



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

24 September 2014

Dear Sir or Madam:

55250/001 Land South West of Highmead House, Old Odiham Road, Shalden, Alton - Objection

1. Introduction

The Alton Society has reviewed in detail the application for the development of the land at Highmead House, Old Odiham Road, Shalden (EHDC Application number 55250/001). Whilst we do not object to the general principle of the development of some land in this area, we object to both the detail and timing of the 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). With the TDS design guidelines endorsed by 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 design guidelines are intended to influence the planning and implementation of the town’s future development.

These guidelines covered a wide range of issues from the physical setting, through settlement patterns and architectural and design guidance. Including the following:

- 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.

2. Material Points of Objection

Landscape and Visual Impact Assessment

The proposed site is outside of the settlement boundary for Alton. At the time when the Wooteys and Eastbrook Estate was developed, both the Planning Authority and Alton Town Council made the decision that development should go no further up the slopes so as not to compromise the rural setting for Alton. This view was confirmed in the TDS at design guidelines 3.3 and 3.5 whereby vistas into and out of the town plus the skyline must not be breached. It is considered that the



proposed development will conflict with these requirements. Furthermore, the EHDC “Landscape Capacity Study” of July 2013 set out comments on this SHLAA site as follows:

“The land ... lies on high ground to the north of the town. In this location it will stand on an exposed area and devalue the very highly regarded undeveloped skyline, which is a feature of the town. The existing dwellings which lie to the north of Gilbert White Way are on contours which represent the limit to which any new development should be permitted in order to maintain a relatively clear skyline.”

We concur with this view.

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 as per, the EHDC “Landscape Capacity Study” of July 2013, as above.

In line with this the maximum height of developed land North of Gilbert Wight Way is 157 metres. Allowing for an 8 metre build height this would put the roof height at approximately 165 metres. We would therefore, on this basis, object to any building that would exceed this height.

The Visual Impact Statement is a thorough and highly professional piece of work. However, in seeking the award of planning permission, it has failed to grasp the significance of the site on high ground above the development line in Alton. It plays down the impact that the development will have on Alton and does not even mention the TDS or any design guidelines. One look at site photograph “*Land to the East*” in the assessment demonstrates that the reverse view of this image over the town at a position up to 8 metres above the point at which the photograph was taken (applicant stated height of dwellings) will seriously impact views and vistas across the town. In line with this the maximum height of developed land North of Gilbert Wight Way is 157 metres. Allowing for an 8 metre build height this would put the roof height at approximately 165 metres. We would therefore, on this basis, object to any building that would exceed this height. Further comments on the applicant’s Landscape and Visual Impact Assessment are at Annex 1.

Transport Assessment

The Planning Authority will be aware that there are already detailed applications submitted for the South Alton development, Will Hall Farm, Cadnams Farm and land West of Old Odiham Road. Alongside this current application there is the prospect of the introduction of around 1682 new dwellings in Alton on which at least 172 are under construction now. Inevitably this amount of development will 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.

In connection with the Transport and Assessment/Travel Plan in particular it fails in several areas. First of these is compliance with the NPPF with respect to access to the town due to the location at the top of a hill and its impact on walking/cycling and disability access. This will inevitably lead to the use of motor transport for shopping, school runs etc. Evidence of such access difficulties are already experienced by residents of Grebe Close which constitutes one of the highest developments within Alton. Also residents of Alton will be only too well aware that the traffic on Old Odiham Road around Alton College is already very congested, often with bottlenecks caused by significant on-road parking. The routes into, or out of Town will be either North up the Old Odiham Road towards the M3, where the junction at the Golden Pot is an existing traffic hazard, or either through Greenfields Avenue or Gilbert White Way and Anstey Lane towards the A31. Greenfields Avenue suffers from on-road parking and is often very congested at the Alton College end, and Gilbert White Way and Anstey Lane will become even more congested if the Cadnams Farm application proceeds. Anstey Lane in particular is congested around the Tesco Metro and Convent



School. 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. At present there is no integrated transport solution to cater for the amount of development proposed in Alton and this is simply unacceptable.

Moreover, we note that the applicants conducted their own traffic survey on 22 July 2014 (with automated traffic count equipment between 15 and 22 July 14) during a school holiday and summer holiday period. Any well informed individual would agree that data gathered in such a short period and at an inappropriate time can hardly be described as representative, and therefore cannot be considered to be robust.

We are aware that the EHDC and HCC are jointly funding a transport study for Alton which is being conducted now. In order to provide a genuine and 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.

Single point entry road access to the site is considered inadequate and also approaches on a steep uphill incline. Winter conditions will make access and egress from the site treacherous. In addition the layout indicates, as part of the vehicle swept path analysis, difficulties with large vehicles such as refuse trucks where encroachment across lanes is shown thereby raising the risk of collision.

Notwithstanding these issues, the Transport Assessment does not reflect individual behaviours. Whilst we wholeheartedly concur with the objective to reduce the need to use a private car and promote walking, cycling and the use of public transport as alternatives, the application fails to offer any practical initiatives, 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. Of equal significance, this proposed development is at the top of a long and steep hill above the town - people simply will not/will be unable to walk to the shops, the doctor's surgery, or to the Railway Station. At Annex 2 we have provided a detailed review of the Transport Assessment and Framework Travel Plan.

Flood Statement

The applicant claims that the site is classified as Flood Zone 1 with a low probability of flooding. This may be so for on site assessment, but the potential to cause flooding from the site to the settlements below the site is a very high risk. Photographic evidence taken within the last year of extensive rain water run-off from the rising land above the existing settlements in Grebe Close and other adjacent streets along Gilbert White Way can be made available. This run-off is not surprising given the geology of this area, which is predominantly Marl - chalky clay. Marl is an aquatard (slows drainage, but will not stop it). The application promises that the design for the reduction of water run off from the developed site to surrounding areas will achieve zero run off via "potential SUDS strategies and swales". However no hard evidence of this potential, or assurance of this, is given.

The Flood Statement includes Developers' investigations of foul sewers. Clause 6.7.2 states "*that the proposed development is anticipated to connect to one or more of the existing foul sewers via a new adopted foul piped network*". There are significant issues with the existing Alton sewage system which is already at capacity. In a letter to the Alton Neighbourhood Plan Steering Group from Thames Water dated 09 Apr 2014, Thames Water state that this site cannot be sustained by the current sewage system, and they will require at least a 12 week survey to determine the upgrade required; and then a minimum of 3 years to implement the necessary improvements. There have already been current instances of sewage backing up and flooding in Alton during last winter (2013/2014). This sewage system improvement work is therefore considered to be



fundamental to ensure that the existing communities do not suffer further, and we 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 Flood Statement are at Annex 3.

Energy Statement

The Energy Statement fails to address and demonstrate how the developer will achieve the wide range of sustainability requirements for the lifetime of the houses. Issues ranging from the proposal only to Code 3 of Sustainable Homes legislation to a lack of innovative solutions for the maximisation of sustainable opportunities of this modern development proposal. Further comments on the applicant's Energy Statement are at Annex 4.

Design and Access Statement

The Design and Access Statement appears to have been assembled in a rush. It is inconsistent within its body of text and other application documents. More importantly it fails to explain how the proposed development is: *"a suitable response to the site and its setting, and a demonstration of how it can be adequately access by prospective users"*, as required in the Planning Portal Guide to the purpose of Design and Access Statements. It fails to acknowledge that this would be the highest development in the town and contrary to the TDS. The EHDC Landscape Capacity Study correctly sums up the site as being beyond the limit up the valley at which further development should occur. In addition it wastes much effort in extensive justification of why the site should be approved for development when measured against National and Authority legislative and plan requirements. We are also concerned that there appear to be no proposals as to how to use the land at the top of the site which, at this time, is not proposed for development. Further comments on the applicant's Design and Access Statement are at Annex 5.

Statement of Community Engagement

Public engagement is a fundamental requirement of NPPF. It is considered the Highmead House application fails to have achieved sufficient engagement (Only 18 responses to invitations to comment). The resulting report therefore should not be taken as having met the NPPF requirement. Further comments on the applicant's Flood Statement are at Annex 6.

3. Conclusion

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

- The proposal is not consistent with the Town Design Statement. Moreover, the EHDC's own Landscape Capacity Study of July 2013 stated that the *"the existing dwellings which lie to the north of Gilbert White Way are on contours which represent the limit to which any new development should be permitted in order to maintain a relatively clear skyline."* This proposed development lies above these contour lines. In line with this the maximum height of developed land North of Gilbert Wight Way is 157 metres. Allowing for an 8 metre build height this would put the roof height at approximately 165 metres. We would therefore, on this basis, object to any building that would exceed this height.
- The Transport Assessment has not taken into account any of the other significant planning applications that are currently with the Planning Authority and the site is difficult to access almost at the top of a steep hill. 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. In addition the accessibility issues should be more fully addressed and resolved.



- The flooding risk to dwellings and roads immediately below the proposed development has not been properly assessed and requires further analysis to determine an appropriate solution. 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 for Alton.
- The applicant has failed to fully engage in a constructive manner in the proposal with the Alton public.
- The proposal appears to be rushed and inconsistent.

Yours sincerely,

signed electronically (by e-mail)

M C Heelis
For The Alton Society

Copies to:

1. Alton Alton Town and District Councillors
2. Alton Town Clerk
3. Alton and District Resident Association Members

Annexes:

1. Detailed commentary on Landscape and Visual Impact Statement
2. Detailed commentary on the Transport Assessment and Framework Travel Plan
3. Detailed commentary on the Flood Statement
4. Detailed commentary Energy Statement
5. Detailed commentary on Design and Access Statement
6. Statement of Community Involvement
7. Supporting Statement for 120 Houses
8. Geo Environmental Assessment

**Proposed development at Land South West of Highmead House, Old Odiham Road, Shalden,
Alton
55250/001
Landscape and Visual Impact Assessment**

Comments:

- 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. Furthermore, the EHDC “Landscape Capacity Study” of July 2013 set out comments on this SHLAA site as follows:

“The land ... lies on high ground to the north of the town. In this location it will stand on an exposed area and devalue the very highly regarded undeveloped skyline, which is a feature of the town. The existing dwellings which lie to the north of Gilbert White Way are on contours which represent the limit to which any new development should be permitted in order to maintain a relatively clear skyline.”

In line with this the maximum height of developed land North of Gilbert Wight Way is 157 metres. Allowing for an 8 metre build height this would put the roof height at approximately 165 metres. We would therefore, on this basis, object to any building that would exceed this height.

- Para 2.8 sub para 4 The first sentence states “...It is expected that with mitigation boundary planting to the higher north western edge and north eastern side of the development, the longer term visual impact of the development would result in a perceptible change in the existing view, without affecting the overall quality or character of the view. The development would form an apparent element in the wider landscape but would be consistent with the adjacent suburban edge of Alton. The highest part of the proposed site will be retained as open space which will prevent the roof ridges being the dominant feature on the skyline. It would therefore not be considered significant.” If the whole site is developed this is simply untrue. The largest proportion of the site is on higher ground in the height range 155 - 165 metres. This is higher than any other development in Alton. Not acceptable.
- Page 24 Box “Assessed Landscape Sensitivity of Development site” We disagree grading of both Quality and Landscape Visual sensitivity as Medium and believe they should be reclassified High. In the same vein Character sensitivity should be regraded Medium. EHDC Landscape Character Assessment and SHLAA Landscape Capacity Assessment back this change and error of grading by the applicant.
- Page 25 is a good photograph (Land to the East of the Site) which is a clear demonstration of the impact 2 storey building from this location will have on reverse views towards the site from the town. It will be placed as the highest development in Alton and compromise the current setting in that part of the town.
- Para 9.13 States that the proposed height of buildings will be up to 8 metres. Add this to the 155 to 160 ground level and the heights will be 163 - 172 metres. This is not far short of the height at the top of the non built upon portion at the top of the site which, visually, will be highly detrimental on reverse views from the town.
- Para 9.6 Land to the East of the site photograph. This picture clearly shows a ground level view across one of the houses (perhaps the highest roof in Alton at number 12 Grebe Close). One only has to imagine another 8 metres higher and the impact on the skyline above Alton is



clear - there would be a massive impact from this development contrary to the Alton Town Design Statement Guidelines.

- Page 41 Table 12. There are only 2 areas of Major visual effect from the 9 viewpoints chosen. We fundamentally disagree this assessment and believe it has been underplayed.
- Page 45 Table 13. Per above bullet point.

Summary

This Visual Impact Statement is a thorough and highly professional piece of work. However in favour of being awarded planning permission it has failed to grasp the significance of the site on high ground above the development line in Alton. It underplays the impact that the development will have on Alton and does not even mention the Alton Town Design Statement landscape criteria.



**Proposed development at Land South West of Highmead House, Old Odiham Road, Shalden, Alton
55250/001
Transport Assessment/Travel Plan (TA/TP)**

Section 1 Introduction

- No comment.

Section 2 Policy Context

- Section 2.2 National Planning Policy Framework, DCLG, March 2012
 - The Transport Assessment/Travel Plan (TA/TP) for 120 dwellings has been prepared in isolation of other potential development in the town and is therefore unacceptable.
 - Known potential developments are South Alton c.530 new homes, Will Hall Farm 200 new homes, Land West of Old Odiham Road 98 new homes, Anstey Road Sports Ground 85 dwellings.

Note: The possibility of Cadnams Farm development is stated in clause 6.5.1 (Cadnams Farm proposal is for 275 new homes).

 - Clause 2.2.7. - The TA/TP fails to account for disability access between the town and the site, and within the site.
 - Clause 2.2.8. - The TA/TP submitted fails to recognise that the site is located at the top of the hill, and that this will discourage walking and cycling. Evidence of this is held from residents of Grebe Close adjacent to the potential development.
 - Clause 2.2.9. - The NPPF “presumption in favour of Sustainable development” cannot be accepted without detailed holistic consideration of traffic for the whole town.
- Section 2.2 Environmental & Sustainable Transport
 - Clause 2.2.10. - As for our comments on Section 2.2 NPPF above, this TA/TP fails to recognize that the site is located at the top of the hill, discouraging modes of transport other than private cars.
- Section 2.3 - 2.6 inc.
 - As for our comments on Section 2.2 NPPF above, this TA/TP fails to recognize that the site is located at the top of the hill, discouraging modes of transport other than private cars.
 - Clause 5.2.1 refers to Appendix D. We would suggest a single road access is inappropriate.
 - We would expect to see traffic calming within the site using the principle of “shared streets” keeping speeds down to 20mph and encouraging shared use of the roads.
 - Clause 2.6.2 refers to Appendix E. Refer to our comments below.

Section 3 Existing Conditions

- Clause 3.2.1. - The description of the site and its surrounding land has been prepared in isolation and fails to recognize other potential housing development.
- Clause 3.3.1. - This clause suggests a road route to the town centre and fails to recognize that the Old Odiham Road is primarily used by buses, private cars, and pedestrians accessing Alton Sixth form College and suffers traffic congestion at peak times.
- This route into town also impinges onto the junction of Old Odiham Road with Greenfields Avenue, which is a further point of congestion at peak times.
- Clause 3.3.2. - As for clause 3.3.1, this clause suggests a road route to the town centre which fails to recognize the impact of additional traffic arising from this development.



- Clause 3.3.3. - This clause fails to recognize the existing congestion due to vehicles accessing main trunk roads.
- No proposals are given to relieve the impact of the additional traffic along this route arising from this development.
- Section 3.4. Traffic Data
 - The TA/TP is based on the developers own limited traffic survey in the immediate vicinity of the proposed site, and in isolation of potential other developments in the town.
 - A full traffic survey is being undertaken 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.
 - The traffic survey undertaken by the developer for this TA/TP excludes the Old Odiham Road/ Greenfields Avenue junction. This is disingenuous given that it provides an integral route to main roads and is constantly blocked at peak times.
 - The date selected by the developer for their traffic survey was Tuesday 22nd July 2014. In selecting this date, the developer has failed to identify traffic generated during school/College terms and non holiday periods. This date was early in the summer vacation. The data gathered, presented and used in the analysis is therefore inadequate and the conclusions drawn are of limited value.
 - Equally, the period when the developer installed his own automatic traffic count (ATC) equipment, 15/7/2014 to 22/7/2014 inclusive (Clause 3.4.4), would have missed most of the School traffic due to the start of the summer vacation. Further, the location used for this ATC cannot be considered representative. The data gathered, presented and used in the analysis is therefore inadequate and the conclusions drawn are of limited value.
 - Clause 3.4.6 notes that traffic along Gilbert White Way exceeds the imposed speed limit.
- Section 3.5 Journeys on Foot and by Cycle
 - Figure 3.3 has not been included in the TA/TP.
- Section 3.6 Public Transport Network
 - Clause 3.6.1. - No comment.
- Section 3.7 Journeys by Bus
 - Clause 3.7.1 and 3.7.2 identify walking distances to nearest bus stops, being approximately 350m distance to Wooteys Ways and approx. 900m to Greenfields Avenue. This TA/TP fails to acknowledge that these distances, together with the return walk up hill, will dissuade new residents from walking to bus stops and requires a good fitness and mobility level.
 - The TA/TP should also note: In addition to Stagecoach bus service 13, service 64 also uses the bus stops located at the eastern end of Greenfields Avenue.
 - The TA/TP offers no proposal to add a bus stop close to the site. The developer should be required to enter into negotiation with Stagecoach to secure an extension of the bus route, including an additional bus stop closer to the top of the hill. Why have they not contacted Stagecoach to see if this can be done?
- Section 3.8 Journeys by Train
 - Clause 3.8.1. - New residents who use the train service will drive to the train station, (approx.) 1.9 kilometres being too far to walk or cycle on a cold or wet winter's day, particularly the homeward journey up hill!
 - Journeys to the railway station will include cars. This should be assessed and included in the junction analysis.
 - Car parking at the station is already at capacity.

Section 4 Accessibility



- This TA/TP fails to acknowledge that distances to facilities and amenities, together with the hill, will dissuade new residents from walking, cycling.
- Figure 4.2 and 4.3 have not been included in the TA/TP. (Not to be confused with Figures in Appendix F).
- The developer should plan for the hill when proposing walking and cycling means of travel, and should provide dedicated routes penetrated into the existing infrastructure and separate from the traffic.
- The proposal fails to recognise that the walk from the town centre, facilities and amenities up the hill to this site requires a good fitness and mobility level. There are no resting places/seating areas along the route. The developer should provide dedicated resting places and provision for disabled access along routes penetrating into the existing infrastructure and separate from the traffic.
- This TA/TP suggests that the site is conveniently connected to local employment, retail and educational facilities in Alton and further afield. This is misleading. There is currently limited employment opportunity in the town. The Sixth Form College is one of the largest employers in the town, if not the largest, and is fully staffed.
- New traffic is likely to rat-run around town centre, dispersing via Greenfields Avenue and/or Southview Rise, Old Odiham road etc, Gilbert White Way and Anstey Lane and Anstey Road, 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.
- Clause 4.6.2. Lloyds Bank has split with TSB in compliance with UKGov policy.
- Section 4.7 Accessibility to Schools and Colleges
 - The list of schools is misleading. i.e. Neither the Convent nor Treloars are state schools.
 - Alton schools at all levels of education are overcapacity except Wooteys.
 - 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.
 - 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:-
 - 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 for children 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. Transport to and from College and local schools involves a high volume of traffic - cars, buses, cycles, pedestrians - causing problems, exacerbated by parking in Old Odiham Road and the connecting roads such as Greenfields Avenue. The junction analysis presented later in the TA/TP needs to include more road junctions.
- Section 4.8 Accessibility to Leisure and Community Facilities
 - Fails to mention Alton Community Centre, Assembly Rooms, Museums and galleries, Alton Golf Club, Alton cinema, churches and meeting rooms. This is a poor report if it fails to note major assets in its evidence.
 - To suggest that the people will walk or cycle to these leisure facilities is unrealistic and naïve, and ignores the hill. People just do not behave in this manner.
- Section 4.9 Accessibility to Health Facilities
 - Fails to mention Chawton Park Doctors Practice.
 - To suggest that the leisure facilities listed are within walking distance is unrealistic and naïve, and ignores the hill. People just do not behave in this manner.
- Section 4.10 Summary



- This Summary fails to recognise the implications of the hill and gradient. This is surprising, for the Developer has apparently undertaken his own albeit limited traffic survey.
- Clause 4.10.1 fails to acknowledge reality in its over simplification. This section has not demonstrated the stated claim. People just do not behave in the manner suggested.
- Clause 4.10.2 fails to acknowledge the hill location of the proposed site, that to walk or cycle will require a good level of fitness and mobility.

Section 5 Development Proposals

- Section 5.3 Car and Cycle Parking Provision: -
 - Overspill parking will tend to make a nonsense of the junction analysis elsewhere in this TA. The provision of parking must be based on a realistic need and not merely on the minimum standards. More parking spaces are essential to avoid obstructing the surrounding roads.
 - The provision of car parking spaces needs to reflect current lifestyles; e.g. it is naïve to ignore the high probability that two adults living in a single bedroom flat will each have 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.
 - An increased allowance for parking ought to be provided for visiting friends and families.
- Section 5.4 Pedestrian and Cyclist Access
 - This section and generally through-out focuses on encouraging residents to walk, cycle or use public transport and fails to recognise the inevitable use of private cars, adopting instead a “wish-list” of walking, cycling or public transport use.
- Section 5.5 Travel Plan
 - 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 anywhere 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. Why not join with other developers and provide a properly funded post/posts to cover all the developments proposed in the town.
 - How will the TP be enforced?

Section 6 Developer Trip Generation and Assignment

- This section uses out of date traffic information and should be re-worked once the results of the full traffic survey around Alton has been concluded and published.

Section 7 Traffic Impact Assessment

- Clause 7.3 Junction Capacity Assessments. The junction analysis presented is a simple “desk-top” study and fails to reflect reality experienced by car users in Alton. We suggest this is due to the base data being out of date. This analysis should be re-worked holistically for the whole town once the results of the full traffic survey around Alton has been concluded and published.
- The junction analysis (Figures 3.1 - Figure 7.6) do not extend far enough down the hill to the town to identify the flow of traffic during school and College mustering times.

Section 8 Developer Contributions

- This entire section should be re-worked once the results of the full traffic survey around Alton has been concluded and published.

Section 9 Conclusions

- We are not convinced by the conclusion and conclude that the proposal is not robust. It should be re-worked once the results of the full traffic survey around Alton has been concluded and published.

Appendix C - Proposed Site Layout



- The site would benefit from the inclusion of separate cycle ways, to continue the theme of other parts of the town.
- The development would benefit if the pond were to be enhanced as a feature, complete with open community and play area.
- There are no community facilities or amenities. The community facilities or amenities in the town centre will inevitably encourage the use of private cars due to the hill.

Appendix D - Proposed Site Access Drawing - (983-GA-001 Rev A)

- As clause 5.2.1, we would suggest a single road access is inappropriate.

Appendix E - Swept Path Analysis of Proposed Site - Access Drawing (983-ATR-001 Rev A)

- The “swept-path analysis” of the refuse vehicle entering and exiting the single site access road is unacceptable - the path clearly encroaches into the path of on-coming vehicles, presenting a very real hazard and obstruction to the flow of traffic.

Appendix F - Framework Travel Plan

- The Travel Plan would be better presented as part of the main report, as opposed to being buried within the Appendices.
- Much of the Travel Plan repeats the content of the Travel Assessment in which it forms an appendix. Our comments to the same content apply.
- The objectives of the plan are welcomed but the implementation will be the real test.
- We note that the Developer will appoint a Travel Plan Co-ordinator (TPC) for this development. (Clause 6.2.9 and 8.1.2 of Appendix F).
 - Has the applicant done this anywhere else and assessed its success?
 - The TP is unclear on the extent of TPC funding, and we submit that the TPC could be linked with other developments in the town.
 - We are not convinced that this plan will work to change people’s travel habits. Where is the “stick” of enforcement?
- The information presented in Figure 4.1 and 4.2 (Appendix F) is generalised and inaccurate.

Appendix H - Improvement Scheme for Anstey Lane / Anstey Road Junction (983-GA-002)

- The inclusion of a proposal for improvement of the Anstey Lane/Anstey Road exemplifies the need for a holistic whole town solution once the results of the full traffic survey has been concluded and published.



ANNEX 3

Proposed development at Land South West of Highmead House, Old Odiham Road, Shalden, Alton
55250/001
Flood Statement

- The Flood Assessment Statement concludes that the site is identified as Flood Zone 1 with a low probability of flooding of less than 0.1%. (Clause 2.2.4) and continues to consider Flood risks to surrounding areas arising as a consequence of the development (Clause 2.2.5).
- Section 6.3 Design Parameters. The Flood Statement states that design for reducing rain water run-off from the developed site to surrounding areas will achieve zero run-off via SUDs strategies including: -
 - Private water butts
 - Permeable paving in private parking areas (where design levels and gradients allow)
 - Swales
 - Lined Soakaways
 - Infiltration Basin
 - Infiltration Tanks
- This is not sufficient given climate change. Pervious pavements should be provided for all pavements on the site and should include porous roads. Together with measures to reduce run off from the dwellings, this can substantially lessen run off and therefore reduce the risk of flooding in areas below this site.
- Clause 6.3.8. This appears to be an economic comment. The site plan does show a pond at a low point.
- The Flood Statement includes Developers' investigations of foul sewers. Clause 6.7.2 states that the proposed development is anticipated to connect to one or more of the existing foul sewers via a new adopted foul piped 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. The Flood Statement is silent on this aspect. There does not appear to be any contact with Thames Water on this point.
 - This is a serious flaw. We have been in contact with Thames Water for other major infrastructure projects and they confirmed a three year lead in time to complete the work.
- Section 7 Offsite Impacts. We cover this above and want more on site proposals to reduce the risk.
- This applicant's agent concludes that the risk of flood to surrounding areas will be lower than the current situation. We believe that more can be done to reduce the risk even further.

Proposed development at Land South West of Highmead House, Old Odiham Road, Shalden, Alton
55250/001
Energy Statement

- Executive Summary
 - High efficiency boilers are mentioned in the Executive Summary.
 - No further details of the boilers are given in following sections of this Energy statement e.g. how is hot water to be provided.
- Section 2: Planning policy.
 - The developers quote the NPPF. However they should study Para 7 which inter alia states that one of the three dimensions to “sustainable” is to include the provision of infrastructure and a social role supporting strong, vibrant and healthy communities with accessible local services that reflect the community’s need and support its health, social and cultural wellbeing. In addition under Para 162 local authorities are obliged to work with others who provide the infrastructure (both statutory and non statutory authorities). We are not convinced the developers recognise this and the Council must take into account other developments which impinge on all these issues in the NPPF.
 - The purpose of the Energy Statement, and other documents submitted, should be to demonstrate that the development will be Sustainable in accordance with the NPPF.
- Section 3: Proposed Development.
 - The stated aspiration to achieve only Level 3 of the Code of Sustainable homes is disappointing.
 - Building Regulations Approved Document Part L1A 2013 for construction compliance. Approval, if given, should be Conditional on compliance with Building Regs current at the time of dwelling applications.
 - The fabric first approach is welcomed.
- Section 4 Dwelling Energy / CO2 Emissions
 - The tabulated target thermal characteristics are noted. (These characteristics should be quoted with units. e.g. U values W/m²K etc).
 - Clarification is required of what type of photovoltaic devices are to be provided: This section mentions both “panel” types and “tile” types. Each type has specific weight and appearance issues.
 - There is no information on the potential wider use of photovoltaic energy in the community, nor on “feed-in” tariff setup for each household/consumer.
 - The Energy Hierarchy diagram is noted.
- Section 5 Conclusion
 - For future proofing, the aspiration should be to not merely comply, but exceed current practice. These dwellings, if approved, can be expected to stand for most of the 21st Century.
- Comments
 - The Energy Statement fails to address and demonstrate how the developer will achieve the wide range of Sustainability topics for the lifetime of the houses.
 - It is disappointing that there is no mention of other Low and Zero carbon Technologies. (LZC). We would expect a deeper analysis of the predicted energy usage for the actual mix of dwellings types to confirm the economic viability of a range renewables - current and emerging - with provision for future proofing. We would expect the developer to have engaged a specialist energy firm (or community based initiative) to investigate the viability of renewable energy production. As with other major developments in the town, this developer only proposes solar PVs.



- We would expect a development of this size, inherently involving the widespread excavation of the site, to make ground-source heat pumps with district heating a worthwhile part of the analysis for future-proofing, thereby reducing the demand on gas and rendering the development more Sustainable.
- There is no mention of heat-recovery ventilation systems.
- There is no mention of any intent to use energy efficient builder's materials, sourced locally as far as practicable.
- A Utility Services Statement has not been provided.
- The Statement is silent on rain water harvesting/grey water recycling. This is essential to improve the use of this valuable resource and reduce water bills for householders. There is mention of a provision of water butts which is insufficient given the most recent problems we are having with heavy rainfalls. Such rainfall is predicted to increase.
- The Statement is silent on control of construction traffic accessing this site via residential roads. We would expect to see inclusion of a site wheelwash to keep Alton roads clear of mud.
- We would expect the Developer to provide every household with a Home User Guide, giving advice on the heating and hot water system(s), the photovoltaic installation and tariff options, on low energy white goods provided with the new homes, guidance for future selection of replacement units, all of which will enable the household to continue to achieve Energy & Sustainability targets. All white goods should be Triple A rated.

Proposed development at Land South West of Highmead House, Old Odiham Road, Shalden, Alton
55250/001
Land at Highmead House, Odiham Road Design and Access Statement

Comments:

- Para 1.1 States that “*access to be considered*”. Elsewhere in the document access is proposed. Appears inconsistent.
- Para 1.2 Mentions “*Interim Policy Statement on Housing*”. Whose interim policy and how does it lend weight to the proposal.
- Para 2.5 States Old Odiham Road is to the East of the site, but actually it is to the West.
- Para 2.7 States that the site is “*sustainably located*”. We cannot agree with this with the flooding issues already evidenced from the proposed landscape. In addition there are transport and traffic issues.
- Para 3.2 Quotes only part of the EHDC landscape assessment of the site. Developer should be directed to the Landscape Capacity Study and SHLAA Assessment Jun 13 which says:
The Land at Highmead House lies on high ground to the north of the town. In this location it will stand on an exposed area and devalue the very highly regarded underdeveloped skyline which is such a feature of the town. The existing dwellings which lie to the north of Gilbert White Way are on contours which represent the limit to which any new development should be permitted in order to maintain a relatively clear skyline. The site at Highmead House lies above this level.
- Para 5.1 As per comment at bullet 2 above.
- Para 5.3 States that “*vehicular access is from Gilbert White Way*” This contradicts what is said at bullet 1 above.
- Para 5.6 The last sentence states “*...designed to fit seamlessly in its surrounds and in particular to avoid development on higher ground*”. This is simply untrue. The whole site is on higher ground in the height range 155 - 165 metres. This is higher than any other development in Alton. Not acceptable.
- Para 5.16 mentions a sewage treatment plant, but does not reference this out to any other documentation. Is there really one proposed?
- Para 5.18 Mentions “*...providing good thermal insulation...*”, but no code level proposed. These words are hollow.
- Page 8:
 - Only one access and egress shown and this will be on steeply rising ground. Not acceptable for a development of this proposed size.
 - No proposals are made as to how the land to the top of the site is to be used. We would expect a commitment from the applicant to ensure that at a later stage there is no proposal to develop this area as well. Why is it not proposed as open play/public area?
- Para 6.1 - 7.17 The Design and Access part of the document ends at page 8 and then the applicant launches into a long winded justification of why the site should be approved for development when measured against National and Authority requirements. The Planning Portal at <http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/designaccess> Prescribes that: *A design and access (DAS) statement is a short report accompanying and supporting a planning application. They provide a framework for applicants to explain how a proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users.* The applicant has failed to achieve this.

Summary

This Design and Access Statement appears to have been assembled in a rush. It is inconsistent, fails to explain how the proposed development is a suitable response to the site and its setting, and demonstrate how it can



be adequately access by prospective users. It fails to acknowledge that this would be the highest development in the town and contrary to the Alton Town Design Statement. The EHDC Landscape Capacity Study correctly sums up the site as being beyond the limit up the valley at which further development should occur.



Proposed development at Land South West of Highmead House, Old Odiham Road, Shalden, Alton
55250/001
Statement of Community Involvement

Comments:

Rather than carry out a point by point assessment of the Statement of Community Involvement a general response here is intended. This is because we believe that the applicant has simply failed to engage with the Alton public. Key factors in this viewpoint are:

- It is claimed that “approximately 100 people attended the public display”. How was this measured and where is the evidence? On the ground feedback indicates that the figure could well have been significantly less than this.
- The number of feedback responses received at 15 on the day and 3 by e-mail indicates a failure by the applicant to get full information in regard to the development across to the Alton public. Those who did attend indicated that very little work had been done on the application and responses to questions were general in nature and not helpful. Hardly surprising therefore that there were only 18 responses.
- The conclusion of the Statement of Community Involvement reads:
 - *The comments from the screening opinion together with those from the public exhibition have provided valuable feedback. In particular the comments from the exhibition and subsequently on line have helped shape the development.*

From 18 public responses received the statement comes as quite a surprise.

- The public consultation event was poorly advertised and held in a location remote from the centre of town. All other major planning application public engagements have been held in the Alton Assembly Rooms in the centre of town.
- The applicant seems to believe that it is only residents in the immediate vicinity of the site who are pertinent to any engagement. We do not agree with this and believe that the application on such a scale concerns all of the people of Alton.

Summary

Public engagement is a fundamental requirement of NPPF. It is considered the Highmead House application fails to have achieved sufficient engagement. The resulting report therefore should not be taken as having met the requirement.



**Proposed development at Land South West of Highmead House, Old Odiham Road, Shalden,
Alton**
(Application No.55250/001)
Supporting Statement for 120 Houses

- Para 2.4.:
 - The description of the site is inaccurate. Approximately half of the site is in triangular in shape, whilst the other half is rectangular in shape.
 - The site is outside the Settlement Policy Boundary.
- Para 2.7:
 - Although it might be that the construction of the proposed individual dwellings is sustainable in detail, the overall location and development of the site is not.
 - The existing infrastructure is not sufficiently robust to support additional development e.g. the site is too far from the town centre to encourage non-motorised access, the site already has a known problem with serious water run-off which has led to localised flooding, there are known traffic hot-spots at the Anstey Lane/Gilbert White Way and the Anstey Lane/Anstey Road junctions. There are already on street parking problems on the main routes into town on Gilbert White Way, Anstey Lane and the Old Odiham Road all of which can only be made worse by the additional cars generated by the proposed 120 dwellings.
 - Also, presumably the statement from the Thames Water Authority regarding inadequate water supply/drainage as has been applied to other proposed developments around the town apply will apply to this site as well.
- PROPOSAL:
 - Para 5.3: There is only one vehicular access point to this long site, situated approximately three quarters of the way along the south side frontage. This single, imbalanced positioning can only lead to traffic build-up from, and into the site at peak times.
 - Para 5.6: The triangular section of the proposed development intrudes too far up the sloping site, exceeding the 165 metre contour line which we have defined as the maximum, and will be intrusive on the town skyline.
 - Para 5.8: This glib statement is not apparent on the indicative site plan. The last sentence is meaningless.
 - Para 5.14: The northern most boundary of the development **would** have a detrimental impact on the views from the town, as confirmed by Section A - A of the Site Sections part of the Report.
 - Para 5.16:
 - Serious water run-off from the site is already known. The proposed development will only worsen the situation unless adequate measures are included in the design. What are they?
 - What are the actual proposals for dealing with sewage and the so called “sustainable” drainage opportunities mentioned?
 - Para 5.20: Not accepted. - The site which is on a hill, is too far from the town centre and the major shopping opportunities, to encourage non-motorised means of transport.
- POLICY:
 - Para 6.13:



- Bullet Point 2: The site is not readily accessible by public transport and on foot as stated. - see above.
 - Bullet Point 4: Adequate infrastructure and services are not available.
 - Bullet Point 11: The proposed development does not promote integration of transport modes and an efficient public transport system as stated.
 - Bullet Point 15: As far as can be understood from the Illustrative Site Plan the public open space area to the north of the site will simply left untouched. Who will be responsible for its maintenance and up keep? There is no mention of a properly equipped children's play area which would be expected on a development of this size.
- RATIONALE FOR THE DEVELOPMENT:
- Para 7.34: Generally there are both transport and highways reasons to object to the proposed development. - see 5.3 and 6.13 above.
 - Para 7.38: Presumably a `typo` with regard to the “720” new homes mentioned.
- CONCLUSION:
- Para 8.3:
 - The proposed development for 120 new dwellings is not sustainable in an overall way unless the existing infra-structure is improved. Particularly when considered in conjunction with other nearby proposed developments e.g. Cadnams Farm - 275 new dwellings and the land to the west of Old Odiham Road - 98 new dwellings. Together they will place interminable pressure on the existing infrastructure of the town.
 - A Transport Study for Alton as a whole is currently being prepared, and it is hoped that it will ready during November of this year .Nothing further should proceed until the results are known.



ANNEX 8

**Proposed development at Land South West of Highmead House, Old Odiham Road, Shalden, Alton
55250/001
Geo Environmental Assessment**

- Generally seems to be a thorough and professional Report but:-
 - Acknowledges that there is a potential Moderate - High risk of contamination on the site.
 - Drainage - Whilst it is known that there is already a problem with site run-off water, no mention is made of this in the Report.
 - Site Sections: Section A -A confirms that ridge lines will be above the acceptable contour line.