

Littleton & Harestock Parish Council (LHPC)

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17th September 2020

OBJECTION TO PLANNING APPLICATION HCC 20/01765/HCS DEVELOPMENT OF INERT WASTE RECYCLING FACILITY, THREE MAIDS HILL, WINCHESTER

1. HCC 20/01765/HCS (Three Maids Hill) Planning Application.

a. Thank you for the consultation on this Planning Application. The Planning Application makes a case for an inert waste recycling facility using allegedly redundant farmland and close strategic transport links. The proposal is at an advanced stage, and the associated documentation is substantial and well written. We recognise the efficient site design with extensive landscaping with bunds and tree planting to hide the few buildings on the site. It is proposed that around half the area of the site would be allocated to landscaping, and approximately 50 larger specimen trees would be planted. We acknowledge the site could integrate into the rural landscape and be largely inconspicuous with biodiversity improvements.

b. The Planning Application addresses most of the usual potential points of objection in an evidence-based convincing manner and links them to National, County and District policies. Environmental matters for the proposed site appear to be treated sensitively. Proposed arrangements for dust suppression involving coverage of load, site speed limits, minimising aggregate drop heights, windy/dry weather actions and damping measures are described.

c. Although the proposed Inert Waste Facility would be outside of the north-eastern edge of the Littleton & Harestock CP boundary, LHPC has identified a major issue of siting and has three main objections to the Planning Application, as described at Appendix 1. Because of the nature of our objections, it is recommended the Regulatory Committee considers HCC 20/01765/HCS in the wider context of other aggregate recycling proposals in the immediate area of Three Maids Hill.

CONTEXT AND MATERIAL CONSIDERATIONS

2. **Waste Recycling in the Wider Three Maids Hill Area.** You should connect this objection letter for Planning Application (**20/01765/HCS**) aggregate recycling at Three Maids Hill to the separate and independent Planning Application (**20/01188HCS**) for aggregate recycling about 500m away at Down Farm, which LHPC objected to on 21st July 2020. The Map at Appendix 2 shows the relatively close relationship between the two proposed recycling locations.

3. **North Winchester Spatial Strategy.** LHPC is concerned about the significant change of use and industrialisation of the Three Maids Hill area in terms of the long-term spatial strategy for north Winchester. If the two proposed aggregate recycling planning applications had been circulating at the same time, then we might have more easily related our objections in the context of District Spatial Strategy. As it is, we must raise the following issues of Spatial Strategy:

a. The MoD Flowerdown Estate due for redevelopment (possibly 800+ future homes and other structures) has a northern boundary about 450m from the proposed recycling site at Three Maids Hill. The MoD may be unaware of proposals for aggregate recycling so relatively close to the Flowerdown estate which is due for sale and redevelopment.

b. The industrialisation of the Three Maids Hill area should be seen from the perspective of the WCC Strategic Housing and Employment Land Availability Assessment (SHELAA) which shows the potential for all sorts of development right up to the Three Maids Hill roundabout. Winchester City Council is currently creating the Local Plan 2038, work that appears to have been delayed because of changes to proposed Government planning policies. Therefore, it is unclear to LHPC where the positioning of aggregate recycling centres in the Three Maids Hill area fits into rapidly changing planning policies and the future Spatial Strategy for North Winchester.

4. **Siting of the Inert Waste Recycling Facility at Three Maids Hill.**

a. The Planning Application does not represent an accurate analysis of the impact of the recycling site's location, and we advise that this is a serious omission. The proposed site edge lies approximately about **150m** north of the commercial Littleton Stud, which is not **agricultural land as claimed in the Planning Application**.

b. The Littleton Stud is a prosperous active major multi-million-pound equestrian amenity to support national and international horse racing. The Littleton Stud (approximately 150 ha), created in 1913, employs 15 staff, with some staff living on site. The Stud is prominent in the racing world. It is a carefully designed and intensively managed equestrian centre for racehorse breeding, development, and care. The Stud consists of 6 properties, 120 stables, support buildings, barns, paddocks, pastures, all-weather surfaces and horse exercise machines. About half of the Littleton Stud is within a 600m radius from the proposed recycling site.

c. Please be aware that performance horses are notoriously vulnerable to dust, respiratory problems and noise. In particular, the value of racing horses (£millions) depends on their developed demeanour and functioning respiratory reserve to win races. By default, Littleton Stud is a '*sensitive area*' for noise and dust and is adjacent to the proposed aggregate recycling operation. The implementation of the inert waste recycling operation, in its proposed location, would place Littleton Stud at risk as a significant national and international horse breeding resource. It is understood that Littleton Stud will be making separate objections to you. LHPC has concluded that, whatever the justification for the inert aggregate recycling site, its proposed location would be inappropriate next to an internationally renowned racehorse stud. *(Please note we have identified the same issue for the separate Planning Application HCC 20/01188HCS for the nearby Down Farm, Winchester).*

5. **Intensity of recycling operations/working times.** You need to be aware that the inhabitants of the buildings close to the Three Maids Hill roundabout and located in the Littleton Stud are accommodation for Littleton Stud staff and barns for horses (some horses recuperating from surgery). The Stud Staff do not work office hours, and at certain times of the year, they often work long, unsocial hours requiring them to rest during the day. Continuous noise from the Recycling Facility during its planned operating hours could be a significant problem.

6. **HGV Movements.** The Planning Application states that HGV traffic will only arrive and depart using the nearby strategic road network. The site is within a few hundred yards of the Three Maids Hill Junction from the A34. It is also stated that HGV will not use Stud Lane which infers such traffic would not pass through Littleton, Harestock or Crawley. LHPC remains concerned that HGV (*not only aggregate carriers*) will be tempted (*perhaps influenced by Satnav*) to travel cross country west/south-west to pass through Stockbridge or travel across the south of Winchester to avoid the A34/M3 junction. See Appendix 2 for details about the issues of HGV travelling through the Littleton and Harestock area (*Note this content is identical to that submitted in objection to the separate aggregate recycling planning application for Down Farm, Winchester (HCC 20/01188HCS)*).

7. **General Impact on the Littleton Settlement.** The eastern end of the Littleton Conservation Area is about 1km from the proposed recycling site, and most of the 20th century Littleton Settlement lies within a 2km radius. Residents can hear traffic on the A34, the trains and specific loud vehicles depending on the ambient weather conditions. It is likely residents will be aware of the recycling operations. Littleton residents are concerned about the prospect of having two separate aggregate recycling sites with extended periods of operation. Many residents will have provided objection statements about the intensity of recycling operations, working times, excessive noise, general dust potential and possible unwelcome HGV movements through Littleton and Harestock.



Stephen Burgess
Chairman Littleton & Harestock Parish Council

Appendices:

1. LHPC Objections Planning Application HCC 20/01765/HCS (Three Maids Hill).
2. Inappropriate HGV Traffic Routes through Littleton/Harestock.

APPENDIX 1: LHPC OBJECTIONS TO PLANNING APPLICATION (HCC 20/01765/HCS) (THREE MAIDS HILL)

| <p>Related Policy References</p> | <p>Planning Application Statements TMR Planning Statement [TPS]</p> | <p>Major LHPC Objections</p> |
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| <p>Winchester District Local Plan (WDLP)</p> <p>WDLP Policy MTRA4: Development in the Countryside. WDLP Policy DM1: Location of New Development. WDLP Policy DM10: Essential Facilities in the Countryside. WDLP Policy DM23: Rural Character. WDLP Policy DM10: Location for operational reasons.</p> <p>Hampshire Minerals & Waste Plan (HMWP)</p> | <p>The Planning Application argues the recycling proposal ought to be approved under the terms of Local Plan Policy MTRA4 because there is an operational reason to locate it in the countryside and offers WDLP policies DM1 and DM10 as justification (TPS, p.24).</p> | <p>Rural Planning Policy</p> <p>LHPC objects to the Planning Application because the proposed development does not conform to any of the stated permitted development categories in the countryside, would cause harm to the character and landscape of the area and neighbouring uses, create inappropriate noise, dust and traffic generation, and is therefore not in accordance with the current Winchester District Local Plan (WDLP Policy MTRA4, p. 65-66).</p> <p><i>‘Development will be limited to that which has an essential need to be located in the countryside. This may include development which is necessary for agricultural, horticultural or forestry purposes’ (WDLP, 2013, Para 6.30, p.65).</i></p> |
| <p>Winchester District Local Plan (WDLP)</p> <p>WDLP Policy DM19: Development & Pollution WDLP Policy DM20: Development and Noise.</p> <p>HMWP</p> <p>Para 4.3. Maintain and support health and well beings of communities and economic prosperity.</p> <p>Policy 4: Protection of the designated landscape. Policy 10. Protecting public health, safety and amenity. Policy 13: High quality design of minerals and waste development. Policy 29: Locations and sites for waste management.</p> | <p>The Planning Application describes the immediate surrounding area of the proposed site to the <i>‘south beyond the three Maids Hill roundabout as further agricultural land’</i> (TPS, Para 2.0.3, p.7).</p> <p>The Planning Application states that recycling would not be conducted in a <i>‘sensitive area’</i> (TPS p.6).</p> <p>In the HCC Planning Officer’s report dated 6th February 2020 you required the applicant to take into account <i>‘material considerations relevant to the circumstances’</i> (TPS, p.6), and demonstrate <i>‘that the development would not be likely to cause unacceptable amenity ... impact’</i> (TPS, Para 1.0.9. p.5); ensuring the approval process would have all the facts.</p> | <p>Assessment Factors</p> <p>LHPC challenges the accuracy of this crucial assertion about the nature of the location of the proposed site. Just to the south of the Three Maids Hill roundabout is a large Equestrian Stud (racehorses) which has not been identified clearly in the Planning Application. See the Map at Appendix 2 for the general area of the Littleton Stud.</p> <p>LHPC objects to the Planning Application because it does not identify or assess the Littleton Stud (large internationally renowned equestrian amenity) as a close sensitive receptor for dust and noise. The proposed recycling site puts at risk this adjacent multi-million-pound business (Refer to HWMP Policy 4).</p> <p>HWMP Policy Context: For proposed developments, it is <i>‘essential to address any potential impact on communities caused by minerals and waste development’</i> (Para 5.1, p.45). <i>‘Minerals and waste management activities should not give rise to pollution or negatively affect the environment or a community excessively or unnecessarily’</i> (HMWP para 5.12, p.47). HMWP Policy describes the wide supportable characteristics for approving recycling sites, e.g. closeness to highways and planned developments etc.</p> <p>This objection is made in relation to Policy 29, Para 3(b), where the special need for the specific location of the site at Three Maids Hill does not appear to have been demonstrated in the context of a significant adjacent sensitive receptor for dust and noise.</p> |

| <p>Related Policy References</p> | <p>Planning Application Statements TMR Planning Statement [TPS]</p> | <p>Major LHPC Objections</p> |
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| <p>HMWP</p> <p><i>Para 5.4 : ‘potential negative effects ... traffic congestion as well as potential health impacts’.</i></p> <p>Policy 12: Managing traffic.</p> | <p>The TMS states all HGV would typically arrive and depart via the A34. Only for exceptional local collections and deliveries would HGV traffic be anticipated to arrive from the north via the A272 or south via the B3420 (Andover Road) HGVs operated by TMR would not use Stud Lane to the west of the site (TMS, Para 5.7.5, p.34)</p> | <p>Highways & Traffic</p> <p>LHPC objects to the Planning Application, which if approved, could add to the potential increase in HGV traffic movements in the Littleton & Harestock CP. (See further details at Appendix 2) and connect to the separate Planning Application 20/01188HCS).</p> |

APPENDIX 2: INAPPROPRIATE HGV TRAFFIC ROUTES THROUGH LITTLETON/HARESTOCK

The application states that most HGV trips will travel to/from the Three Maids Hill site via the strategic road network.

The Application implies that there will be little aggregate bearing HGV traffic passing through Littleton or Harestock.

Littleton and Harestock Parish Council is concerned that heavily loaded aggregate HGV traffic travelling west/south-west may cross over the Three Maids Hill roundabout system and (*perhaps influenced by Satnav*) transit through the residential areas of Littleton and Harestock. The Parish Council is concerned about two routes the HGV might elect to take (Refer to the Map).

Route 1

HGV might opt to take Stud Lane and move through Littleton to gain access to the Stockbridge Road for onward travel west towards Salisbury or perhaps south to take advantage of a route along Chilbolton Avenue (in Winchester) and on to the M3 south of Winchester. This direction would be a poor route for HGV because of:

- lack of pedestrian walkways in the Littleton Conservation Area (Map point R1).
- the complexity of the Kennel Lane Junction (Map point R2) where pedestrians have to cross the junction roads several times to follow the single pavement, coupled to poor sightlines for pedestrians and vehicles.
- the pedestrians, cyclists and disability units which use Littleton Main Road (Map point R3) to access shops at Weeke. Note there are no pavements and the road is unsuitable for two large vehicles to pass side by side. Also, the north part of Littleton Lane is impassable for large vehicles, and Dean Down Drove is not a suitable shortcut to the Stockbridge Road.

Route 2.

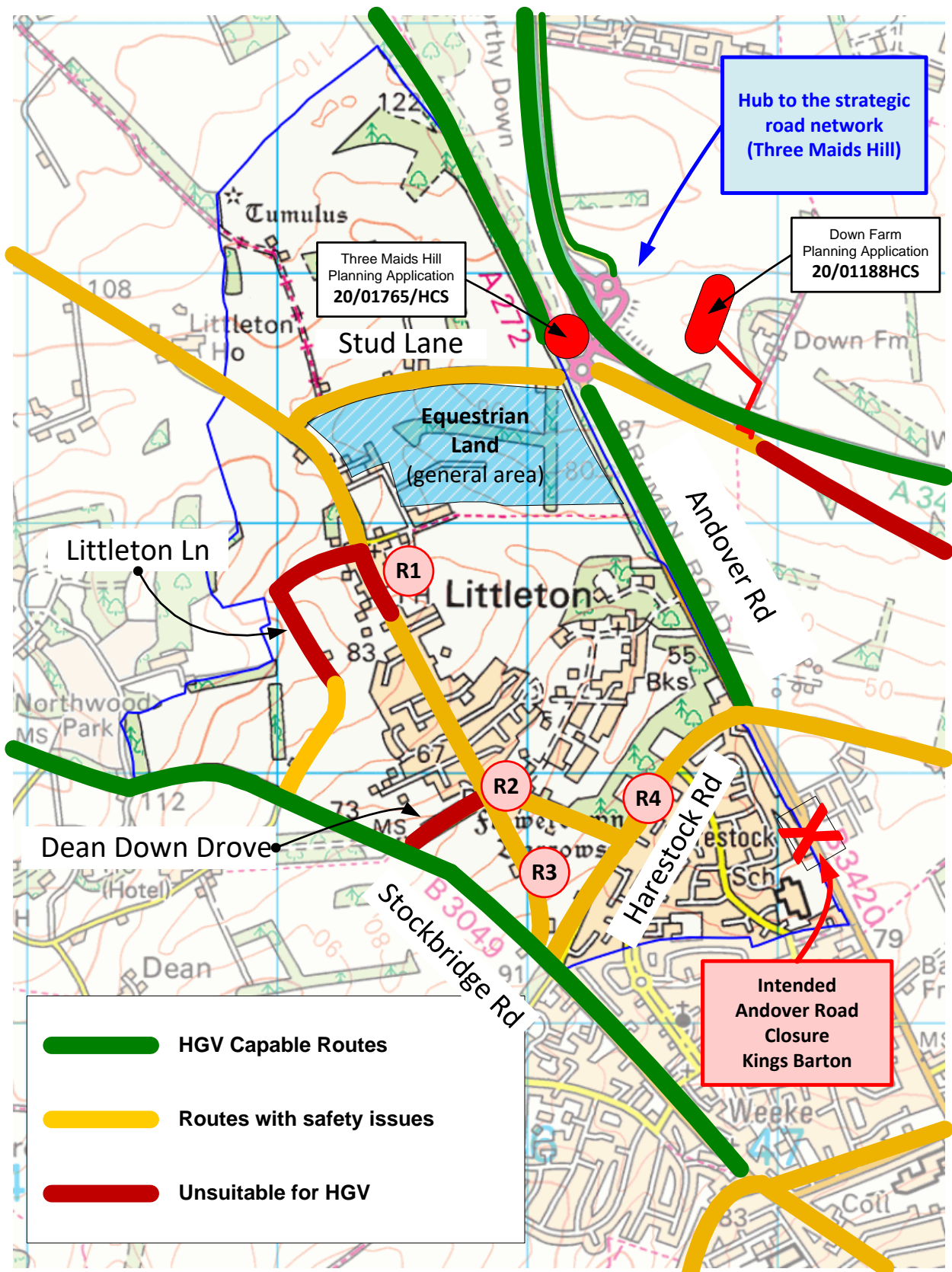
The Parish Council is concerned about the increasing level of traffic using the Harestock Road due to the development of Kings Barton and the intended closure of the Andover Road which will funnel traffic down the Harestock Road (Map point R4). HGV might opt to travel down the Andover Road and turn right along the Harestock Road to gain access to the Stockbridge Road. The Harestock Road is just wide enough for HGV

traffic, but there can be difficulties (see Photograph).



Example Harestock Road safety issue: HGV and Horse Box (pavement mounted) attempt to pass each other (2020)

The single pavement along the Harestock Road is unsuitable in parts for groups of pedestrians, and pedestrians with prams and wheelchairs (*we are in discussion with our County Councillor about this issue*). Therefore, walking along the Harestock Road towards the shops at Weeke is an unpleasant experience for pedestrians and can be intimidating. The junction of the Harestock Road with the busy Stockbridge Road is also a risk point for HGV because of the approach speeds of vehicles travelling south to Winchester.



Map of North Winchester Area

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