



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

20th June 2014

Dear Sir / Madam

55428/001 – CADNAM'S FARM DEVELOPMENT - OBJECTION

1. Introduction

The Alton Society has reviewed in detail the application for the development of the land known as Cadnams Farm. We note that the application is seeking full permission for the enabling access works, and outline permission for the housing development. As a consequence, we have focused our comments on the key principles relating to the proposed housing development, and offer more substantive comment 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." Inter alia, its aims were to "generate appropriate design guidelines to influence the planning and implementation of the town's future development".

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 relating to this application are as follows:

- 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.

At this early stage of the outline planning application we would merely seek for EHDC to ensure that these planning guidelines are adhered to, as we have no real objection to the general principle of the development of some land in this area. However, we do object on two counts related to the important issue of underpinning infrastructure – transport and drainage / sewage, and we will discuss these issues in further detail below.

2. Material Points of Objection

2.1 Transport Assessment

The Planning Authority will be aware that there are already detailed applications submitted for the South Alton development and Will Hall Farm; we are also advised that a further application for developing land to the West of Old Odiham Road is shortly to be submitted. 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. It is therefore imperative that a holistic view is taken of the transport requirements before any of these significant applications can be accepted.

Looking specifically at the Cadnams application there are already a number of traffic hotspots, yet the application indicates that the impact on the local highway network “would not be severe”. The traffic on Old Odiham Road around the Alton College is already very congested, often with bottlenecks caused by significant on-road parking. Anstey Lane is similarly congested where the Tesco Metro and Convent School create an additional issue that often leads to single-lane traffic. This has been exacerbated by the new traffic lights around Eggars School and will be further affected by the on-going building of Grange Gardens directly opposite the School and by the proposed development of the Molson Coors Sports Ground. The applicant’s own transport assessment identifies that the junction of Anstey Lane and Anstey Road will be “over capacity” by 2019, and accepts that there will be a 60 vehicle tailback during peak times; this assumption does not even reflect the reality whereby parents will inevitably use their cars on school runs which will only exacerbate the issue further. The impact on Greenfields Avenue and Old Odiham Road will also be significant as traffic seeks to go north from these developments. This whole transport solution is simply unacceptable.

Moreover, the basic assumption for determining the travel characteristics is based upon 2001 data. 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. We are aware that the EHDC and HCC are jointly funding a transport and 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 must be rejected until the results of that survey are published. The information from this survey should then become the base data for all other detailed assumptions. Furthermore, any future application must take into account all of the known potential developments in order that the transport infrastructure can reflect the real needs of the enlarged town.

Notwithstanding these issues, the Framework Travel Plan does not stand scrutiny. The objective of this plan is to reduce the need to use a private car and promote walking, cycling and the use of public transport as alternatives. Whilst these principles should be applauded, it is the associated practical solutions and execution that are important. However, the application fails to offer any real initiatives, and also fails to recognise the fundamental behaviours that humans exhibit in taking the “easiest” option - which is the car. If the application was serious on these matters then we would expect to see a number of practical solutions being offered such as dedicated cycle paths, cycle parking, a commitment to ensure greater access to, and more frequent buses, thoughts on creating local shopping outlets to reduce the need for the use of the car etc. But they offer nothing of substance.

Finally, the application is also broadly silent on a number of other practical issues, for example:

- The need to improve car parking at Alton College to keep the cars off the road. It will be essential to ensure that the road does not become effectively a ‘single-lane’ road.
- The need to ensure that appropriate traffic calming is installed on Gilbert White Way, Greenfields and Anstey Lane.
- The need to construct more appropriate entrances and exits from the proposed developments.
- The need to improve and extend bus routes both from and within the town.

At Annex 1 we have provided a detailed review of the Travel Plan and Travel Assessment Plan.

2.2 Drainage and Sewage

Turning to the drainage, the geology in this area is clay with flint capping, some Lewes Chalk and New Pit Chalk. As a result, the surface run-off from the clay is already significant; Gilbert White Way and Upper Anstey Lane tend to act as natural drainage channels. The surface water run-off will increase significantly with such a



large number of properties being proposed, and there will inevitably be further pressure on the drainage system that is already failing to keep pace with the Town's needs. Indeed, within the applicant's own documentation they have confirmed that a soak away test trial in "TPO5" and two trials in "TPO6" did not drain to 25% of the initial effective submerged depth due to slow infiltration rates. We would contend that the trials must therefore, at best, be inconclusive and should be the subject of specific scrutiny and appropriate "stress-testing" by experts to ensure the proposed solution is viable.

Turning to the issue with sewage, in a letter to the Alton Neighbourhood Plan Steering Group from Thames Water dated 09 Apr 2014, Thames Water state that the Cadnams 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 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 contend 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. It must therefore be rejected as submitted. Further comments on the applicant's Utility Statement are at Annex 2.

3. Other matters of concern

3.1 Sustainability and Energy

The Alton Society are disappointed that the applicant has chosen to pay lip service to the important issues relating to sustainability. Whilst we support the plans to reduce carbon emissions, we are surprised that there has been no approach made to any specialist energy suppliers to see if renewable sources could be viable. The passive methods identified represent the minimal number required under current legislation, so we will look carefully at the design specification in the detailed plans to ensure that this matter is appropriately addressed. We would also highlight the statement made that "full consideration will be given to the Council's waste management infrastructure". In our view this fails to meet the requirement and is unacceptable – surely this should be mandatory and therefore should be determined to be a condition for any subsequent application. Further comments on the applicant's Sustainability and Energy Statement are at Annex 3.

3.2 Skyline

Bearing in mind the particular topography of this site, the overall layout appears to be broadly acceptable with reference to protection of the skyline. We recognise that the application includes some three-storey properties; we are content with this in principle, but would ask that the overall heights of the properties are maintained at no higher than the average two-storey property, and that the three-storey properties do not dominate the top line of the build. We would also seek for it to be a condition on any subsequent development that the existing proposed master plan must be adhered to without any further infringement of the skyline. Wherever possible, we would also seek to have the density reduced closer towards 30 dph.

3.3 Affordable Homes

The principle of a mixture of family homes to include 40% affordable homes is welcomed and again, the Alton Society would ask that this be placed as a firm condition on any subsequent application.

3.4 Play Area

The applicant has recognised the importance of security and supervision in placing the play area within the central mass of the dwellings. However, there is only one play area serving the whole development; this is situated toward the western end of the site and is therefore quite remote from the eastern end. It would be far more desirable to provide two smaller play areas, one serving the western end, and the other the eastern end. We would contend that the site plan should be adjusted to accommodate this arrangement.



3.5 Layout

On a development of this size every effort must be made to break up the overwhelming scale of the development to give it a “sense of place”. This can be achieved by creating small individual clusters of houses each separately identifiable creating a sense of belonging. Varying the house types, building materials, changing the external appearance of the houses, mixing the surface materials of roads and footpaths, and the design of the landscaping can all play an important part in achieving this. We would hope that this would be a feature of any detailed application.

3.6 House design

Whilst this outline proposal does not incorporate any design features for the dwellings the Planning Authority may consider it appropriate to advise that, rather than just providing the usual predictable `speculative` development, some serious thought should be given to making this site a development of special architectural merit, reflecting more of the design influences of 2014 rather the 1930`s, whilst still respecting the scale and materials of the area. Such an approach would provide a much more appreciated asset for the town of Alton.

3.7 Landscaping

In general the Alton Society are content with the landscaping proposals. However the proposed Amenity Grass/Lawn areas alongside some of the internal roads of the proposed development should be protected, perhaps by dwarf bollards or by selective planting, to prevent vehicles using them as additional parking spaces and quickly turning them into unsightly mud heaps.

3.8 Site lighting

The proposed green corridors and informal footpaths should be discreetly lit with vandal proof, bollard type fittings.

3.9 Construction Activities

The Alton Society would like to bring to the Planning Authority’s attention the potential for significant building works to be taking effect across many different parts of the Town over the coming years. The movement of heavy plant will require careful management, and all contractors should be required to maintain clean roads.

4. Conclusion

The Alton Society objects to the application on two specific counts:

- The Transport Assessment has not taken into account any of the other significant planning applications that are currently with the Planning Authority. Moreover, the traffic movements have 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 rejected, and then re-worked once the planned Transport and Traffic Survey of Alton has been concluded and its findings published.
- Thames Water has already indicated that the existing drainage and sewage infrastructure is insufficient for any further development. They have further indicated that the enabling works will take up to three years to complete. Of equal importance, as with transport and highways, this application cannot be considered in isolation, as the capacity of the underpinning infrastructure must be capable of handling the total increase anticipated by all of the pending applications.

We would further request that if the Planning Authority are minded to approve the application, then a number of pre-conditions should be set for any subsequent detailed application; these should include:

- To protect the skyline, the development should be maintained within the boundaries of the existing proposed build area.
- The requirement to provide 40% affordable homes.



- The need for the site to have a ‘sense of place’
- A greater emphasis on the application of sustainable energy sources.

Finally, the Alton Society would urge the Planning Authority to take into account the many public objections that have already been lodged, and note that many of these objections reflect the concerns around the key infrastructure issues. If EHDC are minded to approve this application, then we will make further comments as to the detail at a later stage.

For The Alton Society

Annexes:

1. Detailed comments on the Travel Plan and Travel Assessment Plan.
2. Detailed comments on the Utility Statement.
3. Detailed comments on the Sustainability and Energy Statement.



ANNEX 1

Cadnams Farm - Travel Plan

■ Introduction

- The Framework Travel Plan (FTP) in this application should be developed in conjunction with other potential developments and not in isolation. eg South Alton c.530 new homes, Will Hall Farm 200 new homes.
- NPPF Para 34 says “All developments which generate sufficient amounts of movement should be required to provide a travel plan”.
- The objective of this plan is to reduce the need to use a private car and promote walking, cycling and the use of public transport as alternatives. The principles are fine but it is in the execution that is important after the developers have gone. We feel this document fails to recognise the desire for humans to use the “easiest” option, which is the car. It needs to be more robust on enforcement.

■ Para 1.4.3 - See our comments above.

■ Para 3.3.6 - This application refers to National Cycle Network Route No.224. Many cycle routes are inadequate when the impact of additional traffic from all potential new housing is taken into account. We are disappointed that the developer does not feel dedicated safe cycle lanes connecting up with the national route are appropriate.

■ Para 3.4.1 - This section fails to recognize the likelihood of new residents preferring to use private cars rather than walk a distance of 250m to the nearest bus stop.

■ We would expect the developer to negotiate with Stagecoach to secure an extension of the bus route into the site, including an additional bus stop.

■ Para 3.4.2 and 3 - This section is silent on the availability of the return bus times from Winchester, and is also silent on the bus service to Farnham/Guildford, Basingstoke/Petersfield.

■ Para 3.4.4 – Rail Services.

- New residents who use the train service will drive to the train station, (approx.) 1.35 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.

■ Section 3.5– Existing Travel Characteristics-

- Para 3.5.1 and Table 3.3– Reasons for travel and proportions will have changed since 2001 for any of a wide variety of reasons, including such as change of employment following the recent recession. This application should be refused until the HCC Traffic Survey is completed.
- Para 3.5.2 and Table 3.4 – Academic desktop analysis based on 2001 travel data is out of date.
- Para 3.5.3 and Table 3.5 – this desktop analysis is based on out of date information, disregards change of employment, and should be reassessed when HCC survey data is available, and for all proposed development, not just Cadnam in isolation.



- School Traffic.
 - The FTP fails to recognise parents have a choice of schools.
 - 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 a deterrent for walking or cycling to school. This will increase cross-town school-run car journeys.
 - The assumption that people will walk, cycle or use buses to escort their children from this site to school is unrealistic. Dedicated Safe Cycle lanes would help. People will use private cars for the school-run unless an attractive alternative is available. This plan does not have such an alternative.
 - New traffic is likely to rat-run around the town centre, dispersing via Gilbert White Way, Greenfields Avenue and/or Southview Rise, Old Odiham Road, Anstey Lane, Anstey Road, Ackender Road, etc adding to problems of traffic flow caused by road-side parking in these residential roads. The impact needs to be assessed against the results of the expected traffic survey information.
 - Old Odiham Road during term time is effectively a “one way system” due to student’s parking. Equally, parking at the eastern end of Greenfields Avenue renders the road a single width road, used by pedestrians - adults and children, cars, Stagecoach and “Simplygo” buses.
 - We are advised that Alton schools at all levels of education are overcapacity except Wooteys.
- Section 4 Targets – This section is a naïve “wish-list” of targets that is unimaginative in its proposals to change people’s behaviour. The aspirations (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).
- Para 5.1.1. Roads should be high quality, low speed, shared use and 20mph limits - also they should be adopted by the HCC.
- Para 5.2.1 - Main Access. We propose that a grassed roundabout would provide a better connection with the existing roads.
 - Note: this comment does not suggest an inappropriate small white painted roundabout. There are several small white painted roundabouts in the town at present and they regularly cause driver confusion.
 - A grassed roundabout with kerbstones would provide better definition of the junction. It also provides an opportunity to integrate surface water drainage into what will be a low-point in the road system.
 - Residents would be disinclined to park cars on approaches to a roundabout.
 - There is adequate space and opportunity to provide a roundabout, with grass and trees and appropriate street lighting.
 - This would add capacity for traffic to join existing traffic flows, and provide traffic calming, turning for buses etc.
 - Trees should be species appropriate to East Hampshire/Alton.
- Section 5.3 – Access by Sustainable modes.
 - We welcome additional footpaths, cycle ways and crossing points along Gilbert White Way.



- We welcome traffic calming proposals for Gilbert White Way.
- It should be an objective of the plan to extend footpaths, cycle ways and crossing points along other roads and routes into the town centre.
- It should be an objective of the plan to allow for disability access to the site and within the site.
- Section 5.4 – Car parking to minimum Standards.
 - The provision of car parking spaces needs to reflect current lifestyles; eg the high probability 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 also own a car of their own for travel to work out of town.
 - New residents will require access to employment appropriate to their education and skills.
 - There is currently limited employment opportunity in the town.
 - An allowance for parking ought to be provided for visiting friends and families.
- Section 6 – Soft Measures, Section 7 – Management and Implementation
 - This section fails to acknowledge the reality of how people behave. Has the applicant done this anywhere else and assessed its success?
 - Travel Plan Coordinator - We question the funding and the period of 5 years is too short. We submit the plans could be linked with other major developments in the town.
 - We are not convinced that this plan will work to change peoples’ travel habits. Where is the “stick” of enforcement?
- Figures
 - Figure 2 presents misleading information:
 - eg Treloars College is not a state school. Butts School is not labeled.
 - eg Chawton Park Surgery is not identified.
 - eg Alton Golf Course is not identified.

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.



Cadnams Farm - Transport Assessment Statement

- Para 1.3.2 Says impact of the development on the local highway network would not be severe. It concedes however that at least one part of the current network will be “over capacity” on their calculations (Junction Anstey Road and Anstey Lane)
 - Para 1.3.3 In view of the above they say the development should be permitted as the impact of the extra traffic will be minimal.
 - This does not take into account the effect on the town as a whole and should not be seen in isolation of all other developments.
- Para 2.2.4 - The statement quotes para 34 NPPF in that a development should have travel plan if it will add significant movements to the area. However it also says the effect of developing Cadnams Farm is negligible.
 - This is naïve and should not be accepted – this development will add traffic to the town; the statement appears to undermine their commitment to the Travel Plan.
- Para 2.7.1 - They quote the current parking standards – we believe that we should be seeking improved standards in order to avoid the awful errors made in the design of other developments - such as Greenfields, Wooteys and most recently Treloars Hospital site – where on-street parking causes further difficulties in traffic flow..
- Para 4.3.2 - We request higher standards for this development.
- Para 6.8 - Sensitivity test - we submit the need to wait for the HCC Traffic survey.
- Para 6.9.3 - We note the Developers consider the closure of Upper Anstey Lane but this is not a proposal at present



ANNEX 2

Cadnams Farm – Utility and Service Statement

- The Utility Statement covers Foul water, Surface water, Mains water, Electrical supply, Gas (natural), Telecoms, Pipelines & Hazard Plants for this site only. The scope covered is a basic level search of utility capacity in the location.
- It is noted that capacity and cost statements from the various supply and connection companies are given in isolation of other housing developments - this is normal shortsighted practice. Developers will be keen to secure and place orders for utility demands early to minimise variation in cost due to other developers' applications for capacity.
 - However, with over 1000 new homes applied for within applications to date, we propose a more inclusive and coordinated assessment of all the utility demands for the developments will be required before approvals are granted.
- Mains Water, Gas and Electricity:
 - Adequate capacity should be provided to enable resident's lifestyle choices in a Sustainable Community whilst encouraging minimum use.
- Section 3 - Foul drainage – Alton Sewerage Capacity.
 - It is known that demand on Alton sewerage plant exceeds capacity. The sewer works is in need of upgrade for current town population. A more inclusive and coordinated assessment of all development sewerage demand is required before approvals are granted.
- Section 4 – Surface Water. Further details of the on-site surface water attenuation prior to draining into the ground/chalk will require review to militate against flooding.
- Section 6. – Electricity Supply. We are concerned about the presence of High Voltage (HV) services given there is evidence this may affect new residents health. Homes should not be located under or near the HV services.
- Section 8 – Telecoms. All telephone and broadband connections should be underground.



Cadnams Farm - Sustainability and Energy Statement

The Policy context shows that the developer has failed to take account of the Town Design Statement. No account has been taken of local planning guidance from the Town.

- Para 3.2 Sustainable Transport. This section repeats the content of the Framework Travel Plan, though distances quoted are slightly different. As for the FTP, this section again fails to recognize how people behave.
 - Distances to existing bus stops are likely to lead to use of private cars.
- Distance to train station will lead to use of the private car.
- Para 3.5 – Energy and Carbon Emissions.
 - We support the plans to reduce carbon emissions but disappointed that no approach has been made to specialist energy suppliers to see if a local renewable source of energy could be viable. The passive methods are the minimal number under current legislation so we will look carefully at the design specification in the detailed plans if permission is given to this outline.
- Heating - Disappointingly, this section does not mention condensing boilers. Equally disappointing, this sections fails to recognize that features such as zoned controls are industry norm. This section offers very little specific information.
 - Where white goods are to be provided, the proposal states they will be A+ rated. Why not A+++?
 - For those dwellings where white goods are not to be provided, residents should be informed of appropriate/matching specifications when planning their own purchases.
- Para 3.5 - Low Carbon and Renewable Energy
 - Disappointingly, table 2 is inconclusive on which LZC technologies will actually be provided.
 - A deeper and future analysis will be required of the predicted energy usage for the actual dwellings to confirm the economic viability of renewables, with inclusion for future proofing to match the construction life of the houses, and not short-term financial return for the developer.
 - We would expect PV to be provided as standard, complete with feed-in tariff agreements.
- Para 3.6 – Water.
 - We expect the inclusion of dual flush w.c. low flow fittings and water meters as standard.
 - The inclusion of a water butt for rainwater is noted. The application is however, otherwise silent on more pro-active use/re-use of "rain-water" and "grey water". The application should include active plans for rainwater and grey water use.
- Para 3.7 – Flood Risk and Sustainable Drainage. We welcome the measures listed as far as they go but would want to see materials used to construct the roads to be permeable as well as the pavements. Given the nature of the land this development is bound to increase the run off from the land once it is built.
- Para 3.9 – Waste Management.
 - We welcome the inclusion of a Construction phase Site Waste Management Plan.



- We would expect a travel plan for builders' construction vehicles, with defined travel times and routes. This site can only be accessed via residential roads.
 - We would expect a 'wheel wash' to be included as part of site establishment to avoid mud on Alton roads.
 - The avoidance of use of insulation materials containing substances known to cause ozone depletion is welcomed – we would not expect otherwise.
 - Provision of space for storage of waste is welcomed. We welcome the proposal to provide compost bins but will check carefully the details as to bin capacity and its storage.
- The statement (page 22) promising, "Full consideration will be given to the Council's waste management infrastructure" fails to meet the requirement and is unacceptable. Surely this should be mandatory and be conditioned in any permission?
 - Conclusion. The application is silent on predicted estimates of energy use other than the type of technology, which it is felt to be most appropriate. No evidence has been presented from other developments where other technologies may be viable, or from companies who have experience of installing such schemes.
 - 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 Coordinator.
 - 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 mention of gardens but no indication of the size of gardens or a commitment to putting in gardens as part of the smaller dwellings. Joint use of gardens should be considered. 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.