



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

2nd June 2014

Dear Ms Mansi

30021/056 | HYBRID APPLICATION FOR SOUTH ALTON DEVELOPMENT

1. Introduction

The Alton Society has reviewed in detail the hybrid application for the development of the land east of the Selborne Road (LESR) and Lord Mayor Treloars Hospital (LMTH). Whilst we do not object to the general principle of the development of some land in these areas, we object to both the detail and timing of the application. We note that the application is seeking full permission for the enabling highways works, and outline permission for the housing development. We further note, that if permission for the enabling highways works is withheld then the housing development in and of itself is unlikely to be considered to be sustainable. As a consequence, we have focused our comments on the key principles relating to the proposed housing development, and offer more detail on the accompanying Transport Assessment and associated application.

Following extensive consultation with the Alton Community, in 2005 “Alton 2020: A plan to shape Alton’s future” was published. This plan led to the preparation of the Town Design Statement (TDS). As approved by the EHDC, this 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; and
- 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.

The guidelines covered a wide range of issues from the physical setting, through settlement patterns and architectural and design guidance. At this outline stage of the planning application we have little or no visibility of the proposed settlement patterns, or the detailed architectural design features. We have therefore limited our focus to those areas within the TDS that are pertinent at this time. The appropriate TDS Design Guidelines to note are as follows:

- Flood plains and river corridors through the town should be protected from further development and enhanced so that they can fulfill their purpose and to ensure that these visual and wildlife amenities are preserved for future generations.
- Rivers, ponds and their banks should be retained as a valued amenity and habitat for wild life.
- Important vistas into and out of the town should be protected.
- Tree cover should be maintained and enhanced.



- 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.
- The road entrances to the town are attractive gateway features and they should be protected from inappropriate new development. The same applies to the Watercress Line's entry from Alresford.

2. Objections as to Principles

2.1 LESR and LMTH

We specifically object to those parts of the Hybrid Application that fail to comply with the TDS. It is the Alton Society's contention that the proposals for LESR contravene the Design Guidelines with regard to the protection of Alton's skyline as well as the protection of important vistas. We are also of the view that the LESR application runs counter to the need to protect the town's 'gateway' features. Moreover, development of this site would further erode part of the local gap between Alton and Chawton. Furthermore, in terms of the hydrology of the area, the drainage is already poor with regular evidence of surface run-off. The water table is very close to ground level in the valley, and with the large number of proposed properties we are concerned that the sewage system will be unable to cope and thus will threaten pollution of the groundwater. Thames Water has already indicated their concerns in this regard. Further detailed commentary on the LESR site is at Annex 1.

As far as LMTH is concerned, we also object on the basis that the proposals contravene the Design Guidelines with regard to the protection of Alton's skyline. Specifically, we object to the development at the top of the natural valley; in this regard we would contend that the comments documented in EHDC Landscape Capacity Study, and the SHLAA Assessment Summary Report recommendations must be respected. We also have specific concerns and objections to the proposed transport proposal and will cover these separately. Further detailed commentary on the LMTH site, including additional detailed points of objection, is at Annex 2 and its accompanying xls spreadsheet.

If the EHDC were not minded to dismiss the whole application in line with our objection, then we would argue that the Planning Authority should still seek to mitigate the ill effects by limiting the spatial extent of the developments. In this regard, for the LESR application, we would contend that it should firmly exclude any development on the upper slopes. In addition, by avoiding the skyline and top valley ridge at LMTH, the EHDC could at least reduce the adverse effects of the current proposal.

2.2 Affordable Housing

The recently endorsed EHDC / SDNP Joint Core Strategy (JCS) policy CP11 sets a requirement for 40% affordable housing. In this Hybrid application, the developers point to the additional cost of the changes that need to be made to the highways, along with a potential investment towards the cost of building a new Sports Centre, as justification for seeking approval for just 20% of the proposed homes being affordable. Given that the median point of the proposal is for 530 homes, which represents a significant proportion of the JCS requirement, such a proposal is reprehensible and we would contend most strongly must be refused.

2.3 Contributions to enhance local services

At para 6.20 of the HCA and Selborne Road Landowners Planning Statement the developers indicate that, with the exception of the of the enabling highways work and contribution towards the cost of a new Sports Centre, there will be no other contributions made to enhance local services. Again, the Alton Society are of the strong opinion that for a development that seeks to provide a significant proportion of the total new homes required under the JCS this position is unacceptable and must be rejected.



2.4 Transport Assessment

The new Butts Bridge and enabling highways works are fundamental to the proposed development. Without these proposed enabling works neither the LESR nor the LMTH developments can proceed. As a consequence, it is therefore imperative that the proposals be based upon sound logic and up to date information. Whilst we recognise that some measure of traffic surveys were conducted at certain junctions, as evidenced by para 6.4.1 and 7.5.1 of the Transport Assessment, the transport distribution assumptions are based upon the 2001 census for the Ashdell and Whitedown wards of Alton. The basic assumptions are therefore 13 years out of date. It is the Alton Society's view that by using such historic data, the underlying assumptions used to determine the highways solution are fundamentally flawed; all projections emanating from these assumptions are therefore also flawed. The developer's contention that they have provided a "robust assessment" is quite frankly untrue and has little basis in current fact. Further detailed commentary on the transport proposal is at Annex 3.

The Alton Society is aware that the EHDC are funding a traffic study of Alton in the near future. In order to provide a genuine robust assessment of future needs we would strongly contend that this application be rejected until the results of that survey are published.

2.5 Butts Bridge

We do not contest the fact that the Butts Bridge layout causes some congestion at peak times; however, the Bridge is a recognisable and much-loved Southern gateway into the town. The proposed new design has an overall 'industrial' look to it, has little character, and would not enhance the aesthetic appearance of the gateway. Moreover, the proposed new bridge appears to be very wide, accommodating the new roundabout directly underneath; this design and location of the carriageways gives cause for concern over the sight lines, particularly when approaching from the north.

We are also concerned that the proposal is silent on the likelihood of the proposed layout encouraging more vehicles to use the B3006 through Selborne as a cut-through from the A3 to M3. This additional traffic will exacerbate the issues in Selborne, will cause further tailbacks at the junction of Whitedown Lane and Basingstoke Road, and will inevitably increase the number of commuters using the residential roads of High Ridge, Kings Road, Queens Road and Ackender Road as rat-runs to avoid the peak period congestion. The proposal is silent on the need for traffic calming on these residential roads, just as it is silent on the evident need to redesign the Basingstoke Road/Whitedown Lane junction to cope with larger traffic volumes.

2.6 Other issues from the Planning Statement

At para 5.38 of the Planning Statement the applicants have referred to the EHDC requirement for development of the sites to commence within two years of permission being granted in order to maximize the "likely delivery of housing to the District". We assume that this refers to the housing development rather than just the enabling highways works, and their application goes on to indicate they "fully intend to release the site for development" within that timeframe. This will be a challenge as we aware from Thames Water that they will require a 12-week lead time to assess sewage requirements, followed by up to 3 years to implement the necessary improvements. A number of further comments regarding the overarching Planning Statement are included at Annex 4.

2.7 Sustainability and Energy

The Energy Statement accompanying the proposal is far too brief. Whilst we note that the housing proposal is at this stage seeking outline permission only, we would expect to see much greater emphasis being placed upon the need for sustainable green solutions, particularly for development two years or more in the future. The Code for Sustainable Homes and BREEAM requires achieving high scores in a number of areas to achieve target ratings. Industry norms would anticipate that to achieve high scores would require the inclusion of, and reliance upon, emerging low and zero-carbon technologies. Unfortunately the proposal is



broadly silent on identifying the use of emerging technologies such as heat recovery, Passivhaus constructional standards, active solar, ground source heat pumps, combined heat and power and rain water and grey water harvesting

3. Conclusion

The Alton Society objects to the Hybrid Proposal on a number of counts:

- Both the LESR and LMTH sites breach the TDS in terms of gateway, vistas and skyline.
- The proposal offers only half of the proportion of affordable homes that EHDC should be seeking.
- Notwithstanding the proposed investment in the highways infrastructure and Sports Centre, the proposal specifically indicates that there is no intention to further support the social and local infrastructure of the Town.
- The Transport Assessment has been based upon 13-year old historic data that underpins many of the assumptions that drive the proposed solution. These assumptions cannot therefore be considered to be robust. The proposal should therefore be re-worked once the planned Traffic Survey has been published.

Finally, the Alton Society would draw the attention of the Planning Committee to para 7.5 of the Homes and Communities Agency and Selborne Road Landowners Planning Statement, which state, “There is no need to wait 12 to 18 months for the adoption of the Alton Neighbourhood Plan. Affordable and market housing is needed now...”. This highlights two important issues; first, the proposal offers only half of the proportion of affordable homes that EHDC are seeking; second, it flies in the face of local democracy in seeking to avoid the impact of the views of the people of Alton. The Alton Society urges the EHDC Planning Committee to reject the proposal as submitted.

For The Alton Society

Annexes:

1. Detailed commentary on LESR
2. Detailed commentary on LMTH
3. Detailed commentary on the Transport Proposal
4. Detailed commentary on the Planning Statement

Comment from the Alton Society on 30021/056**[With particular ref to LESR (Land East of Selborne Road: SHLAA AL001)]****Objection**

- The principal grounds upon which the Society objects to the current proposals for development at LESR relate to those parts of the Hybrid Application which fail to comply with the Guidelines of the Alton Town Design Statement (TDS). These were approved by the EHDC in 2008 as Non-Statutory Planning Guidance, with a view to eventual adoption as Statutory Guidance once its Core Strategy was in place.

Within the extensive documentation submitted by the applicants we have interpreted “Land at South Alton: Planning Statement, April 2014” as the central element in the developers’ bid and thus as the chief point of reference for explanation of the Society’s Objection. We note that salient aspects of the TDS are surveyed in that Planning Statement principally through Paras 4.96 to 4.102. Most particularly, Para 4.99 of the developers’ document summarizes the TDS’s general approach towards Setting and Landscape, while Para 4.100 makes specific mention of certain consequential Design Guidelines (DG).

It is, however, the Society’s contention that the proposals for LESR (like those for LMTH) then go on to contravene DG 3.5 with regard to the protection of Alton’s skyline as well as DG 3.3 which concerns the preservation of important vistas.

- DG 3.5 reads: “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 on to the skyline.” DG 3.3 reads: “Important vistas into and out of the town...should be protected.”
- The Society also takes the view that the Selborne Road/Borovere Farm part of the Hybrid Application runs counter to DG 3.6 with regard to the protection of the town’s entrance features. This Guideline reads: “The road entrances to the town are attractive gateway features and they should be protected from inappropriate new development.”
- We contest in particular the applicants’ statement made in Para 5.27 of the “Planning Statement” previously cited. This claims that “the impacts of the proposed development...will conserve or enhance the character of the area”. In this connection, the related EDP document dealing with “Landscape and Visual Impact Assessment” would seem to constitute an ingenious attempt to play down the harm and loss to such character in the area of LESR rather than setting out any convincing case for actual improvement.
- Bearing all the above in mind, the Society would urge the Planning Authority to pay careful heed to the EHDC’s own “Landscape Capacity Study” of July 2013. With reference to SHLAA AL001, this reads as follows: “Borovere Farm is located on high ground to the south of the town. It lies at the western edge of a ridge which is visually very important. This hillside effectively defines the settlement whilst the ridge’s southern slopes present an attractive rural prospect in views from the SDNP to the south, [from] A31 the town’s bypass, and from the numerous public footpaths in that direction. The SHLAA site extends up the hill to the highest part and despite the recent planting of hedgerows etc residential development on this site would have a profound and adverse impact on the character of the area. Currently the approach to Alton is through countryside until one reaches The Butts Railway Bridge and only once this pinch point has been reached is the presence of the town apparent. Ideally this very pleasing and dramatic approach to the town should be retained and protected.”



- The Society would add that the final parts of that judgment, bearing upon the advantages that stem from the fact that (as p.6 of the TDS puts it) Alton “is ‘hidden’ from the landscape whilst being an integral part of it”, constitute a better basis for planning strategy than the attempts of the EDP document on “Visual Impact” to dismiss (e.g. at Para 6.14) the benefits of preserving a certain seclusion that is highly valued by most of the town community.
- Further problems of hydrology and run-off at LSER are mentioned in Para 2.1 of the Society’s covering letter to which the present notes serve as an Annex. The concerns about sewerage provision for the proposed site are best summarised in the letter dated 9 April 2014 sent to the Alton Town Council Neighbourhood Plan Steering Committee by the Town Planning Manager of Thames Water Utilities Ltd. Alongside its overall review of anxieties about major development across Alton viewed as a whole, this records in an Annex its quite specific concern about network capacity in relation to the SHLAA AL001 location.
- Current proposals for development on the LSER site are undesirable for the further reason that they would erode part of the local gap between Alton and Chawton to a significantly harmful degree, and set a precedent for further intrusion.
- It is clear to us that all of these considerations are fundamental enough to justify Objection even at this stage of ‘outline’ application regarding the housing aspects of the overall South Alton scheme.
- If the EHDC were not minded to dismiss the whole of the LESR part of the general South Alton scheme, then we would argue that the Planning Authority should still seek to mitigate the ill-effects by limiting the spatial extent of the development at this location.
- In that context, it may be helpful to refer to Appendix 2 of the applicants’ “Planning Statement”. This includes helpful schematic mapping of the Borovere Farm site, which rises through three fields from the Selborne Road to the ridgeline. In the “Landscape and Visual Impact Assessment” these are referred to as the lower, middle, and top fields. The Society would argue that, if any development at all for LSER is accepted by the EHDC, then the Planning Authority should limit its permission to the lowest of the hedged areas. Development on the middle field would certainly obscure views to the skyline on the immediate approach to Butts Bridge, while any building on the top field would be obtrusive particularly in the context of more distant vistas (e.g. from the National Park and from the upper slopes of the LMTH site).

Additional Comment

- As with the LMTH portion of the overall scheme, we would expect to see the Planning Authority strongly challenging the applicants’ suggestion (see “Planning Statement”, Para 2.10) that any approvals should be based on the developers’ alleged inability to provide more than a mere 20% allocation of affordable dwellings. Ideally, the calculations behind that remarkably limited proposal would be in the public domain. At the very least, those who do have access to the confidential material have a duty to scrutinise very carefully the level of likely profit margins being predicted by the applicants. It is worth adding that the responses to the Community Questionnaire canvassed (February-March 2014) in connection with the preparation of Alton’s Neighbourhood Plan underlined the townspeople’s desire to give a high priority to this general issue of ‘affordable’ housing.

Document - Lord Mayor Treloar (LMT) Design and Access Statement

Comments:

- Para 2.5 describes the site as ‘essentially open green space’ and mentions that ‘the upper slopes comprise areas of species-rich grassland’. In 5.69 of the Planning Statement WYG mention the retention of 2.33ha of SINC, but some of this will be ‘translocated’. It is our understanding that that this type of grassland takes many years to develop and therefore is a risk of failure.
- Para 2.6: **Services, facilities and transport links:**
 - Important views into and out of town are not included for the LMT site as they are for LESR. The site is too sensitive not to include this as they are in the ~LESR document. It is acknowledged that both have Visual Impact Assessment Sections commented on elsewhere.
 - The walking times are underestimated, i.e. 22-24 minutes to the station is insufficient and especially so for the upper levels of the development proposed.
- Para 3.1: **Topography and Hydrology:**
 - Says that the site is enclosed on the North West and West, but no mention South and East where it is not. Implication is that site will not be enclosed and this will compromise the Alton Valley setting as set out in Alton Town Design Statement Guidelines 3.3, 3.4, 3.5 and 3.6.
 - The ‘exceptional landscape setting’ is referred to. In describing the topography WYG have minimized the total rise from Chawton Park Rd to the top of the ridge which is over 30 metres in reality. More or less the entire site is visible from Jubilee Park where Robertson House appears halfway up the slope. Any development above this line is likely to be highly detrimental.
 - The whole site is also visible from the Selborne Road, on the stretch below the toll house crossroads. This underlines the point about not developing the upper part above Robertson House
- Para 3.2: **Existing buildings:**
 - Existing Bat House and Western Bunker cannot be identified in the drawing. Needs resolution clearly defined so we can understand precisely which buildings to be retained/demolished.
 - The assertion that the smaller of the two water towers should be removed (see also under 5.6) is disputed.
- Para 3.2: **Utilities:** Says “sewerage system will be upgraded as necessary to increase capacity”. We know from Thames Water that current system cannot sustain site so more explanation than a one off statement in text should be made. In a letter to the Alton Neighbourhood Plan Steering Group from Thames water dated 09 Apr 2014 Thames Water state that the LMT and LESR sites 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.
- Para 3.4: **Visual Impact** - Last para claims there will be “some change in local landscape character and visual amenity at some receptors...” WYG then go on to admit the need for mitigation measures and say that the ‘effects are considered to be minor...’. Comment as per bullet 3 above.
- Para 3.7: **Constraints and opportunities:**
 - Under Opportunities - “to provide high quality housing in an exceptional landscape setting making good use of high quality topography of the site”. Comment as per bullet 3 above.

- States, “to provide much needed affordable housing”. There is insufficient evidence to back this statement in this document (unlike LESR Design and access Statement).
- States “To establish residential properties with distinctive short and long distance views in many parts of the site. Comment as per bullet 3 above.
- Para 5.1: **Need for development** - Bullet 2 states “Deliver much needed affordable housing” Comment as per bullet 7 above.
- Para 5.5: **Maximum Storey Heights:**
 - Parcels C, D, F and G all exceed the height of the top of the valley. Comments per bullet 3 above.
 - No indicative sight lines or building heights included in document as there is for LESR Design and Access Statement. Comments as per bullet 2 above.
 - The lack of such information is conspicuous. However there is a table of floor levels and ridge heights, these ranging from 131 to 162m approximately. There is mention elsewhere in the proposal that the upper parts of the LESR site coincide with Robertson House, which is only halfway up the side of the valley.
 - To quote: ‘... with mitigation and tree planting the scheme will not give rise to significant landscape effects’. It has to be remembered that many trees lose their leaves in the winter...
- Para 5.6 **Design principles:**
 - Proposed Country Park - The car park to ~ Country Park shown can only be accessed by means of the winding development access road. This is considered not to be convenient and many will access Country Park by means of parking in whatever fashion they can on the pedestrian entrance at Whitedown Lane.
 - No mention of parking for cycles mentioned as accessing from Whitedown Lane?
 - Landscape and public realm - Bullet 3 states “Respect the visual horizon in long distance views” Comment as per bullet 3 above. Per the WYG Visual Impact Statement section there will undisputedly be an impact if the upper slopes are built upon.
 - Indicative Tree Removal:
 - States “As a landscape led development, there is an inherent desire to retain trees where possible...” comment as bullet 3 above. Also see comments on Arboricultural Assessment in Annexes to follow this.
 - States “... retain as many trees as possible and have sought to use the retained trees as a backdrop to development parcels” Comments per bullet 3 above.
 - Built Form - Bullet 2 states “...maximising long range views of the landscape setting”:
 - Comment as per bullet 3 above.
 - If the new housing has long-range views it follows that it will itself be visible from far away.
 - Access and movement - Why is emergency access route shown on page 47 map so short and what utility will this have?
 - Streetscape character fourth para page 46 - Says, “It is envisaged that an element of cut and fill will be required for the development of some parcels to provide terracing and to fully exploit the site”. No explanation of where these will be and the extent of change. Comment as per bullet 3.



- WYG want to demolish the water tower on grounds of public safety, but it could be repaired. It is considered to be an attractive and historic building.
- Para 5.7: **Illustrative masterplan** layout plan showing delivery of 280 units - Claims "*low density*" of 280 units, but no mention of affordable housing. This despite earlier text claim of parcel H offering potential for 3 storey apartments (para 5.5 page 36). Comment as per para bullet 7 above.
- Page 50: **Conclusion** - brings back into consideration affordable housing where there has been no reference to this elsewhere except for introductory paras. Comment as per bullet 7 above

SUMMARY

Due to the comments set out above we object primarily on the basis of development at the top of the natural valley and breaching the skyline against the Alton Town Design Statement. This is backed by the EHDC Landscape Capacity Study and SHLAA Site Assessment Summary Report recommendations. Development is accepted, but not above the skyline and on top of the valley ridge. In addition the requirements of the EHDC endorsed Core Strategy policy CP11 requirement for 40% affordable housing has not been respected. Other issues have been raised, but are minor in comparison with these two important observations, which constitute grounds for objection.

Document - Landscape and Visual Impact assessment Former - Lord Mayor Treloar Hospital

- Para 4.7.4 Table 10 **Summary of Visual Receptors** - We welcome the methodology for assessing the visual impact and its presentation. We have the following comments:
 - The range of Visual receptors are comprised of 10 areas within the town, 2 in adjacent Chawton and 2 on the outreaches of Alton (Worldham and Whitehouse Farm [from a stream bed?]). Bearing in mind its situation and outlook to the South East we would have expected more from that direction at possibly medium and longer range. The two Topography and Zone of Theoretical visibility maps at figure 2 supports the case for this expansion.
 - It is noted that of all the "Sensitivity to Change" classifications there were 7 High, 6 Medium and 1 Low. This reflects the sensitivity of the site which cannot therefore be dismissed. This is because the proposed development will be up to the top of and over the skyline of the valley.
- Para 5.2.40 Table 19 **Summary of Operational Effects on Visual Receptors**. We note that from all of the risk categorised site receptor findings at bullet 1/2 above all were recategorised down to negligible or minor negligible level predominantly by the use of planting trees, fauna and flora. However, the impact of climate change and frequent tree diseases should not be overlooked and leaves a residual risk above the categorised level in our opinion. In addition it must be remembered that many trees lose their leaves in the winter.
- Para 5.2.39 Mitigation:
 - States "**Establishment and growth of new areas of trees**" - we comment per bullet 2 above.
 - Limitation of building heights to 3 storeys only applies to the lower site H in the Design and Access document and here it implies all over. WYG needs to be consistent and realistic that it means at site H only.
 - The last 2 bullets refer to selection and use of lighting specification. We are concerned that given the comment at para 4. Light pollution as perceived from the South East is a real risk. This is because the proposed development will be up to the top of and over the skyline of the valley.
- Figure 1 GIS **Topography and GIS Visual analysis**:
 - This figure at pane 1 is most useful in showing how prominent the site is in terms of height compared with the rest of Alton Parish (bar 2 other sites in the town not proposed for development at this time).
 - This figure at pane 2 shows how susceptible the site is to potential visibility (notwithstanding trees, flora and fauna) from the South and East. Combined with the statements under Lord Mayor Treloar (LMT) Design and Access Statement where it is claimed there will be far reaching views from the site this fails to meet the requirements of the Alton Town Design Statement Guidelines 3.3, 3.4, 3.5 and 3.6
- Para 6.1.4. Acknowledges that there will potentially be a susceptibility to an increase in light spill, glare and change of nighttime scene. This is considered to be due to building at the top and over the top of the valley side.
- Para 6.1.5. Acknowledges that there will be a change in ambient lighting levels at some receptors, but claims that this is unlikely to result in statutory nuisance. In other words recognition that the character of the area will be changed, but not a nuisance to others. This is considered to be due to building at the top and over the top of the valley side.



SUMMARY

Due to the comments set out above we object primarily on the basis of development towards and at the top of the natural valley and breaching the skyline against the Alton Town Design Statement Guidelines 3.3, 3.4, 3.5 and 3.6. In summary, the SHLAA Site Assessment Summary Report East Hampshire Joint Core Strategy June 2013 recommendations must be respected. Development is accepted, but not above the skyline and on top of the valley ridge.

Document - Arboricultural Advice in accordance with BS 5837:2012 Trees in relation to construction – Recommendations Tree survey and Impact Assessment 4th April 2014

Comments on 30021 / 056 / TPO / SG Hybrid sites, former Treloar site, Chawton Park Road:

- The tree survey retention and removal plan locates trees in question on three slightly overlapping drawings, all ref. MF7523, sheets 1, 2 and 3. Scaled at 1:500 these huge maps could not be risked when I surveyed the site at a time of heavy rainfall. It was found sufficient to transfer tree positions to MF7523 Draft Protection Plan at a scale of 1:1250 where one sheet covered the entire site. That also has the advantage of showing proposed roads in black, with houses and gardens in yellow.
- Comments follow the listed Survey Schedule and every tree was visited and assessed. Throughout, the key is Black, to retain. Blue, remove to facilitate development. Red, remove for arboricultural reasons.
- Commencing lists, Trees as individuals, with a unique **number**:
 - Black, numbers 17 and 18, to retain, were listed but did not appear to be numbered anywhere on any of the maps! I put this mystery down to human error. Except for that caveat, I agree with all the descriptions. Blue, mature and over mature Hawthorn trees and a young coppice stump of Sycamore. Red, I entirely agree with the comments, and also the classification for removal.
- Then Trees as groups, with a prefix **TG** :-
 - Black, I agree with the assessments given.
 - Blue, TG6 and TG16 listed as Lawson's Cypress but appear to be Western Red Cedar *Thuja plicata* ? Both areas were hedges screening work buildings where the trees have 'got away' due to the long period of neglect.
 - TG18 is Horse Chestnut obstructing the line of the main access road, but these are the Red Hybrid Horse Chestnut which are invariably prone to canker, which can be seen on both, and thus of little value.
 - Red, TG5 is the very rare (in this country) Loblolly Pine *Pinus taeda*, at home from Texas to New Jersey and introduced here in 1713. True that the southern two trees are poor, but the northern one 'shows signs of sparse foliage' because that is how the species grows. Please try to retain the specimen as it does not appear to coincide with any house or garden area shown.
- Trees as woodland groups, with a prefix **WG** :-
 - WG1 is mostly black, to retain, but part listed in blue, to remove. However, the two portions shown are derelict Hawthorn, Hazel, Ash saplings and scrub bordering the wood, of no significant value.
 - WG3 is again mostly black, but a small area blue, to remove, on the line of the main access road.
- Hedges, with a prefix **H** :- All retained, except for a 20metre stretch at the north west end of H2, to allow the main access road to pass through.

SUMMARY

To summarise, most of the retentions and removals proposed seem reasonable and can be agreed, with the one exception of the single specimen Loblolly Pine in TG5.



General Sustainability Issues with LMT and LESR Application

Comments:

- See enclosed xls spreadsheet to show the Alton Society Sustainability Appraisal on LMT and LESR sites at appropriate spreadsheet tabs.
- General sustainability comments unrelated to textual presentation, but impacted by the WYG Application:
 - Transport:
 - A339 Basingstoke Road to Whitedown Lane requires insertion of mini roundabout should Butts Bridge be extended, otherwise improvements at Butts Bridge will be irrelevant to improve traffic flow.
 - Traffic Lights with Whitedown Lane and Chawton Park road will have same impact on causing holdups as have traffic lights at London Road to the East of Alton. Instead of being held up at the bridge one will be held up at this junction.
 - Improving the bridge and other hoped for improvements per above 2 bullets will cause more traffic to head towards Selborne where there are problems of traffic.
 - Despite claims that residents of the 2 new developments will walk to Alton and the Schools this cannot be agreed with. There is insufficient parking capacity in Alton to cater for this and the other large developments coming on line.
- Additional primary medical care will be required.

TRANSPORT ASSESSMENT**Alton Society Response to South Alton Planning Application Ref: 30021/056
HCA and Selborne Road Landowners – Transport Assessment**

- The new Butts Bridge and highways works are fundamental to the proposed development. Without approval for these enabling works neither the LESR nor LMTH sites can be deemed to be sustainable. It is therefore imperative that they be based upon sound logic and up to date information. Whilst we recognize that some measure of traffic surveys were conducted at certain junctions, as evidenced at paras 6.4.1 and 7.5.1 the transport distribution assumptions are based upon the 2001 census for the Ashdell and Whitedown wards. The basic assumptions are therefore 13 years out of date.
 - We would contend that by using such historic data, the underlying assumptions are flawed and therefore all projections emanating from these assumptions are also flawed. The contention from the developers that they have provided a “robust assessment” is frankly untrue and has little basis in current fact.
 - We are aware that a full traffic survey is shortly to be conducted in and around Alton; the data that this survey provides will be current. This South Alton proposal should therefore wait until the results of this survey are published; these results should then be used as the basis for all projections.
- Pedestrian & Cycling Infrastructure, and Access to Schools.
 - The proximity of schools is noted, but the Transport proposals take no account of choice of schools nor the fact that all Alton schools are on the opposite side of busy roads from the proposed sites: -
 - for LMTH, Whitedown Lane.
 - for LESR, Butts Road.
 - Those children (and their escorting parents/adults) who choose to walk or cycle to school face a very real hazard when crossing roads.
 - The need to cross these roads introduces a new hazard not identified in the assessment and negating the claims of 2.7.14 (which states “*It is therefore concluded that there are no issues of road safety in the vicinity of the site and hence that the development proposals will not be prejudicial to road safety.*”). The hazard is increased by the proposed improvement to the roundabout junction.
 - The need to cross these busy roads will only add deterrent to the walk or cycle to school, promoting use of the car and thereby increasing cross-town school-run car journeys.
 - This needs reconsideration against the inevitable increase in car traffic.
- Para 3.5 - We do not contend the fact that the current Butts Bridge layout causes some congestion at peak times. However, the Bridges are a recognizable and much-loved gateway into the town and early indications from the Neighbourhood Plan work indicates that the Alton community has a strong affiliation to the bridges.
 - The proposed design has an overall “industrial” look to it, with little character and it would not enhance the esthetic appearances as the southern gateway to Alton.
 - Moreover, from a practical perspective the Transport Assessment is silent on the likelihood of the proposed layout attracting more vehicles to use the B3006 road through Selborne as a cut through

from the A3 to M3. This likely additional traffic will exacerbate the issues through Selborne, will cause further tailbacks at the junction of Whitedown Lane and the Basingstoke Road, and will inevitably increase the likelihood of commuters using the residential roads of High Ridge, Kings Road, Queens Road, and Ackender Road, to avoid the peak period congestion.

- Para 3.6.1/2 – The proposal is to place traffic signals on the junction of Chawton Park Road and Whitedown Lane. All of the practical evidence from residents in the Anstey Road, Anstey Lane and London Road areas indicates strongly that the signals installed at the London Road / Holybourne area have caused a significant increase in journey times, particularly at peak commuting and school periods. This needs to be reconsidered.
- Para 3.6.4 – The proposed narrowing of the carriageway under the Northfield Lane Railway Bridge with priority signage is flawed. The drawings indicate the give way point as being just north of the entrance to the Jubilee Pavilion, but from this point drivers will be unsighted on vehicles approaching the bridge from the A31. This needs reconsideration.
- Section 5 – This section discusses accessibility and describes the “acceptable” distances from facilities that deem to be appropriate for walking. These are 400 metres to town centres, 1000 metres to schools and commuting, and 800 metres elsewhere. Para 5.3.1 then goes on to discuss that it is “widely accepted” that walking and cycling are the most important modes of travel for distances of 2 km for walking, and 5 km for cycling. On a practical level this basic assumption is flawed – in general, people simply do not behave in this manner.
- Para 5.3.2 and Table 5.2 identify the distances from the sites to a number of local facilities and services. The railway station is not included in this table, yet the proposal indicates that commuters will walk to the Station to commute. The Station is close to 3 kms from the LMHT site – a walk of 35 minutes or so. In general, given the overall journey time to commute, an additional 35 minutes to simply get to the railway station is likely to be unacceptable. Residents will then resort to driving, and the car parking facilities at the railway station are already at capacity.
- Overall, the transport assessment is based upon 13-year old historic data that underpins many of the assumptions that drive the proposed solution. These assumptions cannot be deemed to be robust. The proposal is also silent on the reality of behaviours of people:
 - The increase in the likely traffic flow through Alton from the widening of the Butts bridge.
 - The flawed assumptions regarding walking habits.
 - The inevitable increase in the use of residential roads as rat runs.
- 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.

Document – HCA and Selborne Landowners Planning Statement**Comments:**

- Para 5.27 – The document indicates that the Design and Access Statement and other papers submitted will conserve or enhance the townscape and landscape character of the town.
 - Given that the current land is greenfield this cannot possibly be the case.
 - Instead of the Butts bridges that define the southern entrance to the town we will have an “industrial” style bridge.
- Para 5.31 – The proposal indicates that it creates safe and accessible environments that offer a good range of transport modes. Sites where it is possible to walk easily to a range of facilities will be considered preferable to sites further away.
 - It discusses Alton Railway Station as being in walking distance – the reality is that is close to 3 km from LMTH – commuters are unlikely to walk and the car park at the Station is already at capacity.
 - The Town Centre is around 2 km from the furthest point at LMTH – people will not generally walk this distance with shopping.
- Para 5.33 – the requirement for 40% affordable housing has been recognized, but passed over in favour of maintaining anticipated profit margins. The developers indicate that the additional cost of the changes required to the roads infrastructure, plus the £5.3 million potential investment in a new Sports Centre outweigh any further obligations. This is not acceptable. They further cite the investment in a “Country Park”. The land is fairly steeply sloping and therefore cannot be easily used for sports. In reality therefore, this is land that is in the main being left to green space – grassland and possibly allotments.
- Para 5.36 – The proposal suggests that it is “deliverable and viable” having regard to the necessary on-site infrastructure, affordable housing etc.
 - We have already discussed the affordable housing issue.
 - The proposal itself recognizes that the sewage system may not cope. Thames Water has already indicated their concerns with both the LESR and LMTH sites. We should not accept an alternative that allows further seepage into the watercourse in an area already susceptible to flooding.
 - No mention is made of other drainage issues, water provision, the capacity to provide other utilities such as gas and electricity etc
- Para 5.38. States that applicant can start within 2 years required by EHDC. This cannot be achieved as evidence is available which sets out that the site is not sustainable until Thames Water have carried out a 12 week survey of site sewage needs and then allowed 3 years for the required infrastructure to support the development to be installed. Set out in a letter to the Alton Neighbourhood Plan Steering Group from Thames water dated 09 Apr 2014 Thames Water state that the LMT and LESR sites 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.



- Para 6.20 – The proposal specifically indicates that there would be no other contributions made to local services.
 - For a development that proposes to deliver such a significant proportion of the JCS housing requirement this is surely unacceptable.
- Para 7.5 – The proposal clearly states that Alton requires these houses and that there is no need to wait 12 to 18 months for the people of Alton to adopt their Neighbourhood Plan.
 - This rather arrogant statement flies in the face of local democracy. Given the JCS requirement takes us out to 2028 it surely would be wrong to rush such a significant proposed development through ensuring that it meets the principles being developed as part of the Alton Neighbourhood Plan.
- A summary of the issues is shown in the table overleaf.

Summary of Issues

| SA of Sites in Alton | SHLAA Code | AL001 | AL002 | AL001-5 | AL003-2 |
|---|---|---|---|---|---|
| SHLAA Code | Site | LESR | Treloar Hospital 1 | Land North of Lord Mayor Treloar | Treloar Hospital 2 |
| SA considerations | Relevant EHDC SA objectives | | | | |
| Availability and deliverability: | | Yes | Yes | Yes | Yes |
| Availability for development recently confirmed? | n/a | Yes | Yes | Yes | Yes |
| Planning status, including any application | n/a | Applied for | Applied for | Applied for | Applied for |
| Land in single or multiple ownership | n/a | Unknown | Unknown | Unknown | Unknown |
| Any known legal issues e.g. ransom strips, land in trust | n/a | Unknown | Unknown | Unknown | Unknown |
| Community support: | | | | | |
| Extent of local community support for developing site | Policy CP9 in JCS | No fully supported at Neighbourhood Plan Consultation. Upper reaches breach Town Design Statement. | General non detailed site area support (at lower reach ease due to Town Design Statement | General non detailed site area support, but breaches Town Design Statement | Supported |
| Sustainable development: | | | | | |
| If known, proposed housing mix / % small/starter homes | Help young people to live in the area | Unknown | Unknown | Unknown | Unknown |
| If known, proposed housing designed for elderly needs | Provide for an ageing population | Non specified | Non specified | Non specified | Non specified |
| If known, proposed per cent to be affordable housing | Ensure decent and affordable homes | Unacceptable as only 20% instead of required 40% affordable | Unacceptable as only 20% instead of required 40% affordable | Unacceptable as only 20% instead of required 40% affordable | Unacceptable as only 20% instead of required 40% affordable |
| Site access to main A and B road network | Meet needs for key utilities and transport infrastructure | Yes | Yes | Yes | Yes |
| Proximity to existing bus routes | Reduce the need to travel by car | Yes | Yes | Yes | Yes |
| Whether entails any loss of employment land | Promote vibrant local economy | No | No | No | Yes, but allowance made by EHDC |
| Distance from town centre | Create vibrant town centres | 0.8 miles from furthest point by road | 1.5 miles from furthest point by road | 1.75 miles from furthest point by road | 1.3 miles from furthest point by road |
| Proximity to primary schools | Improve access to service facilities | 0.75 miles from furthest point on foot | 1.1 miles from furthest point on foot | 1.4 miles from furthest point on foot | 0.75 miles from furthest point on foot |
| Whether entails any loss of existing public open space | Protect public open spaces | No | No | No | No |
| If known, proposed public open space on site | Improve health and well-being | Yes | Yes | Yes | Yes |
| Local heritage assets on site | Protect historic and cultural heritage | No | Yes - Water Tower | Yes - Water Tower | No |
| If known, proposed energy efficiency measures | Promote energy efficiency | Yes, but see individual comments (requires more detail) | Yes, but see individual comments (requires more detail) | Yes, but see individual comments (requires more detail) | Yes, but see individual comments (requires more detail) |
| Whether site is grade 1, 2 or 3a agricultural land | Protect soil quality and structure | No | No | No | No |
| Potential for impact on groundwater | Protect the natural water environment | High | High | High | High |
| If in an area of flood risk or has recent flood evidence | Reduce the risk of flooding | Lower reaches adjacent to site | No | No | No |
| Whether includes or adjoins a nature conservation site | Protect nature conservation interests | No | Yes | Yes | No |
| Whether there would be visual impact on skylines | Protect local landscape character | Yes | Yes | Yes | No |
| Whether development would affect Right of Way | Enable recreational countryside access | No | No | No | No |
| Any other site comments | n/a | | | | |
| Summary, including significant site constraints identified: | | Site has been identified as a potential for development for a long time. Provided this is restricted to the lower slopes (not as submitted) this will be acceptable | Site has been identified as a potential for development for a long time. Provided this is restricted to the lower slopes (not as submitted) this will be acceptable | Site is proposed is on the ridge line and contravenes Town Design Statement. Visual impact study accepts that there will be landscape issues due to this. | Acceptable as outline application without caveats. |