



19 January 2026

**Draft Basingstoke and Deane Local Plan 2024-2042
Updated Spatial Strategy (Regulation 18 Consultation)
December 2025**

Response of the General Aviation Awareness Council on behalf of Popham Airfield Matters

The General Aviation Awareness Council (GAAC) was formed over twenty years ago to work for the protection of UK airfields from indiscriminate development. It represents the interests of over 30 Associations, including the British Gliding Association (BGA), Aeroplane Owners & Pilots (AOPA), the Light Aircraft Association (LAA), the Honorable Company of Air Pilots (HCAP), the Aerodrome Operators Group (AOG), British Business & GA (BBGA), the Flying Farmers Association (FFA), British Microlight Aircraft Association (BMAA) and ARPAS, the Association of Remotely Piloted Aircraft Systems. It therefore represents 40,000+ members involved in fixed wing, helicopter, gliding, Microlight, Balloon, Drone and Aeromodeller activities.

Wherever possible, the GAAC works in conjunction with complementary organisations such as Sport England, the RSPB and CPRE. Since 2018 the GAAC has been closely involved with the All Party Parliamentary Group for General Aviation.

1. Introduction

- 1.1 Popham Airfield Matters (PAM) has a membership in excess of 2,500 people, comprising local residents, pilots and others directly involved in aviation and Popham Airfield as well as people who visit the site for a variety of activities and those who use Popham Airfield as an intermediate stop on a long flight. All have contributed to Popham Airfield Matters to represent their opposition to the closure and loss of the airfield and its associated facilities.
- 1.2 Senior Councillors were persuaded in 2024 that the land should be retained as an airfield – and logically recognised the need to provide alternative sites for housing. The principle of retaining the airfield not only for aviation use, but community use and for its economic value now and in the future should not be undermined by a general increase in housing requirements.



1.3 This representation sets out the strategic importance of Popham Airfield now and for the whole Plan Period. This importance has actually grown over the last two years.

1.4 It also sets out the soundness of the Draft Local Plan – in respect of the Updated Spatial Strategy and other flaws, errors and omissions in the Draft Local Plan and Draft Policy SPS5.8. The flaws have increased in this Regulation 18 document.

2. Popham Airfield Activity

2.1 This section of our representation describes the character and use of Popham Airfield, the opportunities it offers to the Borough, its importance as a Strategically Important aerodrome and relevant Government Policy.

2.2 Popham has operated as a General Aviation (GA) aerodrome for 50 years and its activities have grown and evolved over time. The activities taking place at Popham Airfield, serving not only the Borough, but a large area of Hampshire, include:

- a. Nearly 20,000 aircraft movements a year
- b. The Popham Spitfire Club has some 550 members
- c. There are 150 aircraft based at Popham
- d. Popham has three flying schools:
 - Airbourne Aviation can have 2000 annual aircraft movements
 - The Gyrocopter Experience Popham is home to the UK’s largest gyroplane school and is one of only two locations in the UK (and the only one in England) where new gyroplane instructors can be trained. Popham is also home to over 10% of the UK’s gyroplane fleet and plays an important role in the support and development of this expanding area of aviation. Adventurer James Ketchell learned how to fly gyroplanes at Popham before departing from the airfield in 2019 to compete the Guinness world record-breaking first circumnavigation of the earth in a gyroplane, one of a number of world records set by gyroplane pilots based at Popham. It draws visitors from across the South, West, Midlands and South-East of the country.
 - Flying for Freedom which aids the recovery of wounded injured and sick military personnel and veterans through microlight flying training. It is a participant in ‘Flying Scholarships for Disabled People’.





- e. A CAA approved Aircraft Maintenance business
- f. Extensive commercial drone testing
- g. The Southampton University Aero Club is based at Popham
- h. The Hampshire Flying Group has 3 aircraft based at Popham and 35 members who jointly own the aircraft.
- i. Events - there is a wide range of events, some of which are prestigious annual national gatherings:
 - Microlight Trade Show
 - World Air Sports Federation
 - Light Aircraft Association Fly-Ins and Rallies
 - British Model Flying Association Model Show
 - Andover Strut of the Light Aircraft Association
 - Off-road driver training
 - Support to Car Fest South
 - Motor Cycle Scrambles
 - Motor Cycle MegaMeet
 - Popham Classic Car Show
 - Hampshire County Cross Country Running
 - Basingstoke Athletics Club
 - British National Cyclo X
 - Basingstoke Motor Club
 - Sebastian's Action Trust
 - Royal Aero Club Race School
 - Hovercraft racing
- j. Popham has a registered Caravan and Motorhome Site
- k. Visits to the Aerodrome Café amount to some 75,000 a year; and, in addition,
- l. An estimated 75,000 public visits to events per annum

2.3 The BYP, British Young Pilots is a club for young people to learn about aviation and experience flight. BYP has only been established for 3 years but about 2000 young people have already signed up (this number is expected to double in 2026). There are weekend clubs at 20 airfields across the country and nine clubs based in schools as well as holiday clubs.





Popham is now, effectively BYP's Headquarters.

Airbourne Aviation (referred to above as an important training operation based at Popham) was founded in 1980 and is the longest running flight school in England. In 2022 the management of the school was taken over by Cliff Hawkins who, as a highly experienced aviator brought in new investment, ideas and instructors to the organisation. In September 2025, ownership transferred to the founder of the BYP, Patrick Tame. The Airbourne Manager and one of the Airborne Instructors provide key support, vision and drive to the BYP and are central to its operations and key to its growing importance. Airbourne is a CAA Declared Training Organisation (DTO). It is also a participant in 'Flying Scholarships for Disabled People'.

We draw attention to this, not only to explain the breadth and depth of flying and flight training at Popham but to highlight the changes happening in the General Aviation industry, its importance for STEM education and training and the crucial key geographic location of Popham Airfield.

- 2.4 The aerodrome has some 30 staff, and the close knit flying community makes substantial contributions to the maintenance and evolution of the infrastructure, facilities and activity of the site. The employee roles are diverse, skilled and unskilled and offer training for young people.
- 2.5 One expression of the strength, community character and ethos of Popham is production of a 32 page magazine, full of news, information and advice which is produced four times a year.

3. Future Potential

- 3.1 Popham is strategically located in two respects relating to the aviation activity and the economic activity of Hampshire:

Popham has been identified as a Category A (the top category) in the Strategic Aerodrome Network. It is a very convenient and well located site, in particular it is geographically important to the south-west of London. It is also clear of surrounding areas of restricted airspace. It provides a wide range of services that make it an attractive location to break a long flight:

- a. It is an ideal location for N-S and E-W journeys. Popham is within 45 nautical miles to the SW of Heathrow but a safe airfield as there is less risk of infringing the London controlled airspace. There are no other airfields that fulfil this



function to the SW of London. (One regular user has said, *'Selfishly, it's the one place the loss of which would make me consider any trip of distance - which would clip my wings greatly.'*)

- b. It is also located very close to the M3 motorway corridor which links the aerospace industry clusters in North and South Hampshire. Popham already supports that aerospace activity and there is a significant opportunity for that to be enhanced and developed for the benefit of Basingstoke and Deane.

- 3.2 Popham Airfield Matters has prepared a Prospectus, with the assistance of the Farnborough Aerospace Consortium, which sets out a strategy and mechanisms to develop the aviation role and technical skills for the benefit of young people and the economy of the Borough. This accords with BDBC Draft Local Plan, Chapter 8 which supports a 'Thriving Local Economy' and states at paragraph 8.1:

'The Plan sets out an approach to maintain and enhance the borough's position as a prosperous economic centre and grow knowledge-based and high value jobs.'

- 3.3 It also accords with the *'Future Economy Framework: Building opportunities for a resilient inclusive and sustainable economy in Basingstoke and Deane'* adopted by the Council in June 2025.

4. Strategic Aerodrome Network

- 4.1 The principle of establishing a 'Strategic Aerodrome Network' (SAN) was first discussed in the 2013 Aviation Policy Framework. It was developed by Lord Byron Davies, in his report that accompanied the Green Paper, Aviation 2050: The Future of UK Aviation 2018.

- 4.2 Lord Davies' recommendations in respect of a SAN were:

- a. The Government should publish criteria to enable an airfield to identify itself as being part of the strategic network.
- b. Local authorities should take this into consideration when planning applications are made.
- c. Government should prepare guidance to support a policy recognising the importance of a national network of GA airfields.

- 4.3 The All-Party Parliamentary Group on General Aviation responded to the Green Paper stating:

- a. The *'...situation facing General Aviation with regard to airfields is extremely precarious.'*; and

b. A ‘radical strengthening of planning protection for airfields’ is required.

- 4.4 In 2023, the General Aviation industry, through the UK VFR Flight Guide and the Aerodrome Operators Group acted and developed a Strategic Aerodrome Network in line with Lord Davies’ recommendations, incorporating the criteria set out in 2018 and adding other factors such as geographic, social and environmental questions. This has been endorsed by the All-Party Parliamentary Group – Aviation, the General Aviation Alliance, the British Microlight Association and the Light Aircraft Association and the aviation community in general.
- 4.5 A UK Government could not itself directly define the SAN as most aerodromes are in private ownership. However, the All-Party Parliamentary Group on Aviation officially endorsed the Strategic Aerodrome Network in May 2024.
- 4.6 The Department for Transport General Aviation Handbook, subtitled ‘For stakeholders, including local planning authorities’ sets out the:

‘Strategic value of GA Airfields’

stating:

‘No two GA airfields are the same, and each can have valuable characteristics which help create a national network of airfields that work collectively to deliver key functions. These include regional and national connectivity, training and educational opportunities, offer a community space or support to emergency service operations.’

- 4.7 It then sets out ‘...a list, and explanation of some of the key characteristics which could constitute an airfield being of strategic value to local communities, transport needs, businesses and Government.’ The list includes:
- a. Government services
 - b. STEM / workforce opportunities
 - c. Regional connectivity
 - d. Innovation opportunities
 - e. Professional aviation training
- 4.8 The Strategic Aerodrome Network analysis embodies 136 physical, regulatory and operational features of each aerodrome in 28 categories. Each feature has been scored. The analysis and scoring have been moderated / peer reviewed by industry experts. The scoring has been divided into four categories. Popham’s score places it in the top category ‘A’, defined as:

'Those containing elements of GA and elements of a commercial airport. They are predominantly licensed and generally have higher aircraft movement levels, ATC services and ground support - in other words satisfying the aeronautical criteria highlighted by Byron Davies and the work by York Aviation. Most have a wider range of activity, flight training, MET services and accommodate emergency and related services.'

- 4.9 Popham exhibits all of the key characteristics set out in the General Aviation Handbook, as has been outlined above. It is also a major recreation and sport resource for the Borough, County and Region. The next section of this objection sets out the salient provisions of the National Planning Policy Framework which contain overwhelming justification and demonstration that this aerodrome should be retained for the long term value to the community.

5. Planning Policy

- 5.1 The National Planning Policy Framework (NPPF) states:

Paragraph: 111: *'Planning policies should:*

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the General Aviation Strategy,'

- 5.2 The Popham Aerodrome activities are, therefore, fully in line with the business, leisure, training and emergency service needs elements of paragraph 111(f) of the NPPF policy.

- 5.3 Sport England recognises the activities at Popham as 'air sports', and the activities being carried out designate Popham Aerodrome as a 'sports venue'. In planning policy terms all of the relevant planning policies as set out in the NPPF to protect Sports Venues apply.

- 5.4 Paragraph 88 of the NPPF states: *'Planning policies and decisions should enable:*

*d) the retention and development of accessible local services and community facilities, such as local shops, **meeting places, sports venues**, open space, cultural buildings, public houses and places of worship.'* [our emphasis]

- 5.5 Paragraph 96 states: *' Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:...*

*c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, **sports facilities**, local shops, access to healthier food, allotments and layouts that encourage walking and **cycling**.' [our emphasis]*

5.6 Popham is well used by many cycling groups – including large groups. For example, the Newbury Road Club, which is the primary cycling club in West Berkshire, frequently visits Popham and has an emergency store at Popham should one of the group need replacement kit.

5.7 Paragraph 98 of the NPPF states: *'To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

*a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, **sports venues**, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;'* [our emphasis]

5.8 Paragraph 103 states:

*'Access to a network of high quality open spaces and opportunities for **sport** and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, **sport and recreation facilities** (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.'* [our emphasis]

5.9 As has been demonstrated above a large number and wide diversity of people visit and use Popham Airfield. It constitutes a sport and recreation facility serving the whole Borough.

5.10 Paragraph 104 of the NPPF goes on to underline the need to retain sports facilities:

*'Existing open space, **sports and recreational buildings and land**, including playing fields and formal play spaces, should not be built on unless:*

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

- b) *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) *the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.'*

5.11 No assessment has been undertaken to demonstrate that Popham Airfield and its activities are 'surplus to requirements. No replacement or better provision is being suggested and the proposed development is not for alternative sport or recreational use. Any proposed open space as part of a housing scheme would be substantially less valuable for sport and recreation.

5.12 Importantly, paragraph 200 of the NPPF states:

*'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and **sports clubs**). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or '**agent of change**') should be required to provide suitable mitigation before the development has been completed.'*

5.13 As highlighted, this gives strong support to sports clubs. In addition, this 'agent of change' principle has been **specifically** applied to aerodromes by PPG paragraph: 012 Reference ID: 30-012-20190722.

5.14 There are a wide range of planning policies which support the continued use of Popham Aerodrome for aviation and other sport and recreational purposes. It operates as a civic amenity, with no comparable venues within the Borough. There are no planning policies which support the Council's proposal to allocate Popham Airfield for housing development, as will be demonstrated in the following sections of this objection.

6. Soundness

6.1 The NPPF sets out the tests of soundness – namely 'positively prepared', 'justified', 'effective' and 'consistent with national policy'.

6.2 The draft Local Plan seeks to meet the objectively assessed need for the new housing required to be provided within the Borough. However, in respect of the proposed allocation at Popham Airfield there is no clear evidence:

- a. to demonstrate that the required number of new homes proposed on this site could be delivered within the plan period’;
 - b. that the strategy set out is appropriate;
 - c. that the draft Local Plan would be effective; or that
 - d. the draft Local Plan is consistent with national policy.
- 6.3 There is little robust or credible evidence in the draft Local Plan that the proposed allocation of Popham Airfield as a new settlement would be sustainable or deliverable . The proposed scheme has been considerably enlarged since the first Regulation 18 document. There is no information to demonstrate that the additional infrastructure burden could be accommodated or delivered.
- 6.4 It is also clear that there is no assessment has been undertaken of the environmental impact of the proposed larger scheme – in respect of (for example) landscape and ecological impact nor of the deliverability or viability of necessary infrastructure provision.
- 6.5 There is not even evidence that the proposed 4,250 homes could be physically accommodated on the proposed site. There is no evaluation of the impacts of the proposed closure of Steventon Road. The sketch site ‘layout’ fails to identify land for a Waste Water Treatment Works – which would require at least a football pitch area of land.
- 6.6 Furthermore, even if it is deliverable, there is no robust or credible evidence that development on the site would be appropriate and / or consistent with national planning policy. The significant extension of the site, into Steventon Parish has not been justified or even explained. If such a large area of open countryside can be promoted without proper strategic analysis it makes the loss of Popham Aerodrome even more egregious.
- 6.7 This part of the objection to the draft Local Plan sets out the flaws, errors and omissions in the draft document that determine ‘soundness’. It sets out details (focussed on Popham Aerodrome but also taking full account of the landscape and infrastructure implications of the now proposed extension into open and important countryside).
- a. Scheme Viability
 - b. Infrastructure Delivery
 - c. Sustainability
 - d. Consistency with national policy
 - e. Alternatives

It then addresses the overall ‘soundness’ of draft Policy SPS5.8.

a. Scheme Viability

6.8 The Draft Infrastructure Delivery Plan identifies the following requirements for development to take place on Popham Airfield. They are itemised alongside the relevant preliminary assumptions about infrastructure costs, where provided. The question marks indicate unknown / undefined costs.

Type	Requirement	Funding	Cost
T17	A30 / M3 Junction capacity improvements	Developer	?
T23	Overton Road	Developer	?
T24	Steventon Road	Developer	?
T25	Extended A303 eastbound on slip	Developer	?
T26	A303/Overton Road off slips; junction improvements	Developer	?
T40	Improvements to M3 Junctions S Basingstoke	TBC	?
T46	Sustainable transport – mobility hubs, public transport, Active Travel connections, high quality public transport including to Micheldever station and Basingstoke town centre	Developer	?
T56	Active travel connectivity to Micheldever station + cycle parking	Developer	?
T75	Micheldever Station – accessibility, multi-modal connectivity improvements including public transport	Developer	?
T77- T80	Borough-wide means of access, public rights of way, off-street and on-street EV charging,	All sites	?
E2	8FE secondary school	Developer	£23.76m
E7	2x3FE primary schools (+ one to expand to 3.5FE)	Developer	£26.38m
E19	Early years	Developer	?
CF9	2 x community facility buildings	Developer	?
H4	Health surgery	Developer	£5m
H10	Enlargement of Kingclere, Oakley, Overton Practice (<i>collectively Watership Down Practice</i>)	Developers (including Popham)	?
S21	Artificial turf pitch	Developer	£0.5m
S22	6x full size grass pitches + facilities	Developer	?
G1	BNG	Developers	?
G2	Strategic habitat creation	Developers	?
G3	Enhancement to River Loddon	Developers	?
G4	Enhancement of River Test	Developers	?
G5	Northern Manydown Countryside Park	Developers	?

G6	Improvements to Eastrop Park	Developers	£4.8m
G7	Improvements to War Memorial Park	Developers	£2.35m
G8	Improvements to Black Dam Ponds	Developers	£1m
G9	Improvements to Crabtree Plantation	Developers	£1.58m
G10	Improvements to Basing Common	Developers	£945k
G11	Improvements to Basing Lime Pits	Developers	£1.16m
G12	Improvements to Millfield	Developers	£1.18m
G13	New and improved green space to meet the needs of new development.	Developers	?
G14	New and improved play areas to meet the needs of new development	Developers	?
G15	New allotments	Developers	?
G16	Green infrastructure	Developers	?
G17	Nutrient neutrality mitigation	Developers	?
U1	Upgrade to WWTW ¹	Developers	?
U2	Local water supply infrastructure	Developers	?
U3	Strategic flood alleviation schemes and flood prevention measures	Developers	?
U5	Improvements to electricity supply networks	Developers (or Utility Company)	?
U6	ICT/Broadband	Developers (or Utility Company)	?

6.9 This extensive list of infrastructure requirements demonstrates the extremely complex process required properly to assess scheme viability / deliverability.

6.10 It is clear that the majority of the essential infrastructure improvements have not been costed. The Council has made it clear that assessment of the nature of the infrastructure improvements needed has not yet been undertaken². It is not possible at this point to determine if the above requirements can physically be

¹ An upgrade would be unlikely to be appropriate and a new on-site WWTW should be assumed.

² As set out in the Report to the Cabinet on 11 November 2025

'3.17 The modelling is now being rerun to consider the sites in the proposed new spatial strategy, and the first outputs from the model are due to be published as part of the evidence base for the forthcoming second Regulation 18 consultation. The work to date has identified the following locations that will require more detailed assessment through the TA:

- *Fiveways/Buckskin Lane/B3400 roundabout;*
- *A30 Southwood Corner;*
- *A303/Overton Road near Popham; and*
- *M3 Junction 6.'*

provided and at what cost and, therefore, if the scheme is capable of being delivered.

- 6.11 The nature, design, cost and deliverability of essential transport infrastructure upgrades are at a very preliminary stage. There is no evidence that acceptable transport infrastructure can be provided.
- 6.12 It is also clear that the identification of a potential new settlement at Popham, a considerable distance from Basingstoke, generates costly infrastructure requirements that could be far more efficiently provided in alternative locations.
- 6.13 Furthermore, Popham Airfield already encompasses equivalent infrastructure to that which would need replacement if the site were to be identified as a new settlement. Popham Airfield contains community buildings (CF9), sports facilities (S21, S22), biodiversity (G1) and rich habitat (G2), it supports the River Loddon and the River Test (G3&4), it is comparable to a Country Park (G5-G7), it provides open space and recreation and leisure infrastructure (G8-G13, G16). These assets which are currently available to all residents of the Borough and beyond would be lost if this draft allocation proceeds.
- 6.14 There is no evidence or certainty that this proposed development is viable or achievable. In accordance with NPPF paragraph 200, Popham Aerodrome is an existing established facility. In this situation where there is significant and material uncertainty about the viability and deliverability of a new settlement on the Aerodrome site, this draft policy should be removed from the draft Local Plan. Other clear evidence of the lack of soundness is set out below.

b. Infrastructure Delivery

Introduction

- 6.15 Draft policy SPS5.8 k requires an Infrastructure Delivery Strategy to be provided with each full or outline planning application. This is completely inadequate. This proposal relates to a major scheme. It is imperative that a comprehensive infrastructure scheme involving detailed design, costing and timescale for delivery should be prepared prior to **any** planning applications being submitted.
- 6.16 This would be essential in order to confirm if essential infrastructure is capable of being provided / that the scheme would be sustainable. It is also essential as it would be a travesty for a thriving, viable and nationally important aerodrome to be lost on the false premise that creating a new town could be a sound concept.

- 6.17 The need to demonstrate compliance with the NPPF tests of soundness make it essential that an Infrastructure Delivery Strategy is in place **prior** to this draft plan being submitted to the Planning Inspectorate. In its absence, this draft plan is unsound.

Transport

- 6.18 Paragraph 5.139 refers to the site promoter's '*...emerging Sustainable Transport Strategy...*' Without evidence that adequate public transport and highway infrastructure is physically and legally possible and financially feasible, there is no evidence that the aspirations set out in Policy SPS5.8 can be delivered.
- 6.19 The Council acknowledges that further work is needed to identify the nature and deliverability of new highway infrastructure and highway improvements. There is no certainty that physical upgrades are feasible or deliverable. The road layout in the vicinity of Popham Airfield is already convoluted and confusing – due to the necessary compromises to take account of the M3 motorway and accommodation of the A303 / A33 intersections. National Highways will need to be involved with any improvements and assessments of impacts on the national network.
- 6.20 SPS5.8 (q) states that there should be '*...no severe adverse impact on the local and strategic highway networks...*'. It is clear that there is no evidence at this point that this could be achievable.
- 6.21 The draft policy only superficially addresses the challenges of encouraging and promoting walking and cycling within the proposed site as well as beyond its boundaries.
- 6.22 It also refers to ensuring '*no severe adverse impact on the local and strategic highway networks*' without there being any evidence that managing the additional traffic created by the scheme and additional complex movements is physically feasible or deliverable.
- 6.23 Similarly, there is no evidence that, in this location, '*high quality public transport infrastructure*' could physically be provided or would be used / viable for the provider, taking account of geography, congestion, travel time and cost.

Water Supply

- 6.24 The Water Cycle Study (WCS) states that the South East of England '*Faces the some of the most significant challenges of water resources in the future.*'

- 6.25 Popham is located in the supply zone of South East Water but borders Southern Water. The WCS states that Southern Water could accommodate increased housing numbers but with caveats. South East Water states categorically it could not. It states that it will not have developed potential solutions until it has completed its next Water Resource Management Plan in 2027-29.
- 6.26 The WCS concludes that water availability is likely to be the key issue impacting growth in BDBC between 2029-34.

Waste Water Disposal

- 6.27 Alfred Homes has made some statements about rainwater harvesting and simple drainage and infiltration schemes. However, the WCS draws attention to the necessary measures that would be required in order to manage waste water acceptably. The volume of waste water could not be managed by rainwater harvesting.
- 6.28 The sensitivity of the chalk streams would require some form of water treatment for runoff (not the simple drainage and infiltration schemes proposed by Alfred Homes) to limit damaging chemicals entering the aquifer.
- 6.29 Southern Water has stated that the developer would need to provide a treatment scheme either as an expansion of Whitchurch or on site. The current Whitchurch plant has a capacity of 4934 Person Equivalents (PEs). The development of Popham would require a plant of about 16,800 PE's and typical costs would range £20-£30 million on a conservative basis.
- 6.30 The draft Local Plan suggests this matter could be left to the Planning stage but there are fundamental issues about acceptable measures to protect the sensitive environment of this area, as well as cost and delivery issues. The draft allocation should not be progressed unless there is clarity and certainty on this matter.
- 6.31 There is no evidence at this point that the necessary drainage infrastructure needed to support a new town at Popham could physically be provided.
- 6.32 As noted in paragraph 5.146, water quality is an 'extremely' important issue and water and drainage infrastructure are complex due to the nature of the geology, the sensitivity of the River Loddon and River Test. There is no evidence that acceptable solutions could be provided for run-off and wastewater management. Therefore, there is no evidence that this proposed site allocation is deliverable.

Social Infrastructure

- 6.33 The existence of appropriate education, primary health, social infrastructure and the on-site presence of shops is critical in the very early stages of any major new housing scheme. No evidence has been provided on the timescale within which such facilities could be available. However, the physical infrastructure demands for this proposed draft housing allocation are extremely high, costly and will take a considerable period of time to deliver. These would, inevitably, take precedence over social infrastructure.
- 6.34 There is no evidence that, in putting forward this proposed housing scheme, there has been any consideration not only of the risks to potential new residents faced with a lack of social infrastructure but also of the risk that the compensatory actions they might take would become permanent, thereby contrary to the suggested internal cohesion of the proposed new settlement.
- 6.35 Furthermore, there is no evidence of evaluation of the comparative benefits of the creation of a new settlement versus other strategic options.

Employment

- 6.36 Paragraph 5.9 has introduced the proposal that part of the Borough's 'industrial and logistics floorspace' amounting to 214,000 sqm would be accommodated at Popham. The scale, nature and location of this is undefined nor is there any consideration of the appropriateness of this in a 'Garden Village'.

c. Sustainability

Travel

- 6.37 Paragraph 5.139 refers to the site promoter's '*...emerging Sustainable Transport Strategy...*' which, as noted above does not give any certainty of this being physically feasible, financially viable or genuinely sustainable.
- 6.38 The site is located 18km from the centre of Basingstoke, and some 20km from the centre of Winchester. Micheldever station is not within reasonable walking distance of the majority of the site (3.5m from the centre of the site) and the nature of the roads – (convoluted, with mostly no footpaths or lighting) are not conducive to walking. There is little parking capacity at the station and, in any case, the 'Sustainable Transport Strategy' would be incompatible with driving to the station. The draft local plan refers to bus provision but there is no information on frequency or whether journey time / cost would be acceptable. There are no current bus services in the vicinity of the site.

- 6.39 It is also important to take account of the counter-intuitive concept for people working in Basingstoke to travel south before being able to travel north.
- 6.40 The roads between Popham and central Basingstoke are either rural lanes or the very congested A30 / A33 / A303 / M3. In reality , the geography and nature of Basingstoke are not conducive to reliance on public transport.
- 6.41 The ability to produce a robust '*Sustainable Transport Strategy*' is highly unlikely.

Water

- 6.42 As outlined above the nature and scale of the physical infrastructure needed to manage water supply and disposal is uncertain but intrinsically complex and challenging. No evaluation has been undertaken to address the relative sustainability (as well as cost-benefit) of the proposed new settlement at Popham against other locations within the Borough.
- 6.43 However, there is evidence from other proposed development in southern Hampshire that strongly indicates that this is an unsustainable location in which to propose large scale residential development.
- 6.44 The only mention of 'nitrate' in this draft Local Plan is in paragraph 5.146, relating to this draft housing allocation.

Bio-diversity and conservation of the natural environment

- 6.45 Airfields, in requiring extensive areas of land, in this case principally grassland, can develop into wildlife havens and support a wide range of plant and animal species. Popham hosts a diverse range of flora and fauna both within the site and on its boundaries.
- 6.46 Analysis of the Hampshire Biodiversity Information Centre information shows a rich flora and fauna. The Priority Habitats map shows lowland calcareous grassland and lowland mixed deciduous woodland (some of which is defined as semi-natural ancient woodland) although not all areas of calcareous grassland identified on the SINC Plan are included.
- 6.47 Oaken Copse and Bellevue Plantation contain important plant species and on the edge of an urban development, their value could clearly be degraded – particularly if access to the site were to be from Steventon Road.

- 6.48 The site adjoins part of the Core Statutory Micheldever Spoil Heaps SSSI. In addition, the 'Ecological Network Mapping' plan shows areas appropriate for network opportunities. These areas have not been evaluated in the context of a proposed urban development.
- 6.49 The first 1810 Ordnance Survey shows the airfield site as open grassland and so its character has been established for over two centuries. Cobley Wood was woodland in 1810. The section to the west, but continuous with Cobley Wood, which is now termed Cobley Plantation, appears to have been felled and replanted and it is now mature woodland. This is on the site of the original mature woodland and would have inherited the flora and fauna and is likely to be species rich.
- 6.50 This legacy, alongside the unobtrusive aviation use, merits protection and it is clear that to replicate such biodiversity on a housing construction site would not be possible. Any 'replacement' would be smaller, subject to residential pressure and would not achieve the breadth and depth of the biodiversity within the existing site.
- 6.51 The existing biodiversity could also be enhanced within the plan period. It is important to note that a limited survey by the HBIC in August 2019 of the small SINC site identified 164 plant species. Of these, nine are 'Notable' as listed by the HBIC of which five are listed as threatened by the IUCN – International Union for Conservation of Nature. This survey took place in a small area of the whole site, and only on the area in active airfield use. Oaken Copse, in a more central part of the wider site, includes a further 9 species and five of them are indicator species for ancient woodland.
- 6.52 In Cornwall, Bodmin Airfield was designated as a County Wildlife Site on January 29 2024. It has recorded 170 plant species, comparable to Popham, but Bodmin has been subject to deliberate management regimes to enhance its ecological value.
- 6.53 Important Birds, Butterflies, Moths, and Mammals have also been identified at Popham. These include:
- Seven Notable / Protected species of birds – Skylark, Black-headed gull, Linnet, Red Kite, Golden Plover, Starling and Fieldfare have been identified.
 - Purple Emperor, Small Heath, and Cinnabar Butterflies
 - Brown Hare, Eurasian Badger, and Hazel Dormouse.
- 6.54 It is clear that the current biodiversity is rich and has evolved over many years. This, alongside the aviation use, merits protection and it is clear that to replicate such biodiversity on a housing construction site would not be possible. Delivery of 'Biodiversity Net Gain' would be exorbitant.

- 6.55 In addition, the HBIC data has not been fully reflected in the WSP SA and the Draft Local Plan Allocation and the weight to be attributed to it is underestimated. A full recording survey across the whole Popham site would be appropriate in order to confirm its full ecological importance and the potential for enhancement and an extension of the SINC designation.
- 6.56 Any ‘replacement’ associated with residential development would be smaller, subject to residential pressure and could **never** achieve the breadth and depth of ecological value of the existing site.
- 6.57 A stated principle of redevelopment of this site is to provide 10% Bio-Diversity Net Gain. However, the site already has great biodiversity. Replacing it on new land would be at a massive cost. There would be a huge net loss of biodiversity for many years. The clear principle is that areas of ecological value should be protected, and sites identified for new housing should be of lesser ecological value so as to generate net benefit (but at an affordable level for a developer). There is no assessment or evidence as to how 10% BNG could be achieved.
- 6.58 The Council’s Landscape Character Assessment shows the historic landscape types in and around the Draft allocation site boundary for Popham Airfield including the assorted woodland on the eastern, western and northern sides of the site. The assessment of Character Areas 14 and 17 which are of relevance to the Draft allocation site refers to their existing rural character and the desirability of retaining this.
- 6.59 In respect of biodiversity and the natural environment, it is clear that this proposed site is unsustainable³.

Community cohesion

- 6.60 The proposed development is inherently unsustainable as the proposed development would wipe out a well-established, well used and valuable community asset which provides jobs and training and has the potential to further grow, flourish and diversify – for the benefit of residents of the Borough and the local economy.
- 6.61 The site is also unsustainable. There would few jobs on the site.

³ As set out Report to Cabinet on 11 November 2025 paragraph 12.3:
‘Concerns remain in terms of the draft allocations at Popham and Skates Lane and further technical work is required to ensure the avoidance of significant impacts on SINC’s and irreplaceable habitat.’

- 6.62 There has been no sustainability appraisal leading to the *choice* of this site as a new settlement. It has been promoted by the land owner and there is no evidence of the Council going through the normal site assessment and selection process that would lead to the choice of a candidate site. The draft Local Plan has not been ‘positively prepared’.
- 6.63 The Council has not undertaken an appraisal of the sustainability / cost / deliverability of a new settlement versus, for example, extension of existing urban areas.

Summary of Changes

- 6.64 The Council’s summary of changes between the first and second Regulation 18 documents demonstrates that the original scheme was clearly not sustainable and a number of measures are now proposed to mitigate the original flaws. There is no evidence that the proposed enlarged scheme is viable, deliverable or sustainable. However, the proposed changes including industrial development and screening are incompatible with the ‘Garden Village’ concept – which in itself is flawed, as set out in this objection.
- 6.65 This scheme – in terms of density, scale and nature is clearly and demonstrably NOT a ‘Garden’ or a ‘Village.’

d. Consistency with national policy

- 6.66 As set out in section 2, the proposed allocation of an active General Aviation airfield for residential use conflicts with NPPF policies and paragraphs 88, 96, 98, 103, 104, 111 and 200 which all support the retention of a national network of General Aviation airfields.
- 6.67 Paragraph 11(d) reinforces the weight of these policies, ‘...*the application of policies in this Framework that protect areas or assets of particular importance [including habitats sites and local green space] provides a strong reason for refusing the development proposed...*’.
- 6.68 Paragraph 8b) of the NPPF states that sustainable development includes: ‘**a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being...**’ (our emphasis)

- 6.69 Section a. of this part of this representation demonstrates not only the direct infrastructure requirements for Policy SPS5.8 but addresses a wide and extensive range of ‘improvements’ – i.e. gaps in current places and spaces.
- 6.70 No evidence has been put forward to justify the logic of promoting a new settlement in a rural area with poor linkages to urban centres. If housing were to be allocated closer to existing urban centres, its infrastructure could support both the existing community as well as the additional future residents.
- 6.71 Paragraph 96 of the NPPF promotes healthy and safe communities and sets out the key principles of promoting social integration, making places safe and accessible and enabling and supporting healthy lives.
- 6.72 Taking account of the points above, at the present time, the draft Local Plan does not provide any evidence that SPS5.8 is physically capable of being delivered in a sustainable way and that appropriate funding is available to deliver the character and quality of the scheme being promoted or the infrastructure needed to support a large new community. This is contrary to the provisions of paragraphs 35 and 36 of the NPPF.

e. Alternatives

- 6.73 No evidence has been provided to demonstrate that the key principle of proposing a new settlement is the most sustainable, efficient and effective approach to meeting the Council’s identified housing requirements.
- 6.74 By virtue of it being promoted by a small developer and by virtue of its location, quite remote from existing communities it might appear to be politically advantageous. However, those are not sound principles on which to make major planning decisions.
- 6.75 Policy SPS5.8 makes no reference to housing mix. An established town has a wide variety of housing types and sizes, as is appropriate for a diverse community. A new settlement, unless very carefully planned, tends to have far less diversity and therefore social and cultural character.
- 6.76 AECOM’s analysis (Housing Infrastructure Cost Model, 2025) states that *‘Site location is critical to the success of a new major housing development. It often makes sense to locate a new town or large development adjacent to existing urban areas. This creates opportunities to share infrastructure between existing and new communities, and to invest in the improvement of existing facilities rather than provide wholly new facilities.’*



6.77 The Council has not published any analysis of the cost-effectiveness of proposed new settlement site.

Conclusion

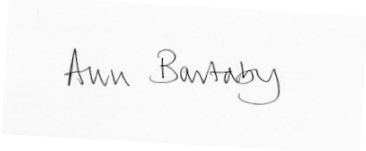
Popham is a thriving aerodrome, an exemplar of the breadth and depth of aviation services and activities. It makes a very valuable and important contribution to the Basingstoke and Deane area and, more widely, Hampshire and the South of England.

Its Category A status in the Strategic Aerodrome Network highlights its regional and national value.

It offers substantial opportunity to enhance STEM skills, in particular the aviation and aerospace interests along the M3 corridor.

Planning policy strongly supports the retention of Popham Aerodrome for aviation and recreational activity as well as to protect and enhance the landscape and biodiversity value of this area of Hampshire.

The draft local plan is unsound. It has not been '*positively prepared*', '*justified*', or '*effective*' and is not '*consistent with national policy*'.



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