



Working together for the future of Alton

The Planning Department
East Hants District Council
Penns Place
Petersfield
Hants
GU31 4EX

13th June 2014

Dear Sir / Madam

Alton Society Response to Planning Application No.55222/001 – Land East of Will Hall Farm, Basingstoke Road, Alton

1. Introduction

The Alton Society has reviewed in detail the outline planning application for development of the land east of Will Hall Farm. Following extensive consultation with the Alton Community “Alton 2020: A plan to shape Alton’s future” was published in 2005. This led to the preparation in 2008 of the Town Design Statement (TDS). The East Hants District Council (EHDC) approved this document, and as such it was explicitly intended to become Statutory Planning Guidance once the Core Strategy was in place. The TDS was directed principally at developers and planners, with the purpose of “making clear the wishes of the townspeople of Alton for the future of their town”. Its aims were therefore to:

- Generate appropriate design guidelines to influence the planning and implementation of the town’s future development.
- Articulate the views of the local community about such development;
- Foster a better appreciation of the town and its setting, both by its own residents and by those in the surrounding area for whom it also provides a focal point.

Alton is currently preparing a Neighbourhood Plan, which is currently due to be completed during 2015. The two very well attended public meetings held so far have firmly endorsed the principles of the Town Design Statement, particularly Section 3 which refers to the “Setting and Landscape” of the town. Specific planning guidelines in this section include the following:

- Guideline 3.3 - “Important vistas into and out of the town should be protected”.
- Guideline 3.5 - “The skyline on the hills surrounding Alton is one of its most valuable and appreciated features. Development should continue to be contained from encroaching up into the surrounding downland and onto the skyline.”
- Guideline 3.6 notes, moreover, “ The road entrances to the town are attractive gateway features and they should be protected from inappropriate new development.”

With these guidelines in mind, the Alton Society has a number of objections to the principles of the application, and other objections as to fact. These will be covered in the following paragraphs.

2. Objections as to Principles

2.1 Alton Settlement Boundary

The Planning Statement clearly confirms that the application is seeking to build beyond the defined and approved Alton settlement boundary. The proposal determines that the EHDC Local Plan is “out of date” because they do not have a 5-year land supply, and quotes the NPPF as being the default authority to enable them to have the application approved because of the presumption in favour of sustainable development. This flies in the face of local democracy; as we have indicated, the Alton Neighbourhood Plan is in the process of development and from the 1000+ responses made to the Neighbourhood Plan Community Questionnaire earlier this year, the Will Hall site was shown to be the SHLAA location that was least favoured by the townspeople of Alton. In view of this, and very much influenced by the wishes of the people of Alton, the Alton Society registers objection in principle to the granting of outline planning permission for development of this land that sits beyond the approved settlement boundary. Further detailed comments relating to the Planning Statement, the Design and Access Statements and the Landscape and Visual Impact Statement are at Annex 1.

2.2 Transport and Travel Plan

The plan states there are “no valid highway or transportation reasons which should prevent the proposed residential development of this site”. The Alton Society would contend that this statement is simply not true. The Planning Authority will be aware that there are already detailed plans submitted for the South Alton Development, Cadnams Farm, and imminently for the land west of Old Odiham Road north of Southview Rise (Southview). All of these applications together would introduce around 1200 to 1300 new dwellings in Alton, and would put significant additional pressure on the highways and transport network around the Town. Specifically, the Cadnams Farm and Southview proposals will inevitably increase the traffic flow through Greenfields Avenue to the proposed junction with the entrance to the Will Hall Farm development.

The evidence provided in this application does not take any of these other proposals into account. As the Planning Authority will be aware, a full traffic survey, jointly funded by EHDC and Hampshire County Council (HCC), is being planned to take effect later this year. This study will cover the whole of Alton and given the potential pressure on the transport system from other development proposals, the Alton Society contend that this application should be refused pending the completion and full report from this survey.

Turning to a point of detail, we are of the view that the proposed new roundabout at the junction of Greenfields Avenue with New Odiham Road is not sufficient for the amount and size of vehicular traffic that will use it. In particular, it is a bus route, and a small roundabout will prove difficult to navigate around. However, of equal consequence, as a redefined gateway to the Town, a larger roundabout with grass, trees and appropriate street lighting would provide a more significant gateway statement and provide a more obvious calming effect on traffic speed. Further detailed comments on the Transport and Travel Plans are at Annex 2.

2.3 Drainage and Sewage

The Design and Access Statement indicates that there is a foul sewer to the East of the Site to which the development can connect. In a letter to the Alton Neighbourhood Plan Steering Group from Thames Water dated 09 Apr 2014, Thames Water state that the Will Hall Farm site cannot be sustained by the current sewage system and they will require at least a 12 week survey to determine the upgrade required; they will then require a minimum of 3 years to implement the necessary improvements. There have already been current instances of sewage backing up and flooding gardens on the New Odiham Road (East of) during last winter (2013/2014). This work is therefore considered to be fundamental to ensure that the existing communities do not suffer further, and the Alton Society content that this application should not be approved until there is absolute clarity on when this work will be conducted. As with the transport and highways work, this application cannot be considered in isolation, as the capacity on the existing underpinning infrastructure must be capable of handling the total increase anticipated by all of the pending applications.

2.4 Energy and Sustainability

The applicant’s Executive Summary outlines the proposed approach to energy use and sustainability and ties this in with current legislation. In short it aims to reduce the use of resources, conserve water and encourage low or zero target technologies. We welcome this, but saw little evidence to suggest that this was being taken

seriously throughout the detailed application. We also noted that the application refers to Building Regulations Approved Document Part L1A 2013 for construction compliance; notwithstanding our objections as to principles, if the Planning Authority are minded to approve the application, then we would strongly contend that any approval should be Conditional on compliance with Building Regulations that are **current at the time that the detailed planning application is submitted**. Other detailed comments relating to service supply, energy and sustainability are at Annex 3.

2.5 Other issues

Having studied the Archaeological Based Assessment of the submission, the Society would emphasise their explicit concern, based on the Domesday record, about the possibility of an Anglo-Saxon church remains being discovered in the south-western portion of the site. If found, these would relate to a very early ecclesiastical building which, because it was no longer noted in the diocesan records c1270, could yield important evidence about a structure whose original form had not been subject to processes of continuous alteration ever since. Such matters are of significant local concern.

The Alton Society welcomes the commitment to 40% affordable homes; if the Planning Authority are minded to approve the application then we would urge them to ensure that this commitment becomes a pre-condition for any subsequent application.

3. Conclusion

Whilst recognising the professional manner in which the application has been prepared, the Alton Society objects to the Will Hall Farm planning application on a number of counts:

- The proposal is to build on land that extends beyond the Alton Settlement boundary and the Alton Community has identified this as the SHLAA site that is least favoured for development.
- The Transport and Travel Assessment has not taken into account any of the other significant planning applications that are currently with the Planning Authority. As such, the proposal cannot be considered to be robust. The proposal should therefore be re-worked once the planned Traffic Survey has been completed and published.
- Thames Water has already indicated that the existing drainage and sewage infrastructure is insufficient; they have further indicated that the enabling infrastructure works will take up to 3 years to complete. Of equal importance, as with the transport and highways work, this application cannot be considered in isolation, as the capacity on the existing underpinning infrastructure must be capable of handling the total increase anticipated by all of the pending applications.
- We welcome the commitment to 40% affordable homes and would urge the Planning Authority to ensure that this, and other positive elements of the Design and Access Statement become pre-conditions for any further detailed planning application.

Finally, the Alton Society would also urge the Planning Authority to take into consideration the many public objections about the proposal that are already lodged on the 55222/001 website. If EHDC approve this outline application, then the Alton Society will make further comments at a later stage on those parts of the current proposal which have yet to be formulated in greater detail for a full planning application.

For the Alton Society

Annexes:

1. Detailed comments on the Planning Statement, Design and Access Statement and Landscape and Visual Impact Statements
2. Detailed comments on the Transport and Travel Plans
3. Detailed comments on the Supply, Energy and Sustainability Statements

Document - Will Hall Farm Design and Access Statement

- Para 6.8 **Design Influence.** States that the hedgerow to the South of and bisecting the site has “little intrinsic value and should not represent a constraint to development”. In other words it should be removed as part of the development. Retention of this hedgerow (or most of it) will serve to soften the views out of town to the North and North East thereby limiting the impact of building on the site and destroying one of the vistas both the Alton Community and visitors enjoy. This is why the site was the least favoured in the Neighbourhood Plan questionnaire to the public that offered the opportunity to comment on the current array of SHLAA sites. Proposal underlines the need to retain key views at para 6.12 and also Policy C5 of the EHDC Local Plan as set out at para 8.4 where it states “development should not harm Hedgerows...etc.
- Para 6.23 **Hydrology.** States that there is a foul sewer to the East of the site to which the site can connect. In a letter to the Alton Neighbourhood Plan Steering Group from Thames Water dated 09 Apr 2014, Thames Water state that the Will Hall Farm site cannot be sustained by the current sewage system and require at least a 12 week survey to determine upgrade required and then a minimum of 3 years to implement improvements. There are instances of sewage backing up and flooding gardens on the New Odiham Road (East of) during last winter (2013/2014). See also flood risk Assessment comments.
- Para 13.3 **Building Heights.** There is a central band shown in figure 10 of 3 storey dwellings. Considering the location of the site and vistas destroyed because of the development it is considered that 3 storeys is too high. The aim should be for 2 and maximum in appropriate places 2.5 storey. The figure also shows a “solid line” of houses across the middle of the proposed development that will inevitably impact on the vista.
- Para 14.1 and 14.2 point to the landscape study and planting proposals. If the proposed tree planting is to form the mask to the houses and support the softening of the site and maintain the vista then they will need to be very large and mature trees. This is unlikely, and we can therefore expect to have to wait at least 25 years before the planting has the desired impact.
- Figure 17. **Illustrative Masterplan.** Item 15 is listed as Wetland. Should this not be referred to as SuDS Attenuation Wetland? If not the proposed SuDS may be insufficient to serve the site.
- Figure 19. As above (Figure 17).
- Figure 20. Annotation states “informal footpath with potential link to Brick Kiln Lane.” It is recommended that the Bluff is not connected to Brick Kiln Lane. The existing footpath is already a link and it would be unfortunate to destroy the serenity of the lane.
- Para 15.15 **Proposed Site access.** As presented the mini roundabout at the site access (4 way junction) is too small. The New Odiham Road is a fast downhill approach to (and subsequently from) the town. Putting a mini roundabout just a short distance after a sweeping bend into Alton is unwise and requires a rethink.
- Para 16.6. **Access and Movement.** Mentions a secondary site access to the North of the main one. Why is this required? Site lines look very difficult and the location is in the wrong direction towards sweeping left hand bend as one approaches Alton as set out above.
- Para 16.8 – **Vehicular movement.** The proposal is silent on the other major developments that are being proposed and their inevitable impact on traffic flows. In particular, Cadnams Farm, Southview Rise and South Alton, which together with Will Hall Farm could bring additional c. 1200 dwellings. Moreover, given the impending traffic survey, it would be appropriate for this proposal to be rejected and reworked once the results of the survey are available, and full consideration must be given to all proposed developments in determining the highways and transport solution.
- Para 17.5. **Urban Form.** Mentions “Key Buildings” for the site and these have been referred to elsewhere. Implication is that they will be dominant and recognisable. If so why is more detail not given? We need to know as they could seriously impact the sense of place or overall layout.

- Para 19.1 – Illustrative Blocks. If EHDC were minded to approve this application for outline permission, we would seek to ensure that the applicants be asked to reduce the number of dwellings so that the visual impact from Basingstoke Road be softened. In addition, we would seek to ensure that any subsequent application for full planning permission should be required to maintain no greater density, and abide by the design principles outlined in this document.
- Figure 40. Connect with para 16.6 above. Sets out that buildings along upper part of New Odiham Road will have a “private drive”. Why is this necessary and is there not a safety issue with another access point?

SUMMARY

We are concerned over the impact on the vistas and do not believe that the proposal satisfactorily addresses this issue; this of itself is sufficient to justify an objection at this stage. In addition the road access and secondary access are not considered to be fit for purpose. We are also concerned that no cognizance has been taken of the other proposals for Cadnams Farm, Southview Rise and South Alton in determining the proposed transport solution. This alone is material grounds for objection, and we would contend that the proposal should take this into account along with the results from the traffic study due to take place over the next few months.

Document – Will Hall Farm Planning Statement

- Para 4.3 and 4.4 – The proposal is to build beyond the defined and approved Alton settlement boundary. The proposal determines that the EHDC Local Plan is “out of date” because they do not have a 5-year land supply, and quotes the NPPF as being the default authority to enable them to have the application approved because of the presumption in favour of sustainable development. This flies in the face of local democracy; the Alton Neighbourhood Plan is in the process of development and the fact-gathering work has concluded. The evidence points clearly to Will Hall Farm being the least favoured for development. The TDS also clearly shows the importance of the vistas and gateway to the Town.
- Para 4.18 – summarises that the site is considered appropriate. Again, not according to the Alton community
- Para 4.20 – Talks again of the presumption in favour of sustainable development; however, the proposed transport infrastructure takes no account of other planning applications, which together add up to around 1200 new dwellings.
- Para 5.14 and 5.15 – The application suggests that as the proposal goes a long way towards helping EHDC meet its shortfall in land supply, this constitutes strong justification for its approval. Surely a shortage of land supply cannot in and of itself constitute “strong justification” for approval.
- Para 5.22 – talks to the desire to preserve key views – by building a housing estate on the hillside this is just impossible to achieve.
- Para 5.49 – The application seriously underplays the issues surrounding draining and sewage with Thames Water.
- Para 6.4 – indicates that the development will have no detrimental impact on the local highway network. This application cannot be considered in isolation to the other proposals – 1200 new dwellings will inevitably have a detrimental impact.

Document - Will Hall Farm Landscape and Visual Impact Assessment

- Para 4.23. **Summary.** This para alleges that views into the site are generally restricted to its immediate surrounds and is reinforced by Figure 5. However, this analysis is done on the basis of looking into the site at ground level. As the plan has 2/3 storey houses on site, this appraisal becomes invalid.
- Para 4.27. **Summary.** States that the site is generally of *medium* sensitivity. The Alton Community would robustly argue against this assertion and this is why the site is the top resisted site in the recent Neighbourhood Plan survey that attracted more than 1000 responses. It is believed that the sensitivity should be rated as high. At para 6.4 it is claimed that we will have to wait 25 years before the site achieves a “high beneficial change’ status. This is too long to wait.
- Para 7.10. **Summary and Conclusions.** States that “The proposed development would result in the enhancement of existing landscape features....”. It is strongly contested that this simply is not the case.
- Para A3.36. **Magnitude of Change.** In line with our comments at with para 4.27 above this para categorises “High Sensitivity” as meaning ‘*Where the scene would cause a significant change to the existing view*’. This is what we believe the site should be classified at and therefore the plans should reflect this.
- General. **Landscape Capacity Study and SHLAA Site Assessment: A Summary Report East Hampshire Joint Core Strategy June 2013.** States - *The Will Hall Farm site represents a significant development of a green field site on the edge of Alton. The site lies to the north of the low lying area which forms the source of the River Wey and ensures that a green finger extends into the town and its flood meadows from the countryside to the north and west. Development of this site will curtail views from the roads over adjacent agricultural areas and high ground to the north.* This reinforces comments as set out above.

SUMMARY

It is surprising that Barton Willmore have played down the impact that the development will have on views and vistas on this gateway to the town of Alton. No account has been taken of the building heights and mitigation is expected to come only after 25 years.

Document - Will Hall Farm Flood Risk Assessment

- Para 5.4. **Network Requirements/Options.** Confirms that Thames Water cannot provide assurance that sewage and sewerage capacity will be sufficient for the development. We know it is insufficient as set out in the Design and Access Statement above (para 6.23). To reiterate, Thames Water States - *In a letter to the Alton Neighbourhood Plan Steering Group from Thames water dated 09 Apr 2014 Thames Water state that the Willhall Farm site cannot be sustained by the current sewage system and require at least a 12 week survey to determine upgrade required and then a minimum of 3 years to implement improvements.* There are instance of sewage backing up and flooding gardens on the New Odiham Road (East of) during last winter (2013/2014). The assessment gives 3 options the last of which would appear to apply and that is attenuation storage will be provided on site. From the information we have even this would be inadequate and a rethink is required.

SUMMARY

It cannot be possible to pass this application as presented until the sewage/sewerage issue is resolved.

SA of Sites in Alton		
	SHLAA Code	AL002-4 Will Hall Farm
SHLAA Code	Site	Will Hall Farm
SA considerations	Relevant EHDC SA objectives	
Availability and deliverability:		Yes
Availability for development recently confirmed?	n/a	Yes
Planning status, including any application	n/a	Applied for
Land in single or multiple ownership	n/a	Single
Any known legal issues e.g. ransom strips, land in trust	n/a	Unknown
Community support:		
Extent of local community support for developing site	Policy CP9 in JCS	Not fully supported at Neighbourhood Plan Consultation. Least acceptable of all site presented.
Sustainable development:		
If known, proposed housing mix / % small/starter homes	Help young people to live in the area	Unknown
If known, proposed housing designed for elderly needs	Provide for an ageing population	Non specified
If known, proposed per cent to be affordable housing	Ensure decent and affordable homes	40% (acceptable).
Site access to main A and B road network	Meet needs for key utilities and transport infrastructure	Yes
Proximity to existing bus routes	Reduce the need to travel by car	Yes
Whether entails any loss of employment land	Promote vibrant local economy	No
Distance from town centre	Create vibrant town centres	0.625 miles
Proximity to primary schools	Improve access to service facilities	0.31 miles
Whether entails any loss of existing public open space	Protect public open spaces	No
If known, proposed public open space on site	Improve health and well-being	No
Local heritage assets on site	Protect historic and cultural heritage	Possibly – requires investigation.
If known, proposed energy efficiency measures	Promote energy efficiency	Yes, but see individual comments (requires more detail)
Whether site is grade 1, 2 or 3a agricultural land	Protect soil quality and structure	Yes (partially)
Potential for impact on groundwater	Protect the natural water environment	High
If in an area of flood risk or has recent flood evidence	Reduce the risk of flooding	Lower reaches adjacent to site
Whether includes or adjoins a nature conservation site	Protect nature conservation interests	No
Whether there would be visual impact on skylines	Protect local landscape character	Yes
Whether development would affect Right of Way	Enable recreational countryside access	No
Any other site comments	n/a	
<u>Summary, including significant site constraints identified:</u>		Site will seriously impact views and vistas on northern (Old Odiham road) access and exit from town. Least preferred site by Altonians of all SHLAA identified sites.

Document – Will Hall Farm Transport Assessment

- Introduction
 - Para 1.9 - The plan states there are “*no valid highway or transportation reasons which should prevent the proposed residential development of this site*”.
 - We disagree; a full traffic survey is planned by Hampshire County Council (HCC) to cover the whole of Alton and given the potential pressure on the transport system from other development proposals it is clear that until the survey is completed by HCC all developments should be refused.
- Para 5.11 - We note the proposal anticipates "shared streets" within the development and welcome this approach.
- Para 6.3 - We regard it as essential to extend the 30mph limit as envisaged in the Access design and note the design giving a new priority at the junction of Basingstoke Road and New Odiham Road (6.8 & 6.9) but are concerned that the roundabout proposed for New Odiham Road and Greenfields Ave and the new development will not be sufficient to deal with the traffic which will use it.
- Para 6.11 - We welcome the idea of a gateway feature at the sign of the new 30mph limit. However we feel controlled pedestrian crossings should be considered to assist at an appropriate point along the New Odiham Road.
- Where paragraphs are repeated in the Travel Plan we refer you to our comments as appropriate (e.g. Table 4.1 is the same as 3.1 in the TP) covering modes of transport and parking.
- We conclude that the proposal is not robust, and should be re-worked once the results of the full traffic survey around Alton has been completed and published.

Document – Will Hall Farm Travel Plan

■ Introduction

- The Travel Plan in this application should be developed in conjunction with other potential development and not in isolation. eg South Alton c.530 new homes, Cadnams Farm 275 new homes.

■ Para 2.3 and generally through-out - The Travel Plan focuses on encouraging residents to walk, cycle or use public transport and fails to recognize the inevitable use of private cars, adopting instead a “wish-list” of walking, cycling or public transport use.

■ Para 3.2 - The Travel Plan claims that the site is located sustainably adjacent to an established residential area with access to existing local amenities. This is unrealistic and fails to recognize that the distances to existing shops, schools, facilities and amenities in the town will inevitably lead to increase number of private cars.

■ Para 3.8 to 3.10 - The proposal relies on existing footpath along the eastern side of New Odiham Road for pedestrian access to town. We would expect provision of a new footpath along the western side of New Odiham Road together with a crossing.

It should be an objective of the plan to allow for disability access to the site and within the site.

■ Para 3.12 – This application refers to National Cycle Network Route No.224 which is 600 metres to the west of the site. The cycle route along Basingstoke Road is inadequate for this proposed development.

■ Table 3.2 – Bluestar bus service is irrelevant to this site and its inclusion in this TP is misleading. These buses are a special service, “Simplygo”, provided for the Alton Sixth Form College for students from remote towns and villages. “Simplygo” is not a public transport service and does not pickup students within Alton; this is readily discernable from their website.

■ Table 3.1 – This table suggests “acceptable” distances for walking or cycling. The assumption in this table is flawed – people simply do not behave in this manner.

- New residents who use the train service will drive to the train station, (approx.) 2 kilometres being too far to walk or cycle on a cold or wet winter’s day.
- Car parking at the station is already at capacity.

■ Para 3.21 – The application claims it is “... *considered to be located sustainably..*” ... We disagree with this statement, for the reasons outlined in this response.

■ Para 3.22 - This statement that public transport services connect to employment, retail and educational facilities in Alton and further afield is misleading;

- There is currently limited employment opportunity in the town. The map in figure 3.1 incorrectly identifies the Brewery as the only employment opportunity. The Brewery is mostly automated and employs few people. The Sixth Form College is one of the largest, if not the largest employer in the town and is fully staffed.
- The assumption that people will walk, cycle or use buses to escort their children from this site to school is flawed. People will use private cars for the school-run.
- New traffic is likely to rat-run around town centre, dispersing via Greenfields Avenue and/or Southview Rise, Old Odiham road etc, adding to problems of traffic flow caused by road-side parking in these residential roads. Other routes in and around town from this site would be via Basingstoke Road into Lenten Street, Ackender Road or past the library etc., or via Whitedown Lane and Butts Road via Butts bridge. The impact needs to be assessed against the results of the expected traffic survey information.
- The schools identified on the map at figure 3.1 present misleading information. eg Treloars is not a state school.

- Alton schools at all levels of education are overcapacity except Wooteys. This has not been considered in the application.

■ School Traffic.

- The TP is silent on parents' choice of schools and fails to recognize that all Alton schools are on the opposite side of busy roads from the proposed site:-
 - Basingstoke Road.
 - New Odiham Road.
- Those children (and their escorting parents/adults) who choose to walk or cycle to school face real hazards when crossing or walking along roads.
- The need to negotiate busy roads will only add deterrent of a walk or cycle to school, thereby increasing cross-town school-run car journeys.
- This needs reconsideration.

■ Section 4 Trip Forecast – This section comprises “wish-list” forecasts, failing to acknowledge the reality of how people behave. The aspirations of Para 4.4 - 4.5 (Targets) deny the inevitable use of cars, particularly when the development does not include its own local amenities, local shop or school (eg pre-school).

■ Section 5 - Travel Plan Coordinator - This section fails to acknowledge the reality of how people behave. What is the anticipated lifetime of the TP? Has the applicant done this anyway else and assessed its success?

It is our view that the Travel Plan Co-ordinator will have difficulty in persuading people to behave in this manner.

How will the TP be enforced?

■ Section 6 - Initiative and Measure

- Para 6.4 - 6.6 – To accommodate traffic entering and leaving the site, the TP relies on the consequential change of appearance of New Odiham Road and the extending of the 30mph speed limit. The appearance of this stretch of New Odiham Road will change.
- Para 6.7 – 6.9 – Car parking to min Standards. The provision of car parking spaces needs to reflect reality; eg the high probability must be recognized that two adults living in a single bedroom flat will both have a car for travel to work out of town. Equally, a four or five bedroom house is likely to be a family home, with two or more grown children old enough to have a car of their own for travel to work out of town.

To reduce the likelihood of car parking overflow into New Odiham Road, an allowance for parking ought to be provided for visiting friends and families.

At present, when joining New Odiham Road from Greenfields Avenue, drivers' sightlines are obstructed by parked vehicles. The approaches to the new site entrance/junction should be designated “No Parking” for a suitably long distance... eg from the existing small roundabout (proposed for re-configuration in this application) on Basingstoke Road along New Odiham Road to the bend & layby at the northern edge of the site, and from the entrance/junction up the hill at western end of Greenfields Avenue.

■ Illustrative Plan in Appendix A –

- It is not clear what the application proposes for the new site entrance/junction off New Odiham Road, but it appears to be no more than a small white painted circle forming a roundabout at what would otherwise be a simple crossroads.
- A small white painted roundabout will fail to redefine the gateway to the town, and imposes too tight a turning circle for the buses – both Stagecoach and “Simplygo”.
- There are several small white painted roundabouts in the town at present and they regularly cause driver confusion.

- There is adequate space and opportunity to provide a larger roundabout, with grass and trees and street lighting. This would form junction definition, add to the capacity for the traffic to enter the roundabout and join the main road and provide traffic calming on New Odiham Road.
 - Trees should be species appropriate to East Hampshire.
- We conclude that the proposal is not robust, and should be re-worked once the results of the full traffic survey around Alton has been concluded and published. Where paragraphs are repeated in the Traffic Assessment, we refer you to our comments as appropriate.

Document – Will Hall Farm Service Supply Statement

- The Services Supply Statement only covers Water, Electricity, Gas and Telecoms.
 - Surface water and foul drainage appear briefly in Section 5 of Planning Statement document - Flood Risk and Drainage. With over simplification, this section states “Foul water will discharge to the existing Thames Water network”. This is inadequate. It is known that demand on Alton sewerage plant is over capacity and in need of upgrade for current town population.
 - Section 6 - All telephone and broadband connections should be underground.
 - Para 6.3 – Cable TV is not available in Alton at present.
- Water, Gas and Electricity: The predicted demand as the development is implemented is noted. Adequate capacity should be provided to enable residents’ lifestyle choices in a Sustainable Community whilst encouraging minimum use.
- It is not clear what white goods will be provided as standard. Residents should be provided with guidance for future selection of replacement white goods to match with Energy & Sustainability targets stated in this application. All white goods should be Triple A rated.

Document – Will Hall Farm Energy and Sustainability Statement

The Executive Summary outlines the applicant's approach to energy use and sustainability and ties this in with current legislation. In short its stated aims are to reduce the use of resources, conserve water and encourage low or zero target technologies.

- This application refers to Building Regulations Approved Document Part L1A 2013 for construction compliance.
 - Approval, if given, should be Conditional on compliance with Building Regulations current at the time of dwelling applications.
- Para 4.4 - We welcome the use of energy efficient builder's materials and they should be sourced locally as far as practicable.
- Para 5 - Low and Zero carbon Technologies. (LZC). A deeper and future analysis will be required of the predicted energy usage for the actual mix of dwellings types to confirm the economic viability of renewables, with provision for future proofing.
- Table 5.4 - We note the estimates for energy use and the proposal for Solar Photovoltaics (PV) as the most favoured solution for providing low or zero carbon energy sources. Total energy produced from PVs on the average dwelling is stated as 821 kWh pa and appears to be on the low side.
- Table 5.6 - All the other renewables, such as heat pumps and biomass, are stated as not viable, except for potentially ground source heat pumps on some larger dwellings.

No evidence has been presented from other developments which have these technologies or from companies who have experience of installing such schemes.
- Para 6 – The application is silent on use/re-use of "rain-water" and "grey water". The application should include plans for rain water and grey water use.
- Para 8.5 - We welcome the principle of encouraging sustainable transport through the use of alternatives to the car. However the travel plan has to be more robust (see comment in Travel Plan) and we are seriously concerned over the funding of a TP Co-ordinator.
- We would want to see a commitment to the use of porous road and pavement materials on this site given the history of run off and flooding from such developments. We are pleased to note the installation of Suds but more needs to be done to avoid the same mistakes made with other developments in the town.
- There is no mention of the size of gardens or a commitment to putting in gardens as part of the dwellings. Whilst this is an outline planning application a commitment should be made at this stage.
 - We want to know what arrangements are to be made for the maintenance of the green spaces adjacent to and on the site.