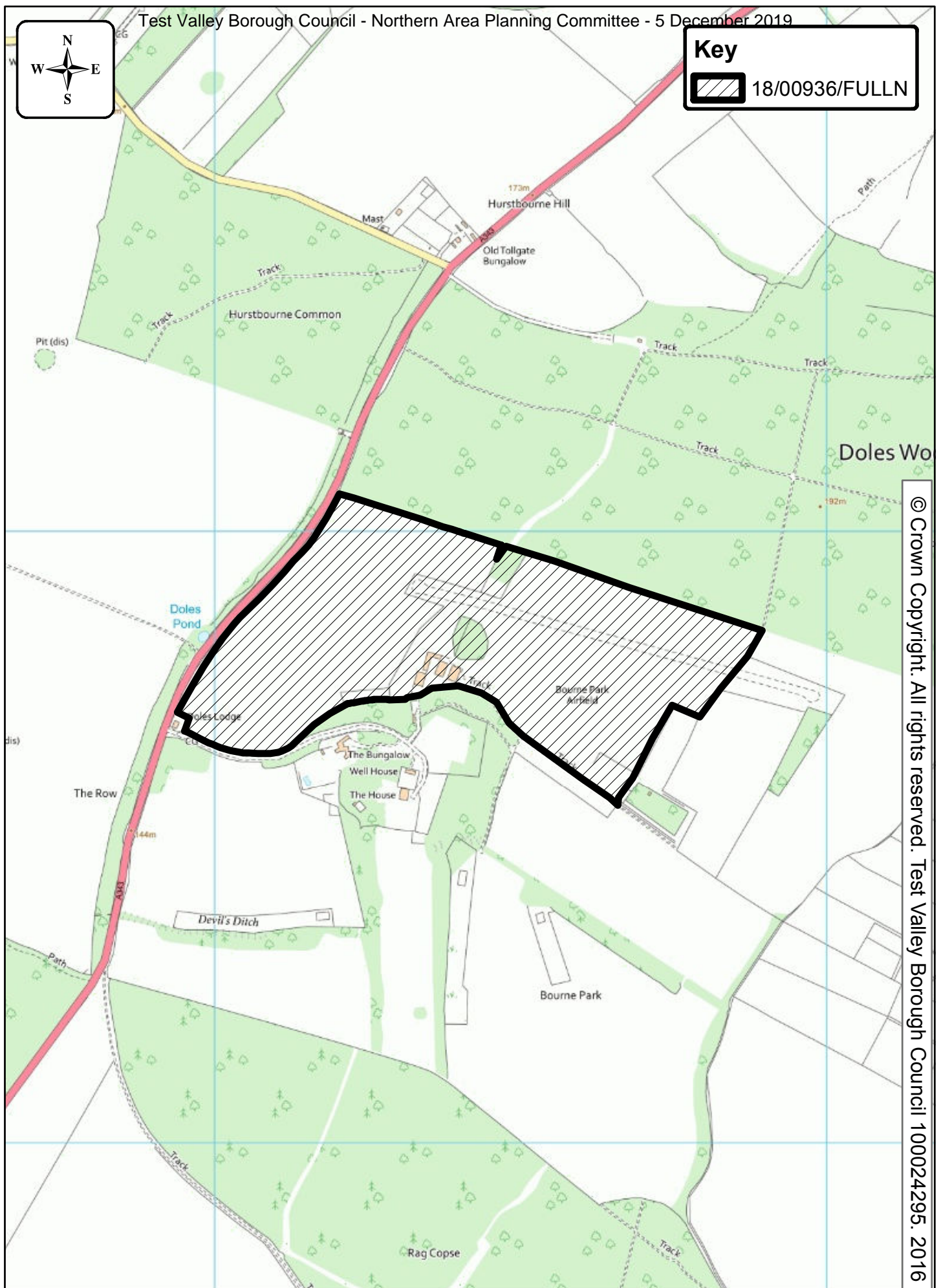
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Equipment	Type	Serial Number	Calibration	
			Date	Certificate no
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Microphone	MK 255	12582	02/07/18	14009840-s2
Preamplifier	SV 12L	57964	02/07/18	14009840-s2
Svantek tri-axial accelerometer	SV84	E2154	02/07/18	14009840-v2
Svan 958 - GREEN				
Svantek Class 1 Sound and Vibration Analyser	958A	59146	02/07/18	14009840-s1
Microphone	MK 255	12565	02/07/18	14009840-s1
Preamplifier	SV 12L	57962	02/07/18	14009840-s1
Svantek tri-axial accelerometer	SV84	E2149	02/07/18	14009840-v1
Svan 958 - BLUE				
Svantek Class 1 Sound and Vibration Analyser	958A	59101	17/12/18	14010568-2
Microphone	MK 255	12579	17/12/18	14010568-2
Preamplifier	SV 12L	57969	17/12/18	14010568-2
Svantek tri-axial accelerometer	SV84	E2158	17/12/18	14010568-2
Svantek Sound Level Calibrator	SV33	58228	04/07/18	14009824



**Key**

 18/00936/FULLN



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**18/00936/FULLN**



revisions	initial	date
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roject

BOURNE PARK

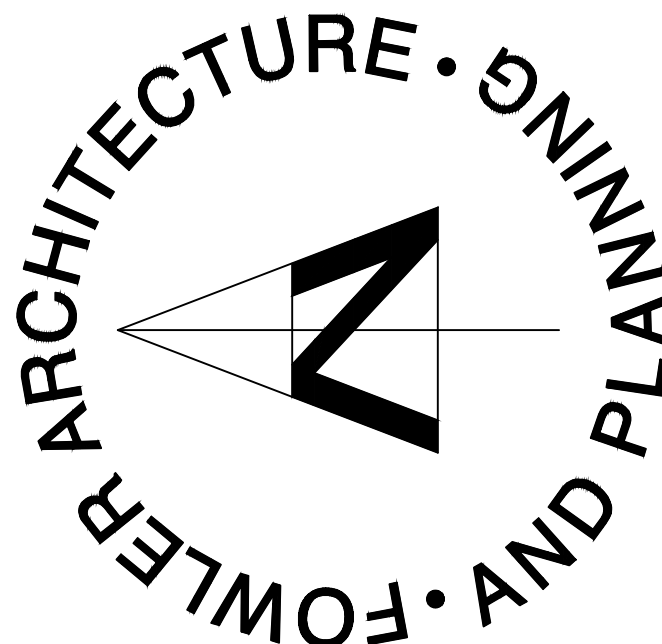
Hurstbourne Tarrant

Drawing

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date  
April'18

date  
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19 High Street

# Pewsey

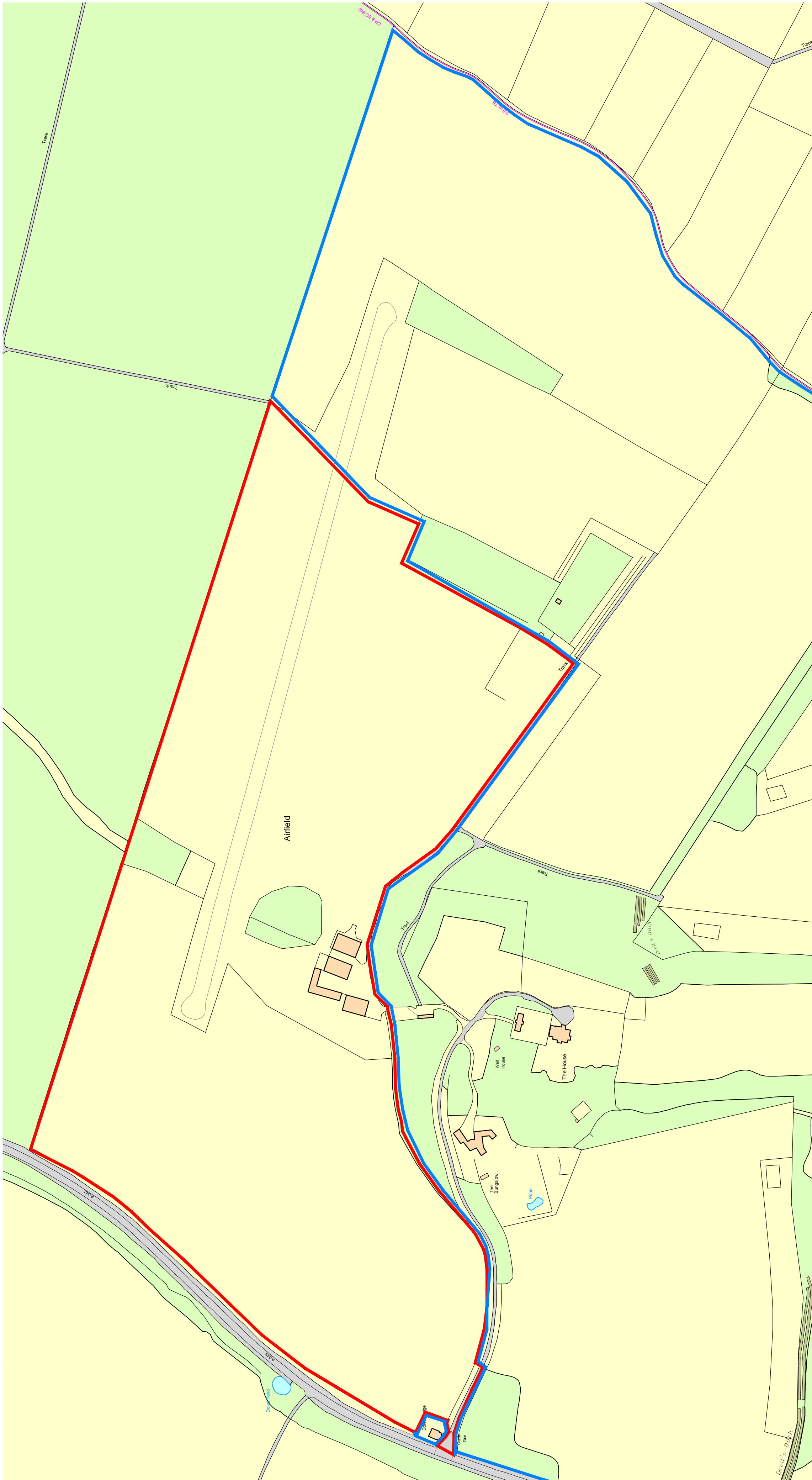
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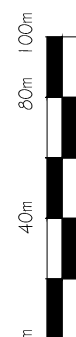
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fax (01672) 569488

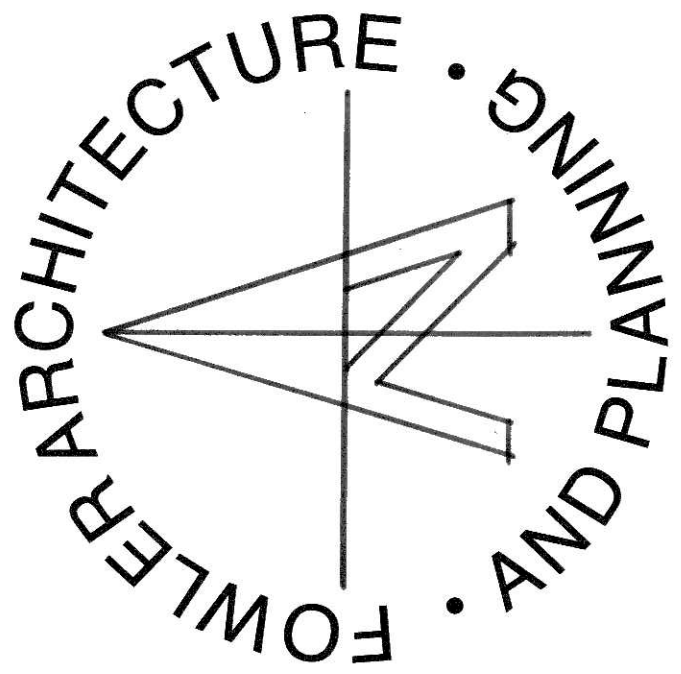
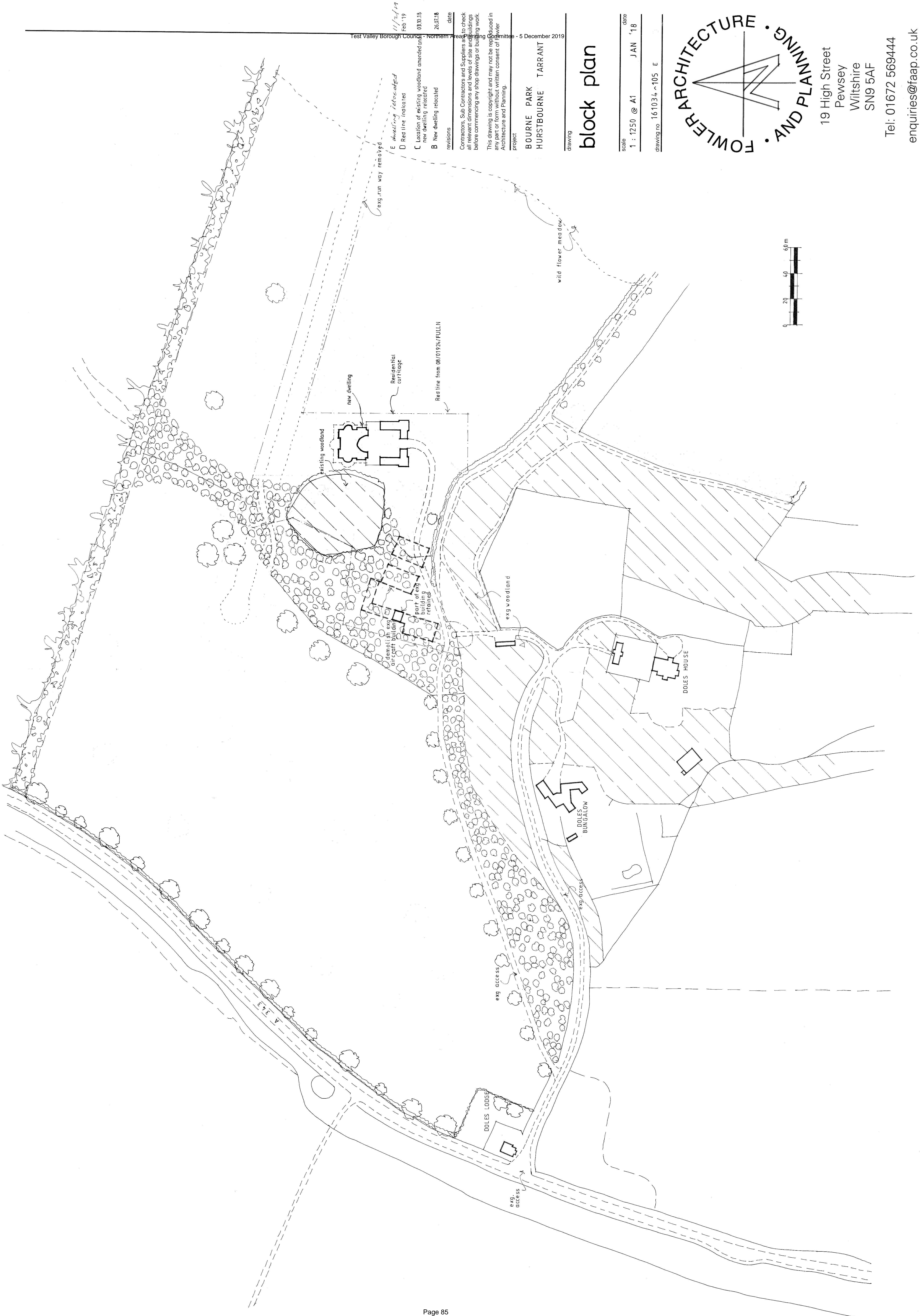
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SITE LOCATION PLAN SCALE 1:2500



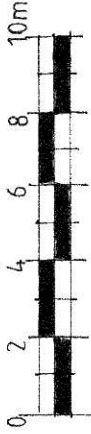
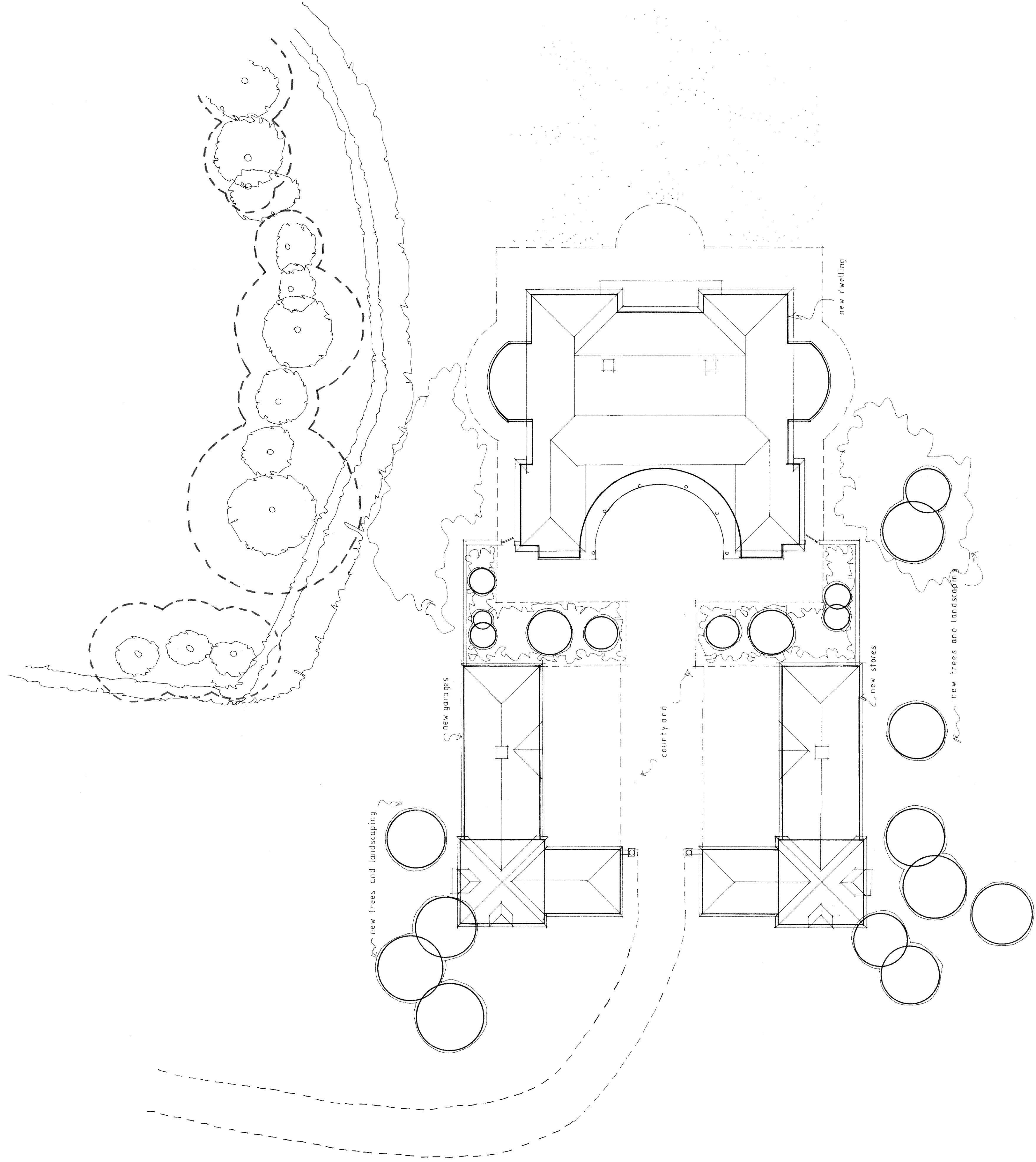




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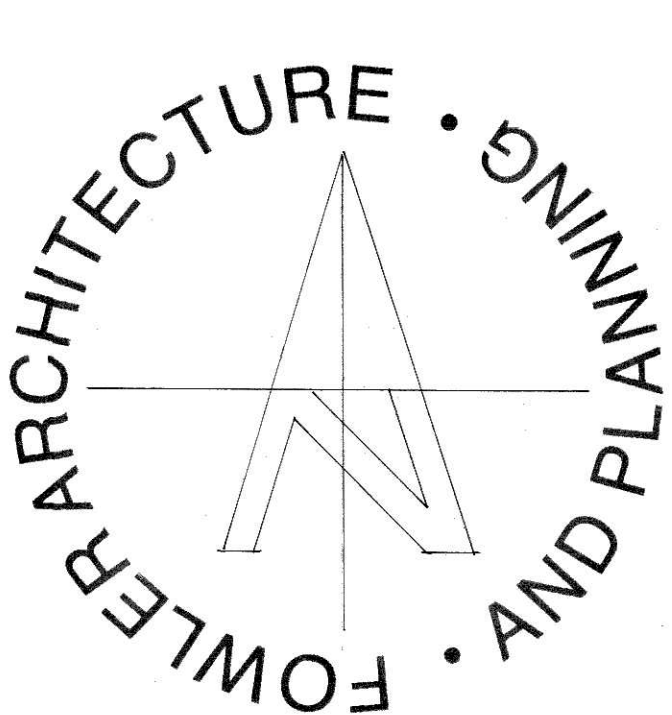




Test Valley Borough Council - Northern Area Planning Committee - 5 December 2019		
C minor amendment	11/2/19	
B Existing woodland shown	01.10.18	
A North point amended & access drive revised	01.08.18	
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project		
BOURNE PARK HURSTBOURNE TARRAN		

drawing  
site plan

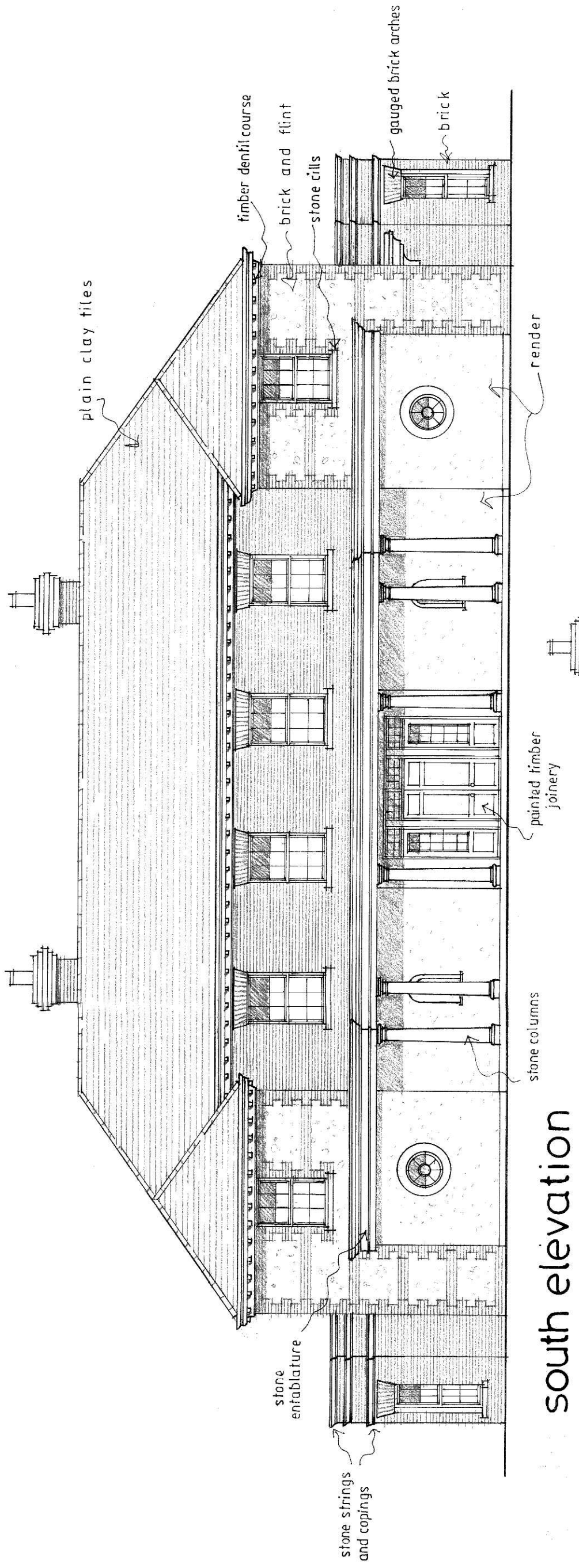
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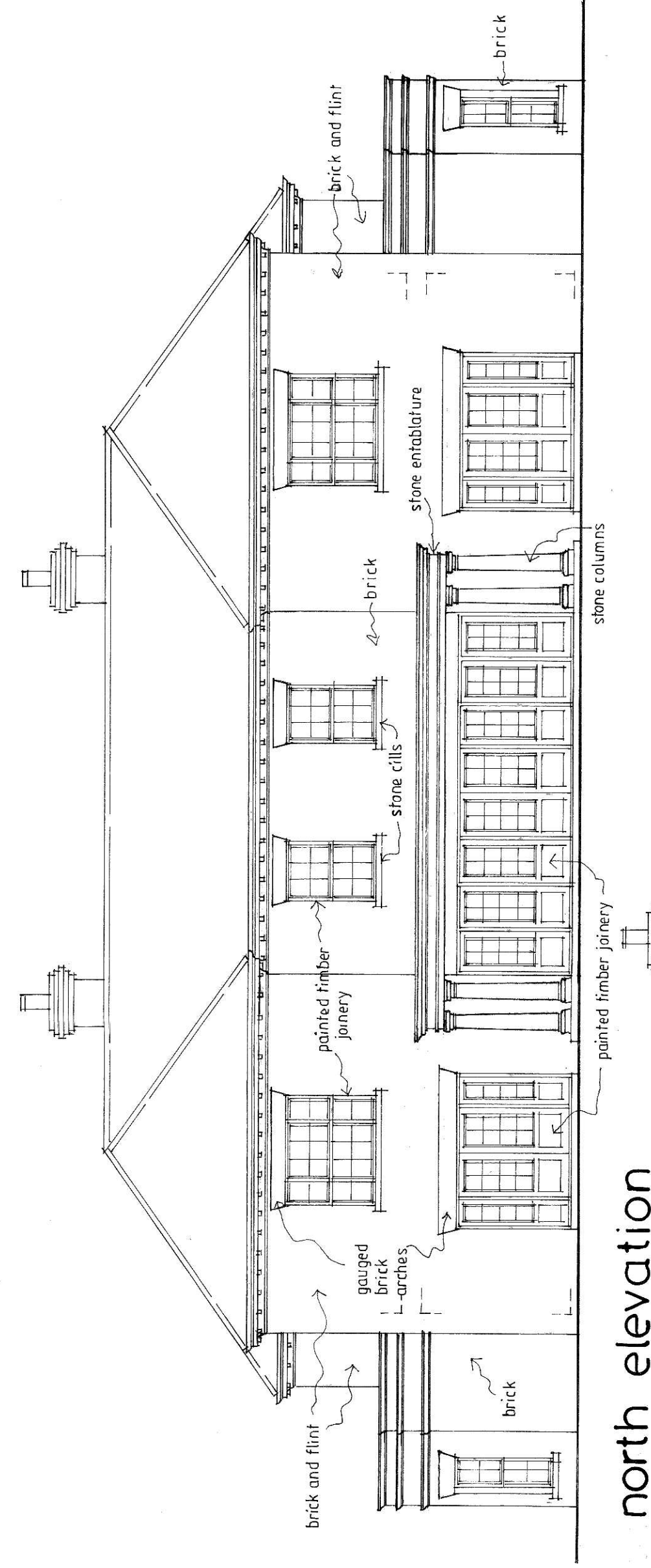
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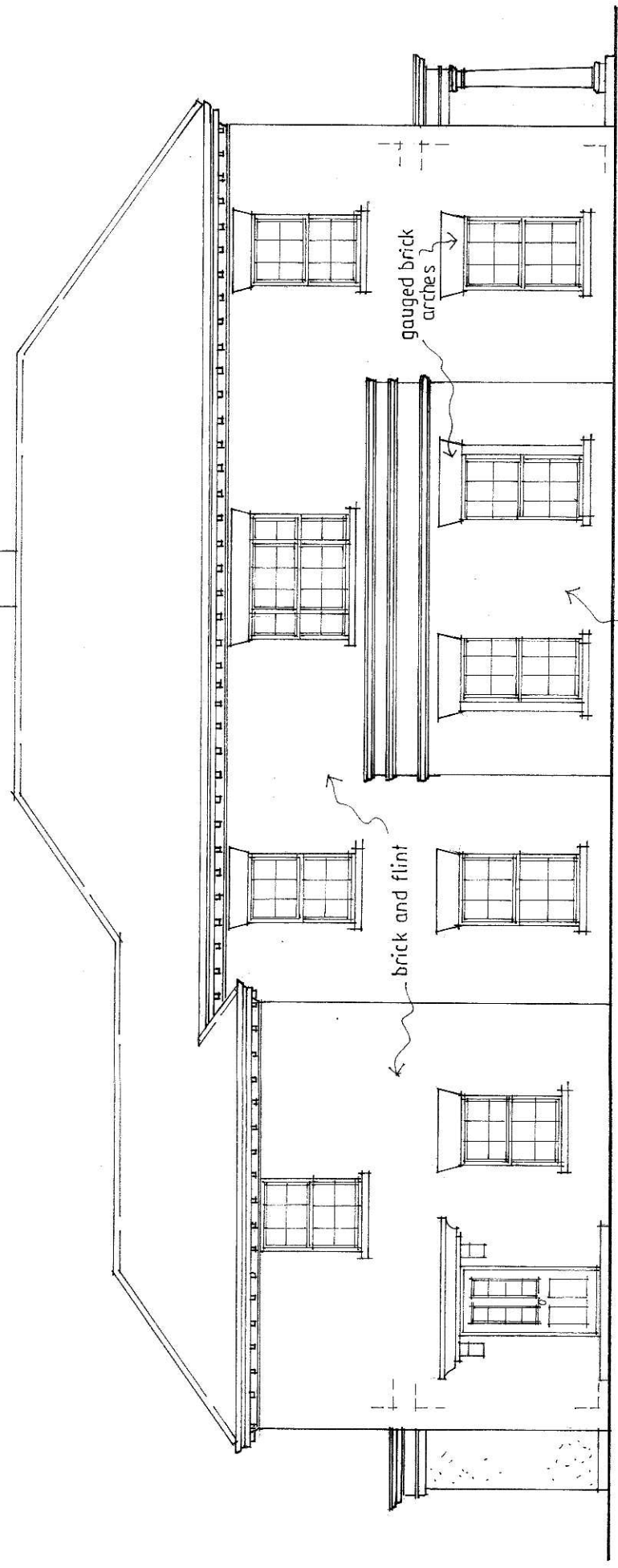




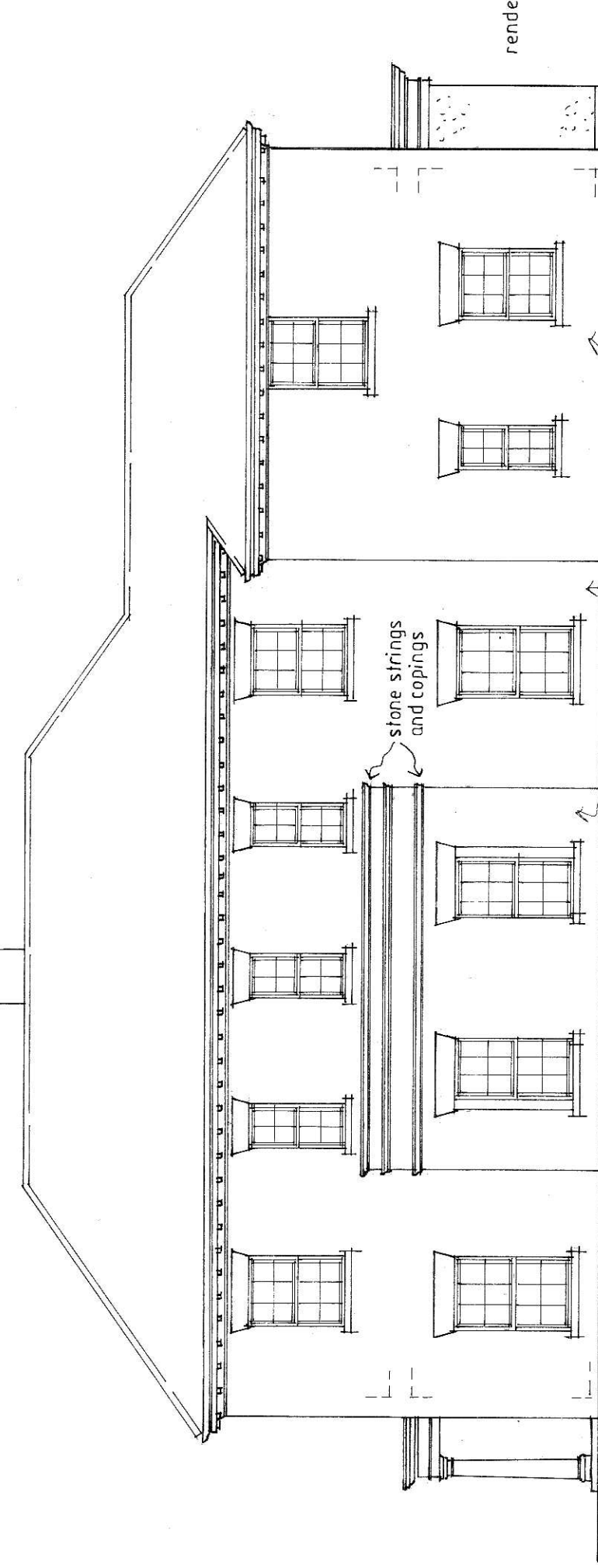
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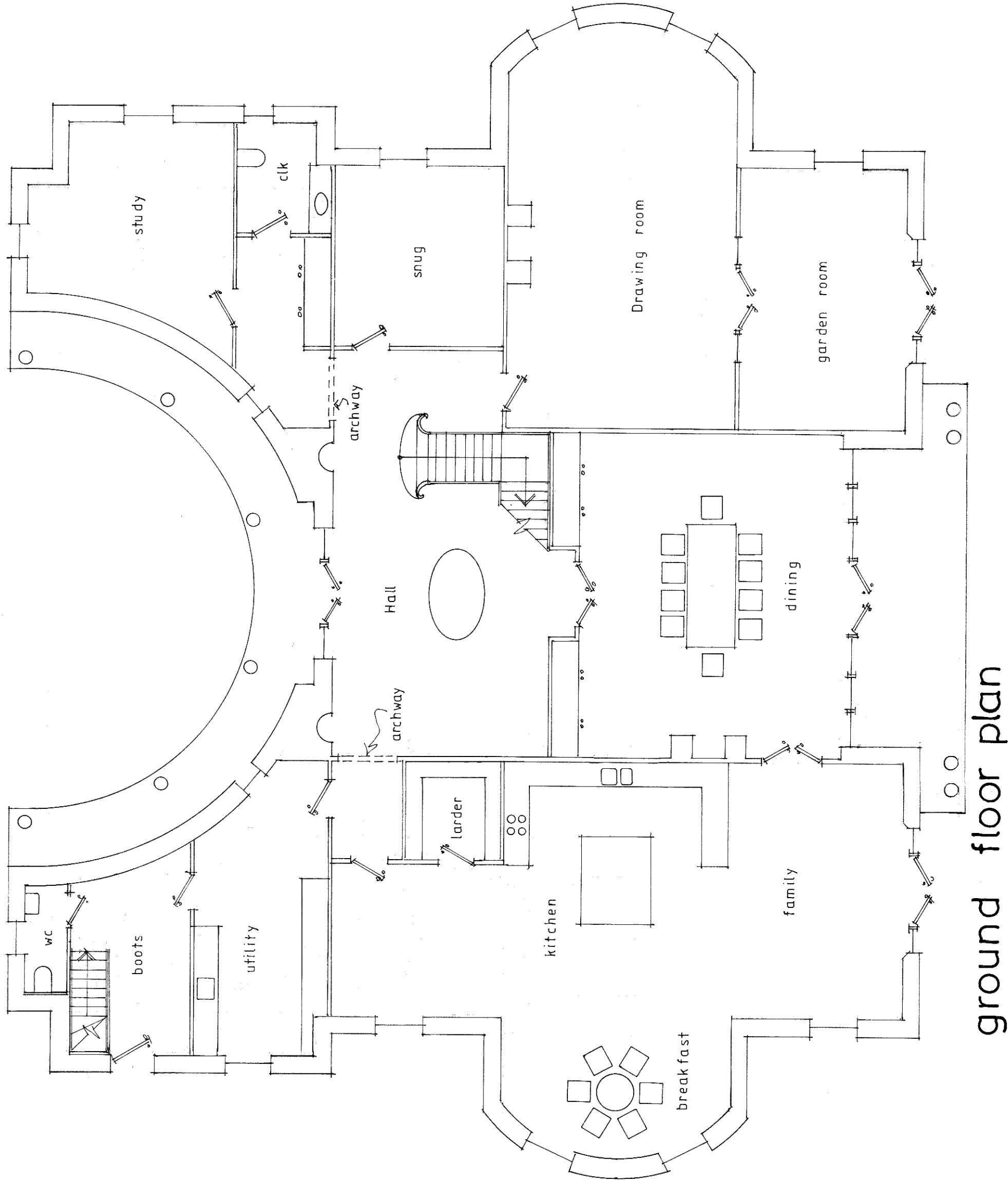
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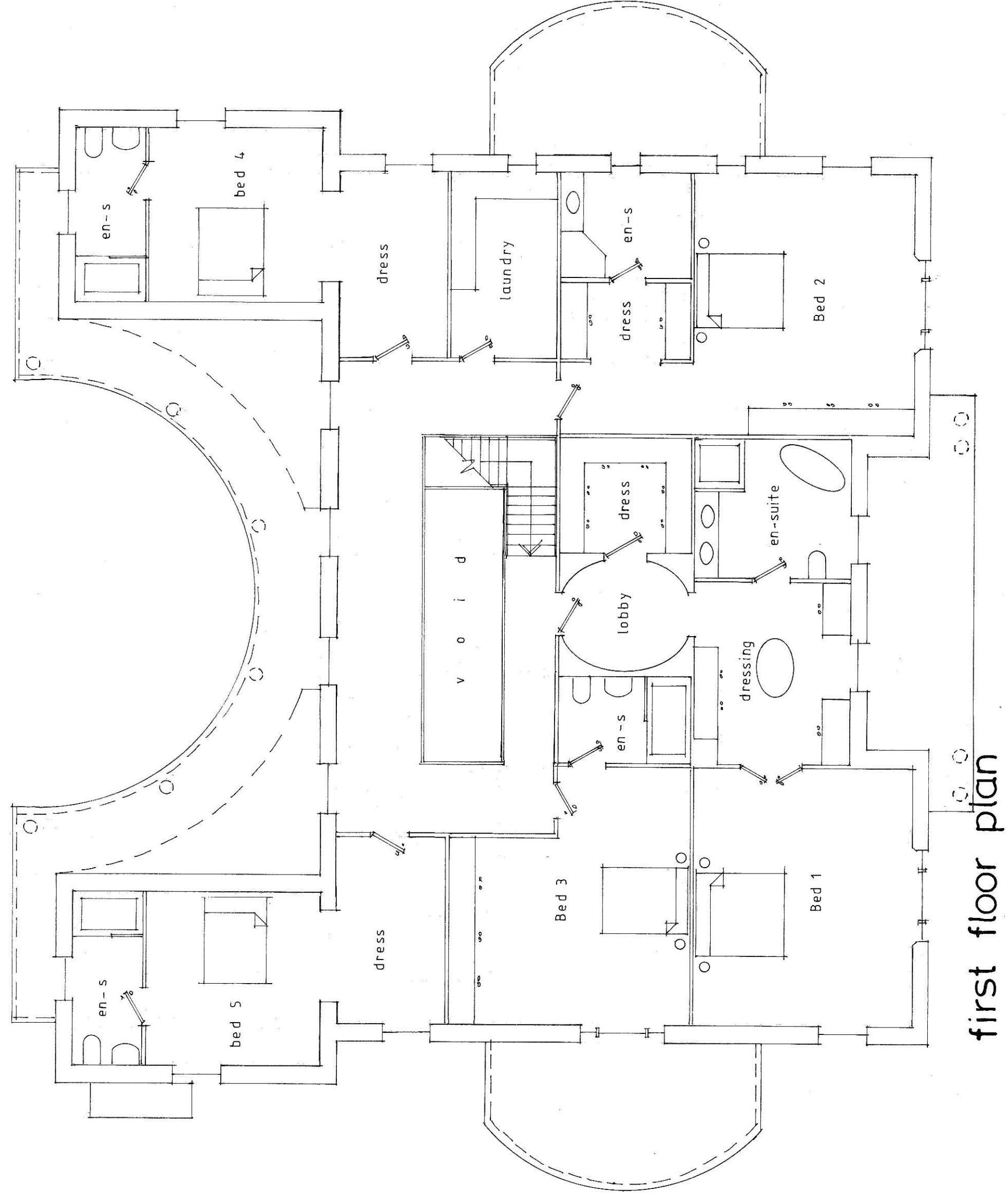
east elevation



west elevation



ground floor plan



first floor plan

Test Valley Borough Council - Northern Area Planning Committee - 5 December 2015

11/2/17  
01.03.18

B orientation  
A Elevations amended to show detailing and materials. North point amended

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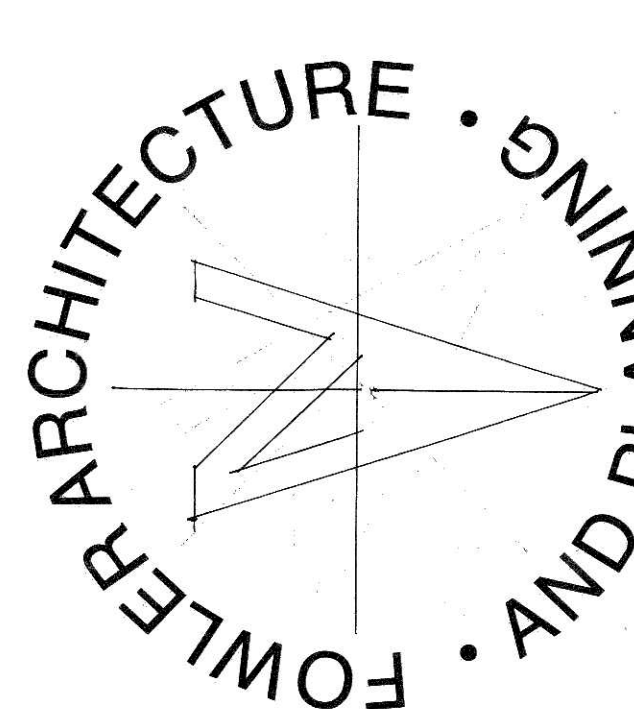
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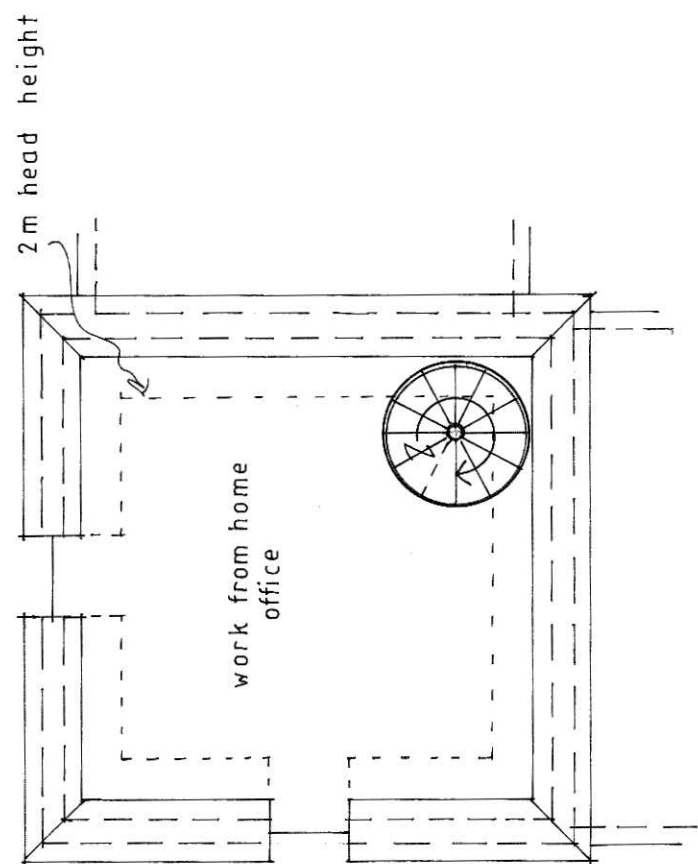
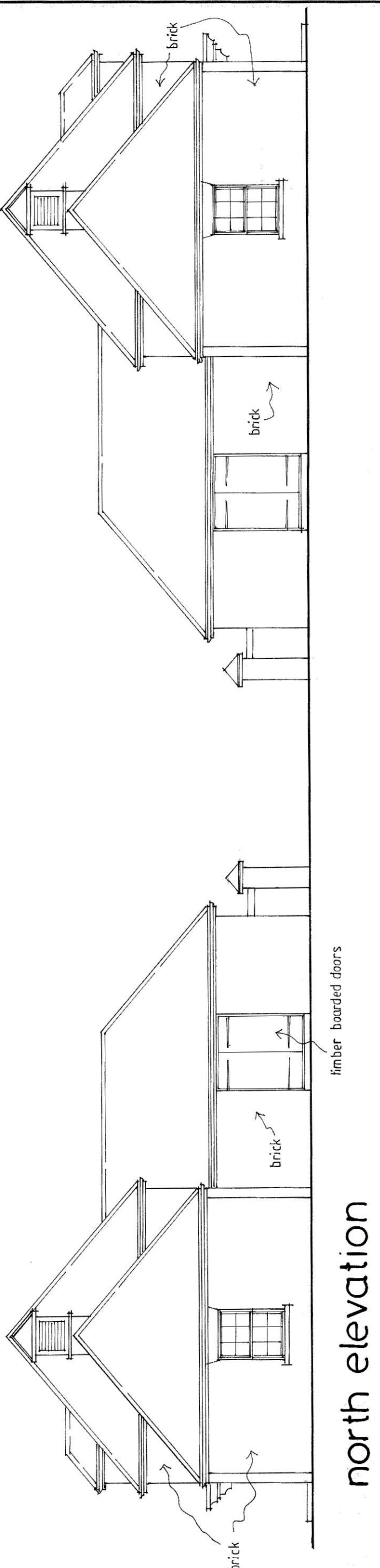
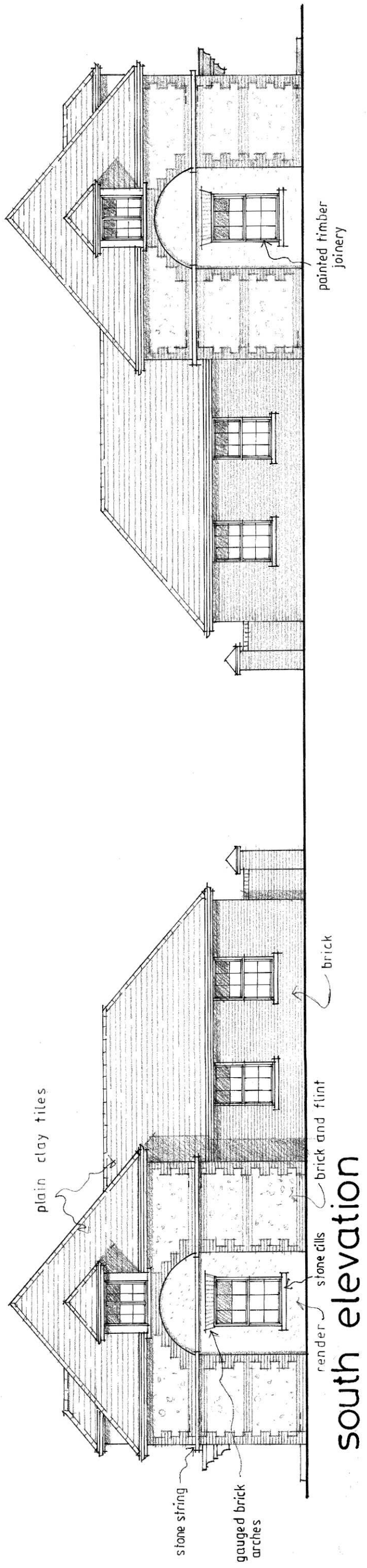
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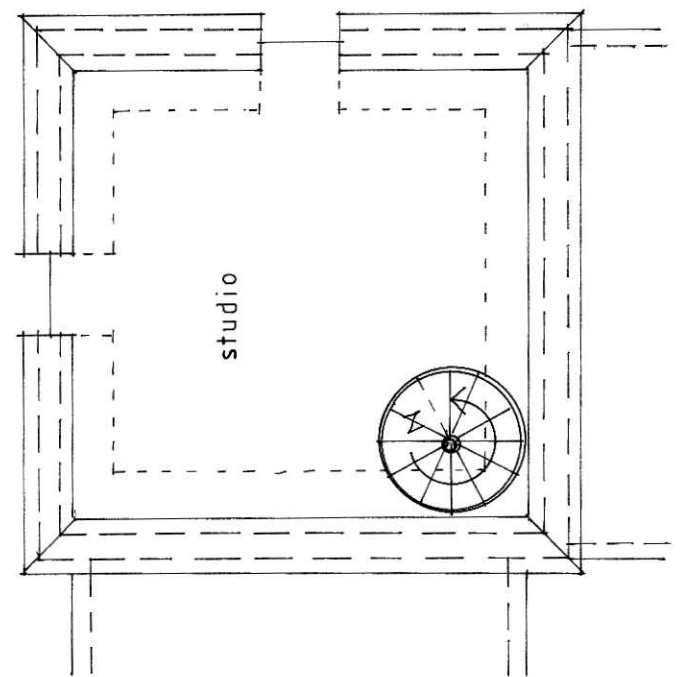


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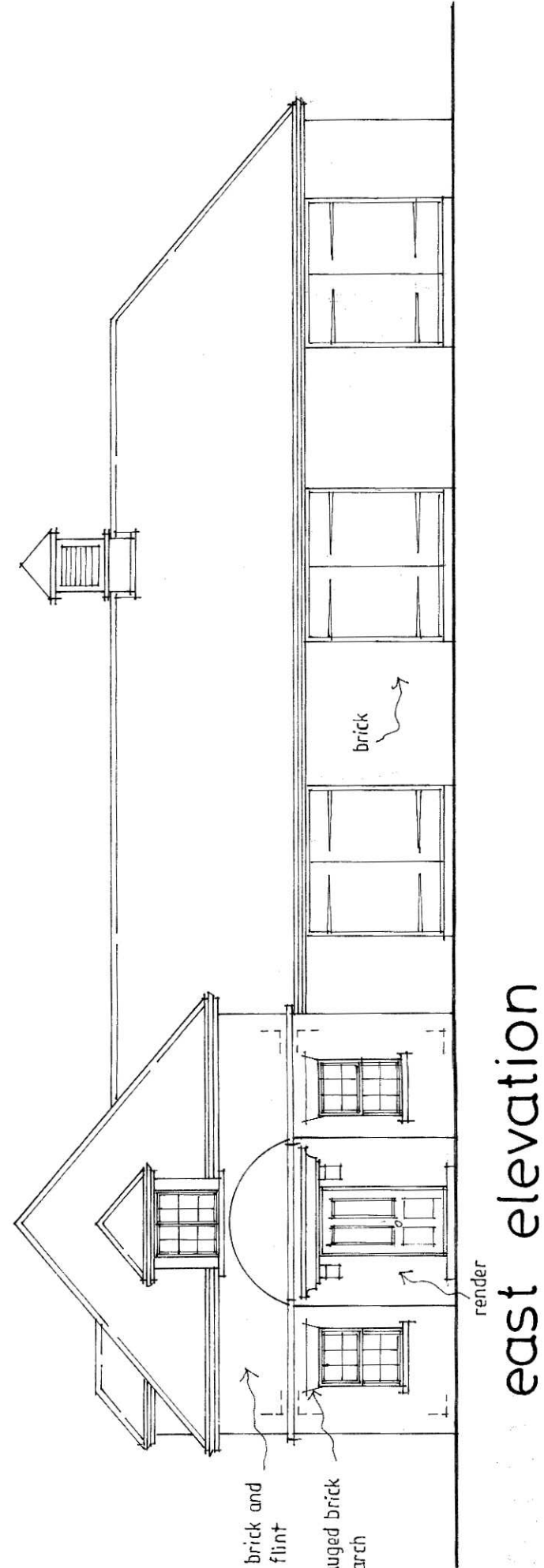
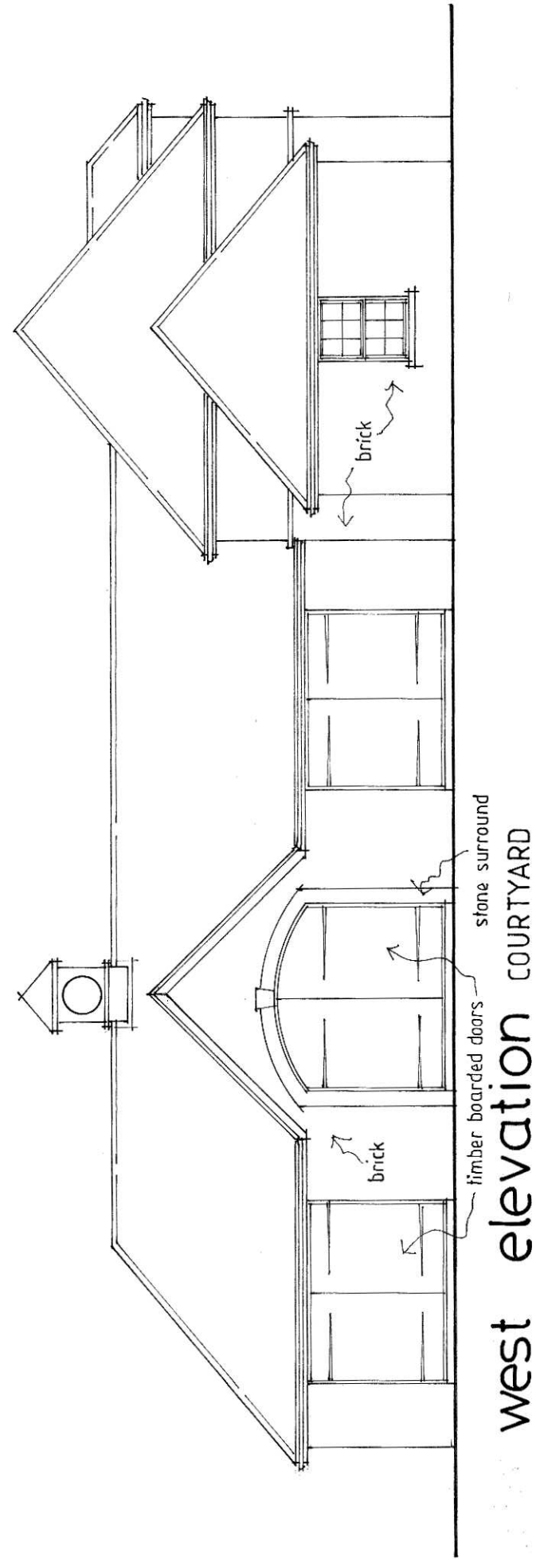
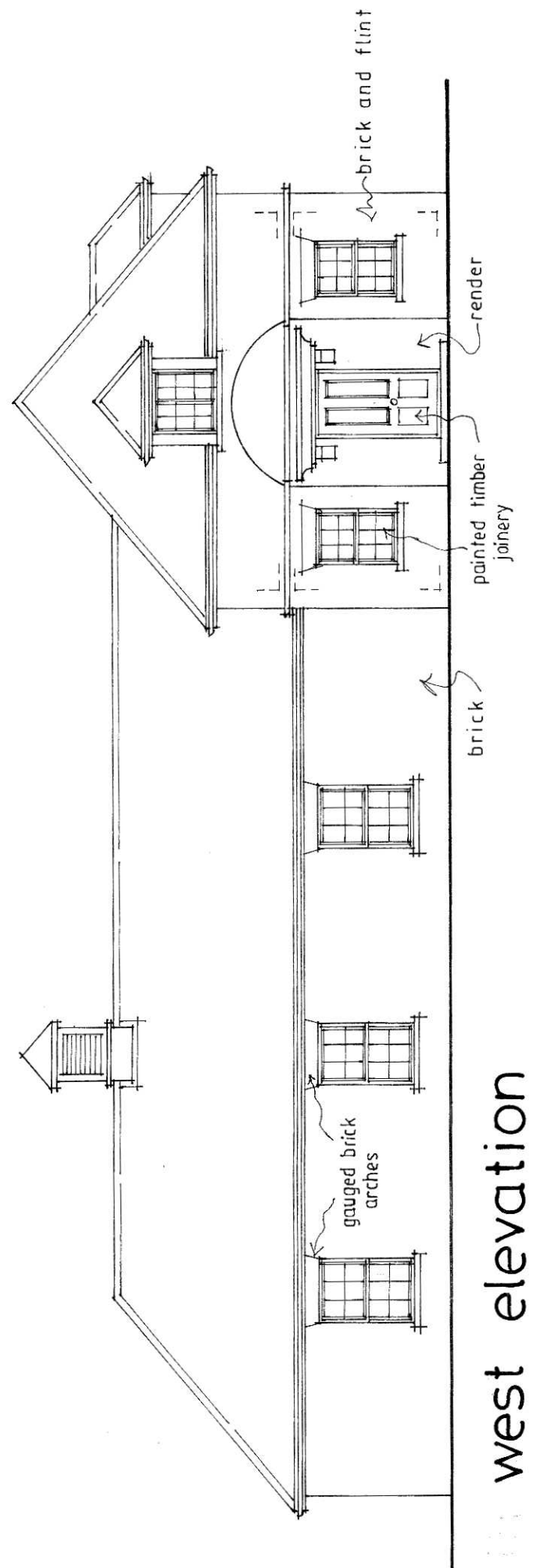
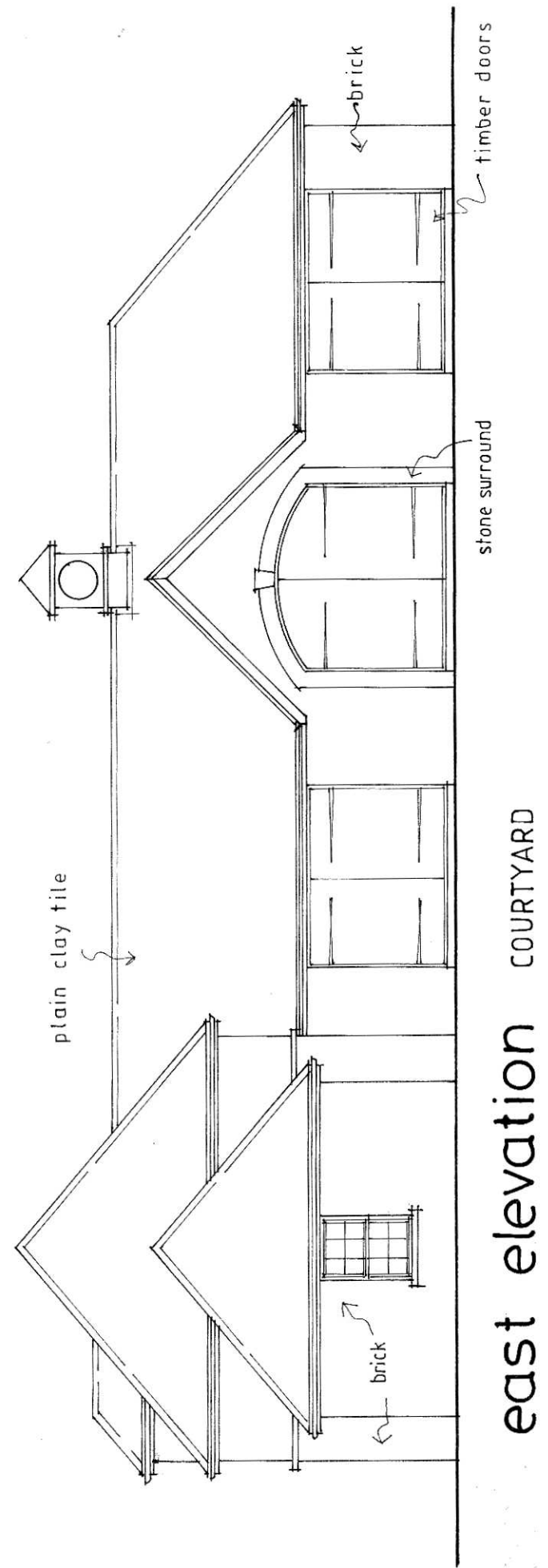




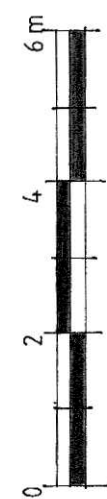
first floor plan



first floor plan



ground floor plan



B orientation  
A Notes added & North point amended  
01/03/18

revisions  
date  
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project  
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drawing  
garages & stores

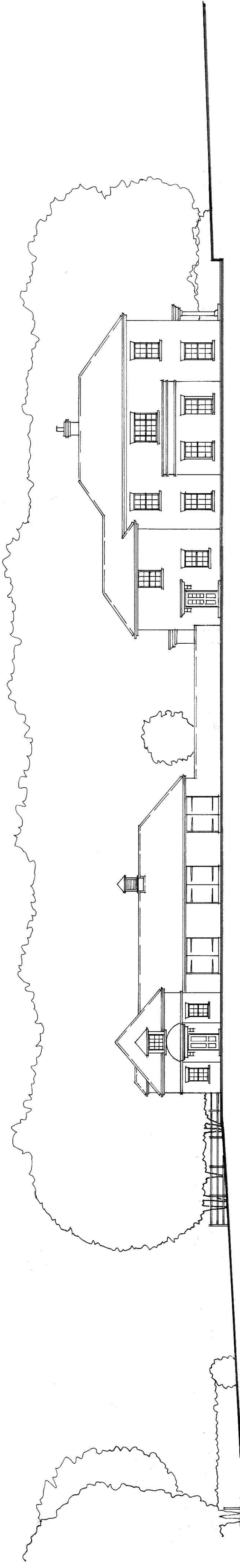
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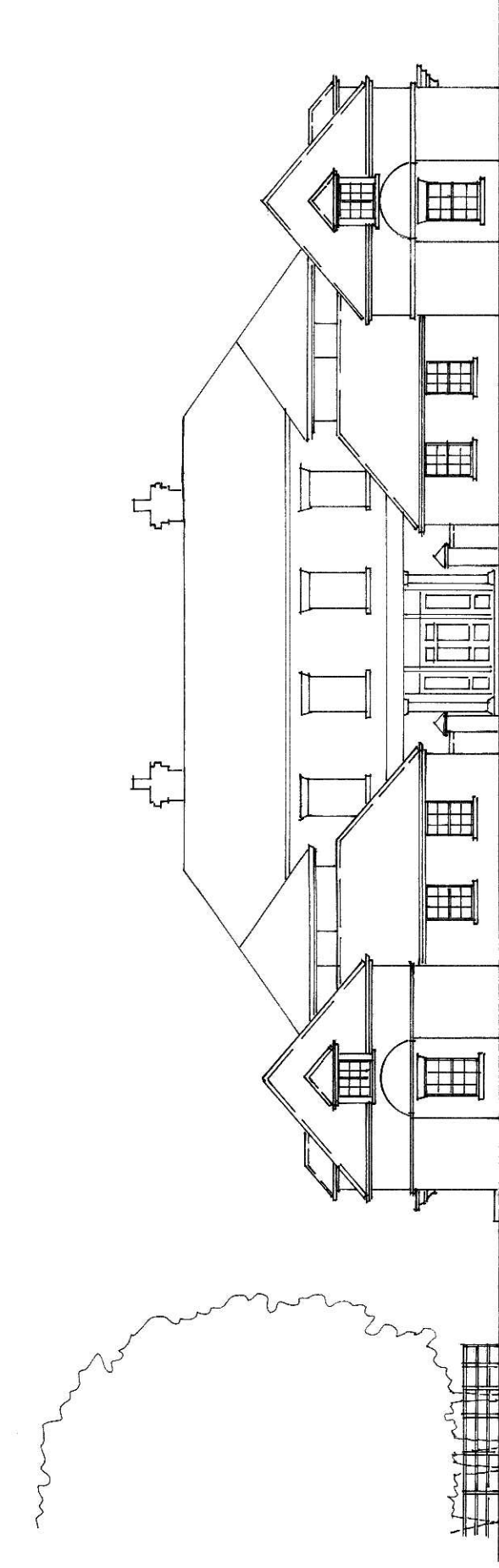
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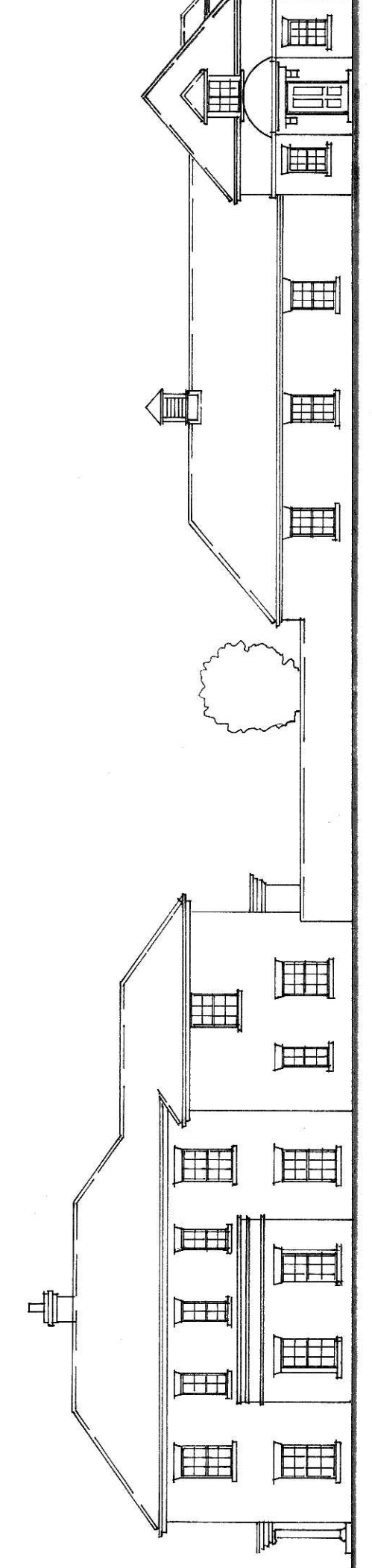




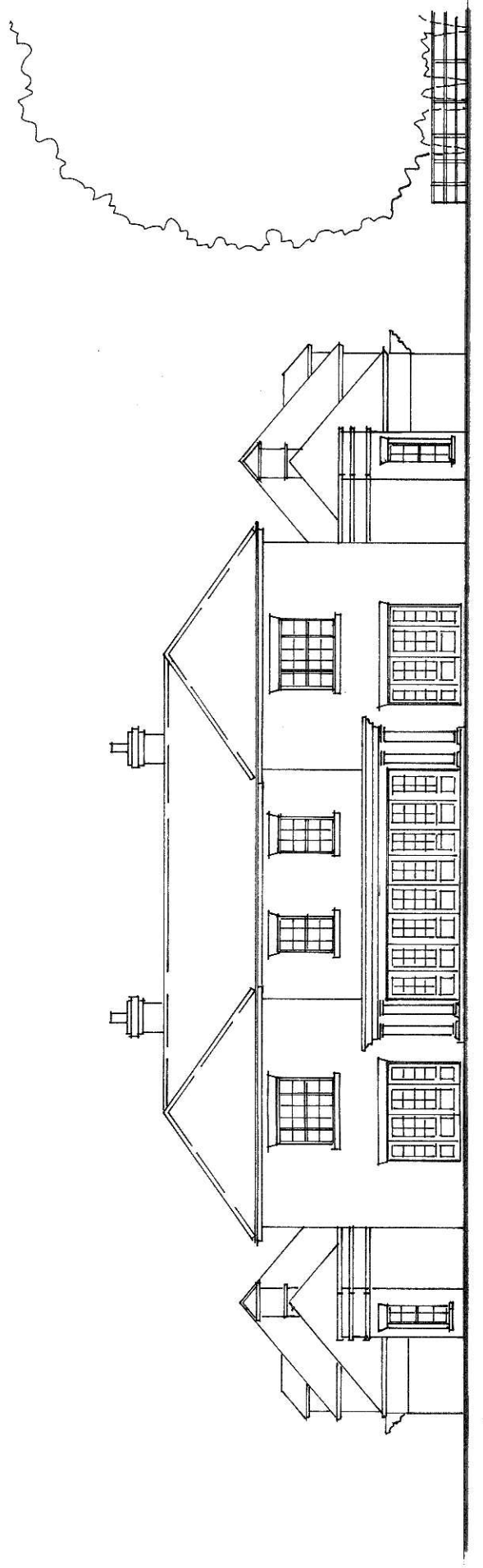
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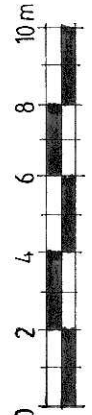
south west elevation



north west elevation



north east elevation



Test Valley Borough Council - Northern Area Planning Committee - 5 December 2019

revisions	date
A Topographical revisions to SE 4NW elevations	03.10.18

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BOURNE PARK  
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drawing

# elevations

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## ITEM 8

---

<b>SITE</b>	Land to the west of the Raymond Brown Waste Solutions, A303 Enviropark, Drayton Road, Barton Stacey, Andover, SO21 3QS
<b>PROPOSAL</b>	A Waste to Energy Facility comprising a twin line facility (i.e. two boiler and flue gas treatment lines) capable of processing a total of up to 500,000 tonnes of waste per annum (tpa), with a gross electrical generating capacity of up to 65 MW. The facility would generate hot gases that in turn are used to produce steam for use in a steam turbine to generate electricity.
<b>CASE OFFICER</b>	Mrs Samantha Owen

---

### 1.0 Introduction

This report is presented to NAPC at the request of the Head of Planning and Building.

1.1 This report seeks confirmation of this Council's response to the public consultation carried out by Wheelabrator who are seeking consent to construct a Waste to Energy (WtE) Incinerator at the A303 Enviropark. This process is administered by the Planning Inspectorate as a Nationally Significant Infrastructure Project and therefore the Council's response to this consultation will be taken into account as part of this process.

1.2 This scheme requires consultation with a wide array of consultees. Paragraph 2.17 details those consultee responses which are awaited from Hampshire County Council. At the time of writing these have not been received and therefore it is anticipated that a number of these will be included in the Update Paper prior to the NAPC meeting.

### 2.0 Nationally Significant Infrastructure Projects (NSIP)

NSIP applications are major infrastructure projects such as new harbours, roads, power generating stations (including offshore wind farms) and electricity transmission lines, which require 'development consent' under procedures governed by the Planning Act 2008. Development consent, where granted, is made in the form of a Development Consent Order (DCO). The Planning Act 2008 sets out thresholds above which certain types of major infrastructure projects are considered to be nationally significant and require development consent.

2.1 On 1 April 2012, under the Localism Act 2011 the Planning Inspectorate (PINS) became the government agency responsible for operating the planning process for NSIPs. The Waste to Energy (WtE) Harewood Incinerator is considered an NSIP as the electrical generating capacity of the facility would exceed a threshold of 50 megawatts.

## 2.2 The role of the Local Authority in the NSIP Process

The Local Authority is a statutory consultee and whilst participation on the process is not obligatory it is strongly advised by PINS guidance. The Local Authority has the ability to provide an important local perspective of the proposed scheme at the pre-application stage. This Council is also likely to have a role in monitoring and enforcing many of the DCO provisions and requirements if consent is ultimately granted by the Secretary of State.

## 2.3 **Proposal**

The proposed development would comprise of a WtE facility and associated buildings, structures and plant, including:

- a tipping hall;
- fuel storage bunker;
- boiler house;
- ash collection area (bottom ash bunker);
- up to two flue stacks including emissions monitoring;
- flue gas treatment building;
- turbine hall housing a steam turbine and generator;
- above ground fuel oil storage tanks for use at start up and as an auxiliary fuel;
- administrative offices;
- air cooled condenser;
- grid connection substations and mains transformer;
- fire water tanks;
- demineralised water treatment plant; and
- supporting infrastructure comprising weighbridges and gatehouses, storage tanks, raw water tanks, emergency diesel generators and vehicle access roads including ramp to tipping hall.

The building would be comprised of two separate buildings; the main boiler house would be 163 metres wide and 54 metres deep, and the turbine and transformer building which would be 150 metres wide and 30 metres deep. The maximum height of these elements would be 46 metres. In addition to this Two chimney stacks are proposed at a height of 80 metres.

2.4 The design of the Incinerator has not been finalised and is part of this public consultation process. Access to the site would be from the existing access to the A303 Enviropark. If granted consent the construction period would be 42 months long and the WtE Incinerator is initially proposed to have a life of 50 years.

## 2.5 **NSIP Process**

There are six stages to the NSIP process which are:

- Pre-application
- Acceptance
- Pre-examination
- Examination
- Recommendation and Decision
- Post Decision

2.6 Pre-application

At this stage the prospective applicant promotes and develops their proposals. There is a requirement to consult widely and it is this stage at which the Council is considering its response to within this report.

2.7 Acceptance

Here the applicant submits an application for development consent to PINS. PINS have 28 days to decide whether the application meets the standards required to be accepted to examination. The applicants are anticipating the submission of their application in the first quarter of 2020.

2.8 Pre-examination

Once the application has been accepted members of the public can register as an Interested Party by making a relevant representation.

2.9 Examination

This part of the process is where the submissions, evidence and public representations are considered by PINS. Up to 6 months is allowed to carry out the examination of all important and relevant matters.

2.10 Recommendation and Decision

PINS must prepare a report on the application to the relevant Secretary of State within 3 months. The Secretary of State then has a further 3 months to make the decision.

2.11 Post Decision

Following the decision made by the Secretary of State there is a six week period in which the decision may be challenged in the High Court if there are grounds to do so.

2.12 **Proposal**

The development proposal for a WtE Incinerator is currently at the pre-application process stage. The Statement of Community Consultation (SoCC) attached at Appendix A details how the developer will carry out their statutory consultation duty with the local community and statutory consultees. The process is currently at the Stage 2 Statutory consultation stage which runs from the 1st November 2019 to 12<sup>th</sup> December 2019. Due to the timescales proposed by the Applicant the current consultation period has occurred close to the proposed submission, (March 2020) it would be expected therefore that a lot of the environmental impacts of the project would have been assessed and available for comment.

The Statement of Community Consultation (SoCC) sets out what information would be available during this consultation period they are;

- The feedback received at Stage 1 and any changes made to the Project.
- The design and appearance of the WtE facility.
- The environmental effects of the Project (detailed within the PEIR) and any mitigation that is required
- The timescales and next steps for the Project.



2.13 The following information has been submitted as part of the public consultation process:

- 3D design visuals
- Site location plan
- DCO site boundary
- Illustrative site layout
- Preliminary Environmental Information Report (PEIR)

2.14 The project is classed as an Environmental Impact Assessment development for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The applicants, as part of the pre-application process, have submitted a PEIR. The PEIR is defined in the EIA Regulations as information which has been compiled by the applicant and is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development. Whilst there is no prescribed format a good PEIR should allow consultees, whether they are specialists or not, to understand the likely environmental effects of the proposed development and informs consultation responses during the Pre-application stage.

2.15 **Considerations**

At this pre-application stage this Council is a Statutory consultee in the process as such the Council can respond to the information submitted by the applicants. The following issues are considered below:

- Principle of Waste to Energy
- Air Quality
- Noise and Vibration
- Ground Contamination
- Heritage
- Landscape and Visual Impact Assessment
- Economic Development
- Connection to the Grid
- Design
- Alternative Sites
- Water Demand
- Amenity – Overshadowing
- Combined Heat and Power (CHP)

2.16 Hampshire County Council (HCC) are currently considering the following areas which will, once received, be reported to the Committee via the Update Paper:

- Highways
- Ecology
- Water
- Archaeology
- Landscape
- Climate Change
- Socio Economic
- Health

### 3.0 **POLICY**

#### 3.1 Government Guidance - National Policy Statements (NPS)

NPSs are produced by government and set out the government's objectives for the development of nationally significant infrastructure. National Policy Statements undergo a democratic process of public consultation and parliamentary scrutiny before being designated (i.e. published). They provide the framework within which PINS make their recommendations to the Secretary of State. The relevant NPSs are:

- Overarching National Policy Statement for Energy (EN-1)
- National Policy Statement for Renewable Energy Infrastructure (EN-3)

#### 3.2 Hampshire, Portsmouth, Southampton, New Forest National Park and South Downs National Park – Minerals and Waste Plan

- Policy 5 – Protection of the countryside
- Policy 7 – Conserving the historic environment and heritage assets
- Policy 8 – Protection of soils
- Policy 9 – Restoration of minerals and waste developments
- Policy 10 – Protecting public health, safety and amenity
- Policy 12 – Managing traffic
- Policy 13 – High-quality design of minerals and waste development
- Policy 14 - Community benefits
- Policy 25 – Sustainable waste management
- Policy 28 – Energy recovery development
- Policy 29 – Locations and sites for waste management

#### 3.3 Test Valley Borough Revised Local Plan (2016)(RLP)

- SD1 – Presumption in favour of Sustainable Development
- COM2 – Settlement Hierarchy
- COM15 – Infrastructure
- E1 – High, Quality Development in the Borough
- E2 – Protect, Conserve and Enhance the Landscape Character of the Borough
- E7 – Water Management
- E8 – Pollution
- E9 – Heritage
- LE18 - Tourism
- LHW4 – Amenity
- T1 – Managing Movement

#### 4.0 **REPRESENTATIONS**

4.1 Section 47 of the Planning Act 2008 sets out the applicant's duty to consult with the local community on the proposed application. How the applicant is going to consult is set out in the SoCC (Appendix A) which has been previously submitted and commented upon by TVBC. Notwithstanding the requirements for interested parties to submit any representations to the applicant, any representations received will be passed directly to the applicant as they have a duty at this stage to consider any comments submitted.

4.2 At the time of writing the report three representations have been submitted from unknown addresses and they have raised the concerns set out in the following paragraph.

4.3 The scheme has been objected to on the following grounds:

- Concern about particulate effects on soldiers using nearby training grounds;
- Air quality expert for Wheelabrator did not think there would be any effect over 800m, training areas fall within this 800 metres;
- Was advised site had not yet been modelled for air quality;
- Found response of Wheelabrator insulting;
- Concern about impact of Incinerator from A303;
- Why is this not being considered in an urban area, site is quite small meaning there is little space for all that is needed;
- Connection to the grid is some distance away;
- Impact on the roads of an additional 200 lorries will be tremendous;
- Concern about impact on mental health of people and health in general
- Impact on tourism;
- Impact on house prices;
- Huge structure will be visible to those living in local area;
- Impact on safety of cyclists utilising local roads;
- Burning waste runs counter to society to reduce, reuse and recycle;
- Cannot see how connection to the grid will be underground, it is more likely to consist of pylons;
- Where is excess heat going?; and
- Incinerating waste would lead release particulates and toxins polluting local habitats, farmland and people.

#### 5.0 **CONSULTATIONS**

The following are summarised responses from the Council's internal consultees.

##### 5.1 **Environmental Protection**

The primary sources of noise during operation appear to be deliveries by road vehicles and noise emissions (surprisingly noisy) from each of the two chimney stacks.

Whereas delivery noise will be intermittent and at ground level, so as to be capable of being screened by barriers and intervening hills etc., noise from the stacks will presumably be continuous 24 hours per day and, due to their height, cannot possibly be controlled through noise barriers or screening. Therefore, it is vital that engineering controls are applied at source to control such noise.

It is important that the list of receptors chosen is sufficiently comprehensive to represent all clusters of properties and individual properties. It is not clear whether sound level measurements for the other receptors will be undertaken or derived by some other means. I would expect sufficient background sound level measurements to be made in representative locations likely to be affected by noise.

There are two types of receptor in this case, firstly those affected by site-generated noise and secondly those affected by increased road traffic noise associated with the facility operations – these may be remote from the site. Much of the methodology provided in relation to noise by the applicant is flawed and cannot be relied upon.

#### 5.2 Tranquillity

Consideration ought to be given by the Council as to whether any sites or footpaths in the vicinity of this site ought to be especially protected not just for amenity reasons but also because the tranquillity of those areas is particularly prized. The assessment does not consider the preservation of tranquillity at all.

#### 5.3 Air Quality

The document is a statement of intent, it lays down the legislative and guidance framework under which it will make its assessment when the monitoring data is in. We are unable to comment further at this point until we have seen the data. We would need a full assessment of all receptors to be included in the final study.

#### 5.4 Contaminated Land

This report is preliminary, rather than the desk study documentation that we are seeking. We would not accept this as a desk study report for example as there is not information to allow a suitable characterisation of the site. We understand that there has been some site investigation undertaken. There is no rational supplied for sampling which has been undertaken to date. We would need to see the laboratory results as well as the bore hole logs etc., so that we can assess that the conceptual model is robust when that is presented to us. We will also need to know who has authored this section of their report and their competence to do so. We will then need to see the remediation and validation information as will the Environment Agency.

## 5.5 **Design and Conservation**

### Methodology:

It is not clear which guidance document has informed the approach taken, and whether the Historic England suite of guidance has been taken into account, particularly: Historic Environment Good Practice in Planning Note 3: The Setting of Heritage Assets

### Approach to GII listed buildings

Conservation areas should also be afforded more significance than non-designated assets. This approach is not considered to accord with national guidance.

Grade II listed buildings are still of special interest, and are of national importance. This needs to be taken properly into account when assessing impact of development on setting. It is not felt to be appropriate to categorise Grade II listed buildings with non-designated assets. This does not allow for sufficient weight to be afforded to the significance of these listed buildings, and there is risk of their being undervalued in the appraisal process.

## 5.6 Approach to Conservation Areas:

Again, it would appear to be appropriate to afford them greater weight than 'medium' significance.

In terms of the valuation of the individual conservation areas, the authors of the document have determined some conservation areas are more significant than others. This seems only to be based on how many highly-graded assets they contain within them. It would be unusual to rank conservation areas, and broadly they are considered to have equivalent status. It should be born in mind it is possible for a conservation area to contain no listed buildings at all. Reference should be made to the Conservation Area appraisal documents.

### Inconsistency of approach

The conservation areas at Chilbolton and Wherwell are not referred to at all – the listed buildings contained within these villages are referred to as the 'Wherwell Group' and the 'Chilbolton Group'. This is confusing, also, as farmsteads (such as those at Firgo Farm) are referred to also as 'groups'. In terms of the assessments of the settings of the buildings, the approach is not consistent.

Some of the buildings located in villages (such as Barton Stacey and Longparish) only have their setting assessed as part of the village – which is not appropriate, as each building has its own setting. Other buildings, though, such as those in Wherwell and Chilbolton are individually assessed. Only those buildings which are set in the open countryside have been considered fully.

There are no assessments of the settings of the conservation areas.

## 5.7 Value of setting

Some buildings may owe more of their special interest to their setting than others, and some may have more intimate settings, mostly confined to the village in which they are located, where others have wider landscape settings. However, the heritage appraisal would need to show that this has been addressed on a case-by-case basis, in order to understand what impact any change might have on a site's setting might have on its significance.

It may be in some cases that the settings of sites have been eroded by existing modern development. However, it cannot simply be assumed that because the setting has been compromised, it no longer makes a contribution. The cumulative impact of the proposed and existing development needs to be taken into account (in accordance with the Historic England guidance).

The contribution which a particular view makes to the appreciation of a site's special interest also needs to be properly taken into account. The development may only intrude into a view to/from a site in a particular direction, and not all views, however, if that view is important to understanding the site, the impact could be quite substantial.

The conclusions of the impact of the development on the site's setting are questioned. In almost all cases the conclusion is the impact would be 'low' or less. However, in some instances it is anticipated not just the chimneys, but also the building will be visible. This would represent quite a significant change, especially given the massive industrial building and chimneys would be a very alien feature in most parts of this rural area.

Further viewpoints should be considered. The need for further viewpoints may become necessary in light of additional information. It is acknowledged that further work may demonstrate that there may be negligible, or no, views of the proposed development from some of the above sites, but sufficient evidence should be provided that this is the case. In these instances, wireframes may be acceptable.

## 5.8 **Landscape**

The Landscape and Visual Impact Assessment Chapter 14 of the PEIR explains that the proposed development would result in moderate to major adverse effects; the development would provide no beneficial landscape or visual effects to the immediate or wider landscape. Therefore it is considered that the proposals fail Paragraphs 127, 130 and 170 of the NPPF and Policies E1 and E2 of the Test Valley Local Plan. Much of the supporting information requires further work and consideration.

A comprehensive range of viewpoints surrounding the site have been selected, which will highlight the impacts upon the local and wider landscape. Within the full application photo montages and wire frame models will be required to demonstrate the impact these proposals will have. Although this will inform the impacts, due to the size and scale of the development and the tight constraints of the site, it is unlikely to inform where further mitigation measures could be achieved.

Due to the sheer size and scale of the development there is no mitigation available, the site will rely entirely on screening measures outside of the red line boundary to mitigate the site. The substantial impact of the development will dominate the local and wider landscape from Year 1; even after Year 15, it will still have major and moderate landscape and visual impacts. Whilst some mitigation suggestions have been proposed, these would do little to integrate the development within its setting.

A significant part of the soft landscaping surrounding the site is comprised of Ash (*Fraxinus*); it is expected that Ash Die Back (*Hymenoscyphus fraxineus*) will wipe out 90% of Ash trees over the next 5 -10 years. This will potentially impact upon the surrounding landscape and open up views towards the site.

## 5.9 **Economic Development**

Tourism is an important and growing sector of the Test Valley economy. It attracts 2.9m day trips p.a. (2017), represents £195m worth of expenditure and supports more than 4,500 jobs.

The A303 represents the main artery for visitors from London and the south east heading west into Test Valley. The siting of a massive industrial structure so close to and within clear view of that road would be alien and likely to have a detrimental impact of the character of the area and to potential visitors.

The 3 year period of construction, although offering a demand for accommodation from construction workers, will emphasise the disturbance that the development would bring.

Furthermore, Test Valley's unique attraction is its river: The River Test and its tributaries are world-renowned and the home of dry fly trout fishing. The quality of the water and the landscape in which it sits within are incomparable. Any potential threat to that unique quality could have a significant impact on both the perception of Test Valley to visitors and to the local recreational fishing industry and the businesses which it supports.

## 6.0 **RESPONSE**

6.1 The response will refer to the following:

- Policy
- Air Quality
- Noise and Vibration
- Ground Contamination
- Heritage
- Landscape and Visual Impact Assessment
- Socio-Economic Issues
- Other Issues

## 6.2 **Policy**

NPS – EN1 is the overarching NPS for Energy and it sets out the Governments policy for delivery of major energy infrastructure and how it seeks to cut greenhouse gas emissions by at least 80% by 2050 when compared to 1990 levels. Moving to a secure, low carbon energy system is challenging but achievable, requiring major investment in new technologies.

6.3 NPS – EN3 deals with renewable energy infrastructure which includes on and offshore wind farms and energy from biomass and waste. The recovery of energy from the combustion of waste will play an increasingly important role in meeting the UK's energy demands. The WtE Harewood Incinerator proposes to utilise fuel that would otherwise be sent to landfill and would come from municipal or commercial waste. WtE facilities are supported in principle within NPS – EN3 in terms of their role in meeting future energy demand.

6.4 Assessment of how the development does or does not accord with local policies will happen at a later stage when an application has been submitted and accepted and will be addressed in the Local Impact Report which is a document produced by the Local Authority assessing the positive, neutral and negative impacts of the proposal.

6.5 **Air Quality**

The issue of Air Quality is twofold, there is the issue of both construction and operating traffic impacts on the surrounding air quality and secondly what is being emitted from the facility itself. Air Quality would need to be addressed in terms of its impact on local residents, businesses and the general air quality within the area and beyond.

Chapter 7 of the PEIR deals with the issue of Air Quality. It has become clear that little information has been submitted to assess at this stage. Monitoring of air quality has not yet been carried out to be able to base any assessment on.

To assess Air Quality on those aspects mentioned above data is monitored at what are known as receptor sites. Receptor sites are those sites that are sensitive to the impact of what is being monitored. Chapter 7 of the PEIR addresses the issue of proposed receptors, however it is noted that this does not include local businesses. The Receptors that have been identified are residential properties and ecological sites. There is also MOD land within the area which is used for training by the Armed forces and it does not appear that a receptor is being considered on these sites either.

6.6 It is considered that there is insufficient information submitted at this stage to be able to effectively assess the impact of the proposed facility on air quality on local residents or businesses. There is also concern that local businesses and landowners like the MOD are not receptor sites. It is concluded that with regard to Air Quality the PEIR is premature in presenting its work so far as it transpires that insufficient work has been undertaken to make any assessment in relation to the impact of the proposed development

6.7 **Noise and Vibration**

A facility of the size proposed has the capacity to create noise and vibration which would impact on local residents, businesses and the quiet enjoyment of the countryside. Noise and vibration would emanate from both construction and operation of the facility and from traffic movements to and from the site.



It is considered that the list of receptors needs to be revisited; there is concern that some businesses and residential properties have been missed. Receptors need to be carefully considered and should reflect the different noise environments that surround the site as well as businesses and dwellings.

To properly assess the noise impacts of the proposed development the current noise levels surrounding the site need to be known. This baseline monitoring is ongoing and has included long term monitoring for one week and weekend. The long term monitoring however has only been carried out at the nearest receptor to the site and whilst it is not clear if other monitoring is occurring, utilising one receptor for baseline monitoring is not considered sufficient. Monitoring should also be carried out in suitable weather conditions.

The primary source of noise during the construction phase is the piling operations and should be assessed using BS5228 but again the assessment of this standard is inconsistent with that guidance. The PEIR document does not consider the preservation of tranquillity at all.

- 6.8 It is considered that with regard to noise and vibration the information supplied is deficient. Assessing the impact of the facility on noise and vibration is not possible when the assessments utilised are not comprehensive enough and the interpretation of any assessment is not carried out to a recognised industry standard. It is considered that the PEIR is premature as it does not adequately address the issues and the assessments that have been carried out fall short of what needs to be done to be able to understand the impacts of the proposed development.

6.9 **Ground Contamination**

Ground contamination is considered in terms of on site contamination of soils and groundwater and is an important issue as the site is above an aquifer and developing the site could disturb any existing contaminants and also create contamination.

The information submitted on contamination is at present not in a format that is acceptable, it is noted that some sampling has been undertaken but no rationale of this sampling has been provided. The ground contamination report is not sufficient to be able to conclude on this issue.

6.10 **Heritage**

Heritage needs to be considered in terms of its impact on the settings of both designated and non designated heritage assets. Designated assets include listed buildings, conservation areas and registered parks and gardens. Non-designated assets could be buildings, monuments, sites, places or areas of landscape that have been identified as having a degree of heritage significance which would need to be considered when making planning decisions.

- 6.11 The methodology used in assessing the impact of the proposal on heritage assets has been inconsistent and flawed. It fails to adequately take into account the setting of these assets and as such represents an unacceptable threat to the historic resources of this part of the Borough.

#### 6.12 **Landscape and Visual Impact Assessment**

Due to the size and design of the proposed facility there is no ability to adequately mitigate the harmful impact the proposed development would have on the landscape. The LVIA is there to help consultees and the public understand where it would be visible from and how it would be viewed from these viewpoints. A thorough LVIA will help inform people's reaction to the impact of the facility within the wider landscape. This is currently inadequate and significantly more work is required in order to fully assess the impact of the proposal on the surrounding landscape.

#### 6.13 **Economic Development**

The proposed facility would have both short and long term impacts on the local economy, as it would create jobs during both construction and operation and whilst this is a potential positive of the proposal, consideration needs to be given to how the facility would impact on another important sector of the local economy – tourism.

It is considered that a facility of the size proposed and its potential to be viewed from a wide area would have a negative impact on the perception of the Test Valley as a tourism destination.

#### 7.0 **Other Issues**

##### 7.1 Connection to the grid

The proposed scheme does not incorporate a connection to the grid. Guidance contained within the National Policy Statement EN-1 advises that any application to PINS should include how the generating station connects to the grid and whether there are any particular environmental issues likely to arise from that connection. NPS EN-3 accepts that connection to the grid is for the applicant who would need to liaise with the National Grid to secure.

It is advised within the PEIR that connection to the grid will be applied for separately by the Distribution Network Operator (DNO). Due to its location connection to the grid could have significant environmental impacts and this should be considered in conjunction with the scheme. It would appear to not accord with Government guidance on generating stations and grid connection contained within the relevant NPS.

##### 7.2 Design

The public consultation has also revealed the future design of the proposed facility. These are presented as 3D visuals and whilst both are the same design they do show different materials finishes. Within the information provided by the applicant they have also provided a photo of how the Incinerator might look from the road to the south leaving Barton Stacey.

The PEIR sets out the layout parameters for the proposed development in Figure 4.1. The layout parameters are shown as a series of elevational drawings. It is worth noting this parameter drawings show a different design than the 3D visuals. In figure 4.1 the Incinerator is shown as a box like structure with little or no design detailing. It is not clear as to why the

parameter drawings are not reflective of the 3D design as if this is the proposed design going forward a parameter drawing for this design should be possible. This ambiguity on design makes it difficult to provide comment as it is not entirely clear whether the 3D visuals can be relied upon or whether the information within the PEIR is more accurate.

### 7.3 Alternative Sites

In the PEIR Non-Technical summary in paragraph 5.2 it states;

“There is no policy requirement for the Applicant to consider alternative sites or justify its selection for the site of the proposed development.”

This is not correct, the proposed development is an EIA development. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states that for an application granting development consent for EIA development must be accompanied by an Environmental Statement which should include;

*(d) a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment*

It is therefore considered that information on alternative sites should be part of the ES and the alternatives to the proposed location should have been shared at this stage through the PEIR.

### 7.4 Water Demand

Issues concerning water resources and flood risk are the responsibility of organisations such the Lead Local Flood Authority (HCC) and the Environment Agency. Notwithstanding this there are areas of concern that should be highlighted at this stage.

During construction the proposed development would at its peak employ up to 1000 people with an average of 800 people, it is assumed that each worker will require 16 litres of water a day (this is based on Construction Industry Research and Information Association CIRA) which equates to 16 cubic metres a day.

During commissioning there would be a initial consumption of 6000 cubic metres to fill 2 x fire water tanks and an approximate ongoing requirement for 15 cubic metre per hour for plan usage. There will be some reuse of water and rainwater harvesting.

In total the proposed development is predicted to generate a demand of 135,000 cubic metres per annum for boiler feedwater, potable water and fire water which equates to 370 cubic metres per day.

Southern Water supplies water to this area with 100% of water coming from groundwater sources and the site falls within the Winchester Water Resource Zone (WRZ) in the western area of Southern Waters region. The Environment Agency has identified all Southern Water's region as an area of serious water stress. Southern Water produced a draft Water Resource Management Plan (dWRMP) in 2019 which sets out supply and demand for the next 50 years. This is recognised in Chapter 11 which acknowledges that without further resource or demand control measures the Southern Water Western area is forecast to have a supply demand deficit throughout the dWRMP period in a 1-200 year drought event. The Western Region however is under particular stress following the Environment Agency's proposed changes to abstraction licences (sustainability reductions) and that temporary use bans and to apply and implement measures secured through Drought Orders until new sources of water have been developed.

It is also noted in paragraph 11.72 of Chapter 11 that the most intensive use of water will be for the mixing of concrete, but it is likely that this will be done off site and delivered and will therefore not affect water supply to the site. Whilst this is noted there is a high probability that concrete brought onto site will have been mixed utilising water within this water stress region.

The developer's contention that the impact on water resources and flood risk during construction, operation and decommissioning would not be significant does not appear to be justified by supporting evidence. It would appear that the proposal would rely on significant amounts of water both during construction and during the operational phase which would place further pressure on this limited natural resource.

#### 7.5 Amenity – Overshadowing

There are no dwellings within the immediate vicinity of the site and as such it is not considered that the proposed Incinerator would give rise to unacceptable overshadowing of any residential properties. To the north of the site is an established solar farm and this will be impacted by the proposed facility. Chapter 17 has assessed the impact of the proposed facility and it has been assessed that the proposed development including stacks would reduce energy production at the solar farm by 0.55%. To offset this loss wall or roof mounted panels are proposed on the Incinerator itself at present it cannot be assessed whether this would be sufficient to offset this loss.

The existing Raymond Brown operation is to the east and this would be overshadowed to some degree by the facility, however this is an employment site and is as stated in Chapter 17 less sensitive to overshadowing.

#### 7.6 Combined Heat and Power

Combined Heat and Power (CHP) is the generation of usable heat and electricity in a single process. CHP is technically feasible for all types of thermal generating stations including energy from waste. The facility will be CHP ready although at present no commercially viable demand has been identified. If the neighbouring employment site has no use of this heat then it is not clear that there is anywhere else in the vicinity that could make use of this heat. Para 4.6.6 of National Policy Statement EN-1 states;

“Under guidelines issued by DECC (then DTI) in 2006, any application to develop a thermal generating station under Section 36 of the Electricity Act 1989 must either include CHP or contain evidence that the possibilities for CHP have been fully explored to inform the ....consideration of the application. This should be through an audit trail of dialogue between the applicant and prospective customers. The same principle applies to any thermal power station which is the subject of an application for development consent under the Planning Act 2008.”

NPS EN -1 also required new thermal generating stations to consider the opportunities from CHP from the very earliest point and should be adopted as a criterion when considering locations for a project.

In light of the Government’s aim to de-carbonise the energy network by 2050 the failure to take advantage of this potential energy source appears somewhat short sighted and further opportunities for this should be explored by the developer.

## **8.0 CONCLUSION AND RECOMMENDATION**

**That the Northern Area Planning Committee (NAPC) OBJECTS to this submission on the basis of inadequate information which has been submitted for Public Consultation including that contained within the PEIR. It is strongly recommended that further consultation with the public should occur. The NAPC endorses this report together with the full responses of consultees as Test Valley Borough Council’s response to the Public Consultation process.**

**The following consultee comments should be noted in particular:**

- **Air Quality - the PEIR is premature in presenting its work so far as it transpires that insufficient work has been undertaken to make any assessment in relation to the impact of the proposed development.**
- **It is considered that with regard to Noise and Vibration the information supplied within the PEIR is deficient.**
- **Ground Contamination - the PEIR is premature in presenting its work so far as it transpires that insufficient work has been undertaken to make any assessment in relation to the impact of the proposed development.**
- **In relation to Socio-Economic issues the PEIR does not address adequately the impacts of the incinerator on tourism which is influenced by a number of factors and whilst this is acknowledged it is considered that more work is needed on the impact of tourism in the local area.**
- **With regard to Landscape and Visual Impact Assessment the PEIR is currently inadequate and significantly more work is required in order to fully assess the impact of the proposal on the surrounding landscape.**

- **Alternatives to the proposed location should have been shared at this stage through the PEIR and in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.**
- **The proposed development would reduce energy production at the solar farm by 0.55% and it is not clear if the proposed mitigation would address this shortfall.**
- **It is advised within the PEIR that connection to the grid will be applied for separately by the Distribution Network Operator (DNO). Due to its location connection to the grid could have significant environmental impacts and this should be considered in conjunction with the scheme. It would appear to not accord with Government guidance on generating stations and grid connection contained within the relevant National Policy Statement**
- **Water Demand - the PEIR's contention that the impact on water resources and flood risk during construction, operation and decommissioning would not be significant does not appear to be justified by supporting evidence. It would appear that the proposal would rely on significant amounts of water both during construction and during the operational phase which would place further pressure on this limited natural resource.**
- **New thermal generating stations are required to consider the opportunities from Combined Heat and Power (CHP) from the very earliest point and should be adopted as a criterion when considering locations for a project. With no end user for the heat generated the failure to take advantage of this potential energy source appears somewhat short sighted and does not help to justify this location and further opportunities for utilising this should be explored by the developer.**

**The full responses of the Council's consultees and any public representations be forward to the applicant for their consideration**

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LEGEND

Application Site

Test Valley Borough Council - Northern Area Planning Committee - 5 December 2019

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Purpose of Issue

PEIR

Client

WT/IEFW HOLDINGS LTD.

Project Title

WHEELABRATOR HAREWOOD  
WASTE TO ENERGY FACILITY

Drawing Title

DCO SITE BOUNDARY

Drawn	Checked	Approved	Date
NS	TD	NT	23/10/2019
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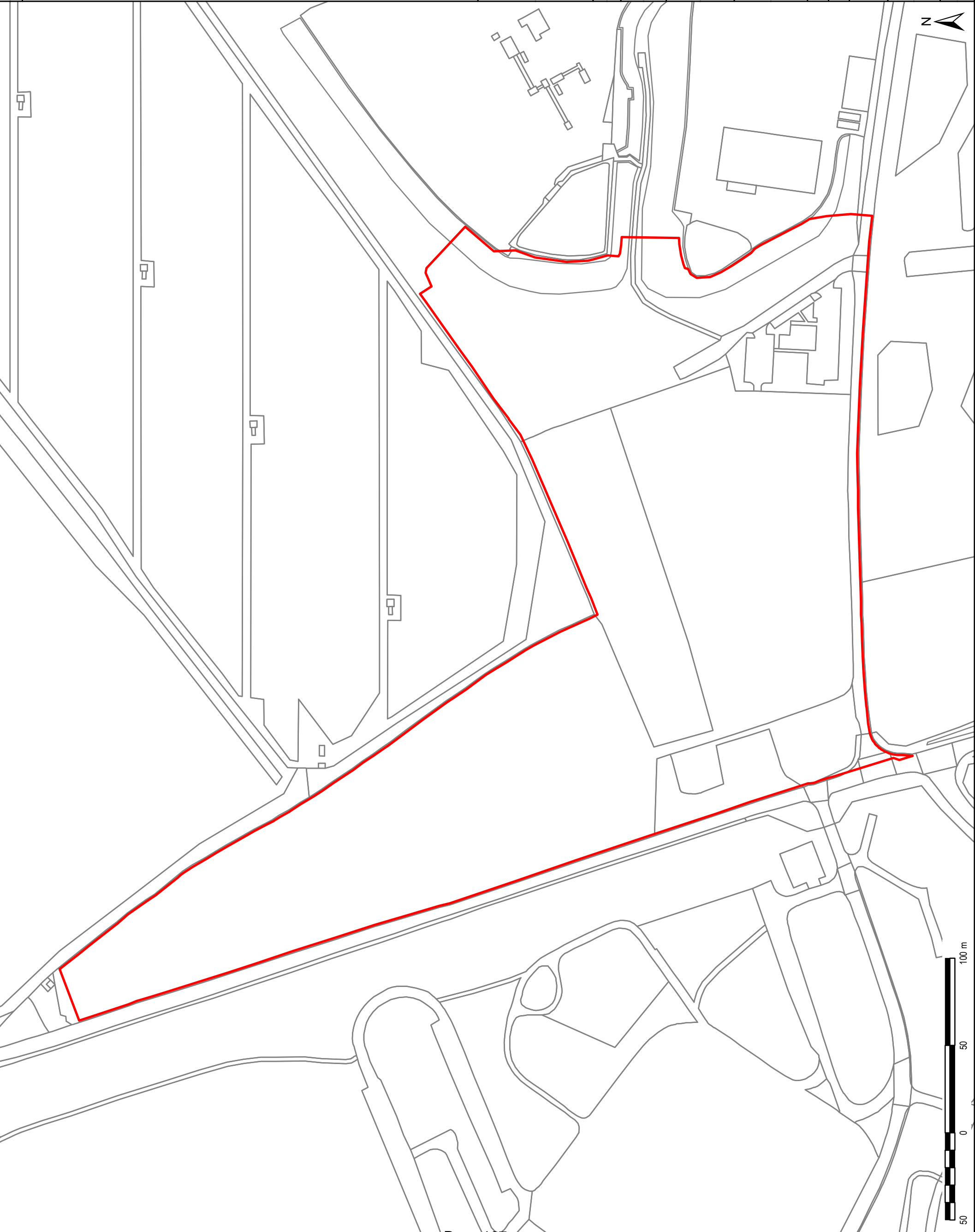
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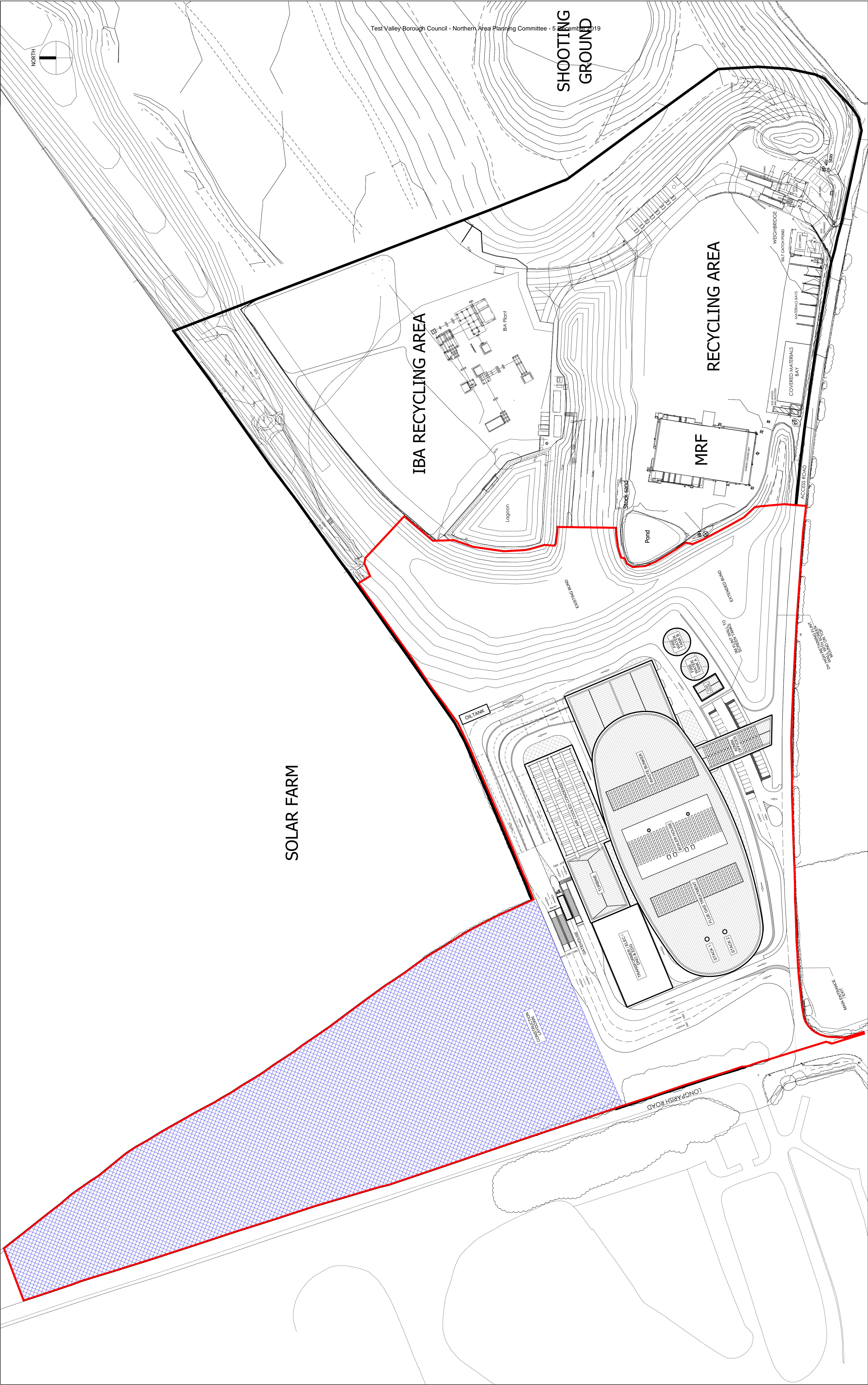
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FIGURE 1-2







Test Valley Borough Council - Northern Area Planning Committee - 5 December 2019

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PROJECT Wheelabrator Harewood

DRAWING Fig 4-9: Illustrative Site Layout

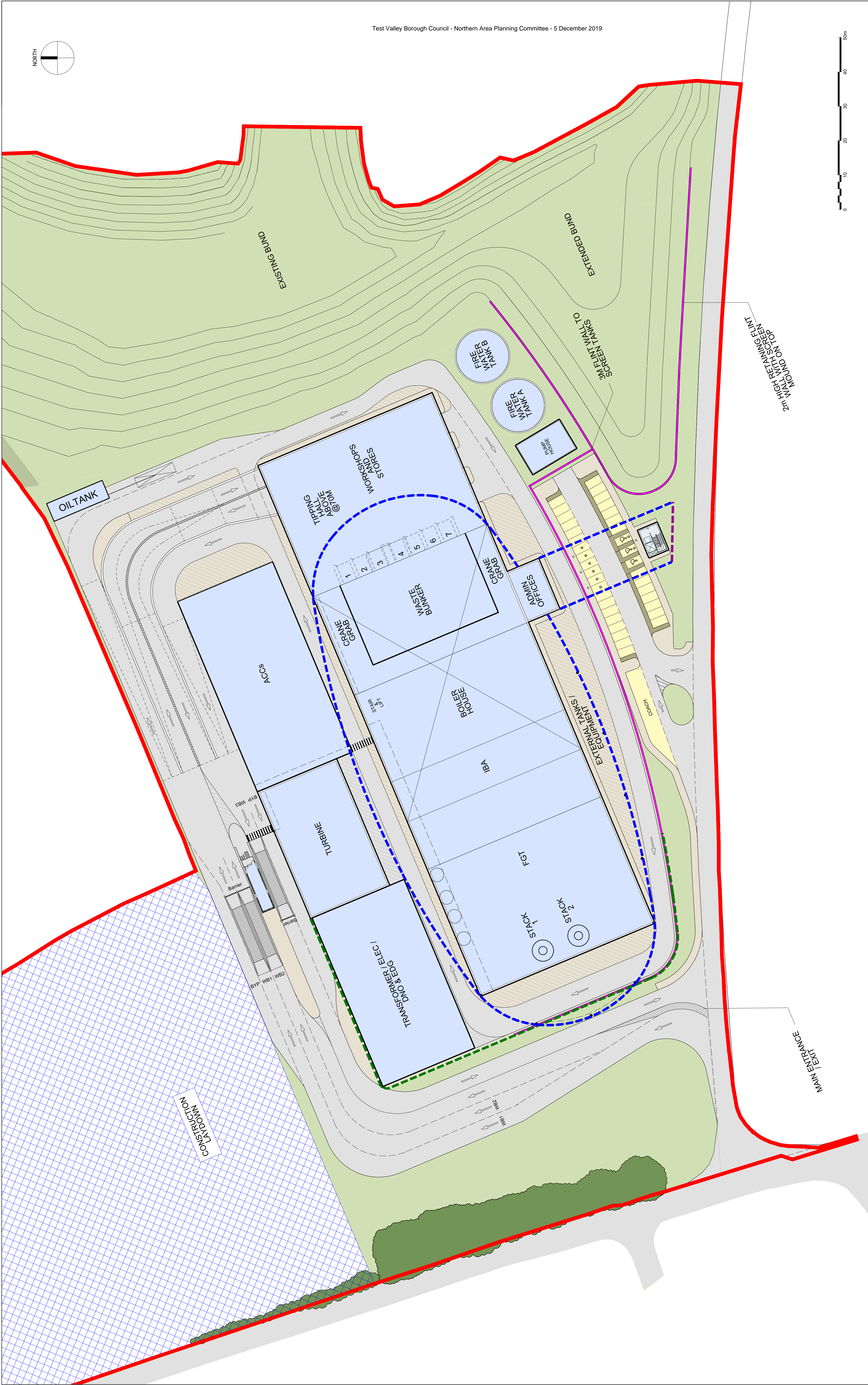
FOR INFORMATION			
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SCALE	DATE	DATE	
1353 SK1027	-	-	REVISION
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DCO Boundary

Construction Laydown







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PROJECT

DRAWING

FOR INFORMATION

1:500@A1

1353 SK1026

DWG. NO.

Wheelabrator Harewood

Fig 4-2: Illustrative Site Layout

FOR INFORMATION

19/10/17

DATE

19/10/17

ISSUED FOR INFORMATION

19/10/17

DATE

19/10/17

ISSUED FOR INFORMATION

DCO Boundary

Flint Wall

Projecting Building Structure at Upper Level

Flint Cladding at Upper Level

Building Structures

Road Access

Vehicle Parking

Indicates Electric Vehicle Charging

Retaining Wall

Landscaping

Hardstanding / Footpaths

Existing Trees

Construction Laydown

GSDA

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Wheelabrator

HAREWOOD





**STAGE TWO CONSULTATION** AUTUMN 2019

## **Wheelabrator Harewood** Waste-to-Energy facility

### Statement of Community Consultation (SoCC)

October 2019

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## GLOSSARY

ABBREVIATION	DESCRIPTION
<b>BEIS</b>	Department for Business, Energy and Industrial Strategy
<b>DCO</b>	Development Consent Order: provides a consent for building and operating an NSIP
<b>WtE</b>	Waste-to-energy: the combustion of waste material to provide electricity and/or heat
<b>EIA</b>	Environmental Impact Assessment
<b>ES</b>	Environmental Statement
<b>ExA</b>	Examining Authority: An inspector or panel of inspectors appointed to examine the application
<b>MW</b>	Megawatt: the measure of electrical power produced
<b>NPS</b>	National Policy Statement
<b>NSIP</b>	Nationally Significant Infrastructure Project: for which a DCO is required
<b>PA 2008</b>	Planning Act 2008
<b>PEIR</b>	Preliminary Environmental Information Report - summarising the likely environmental impacts of the proposed development
<b>PEIR NTS</b>	A non-technical summary of the information in the PEIR
<b>PINS</b>	Planning Inspectorate
<b>SoCC</b>	Statement of Community Consultation: sets out how a developer will consult the local community about a proposed NSIP
<b>WTI / EfW Holdings Ltd</b>	The Applicant
<b>SoS</b>	Secretary of State

## 1.0 INTRODUCTION

### Context

- 1.1 WTI / EfW Holdings Ltd, a subsidiary of Wheelabrator Technologies Inc, ('Wheelabrator') is proposing to apply for development consent from the Secretary of State for Business, Energy and Industrial Strategy ('BEIS') to allow it to construct and operate a waste-to-energy ('WtE') facility, to be known as 'Wheelabrator Harewood', on land to the west of Raymond Brown Waste Solutions at the A303 Enviropark, Drayton Road, Barton Stacey, Andover, Hampshire, S021 3QS (the 'Site'). The application process is administered by the Planning Inspectorate ('PINS') on behalf of the Secretary of State.
- 1.2 This Statement of Community Consultation ('SoCC') has been prepared by Wheelabrator in accordance with Section 47 'Duty to consult local community' of the Planning Act 2008 (the 'PA 2008'). Section 47 places a statutory duty on applicants for development consent to "prepare a statement setting out how the applicant proposes to consult, about the proposed application, people living in the vicinity of the land." The SoCC therefore sets out how Wheelabrator will consult the local community about its proposals for the Site prior to submission of the application for development consent to PINS.
- 1.3 The SoCC has been prepared with reference to guidance on pre-application consultation published by the Government and PINS. It also takes account of the non-statutory and statutory consultation exercises that Wheelabrator undertook with the relevant local authorities as defined by the PA 2008 (these are Hampshire County Council and Test Valley Borough Council) on its proposals for community consultation.
- 1.4 The SoCC provides a brief overview of the Wheelabrator Harewood project, the development consent application process, environmental information, the pre-application consultation process and also explains how people will be able to learn more and engage with the process. Pre-application consultation provides an important opportunity for the local community to engage and help shape the proposals during their development.

## 1.0 INTRODUCTION

### Quick facts

- Wheelabrator Harewood – A proposed waste-to-energy facility capable of producing up to 65 Megawatts ('MW') gross electrical output. This means it is classed as a nationally significant infrastructure project (a 'NSIP') which requires development consent under the PA 2008. Development consent is granted in the form of a 'Development Consent Order' (a 'DCO').
- An application for development consent for the construction and operation of the proposed WtE facility will be submitted to PINS for examination before a recommendation is made by the examiners to the Secretary of State for BEIS who will then decide if development consent should be granted.
- Wheelabrator undertook 'non-statutory' (Stage 1) consultation on its proposals in February and March 2019. The information gathered during the Stage 1 consultation has informed the preparation of this SoCC and the proposals for statutory (Stage 2) consultation. Wheelabrator also informally consulted on an initial draft SoCC with the relevant local authorities (Test Valley Borough Council and Hampshire County Council) in April 2019 and then again in September 2019 for formal consultation under Section 47(2) of the PA 2008. The feedback received was taken into account and helped to inform this final version.
- The statutory (Stage 2) consultation will commence in November 2019. The local community will be consulted on the proposals via a range of methods, including consultation events held at local venues. The key consultation dates are outlined in Table 1.1 below. Preliminary Environmental Information will be prepared by Wheelabrator and made available as part of the Stage 2 consultation.

Table 1.1 **Wheelabrator Harewood community consultation key dates**

DATE	CONSULTATION
17 October 2019	SoCC published and available for inspection in local venues.
29 October 2019	Letter announcing consultation launch distributed to addresses within mailing zone outlined at paragraph 7.4.
1 November 2019 - 12 December 2019	Statutory 'Stage 2' consultation period starts.
	Consultation materials available in local venues for inspection.
	Public consultation events at local venues held (including at least one event on a Saturday). Refer to Table 8.2 below.
12 December 2019	Statutory 'Stage 2' consultation period closes at 17.00.

## 2.0 THE WHEELABRATOR HAREWOOD PROJECT

### The Applicant

- 2.1 Wheelabrator Technologies Inc. is the second largest US waste-to-energy business, and an industry leader in the conversion of everyday residential and business waste into renewable baseload energy, across the US and UK.
- 2.2 Wheelabrator Technologies Inc. entered the UK waste market in 2008. Its first WtE facility Ferrybridge Multifuel 1, a joint venture with SSE, became operational in August 2015. Three further WtE facilities are due to become operational in 2019/2020.
- 2.3 In the UK and across Europe, WtE facilities are driving residual waste away from landfill sites and instead using it as a valuable resource to contribute to the UK's drive to decarbonise energy generation by off-setting fossil fuel energy generation. The facilities also support energy security by reducing the UK's dependency on the import of fossil fuels.
- 2.4 Wheelabrator Technologies Inc. is owned by Macquarie Infrastructure and Real Assets, a business within the Macquarie Asset Management division of Macquarie Group and a global alternative asset manager focused on real estate, infrastructure, agriculture and energy assets. For more on Wheelabrator, please visit [www.wtienergy.co.uk](http://www.wtienergy.co.uk).
- 2.5 The Applicant, WTI / EfW Holdings Ltd, is a subsidiary of Wheelabrator Technologies Inc.

### Site Location

- 2.6 The Site is located adjacent to the A303 Enviropark, Drayton Road, Barton Stacey, Andover, Hampshire, SO21 3QS and is within the administrative boundaries of Hampshire County Council and Test Valley Borough Council.
- 2.7 The A303 Enviropark site is owned and operated by Raymond Brown and is a recognised strategic centre of excellence for integrated waste management in the region. The A303 Enviropark site includes an operational Materials Recovery Facility ('MRF') that recovers recyclable resources from construction waste, and a highly specialist Incinerator Bottom Ash ('IBA') processing plant operated by Fortis.
- 2.8 The Wheelabrator Harewood WtE facility is proposed on land directly adjacent to and west of the operational MRF and IBA plant. It is envisaged that IBA from the WtE facility will be sent to the adjacent IBA plant for processing.
- 2.9 The A303 Enviropark is already committed to excellent standards of environmental performance. Wheelabrator will seek to ensure that the proposed WtE facility maintains these standards.

## 2.0 THE WHEELABRATOR HAREWOOD PROJECT

### The Project

- 2.10 The proposed Wheelabrator Harewood WtE facility (the 'Project') will convert residual household and business waste into renewable baseload energy.
- 2.11 The WtE facility will have an energy generating capacity of up to 65 megawatts ('MW').
- 2.12 The WtE facility will allow for the recovery of valuable materials. The waste received and processed will already have had materials suitable for recycling removed. In total, the WtE facility will use up to 500,000 tonnes of residual waste per annum that would otherwise have gone to landfill or been exported to mainland Europe.
- 2.13 The site layout will, to some degree, shape the building design. Wheelabrator is working with its architects to optimise the layout and design to minimise impacts. It will assess various architectural options appropriate for the locality and these options will be presented at the Stage 2 consultation.
- 2.14 The electrical connection between the WtE facility and the National Grid (for the export of electricity) is expected to comprise below ground electrical cables (except at the point of connection). The exact route of the cables is yet to be finalised, however, the connection works are currently proposed to be progressed by the relevant Distribution Network Operator and is unlikely to form part of the application for development consent. The potential options for connection works will be considered as part of the cumulative effects assessment in the Environmental Impact Assessment (see Section 4.0 below) which will be submitted with the application.
- 2.15 For more information on Wheelabrator Harewood, please visit the project website: <https://www.wtiharewood.co.uk/projects>

## 3.0 THE APPLICATION PROCESS

### Development Consent Order Applications

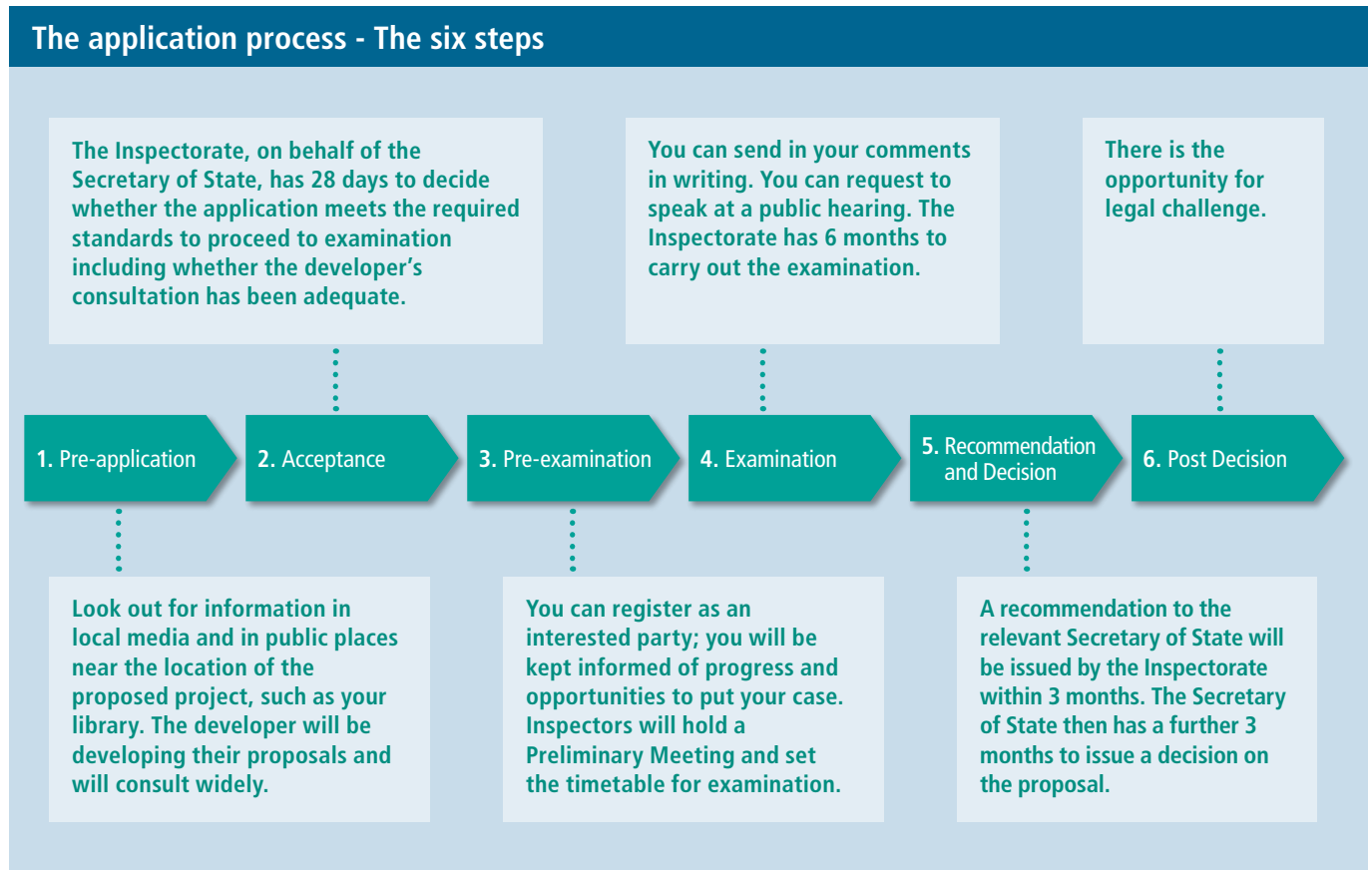
- 3.1 PA 2008 states that the construction of an onshore generating station of more than 50 MW constitutes a NSIP. NSIPs require an application for development consent to be submitted to the relevant Secretary of State ('SoS'). The proposed Wheelabrator Harewood WtE facility will be capable of producing up to 65 MW gross electrical output and is therefore a NSIP.
- 3.2 Wheelabrator will be submitting an application for development consent to PINS which will first decide, on behalf of the SoS and within a prescribed period of 28 days, whether to accept the application for examination. If accepted, PINS will then appoint an independent inspector or panel of inspectors, also known as the Examining Authority ('ExA'), who will examine the application on behalf of the SoS.
- 3.3 There will be the opportunity for the local community and other stakeholders to engage with the examination process and to express their views on the application.
- 3.4 Following an examination process of up to six months, the ExA will have three months to write a report setting out a recommendation as to whether development consent should be granted. The report is then sent to the SoS who has three months to consider it and to make a final decision on whether or not to grant development consent. If the SoS grants consent this will be in the form of a DCO.
- 3.5 The SoS's decision must be made in accordance with the relevant National Policy Statements ('NPSs') which outline the need for new energy infrastructure and the issues to be considered in determining such applications. Other matters that the SoS may consider important and relevant when determining an application for development consent may include other national policies and local planning policies.
- 3.6 The relevant NPSs are:
  - NPS EN-1 (Overarching Energy Policy) and
  - NPS EN-3 (Renewable Energy Infrastructure)
- 3.7 Both NPS EN-1 and NPS EN-3 establish that there is an urgent need for new energy infrastructure and therefore Wheelabrator will not be consulting on the principle of this type of infrastructure; instead the consultation will seek views on the specific proposals that are put forward.
- 3.8 These NPSs can be viewed at: <https://www.gov.uk/government/publications/national-policy-statements-for-energy-infrastructure>



## 3.0 THE APPLICATION PROCESS

3.9 Figure 3.1 below illustrates the six key steps of the DCO application process.

**Figure 3.1: Diagram of the DCO application process**



3.10 The PINS website provides further details on the application process:  
<https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>

### Project Timeline

3.11 Pre-application consultation is an important part of the planning and development process and the PA 2008 requires developers to publicise their proposals widely as well as consulting with the local community, local authorities, statutory bodies and persons with an interest in land potentially affected by the proposed NSIP. Pre-application consultation must be adequately carried out to the satisfaction of the relevant local authorities before an application for a DCO can be accepted by PINS on behalf of the SoS.

3.12 The Stage 1 (non-statutory) consultation on the proposals was undertaken in February and March 2019 (see Section 6.0 for further details). Non-statutory consultation on an initial draft SoCC was also undertaken with the relevant local authorities (Test Valley Borough Council and Hampshire County Council) in April 2019. Statutory consultation on the SoCC with the relevant local authorities was subsequently undertaken during the period 3 September 2019 to 3 October 2019 pursuant to section 47(2) of the PA 2008.

### 3.0 THE APPLICATION PROCESS

- 3.13 Stage 2 (statutory) consultation on the proposals will commence in November 2019 and will run for six weeks. The consultation period will finish in December 2019. Further information on the Stage 2 consultation is set out in Section 8.0.
- 3.14 The project team will record all the comments and feedback received during Stage 2 consultation. Once the Stage 2 consultation period has closed, the project team will review the comments and take these into account in further developing the proposals and preparing the DCO application for submission, having regard to technical, economic, environmental and health and safety considerations, amongst others.
- 3.15 A Consultation Report will be produced and submitted with the DCO application. This document will summarise the consultation undertaken (which will be in accordance with this SoCC), the comments received and how Wheelabrator has had regard to them. It will be available to view on the PINS website and the project website once the application has been submitted to PINS and accepted for examination.
- 3.16 It is currently anticipated that the application will be submitted to PINS in Q1 2020. All the application documents will be available to view on the PINS website or project website and will also be made available in alternative form or language on request.
- 3.17 The approximate project timeline is summarised in Figure 3.2 below.

**Figure 3.2: Approximate Project Timeline**



## 4.0 ENVIRONMENTAL INFORMATION

- 4.1 The Project is classed as 'EIA development' for the purposes of 'The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017' ('EIA Regulations 2017').
- 4.2 The application for development consent will therefore require an Environmental Impact Assessment ('EIA'), which will be a detailed assessment of the potential environmental effects of the Project. It will also identify any mitigation measures required to control or reduce environmental effects. The findings of the EIA will be reported in an Environmental Statement ('ES') that will form part of the application for development consent.
- 4.3 An EIA Scoping Opinion was issued by PINS on 4 April 2019. This identifies the environmental issues and topics relevant to the Project, and which should be assessed as part of the EIA. The Scoping Opinion is available to view at: <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/wheelabrator-harewood-waste-to-energy-facility>
- 4.4 A Preliminary Environmental Information Report ('PEIR') and PEIR Non-Technical Summary ('NTS') will be made available as part of the Stage 2 consultation. This will provide initial information on the potential environmental effects of the Project and any proposed mitigation to help the local community understand the environmental effects and inform responses regarding the proposed development. Feedback on the PEIR received during consultation will be considered before the application and EIA are finalised for submission.

## 5.0 CONSULTATION OBJECTIVES

- 5.1 The overall consultation objectives are to:
- Raise awareness of what is proposed and to give the local community, relevant local authorities and other stakeholders an opportunity to comment on the proposals.
  - Provide consultees and the local community with an opportunity to influence any aspects of the Project that are under development and to communicate which elements of the Project are fixed and why.
  - Provide clear and concise information during consultation.
  - Provide a range of different opportunities for people to engage with the Project and comment on the proposals.
  - Show how the proposals have taken account of consultation and feedback in finalising the application for development consent prior to its submission.

## 6.0 PRE-APPLICATION CONSULTATION PROCESS

6.1 The pre-application process for the Project comprises two stages, as follows:

- **Stage 1** – non-statutory consultation; and
- **Stage 2** – statutory consultation in accordance with the requirements of the PA 2008.

### Stage 1 – Non-statutory consultation

6.2 The Stage 1 'non-statutory' consultation on the Project was undertaken by Wheelabrator between 14 February and 22 March 2019 in order to present the early proposals to the local community and stakeholders. The consultation was publicised to the local communities including the parishes of Barton Stacey and Longparish. Two consultation events were held; at Barton Stacey Village Hall on 25 February 2019 and at Longparish Village Hall on 28 February 2019. A media release was issued to local print / broadcast media and posters were displayed locally, publicising the events. Local political representatives and councils also received a written invitation to find out more about the proposals and take part in the consultation.

6.3 Through the publicity, the consultation events and a number of other means (e.g. the project website, freephone information line, bespoke email address), the local community and other stakeholders were provided with initial information on the Project and given the opportunity to submit feedback. In response to the issues most frequently raised during the consultation exercise, Wheelabrator prepared a series of frequently asked questions and answers which were made available on the project website in the FAQ section: <https://www.wtiharewood.co.uk/faq/>

### Stage 2 – Statutory consultation

6.4 The Stage 2 'statutory' consultation on the Project will take place for six weeks between 1 November and 12 December 2019. This will provide an opportunity for Wheelabrator to update the local community and other stakeholders on the progress that has been made on the Project since the Stage 1 consultation and how the proposals have developed. The Stage 2 consultation will be undertaken in accordance with the requirements of the PA 2008. It is envisaged that the Stage 2 consultation will provide information on the following:


- The feedback received at Stage 1 and any changes made to the Project.
- The design and appearance of the WtE facility.
- The environmental effects of the Project (detailed within the PEIR) and any mitigation that is required.
- The timescales and next steps for the Project.

6.5 The Stage 2 consultation will be publicised to the local community within a defined consultation area (as detailed in Section 7.0) as well as other stakeholders through a variety of means (these are detailed in Section 8.0). Consultation documents and materials will be made available at public inspection locations and a number of public consultation events will be held. The events will be attended by members of the project team, who will be available to explain more about the proposals and answer questions.

6.6 Wheelabrator is required to provide a minimum period of at least 30 days for responses to be received however the consultation period will run for a six week period which will provide people with additional time to submit responses.

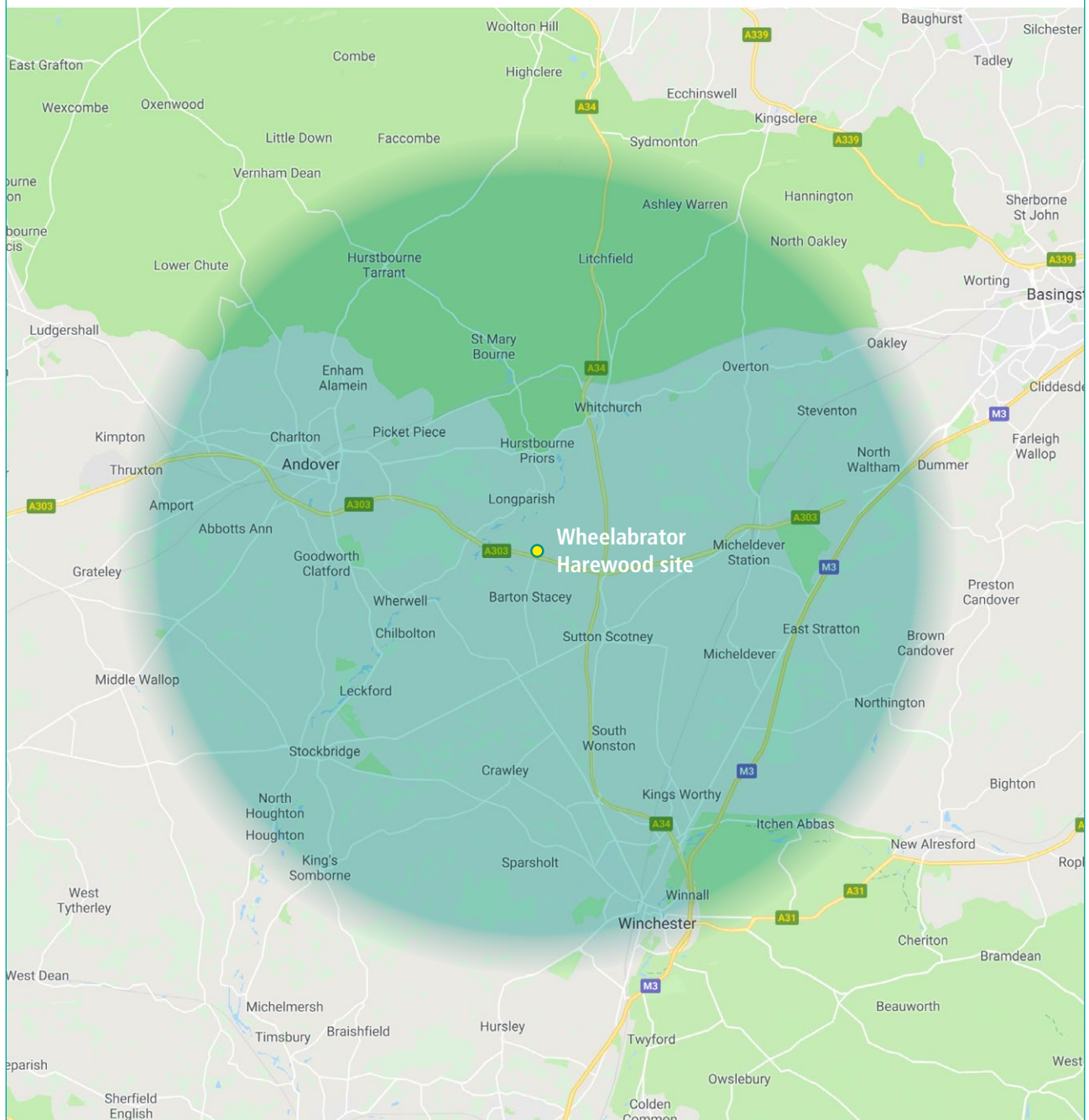
## 7.0 WHO WILL BE CONSULTED?

- 7.1 The consultation process has been designed to engage with the local community and other stakeholders who may be affected by the Project. The consultation zone, identified in Figure 7.1, is centred on the Wheelabrator Harewood site and covers a radius of approximately 15km from the Site.
- 7.2 The extent of the consultation zone has been informed by the initial environmental work undertaken on the Project and also comments received from the relevant local authorities in response to the informal consultation on the draft SoCC in April 2019 relating to the inclusion of Andover.
- 7.3 Section 8.0 details how Wheelabrator will consult in the consultation zone and the types of consultation methods that will be used. A summary of the key methods is set out below.
- 7.4 Wheelabrator will send invitations to attend public consultation events by mail to approximately 4,500 addresses within an inner area which is closest to the Project. This inner area comprises the settlements of Longparish, Barton Stacey, Hurstbourne Priors, Wherwell, Bullington, Sutton Scotney, Forton, Chilbolton, Tufton and the town of Whitchurch. This is an extension to the area within which invitations to public consultation events were sent for the non-statutory consultation held in February 2019.
- 7.5 Wheelabrator will hold public consultation events within the inner area and within Andover at publicly accessible venues, on days and times that will enable the maximum number of people to attend, including at least one event on a Saturday. Please refer to Table 8.1 in Section 8.0 below.
- 7.6 Wheelabrator will inform people about the proposals and consultation events through local newspaper advertisements, posters in libraries and on local noticeboards at locations within the 15km consultation zone.
- 7.7 It is therefore considered that people living and working within the vicinity of the Site will be adequately consulted in accordance with the Section 47 of the PA 2008.



**Wheelabrator**  
HAREWOOD

# 15KM CONSULTATION ZONE



The map displays the 15KM consultation zone around the Wheelabrator Harewood site, which is marked with a yellow dot. The zone is shaded in green and blue, indicating different levels of consultation intensity. The map includes various roads, towns, and villages in the area, such as Andover, Winchester, and Basingstoke. Key roads shown include the A303, A34, A339, and M3. The map also shows the location of the Wheelabrator Harewood site relative to the surrounding area, including the M3 motorway and the A303 road.



## 8.0 HOW WHEELABRATOR WILL CONSULT

### Consultation methods

- 8.1 During Stage 2 (statutory) consultation, Wheelabrator will provide information about the consultation and the proposals through a range of methods in accordance with the statutory requirements of the PA 2008 (broadly the same methods used for the Stage 1 consultation will be used). The consultation methods are set out in Table 8.1 below.

Table 8.1 – Stage 2 Consultation Methods

CONSULTATION METHOD	DETAIL OF METHOD
<b>Briefing to The Raymond Brown A303 Liaison Panel (the Liaison Panel)</b>	The existing Liaison Panel operated by Raymond Brown will be a conduit for reaching stakeholders and as a channel for providing information to the wider community. Information will be provided to the Liaison Panel via direct briefings and written communications.
<b>Project website</b>	The project website ( <a href="https://www.wtiharewood.co.uk">https://www.wtiharewood.co.uk</a> ) will be used to publish updates and information on the Project, including details of consultation events and consultation materials such as the SoCC, feedback forms and the PEIR and PEIR NTS. It will be possible to submit a response via the project website during the consultation period.
<b>Public consultation events</b>	Wheelabrator will hold five pre-application public consultation events at local and publicly accessible venues comprising four events within the inner area of the consultation zone (including Longparish, Barton Stacey, Whitchurch and Sutton Scotney) and one event in Andover. At these events, further information on the proposals will be provided and members of the project team will be present to discuss the scheme. There will be the opportunity to complete a feedback form to submit your responses at these exhibitions.
<b>Local websites</b>	Wheelabrator will submit information on the Project to the following local websites to consider for publication: Andover Advertiser, The Breeze Andover, LoveAndover Radio and Andover and Villages.
<b>Invitations to public consultation events</b>	Wheelabrator will send invitations to attend the public consultation events by mail to approximately 4,500 addresses within an inner area comprising the settlements of Longparish, Barton Stacey, Hurstbourne Priors, Wherwell, Bullington, Sutton Scotney, Forton, Chilbolton, Tufton and the town of Whitchurch. Information will be provided about the events, timescales and how to make comments.
<b>Local newspaper adverts</b>	Wheelabrator will publish adverts in relevant local newspapers within the 15km consultation zone to provide information about the proposal and consultation events. The circulation of some of the local newspapers extends beyond 15km.
<b>Section 48 Notice</b>	Wheelabrator will publish a notice in local and national newspapers advertising the intention to submit a DCO application, as required by Section 48 of the PA 2008.
<b>Letters to town and parish councils</b>	Wheelabrator will write to town and parish councils within the 15km consultation zone, inviting them to take part in the consultation and asking them to encourage others to take part too.
<b>Stakeholder letters and meetings</b>	Wheelabrator will be contacting key stakeholders including local political representatives to provide information about the proposals. Meetings with stakeholders will be arranged if a need for a meeting is identified or if a meeting is specifically requested.



## 8.0 HOW WHEELABRATOR WILL CONSULT

CONSULTATION METHOD	DETAIL OF METHOD
Notices/posters	Notices/posters advertising the consultation and the public consultation events taking place will be displayed at specific locations within the 15km consultation zone such as libraries and noticeboards. The notices/posters will publicise the events and set out timescales for submitting comments and how to make comments.
Public inspection locations	The relevant consultation documents will be made available for inspection in selected publicly accessible venues such as libraries or council offices (see Table 8.3 below).
Consultation materials and format	<p>Wheelabrator will make the consultation documents available to consultees upon request. Wheelabrator will also provide, on request:</p> <ul style="list-style-type: none"> <li>■ Consultation material in large print or audio for those with visual impairments.</li> <li>■ Consultation material in languages other than English to enable those for whom English is not their first language to take part in the consultation.</li> <li>■ Consultation material in a different format, or presented in a different way, if individuals have specific personal needs that mean they would be unable to take part in the consultation without this taking place.</li> </ul>

### Consultation Events

- 8.2 Wheelabrator will hold five public consultation events during Stage 2 (statutory) consultation. The events will be held in the following locations within the consultation zone.

Table 8.2 – Public consultation events

DATE	VENUE NAME AND ADDRESS	TIME
Tuesday 12 November	Whitchurch: Gymnasium, Testbourne Community School, Micheldever Road, Whitchurch, RG28 7JF	17.00 - 21.00
Wednesday 13 November	Andover: Guildhall, High Street, Andover, SP10 1LP	16.00 - 20.00
Thursday 14 November	Barton Stacey: Village Hall, Barton Stacey, SO21 3RW	16.00 - 20.00
Saturday 16 November	Longparish: Village Hall, Longparish, SP11 6PB	09.00 - 13.00
Wednesday 20 November	Sutton Scotney: Victoria Hall, Sutton Scotney, SO21 3GX	14.30 - 18.30

## 8.0 HOW WHEELABRATOR WILL CONSULT

- 8.3 As can be seen in Table 8.2 there are several events to cover weekday evenings and one event to cover a Saturday.
- 8.4 In the event that a consultation event is cancelled or rescheduled due to unforeseen circumstances, Wheelabrator will contact the relevant Parish Council (e.g. Barton Stacey or Longparish) and will seek to inform consultees as early as possible by updating the project website and displaying notices in the vicinity of the affected venue. Wheelabrator will seek to reschedule the cancelled event, subject to venue availability during the consultation period.

### Public inspection locations

- 8.5 The consultation documents will be available to view at the following venues during the consultation period (1 November to 12 December 2019) as set out in Table 8.3. These venues have been selected because they are publicly accessible and secure, in addition to them being located across the consultation zone.
- 8.6 Wheelabrator has liaised with Barton Stacey and Longparish Parish Councils to discuss the use of four additional venues to display consultation documents (e.g. village halls, shops, pubs or churches). The use of these venues relies on the agreement of private individuals/businesses which have certain time restrictions as identified in Table 8.3.

Table 8.3 – Public inspection venues for consultation documents

LOCATION	OPENING TIMES	
<b>Test Valley Borough Council</b> Council Offices Beech Hurst Weyhill Road Andover SP10 3AJ	<b>Monday</b>	<b>08.30 - 17.00</b>
	<b>Tuesday</b>	<b>08.30 - 17.00</b>
	<b>Wednesday</b>	<b>08.30 - 17.00</b>
	<b>Thursday</b>	<b>08.30 - 17.00</b>
	<b>Friday</b>	<b>08.30 - 16.30</b>
	<b>Saturday</b>	<b>Closed</b>
	<b>Sunday</b>	<b>Closed</b>
<b>Andover Library</b> Chantry Centre Andover SP10 1LT	<b>Monday</b>	<b>09.00 - 17.00</b>
	<b>Tuesday</b>	<b>09.00 - 17.00</b>
	<b>Wednesday</b>	<b>09.00 - 17.00</b>
	<b>Thursday</b>	<b>09.00 - 18.00</b>
	<b>Friday</b>	<b>09.00 - 17.00</b>
	<b>Saturday</b>	<b>09.00 - 16.00</b>
	<b>Sunday</b>	<b>11.00 - 15.00</b>

## 8.0 HOW WHEELABRATOR WILL CONSULT

LOCATION	OPENING TIMES	
<b>Hampshire County Council</b> The Castle Winchester SO23 8UJ	Monday Tuesday Wednesday Thursday Friday Saturday Sunday	09.00 - 17.00 09.00 - 17.00 09.00 - 17.00 09.00 - 17.00 09.00 - 16.30 Closed Closed
<b>Whitchurch Library</b> Gill Nethercott Centre Winchester Road Whitchurch RG28 7HP	Monday Tuesday Wednesday Thursday Friday Saturday Sunday	13.00 - 17.00 Closed 13.00 - 17.00 Closed 10.00 - 17.00 10.00 - 13.00 Closed
<b>The Cricketers Inn</b> Longparish SP11 6PZ	Monday Tuesday Wednesday Thursday Friday Saturday Sunday	Closed 12:00 - 15:00 18:00 - 23:00 12:00 - 15:00 18:00 - 23:00 12:00 - 15:00 18:00 - 23:00 12:00 - 15:00 17:00 - 23:00 12:00 - 15:00 18:00 - 23:00 12:00 - 17:00
<b>St Nicholas Church</b> Longparish SP11 6PG	Monday Tuesday Wednesday Thursday Friday Saturday Sunday	09.00 - 17.00 09.00 - 17.00 09.00 - 17.00 09.00 - 17.00 09.00 - 17.00 09.00 - 17.00 09.00 - 17.00
<b>Village Hall</b> Barton Stacey SO21 3RL	Please obtain the key to the hall from Barton Stacey Post Office and Stores (The Street Barton Stacey, SO21 3RL) or The Swan Inn (The Street, Barton Stacey, SO21 3RL) between 7.30am and 11pm	
<b>The Swan Inn</b> The Street Barton Stacey SO21 3RL	Monday Tuesday Wednesday Thursday Friday Saturday Sunday	Closed 12:00 - 15:00 17:00 - 23:00 12:00 - 15:00 17:00 - 23:00 12:00 - 15:00 17:00 - 23:00 12:00 - 00:00 12:00 - 23:00 12:00 - 22:00

## 9.0 NEXT STEPS AND CONTACT DETAILS

### Responses

- 9.1 Wheelabrator will take into account all responses as the proposals are refined prior to the submission of the application for development consent. The Consultation Report submitted with the application will detail how Wheelabrator has addressed any responses received. Any comments received could be made public but no personal information will be published.
- 9.2 Wheelabrator and its project team take reasonable care to comply with the requirements of the General Data Protection Regulation and the Privacy Notice is available on the project website: <https://www.wtiharewood.co.uk/privacy-policy>

### Contact details

- 9.3 You can find out more about the project, contact the project team or submit responses via:
- The project website: <https://www.wtiharewood.co.uk>
  - E-mail: [info@wtiharewood.co.uk](mailto:info@wtiharewood.co.uk)
  - Post to: **Freepost WHEELABRATOR HAREWOOD.**
  - Calling (freephone): **0800 062 2981.**
  - Copies of project documentation can be downloaded from the project website or viewed in hard copy at the venues shown in Table 8.3.
- 9.4 Hard copies of documentation can be purchased, subject to a reasonable charge, by contacting Wheelabrator using the details above. **Please contact Wheelabrator if you need any of the application documents in an alternative format or language as detailed in the 'Consultation materials and format' section in Table 8.1 in Section 8.0 above.**

### Next steps

- 9.5 Wheelabrator looks forward to engaging with you during the forthcoming consultation period. Following the conclusion of the consultation period, all the responses received will be reviewed as preparation of the application continues.
- 9.6 Wheelabrator anticipates submitting the application in Q1 2020. PINS will have up to 28 days to decide whether to accept the application for examination. During the following three months after acceptance there will be a Preliminary Meeting to discuss the programme for the examination of the application. The examination will follow and must be completed within six months. PINS then have three months to make a recommendation to the Secretary of State, who has a further three months to determine the application. It is therefore anticipated that the application would be determined by the end of Q3 2021.





Web: [www.wtiharewood.co.uk](http://www.wtiharewood.co.uk)  
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