Land at Lord Mayor Treloar Hospital Site, Chawton Park Road, and land East of Selborne Road, Alton - 30021/056
PART 1

EAST HAMPSHIRE DISTRICT COUNCIL

PLANNING COMMITTEE

REPORT OF THE SERVICE MANAGER PLANNING DEVELOPMENT

Applications to be determined by the Council as the Local Planning Authority

PS.446/2015
4 February 2015

SECTION 1 – SCHEDULE OF APPLICATION RECOMMENDATIONS

Item No.: 01

The information, recommendations and advice contained in this report are correct as at the date of preparation, which is more than one week in advance of the Committee meeting. Because of the time constraints some reports may have been prepared in advance of the final date given for consultee responses or neighbour comments. Any changes or necessary updates to the report will be made orally at the Committee meeting.

PROPOSAL  HYBRID APPLICATION: Development, following demolition of existing buildings to include: 1) Outline application (all matters reserved, except access) for: a) Residential development (with a net developable area of 7.12 hectares) at land east of Selborne Road; b) Residential development (with a net developable area of 11.5 hectares) and provision of a country park on land at the former Lord Mayor Treloar Hospital, Chawton Park Road; c) Associated vehicular, pedestrian and cycle access to the highway network, general amenity areas (including informal and formal open spaces), ecological areas; equipped play areas; landscaping; vehicle and cycle parking; bin stores; electricity sub-stations; lighting; drainage and associated infrastructure works, including sustainable drainage systems; and associated engineering and service operations. 2) Full application for: d) Highways works, including: i. a new roundabout in Selborne Road to provide entry/exit to the 'Land east of Selborne Road' site and new link to Winchester Road; ii. construction of a new road and associated groundworks linking Selborne Road with Winchester.
Road, following demolition of Stonehill farmhouse and associated buildings; iii. re-arrangement and closure of Winchester Road at its eastern end and provision of new turning area; iv. works to provide a new roundabout at the junction of Selborne Road with Winchester Road (as existing), Butts Road and Whitedown Lane; v. associated works within the highway at the junction of Chawton Park Road and Whitedown Lane; vi. a new access into the 'former Lord Mayor Treloar Hospital' site from Chawton Park Road; vii. works within the highway in Northfield Lane; viii. pedestrian crossing at Whitedown Lane to provide access to the new country park; e) Works associated with the construction of a replacement railway bridge across Whitedown Lane following removal/demolition of existing (Butts Bridge) (as additional information received 02/07/2014, 11/07/2014, 29/07/2014, 06/08/2014, 12/11/2014 and 26/11/2014)

LOCATION: Land at Lord Mayor Treloar Hospital Site, Chawton Park Road, and land East of Selborne Road Alton

REFERENCE 30021/056 PARISH: Alton

APPLICANT: The Homes & Communities Agency and "The Selborne Road Landowners"

CONSULTATION EXPIRY: 24 December 2014

APPLICATION EXPIRY: 06 August 2014

COUNCILLOR(S): Cllr M Maynard and Cllr A Joy

SUMMARY RECOMMENDATION: OUTLINE ANF FULL PERMISSION

This application is included on the agenda as it is a departure from the adopted Local Plan.

Site and Development

Application Site

The application site consists of two separate areas of land. Both are located to the south of the settlement and are outside the settlement boundary. The areas of land are known as, land at the Former Lord Mayor Treloar Hospital site and Land East of Selborne Road.

Former Lord Mayor Treloar Hospital Site:

This has a site area of approximately 26.43ha and is located to the west and north of the existing Treloar Estate. It is to the north of Chawton Park Road and comprises open land. There are some buildings on site, a former nurses home (Robertson House), two former water towers and a dilapidated bunker in one of the northern fields.
The lower part of the land rises gently from the existing estate and Chawton Park Road, whilst the most northern part rises more steeply. There is woodland to the west and north, whilst the site itself has several tree belts and hedgerows marking field boundaries.

Land East of Selborne Road.

This has a site area of approximately 10.6ha. It has a boundary with Selborne Road to the west. A residential property also shares a boundary with the site and fronts on to Selborne Road adjacent to the roundabout. The frontage to Selborne Road is well vegetated with trees and hedgerows. The land rises sharply up from Selborne Road and levels out as it gets further east towards Borovere Lane. The land has two hedgerows running across the site, with field entrances breaking through each. The top of the site (east) adjoins Borovere Lane, opposite to Borovere Farm, and the rear of properties fronting onto that lane.

Other Land

The site edged red also includes land around, and including, Butts Bridge and its roundabouts, as well as a section of Selborne Road, and land to the west of Selborne Road, connecting it to Winchester Road.

Constraints

The sites are outside of, but directly adjacent to, the settlement policy boundary for Alton, as identified in the East Hampshire District Local Plan: Second Review (Local Plan).

The sites are not subject to any national landscape designations and are located outside of the South Downs National Park, with the Park boundary lying to the south of the A31. The sites are not identified as falling within any international ecologically designated sites. There is a Site of Importance for Nature Conservation (SINC) within the Lord Mayor Treloar Hospital Site.

The French Horn Public House is a Grade II Listed Building and part of the site is adjacent to the Butts Conservation Area.

Proposals as originally submitted:

The application is a Hybrid application which consists primarily of an outline planning application combined with some elements which seek full planning permission. The application seeks the following:

1) Outline application (all matters reserved, except access) for:

a) Residential development (with a net developable area of 7.12 hectares) at land east of Selborne Road, Alton
b) Residential development (with a net developable area of 11.5 hectares) and provision of a country park on land at the former Lord Mayor Treloar Hospital, Chawton Park Road, Alton;
c) Associated vehicular, pedestrian and cycle access to the highway network, general amenity areas (including informal and formal open spaces), ecological areas; equipped play areas; landscaping; vehicle and cycle parking; bin stores; electricity sub-stations; lighting; drainage and associated infrastructure works, including sustainable drainage systems (SuDS); and associated engineering and service operations.

2) Full approval for:

d) Highways works, including:

i. a new roundabout in Selborne Road to provide entry/exit to the ‘Land east of Selborne Road’ site and new link to Winchester Road;

ii. construction of a road and associated groundworks linking Selborne Road with Winchester Road, following demolition of Stonehill Farmhouse and associated buildings;

iii. re-arrangement and closure of Winchester Road at its eastern end and provision of turning area;

iv. works to provide a roundabout at the junction of Selborne Road with Winchester Road (as existing), Butts Road and Whitedown Lane;

v. works within the highway at the junction of Chawton Park Road and Whitedown Lane;

vi. a junction to provide access into the ‘former Lord Mayor Treloar Hospital’ site from Chawton Park Road;

vii. works within the highway in Northfield Lane;

viii. pedestrian crossing at Whitedown Lane to provide access to the proposed country park;

e) Works associated with the construction of a replacement railway bridge across Whitedown Lane following removal/demolition of existing (known as the Butts Bridge).”

It can be seen from this that the full element of the application relates to the highway works and replacement bridge.

The planning application has been supported by the following documents;

- Location plan
- Indicative Masterplans for LMTH and LERSR
- Parameter Plans for LMTH and LERSR
- Plans of highways and Butts Bridge improvement works
- Planning Statement (including Planning Obligations Statement)
- Affordable Housing and Viability Statement
- Transport Assessment and Travel Plan Framework
- Statement of Community Involvement
- Utilities (electricity, gas, water, sewerage) Assessment
- Air Quality Assessment
- Noise Assessment
- Viability Assessment

Lord Mayor Treloar Hospital:

Design and Access Statement
Historic Environment Desk Based Assessment
Arboricultural Assessment
Energy Statement
Flood Risk Assessment
Landscape and Visual Impact Assessment
Geo-environmental Desk Study
Asbestos Re-Inspection Assessment
Lighting Assessment
Ecology Assessments

Land East of Selborne Road

Design and Access Statement
Bridge Design and Access Statement
Heritage/Archaeology Assessment
Findings of Arboricultural Assessment (incorporating Arboricultural Impact Assessment and Tree Protection Measures)
Energy Statement
Flood Risk Assessment
Landscape and Visual Impact Assessment
Phase 1 Contamination Assessment Report
Lighting Assessment
Nightscape Assessment
Ecological Appraisal

Within the Lord Mayor Treloar site approximately 274 units could be provided. On the Land to the East of Selborne Road it is indicated that approximately 255 units could be provided. This would give a total of approximately 529 units. It is proposed to provide 20% affordable housing across the development site. The masterplans for both sites show indicative parcels of development.
Lord Mayor Treloar Hospital Site

The majority of development would be immediately to the west and north of the existing estate with a single parcel located in the north of the site. The Masterplan also shows the country park area located to the north-east of the site with associated car parking. The two water towers within the site would be retained, the north-westerly one to be used as a bat habitat, the southerly tower would be marketed for alternative uses. Robertson House is shown to be retained also.

The plan also shows areas of landscaping and strategic planting as well as a suggested location for a play area.

The majority of dwellings would be a maximum of 2.5 storeys in height, with the exception of parcel H fronting onto Chawton Park Road, which would be a maximum of 3 storeys.

Land East of Selborne Road

The Masterplan shows residential parcels together with an area of open space to the north-east of the site. The Masterplan also shows indicative heights ranging from a mixture of 3 – 2.5 storey on the lower levels of the site fronting onto Selborne Road, and 2 – 3 storey properties on the upper part of the site.

Relevant Planning History

30021/055 - Request for Screening Opinion was undertaken in January 2014 under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, at which time the Council’s opinion was that the proposed development did not constitute EIA development within the meaning of the 2011 Regulations

30021/019 - Mini-roundabout, two accesses from Chawton Park Road, cycleway and associated signing and lining (duplicate application) – Approved 10 July 2003

30021/016 - 183 dwellings with associated access roads, car parking, open space and landscaping (after demolition of existing buildings) (as amplified by information received 03/04 and plans received 17/07/02) – Approved 1 August 2002.

30021/010 - Outline – Erection of 145 dwellings and community centre/church, provision of public open space and access road (as amplified by additional information received on 27/11/98, 13/01/99 and 25/01/99 and 5/5/99) – Appeal allowed by notice dated 30 March 2000.

Other current major residential development proposals in the Alton area comprise;
55428/001 - Land at Cadnam Farm, Upper Anstey Lane, Shalden, Alton- Outline application for up to 275 dwellings together with associated landscaping, children’s play area, open space, infrastructure, car parking and roads (as additional information received 03/09/2014) – Not yet determined

55222/001 - Land East of Will Hall Farm, Basingstoke Rd. Alton – Residential development comprising up to 200 dwellings with associated access, highway works, drainage works (SUDS) open space and landscaping – Not yet determined

55250/001 - Land south west of Highmead House, Old Odiham Rd. Shalden, Alton – Outline Application for residential development of 120 houses comprising 49 affordable and 72 open market houses – Appeal lodged against non-determination (Hearing 1 April 2015)

55097/001 - Land South West of Old Odiham Road, Alton – Development of 97 residential dwellings, associated landscaping and transport provisions (as amended by revised Masterplan and additional information received 05/08/14). Refused 23 December 2014.

**Development Plan Policies and Proposals**

**East Hampshire District Local Plan: Joint Core Strategy (2014)**

CP1 - Presumption in favour of sustainable development  
CP2 - Spatial Strategy  
CP10 - Spatial strategy for housing  
CP11 - Housing tenure, type and mix  
CP13 - Affordable housing on residential development sites  
CP16 - Protection and provision of social infrastructure  
CP18 - Provision of open space, sport and recreation and built facilities  
CP19 - Development in the countryside  
CP20 - Landscape  
CP21 - Biodiversity  
CP24 - Sustainable construction  
CP25 - Flood Risk  
CP26 - Water resources/ water quality  
CP27 - Pollution  
CP28 - Green Infrastructure  
CP29 - Design  
CP31 - Transport  
CP32 - Infrastructure

**East Hampshire District Local Plan: Second Review (2006)**

T3 - Pedestrians and Cyclists  
T4 - Protection of Public Footpaths
This document has been issued for consultation for a period up to 6th February 2015. Housing allocations with Alton will be contained within the Alton Neighbourhood Plan.

Five Year Housing Land Supply.

An assessment of housing land supply dated 1st January 2015 states that the Authority has a five year housing land supply of 5.09 years.

EHDC Interim Housing Policy Statement (IHPS)

This is a non-statutory interim planning policy statement to guide housing development applications until the Council is able to demonstrate a five year housing land supply or until a Local Plan (Allocations) is in place. At the time of preparation of this report the IHPS was still a material consideration, however a report is due to be considered by Cabinet on 28th January which would recommend to Council that the document be rescinded. An update will be provided on this matter.

Alton Neighbourhood Plan

The Alton Neighbourhood Plan designation order was confirmed on 30 May 2014. A public exhibition giving draft details of the plan took place on 22nd November 2014.

Planning Policy Constraints and Guidance

National Planning Policy Framework (NPPF)

The NPPF sets out three roles (economic, social and environmental) that should be performed by the planning system. The Framework states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):

- making it easier for jobs to be created in cities, towns and villages,
- moving from a net loss of bio-diversity to achieving net gains for nature,
- replacing poor design with better design,
- improving the conditions in which people live, work, travel and take leisure and,
- widening the choice of high quality homes
The following sections of the NPPF are considered to be particularly relevant to the consideration of this application:

- Section 1; Delivering sustainable development.
- Section 4; Promoting sustainable transport.
- Section 6; Delivering a wide choice of high quality homes.
- Section 7; Requiring good design.
- Section 10; Meeting the challenge of climate change, flooding and coastal change.
- Section 11; Conserving and enhancing the natural environment.
- Section 12; Conserving and enhancing the historic environment.

The Butts, Alton Conservation Area
Conservation areas are designated areas of special architectural interest, the character or appearance of which it is desirable to preserve or enhance. It is the quality and interest of the area rather than individual buildings which is important. The consequence of conservation area designation is not to preserve conservation areas unchanged but requires that new development is designed in a sensitive manner which has regard to the special character of the area. The Council's policy on allowing development within conservation areas is set out in Policy HE4 of the East Hampshire Local Plan: Second Review, where development will be permitted only where it would preserve or enhance the character or appearance of the area.

Town Design Statement - Alton Town Design Statement - non statutory planning guidance that has been the subject of public consultation and therefore is a material planning consideration.

Alton 2020 Town Plan 2005

Consultations and Town/Parish Council comments
The details below are a summary of the responses received with the exception of the Town Council comments. A transcript of the full comments can be found at Appendix 1 at the end of the report.

Archaeology Section - The analysis and conclusions of the desk based assessment submitted with the application are agreed. The following conditions are suggested: 1) That no development shall take place until the applicant has secured the implementation of a programme of archaeological assessment in accordance with a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority. 2) That no development shall take place until the applicant has secured the implementation of a programme of archaeological mitigation of impact in accordance with a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority. 3) Following completion of archaeological fieldwork a report will be produced in accordance with an approved programme including where appropriate post-excavation assessment, specialist analysis and reports publication and public engagement.
Conservation Officer - Due to its location close to the Butts Conservation the design and layout of the Selborne Road development will be key to the success of the scheme. However, the site is largely screened from the conservation area and as such the proposed access that is subject of this outline permission would not have an adverse impact. Outline residential development at the Former Lord Mayor Treloar Hospital The site is set some distance from Chawton and Butts Conservation Areas and listed buildings with the nearest being the Museum at Treloar Hospital which now acts as a store. In terms of these designated heritage assets it is not considered that this proposal will have an adverse impact. Within the site there are a number of buildings that related to the former Lord Mayor Treloar Hospital. However, many of these could not be classified as non-designated heritage assets. Of the buildings the two water towers and Robertson House are of local historic interest. The water towers in particular are of interest. Both of them could be adapted for another use or could even be retained as folly’s that would provoke interest within the landscape. Robertson House appears to have been one of the original hospital buildings constructed in the early 20th century. Although altered from its original state and in a particularly poor state of repair I would consider the building to be of local interest. Little justification is given in the application for its removal other than the cost of refurbishing the building is too high. It is recommended that it is integrated into the overall scheme. If refurbished it would certainly make a positive impact on the area particularly due to its dominant position in the landscape. Works associated with the construction of a replacement railway bridge following removal/demolition of existing. The key policies in the NPPF to be considered in the assessment of this application are as follows: NPPF Paragraph 134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Paragraph 135. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset. A local heritage asset is defined as:- 'A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Local heritage assets are valued components of the Historic Environment’. It is considered that Butts Bridge is a Local Heritage Asset that meets the definition shown above. It forms a relatively attractive gateway feature to Alton and is of architectural merit clearly defining its history as part of the Watercress Line. Although local heritage assets are not protected from demolition by national legislation, the NPPF is clear that the effect on such an asset, or its setting, is a material planning consideration. Butts Bridge has strong historic associations with the development and evolution of the town and its social history. As a result it can be concluded that the building has strong historical and communal value especially as a landmark within Alton. Given the significance of the building outlined above it is concluded that the total demolition and loss of the heritage asset will amount to NPPF ‘substantial harm’. However, the NPPF does go on to say that where there is harm to the heritage asset this has to be weighed against the public benefit which is explored below. Impact on wider conservation area and design of bridge. Although located outside the Butts Conservation Area the bridge nonetheless makes an important contribution to the character of the conservation area as it forms an attractive gateway feature. In assessing the impact of the demolition of the bridge on the significance of the setting of the conservation area it is
considered that the proposal will not preserve or enhance the character and appearance of the conservation. However, the level of harm caused is considered to be less than substantial. Although planning permission is not sought at this time for the details of the bridge deck cladding the overall design of the bridge needs to be considered. It is recognised that there are numerous technical and financial restrictions that constrain the applicants ability to address all the design issues with the bridge. Whilst the design of the bridge is not necessarily of a landmark style it is not considered that the proposal would have a negative impact in the conservation area. There are some shortcomings with the scheme particularly with the layout of the roundabout but it is not considered that these are enough to justify refusal in their own right. Public Benefits. As before the concerns expressed about the demolition of the existing bridge must be balanced against the very real and demonstrable benefits the new bridge and associated highway works would bring to the wider community. It is claimed in the proposal the following public benefits will occur if granted permission: - Deliver open market housing to meet local need and the requirements of the NPPF and the East Hampshire/ South Downs National Park Joint Core Strategy; - Deliver much needed affordable housing; - Address existing highway problems at Butts Junction, including the widening of Butts Bridge over Whitedown Lane; - Supply funding towards the construction of a replacement Sports Centre and leisure facilities for Alton and the surrounding area; and - Provide a new publicly accessible 8 hectare Country Park for the town. It above points are to be delivered as part of the proposal it would appear that therefore the public benefits of the scheme could be considered significant enough to outweigh any perceived harm to the to the non designated heritage asset that is Butts Bridge. Impact on Grade II listed French Horn PH & tank trap. The applicants have not addressed the impact the proposal might have on the Grade II listed PH that sit close to the Bridge. Whilst I am not convinced there will be any impact this should be addressed in the submission as currently it is devoid of detail on this point. It should also be noted that on the south east side of the existing bridge, adjacent to the roundabout, a concrete tank trap survives from the 2nd World War. Whilst not a thing of beauty, it does have local historical value and should be preserved in the locality. Conclusion.

It is considered that the proposed bridge will potentially preserve the appearance of the nearby conservation area but there is a degree of harm in the loss of the existing railway bridge which is part of Alton's heritage. It is also recognised that there are numerous technical and financial restrictions that constrain the applicants ability to address all the design issues of the bridge that have been raised. On balance, the significant public benefits the proposal is likely to bring would on balance justify accepting any harm the removal and reconstruction of the bridge might have.

Hampshire and Isle of Wight Wildlife Trust - The Trust wishes to re-affirm its objection to this application. The development site includes the loss of a species-rich habitat type (Lowland Calcareous Grassland), which has been identified as a habitat of principal importance under Section 41 of The NER Act. In addition the development includes the development of SINC sites which have been designated for their nature conservation value, which is contrary to locally adopted and national planning policies. Sites that have been designated for their nature conservation should not be included within development plans, and their inclusion is contrary to many local and national planning policies.
HCC - Rights of Way Officer (Access Devt Team) - The chief concern with this application is with the landscape and visual impacts for users of the public rights of way that run alongside both of the proposed sites, and particularly the proposal for new development on that part of the Lord Mayor Treloar (LMT) site immediately to the east of Chawton Footpath 1. Notwithstanding the screening and other mitigation measures proposed within the Design and Access Statement, this will have an urbanising impact on what is currently a rural path with fields on either side. On that basis, we would be inclined to object to this application. One possibility for offsetting this impact would be to make provision for improving the local rights of way network, for example by providing an off-road link for walkers, horseriders and cyclists to the north-west of Chawton Park Road between Mounters Lane (Alton Restricted Byway 506) and Chawton Bridleway 4. This would enable users of those rights of way to avoid a dangerous on-road link identified by local users consulted during research for the Countryside Access Plan. It would also contribute to the 'wider green network that will promote permeability into and out of the new and existing neighbourhood' and the 'strong green infrastructure network, which promotes sustainable movement, biodiversity and recreation' envisaged on page 45. These intentions within the D&A statement link closely with the work that the Countryside Service is doing in East Hampshire and across the rest of the county to implement the Countryside Access Plan.

Thames Water - Waste Water. Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following ‘Grampian Style’ condition imposed. ‘Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed’. Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Water Comments. We would recommend that developers produce drainage strategies as part of their evidence base when submitting their planning applications. The drainage strategy should be produced in consultation with Thames Water to show that capacity exists in both the on and off site infrastructure or that it can be provided ahead of occupation. Where additional infrastructure is required the strategy should go on to identify what infrastructure is required, where and funded by whom.

HCC - School Organisation Officer - In terms of school places Alton is full and forecast to remain so for the foreseeable future. Consequently any development brought forward within Alton will require a contribution to be paid towards the expansion of the schools within the town or the provision of a new school. The application on the website does not give the number of dwellings proposed but as a guide a sum of £5,057 per dwelling towards the cost of an expansion to the primary places in the town. If a new school is required they will be seeking a site of 2ha (at nil cost) together with a contribution of £6,278 per dwelling towards the cost of the new provision. Similarly there may be a need to expand the secondary
provision (dependent upon the number of dwellings proposed). They will be able to be more specific when actual numbers of dwellings are known and will update this response at that time.

**Hampshire Fire and Rescue Service** – No objections.

**EHDC Housing Officer** - This application proposes 20% affordable housing, which falls short of the 40% target of CP13 in the JCS. The policy allows for individual circumstances and viability to be taken into account when considering the amount of affordable housing. There is some reference within the application that a financial contribution towards the provision of a new sports facility will be made which may be the justification for a lower percentage of affordable housing. I would recommend that further supporting evidence is provided with the application to demonstrate it is appropriate to provide 20% affordable housing on this site.

The housing need for affordable rented accommodation in Alton is very high, as detailed below: (figures taken from Hampshire Homechoice Register): 1 bed: 473 2 bed: 235 3 bed: 77 4 bed: 23 Total: 808 Included within these figures are applicants with a local connection to Alton (live, work or have family there). The numbers of applicants with this local connection are currently: 1 bed: 290 2 bed: 105 3 bed: 35 4 bed: 12 Total: 442 In addition to the housing need for rented accommodation there are a further 72 households registered with the Help to Buy Agent requiring intermediate housing in Alton. The majority of this need is for two and three bedroom accommodation. The size, type, location and tenure of the affordable housing provision should be agreed with Housing Development prior to the submission of a full or reserved matters application. This should be secured through a suitable legal agreement, with triggers for the transfer of the affordable housing land / units to an acceptable Registered Provider. As a guide to the applicant I would recommend the following affordable mix, as a starting point, with the tenure split as 70% affordable rent to 30% intermediate. 1 beds: 25% 2 beds: 50% 3 beds: 20% 4 beds: 5% The affordable homes should be genuinely pepper-potted throughout the development as required by policy CP.13. The Design and Quality of the affordable homes should be to HCA standards to ensure eligibility for grant, if available. In summary this application does not currently meet the requirements of CP13 and insufficient evidence to support a lower percentage of affordable housing has been supplied.

**Highways Development Planning Strategic Transport** - I can confirm that subsequent to our previous response a preliminary design check submission has been submitted by the Applicant. This process has enabled the Highway Authority to undertake a detailed review of the off-site highway elements of the scheme.

The Highway Authority have considered the operational performance, safety, design and deliverability of the proposals. The proposed improvement scheme to deliver an enlarged roundabout at The Butts junction and a roundabout to access the Selborne Road element of the site as set out on drawing B14149001C are acceptable in principle. The proposed priority junction to serve the Chawton Road aspect of the development as shown on drawing B14149-007-B is also considered acceptable. In order to implement the highway works set out on these drawings it will be necessary for the Applicant to enter into a Section 278 Agreement with the Highway Authority.

The design checking process has identified a preferred approach for the proposed signalisation of the Chawton Park Road/Whitedown Lane junction and traffic calming on Northfields Lane and this is discussed further below.
Chawton Park Road/ Whitedown Lane junction
The design check submission included proposals to signalise the above junction and this has been reviewed in terms of operation and design.

Whilst the applicant has demonstrated that the proposed signalised junction is deliverable in design terms, the operation of the proposed junction in the post development scenario is of concern. The LINSIG modelling outputs demonstrate that once the pedestrian crossing phase is called every cycle, which the Highway Authority consider realistic for the peak periods, the signals are forecast to generate additional queuing on Chawton Park Road over the existing layout. A technical note submitted by the applicant set out to address these issues, and included revised modelling of the existing layout.

Chawton Park Road is shown to be operating over theoretical capacity during the future year (2020) plus committed development and proposed development scenario and mitigation of the development related impact at this junction therefore remains justified.

However, on-site observations of the operation of the existing junction during peak periods reveal that while queues do form on Chawton Park Road, these often disperse quickly, and opportunities are also afforded to vehicles exiting, when the adjacent controlled crossing facility is called, which is frequent during peak times. The modelling summary is based upon assumptions that queuing is sustained throughout peak periods and is therefore considered to represent a ‘worst case scenario.’

It is also difficult to forecast the impact resulting from the significant improvement scheme at ‘The Butts’ junction and traffic management measures on Chawton Park Road in terms of the redistribution of both existing and future traffic movements through this junction. The Highway Authority are therefore minded that introducing signals at this junction prior to occupation of the development is premature and monitoring of post development conditions should be undertaken in order to ensure the optimum mitigation scheme is delivered. A contribution of £125,000 has been agreed with the Applicant in order for the Highway Authority to take this forward.

Chawton Park Road/ Northfields Road traffic calming
The design check submission also set out proposals to provide a highway narrowing under the existing bridge on Northfields Road. As set out in our previous response, in order to effectively manage traffic speeds, this should be delivered in the context of a wider traffic management scheme. The Highway Authority have therefore agreed a contribution figure of £100,000 to deliver a comprehensive traffic management scheme on Chawton Park Road/Northfields Road. This approach will ensure that the local community are able to influence the scheme, and the County Council will undertake public consultation on a range of traffic management options.

Whitedown Lane/Basingstoke Road
The Transport Assessment work demonstrates that the proposed development will result in detriment to the operation of the Whitedown Lane/Basingstoke Road junction and it would be reasonable for the developer to contribute towards improvements at this junction.
It is however also acknowledged that the cost associated with delivering the improvement to ‘The Butts’ junction is considerable and whilst the Highway Authority retain the view that securing a contribution figure towards improvements at this junction can be justified, it is also acknowledged that this junction is to operate at theoretical capacity in the future year scenario in the absence of the proposed development. It is therefore recommended that the agreed contribution of £225,000 set out above be flexibly worded in the Section 106 Agreement to allow a proportion to be allocated to the Whitedown Lane/Basingstoke Road, should funding from alternative development sites not come forward.

Pedestrian and cycle linkages
As set out in our previous response, the Highway Authority are satisfied that both sites are conveniently located in terms of sustainable access to key services. Whilst existing routes are in place, the East Hampshire District Council Transport Statement highlights a number of pedestrian and cycle improvement schemes between the site(s) and Alton town centre. It is therefore considered reasonable for a proportion of the agreed Contribution to be spent on these schemes, particularly given the National Cycle Network passes the site.

Section 106 requirements
Financial Contribution
As set out above the Highway Authority have agreed a Contribution figure of £225,000 with the applicant which is to be secured towards the following mitigation measures:

- Improvements to the Chawton Park Road/Whitedown Lane junction
- Traffic management measures on Chawton Park Road and Northfields Lane
- Improvements to Whitedown Lane/Basingstoke Road
- Walking and cycling linkages from the site(s) to the Town Centre
- Wider mitigation measures identified in the Alton Transport Study

These schemes are directly related to the proposed development in terms of both proximity to the proposed development site, and operational impact as documented in the Transport Assessment.

The Contribution of £225,000 is also considered reasonable as it has been calculated using a first principles approach based on the cost of delivering the specific infrastructure required to support the development proposals.

The above Contribution requirement is in line with both Local and National Policy. East Hampshire District Council’s Joint Core Strategy sets out that developments need to “plan for new highway infrastructure that will reduce congestion, improve highway safety, increase accessibility to the District’s town and district centres and enhance economic prosperity of the District”. The National Planning Policy Framework also confirms that development needs to be supported by ‘improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.’
Travel Plan

As set out previously, a framework travel plan has been submitted to support the planning application. This will be utilised to form the basis of a full travel plan document prior to occupation of development and will be secured via the Section 106 Agreement along with the Highway Authority’s assessment and monitoring fees of £16,500. It will also be necessary for a bond to be provided for the cost of measures set out in the Travel Plan to ensure these are delivered by the Applicant.

Off-site Highway works

The site access arrangements and improvement scheme to ‘The Butts’ junction will be secured by way of Section 106 Agreement. It will be necessary for these works to be technically approved and undertaken prior to commencement of development under the terms of a Section 278 Agreement.

Delivery of ‘The Butts’ improvement scheme will undoubtedly be sensitive and the Highway Authority will require a bespoke Traffic Management Plan for these works to be secured by way of the Section 106 Agreement.

Recommendation

In light of the above, the Highway Authority raise no objection to the proposed development subject to the following Section 106 Obligations;

Financial contribution of £225,000

Delivery of off-site highway works as shown on drawings B14149001-C (The Butts/ Selborne Road access roundabout) and B14149-007-B (Chawton Park Road access)

Traffic Management Plan for Butts Improvement works

Travel Plan and associated assessment and monitoring fees and Travel Plan Bond

Construction Traffic Management Plan

South Downs National Park Authority – Principle of Development The East Hampshire Joint Core Strategy makes an allocation of a minimum of 700 new homes at Alton and these development proposals, should they be considered acceptable by EHDC, while potentially being seen as premature to the Alton Neighbourhood Plan, would help in meeting that allocation target and add to EHDC’s housing land supply position for the part of the district outside of the National Park. Landscape Impact: The height of the land proposed for development at both the Treloar site and land east of Selborne Road is a big concern. For the Treloar site, development on the upper slopes to the west of the site would appear unrelated to Alton being located in the Wey Valley and this land is clearly high on the valley side and visible from higher ground within the National Park from some distance. Also the change of character from farmland to a country park would be detrimental to these views owing to the artificialness of the layout high on the valley side. This is likely to adversely affect the setting of the National Park and its special qualities. The corresponding opposite valley side land to the East of Selborne Road - is also high land to the south of the site which would mean that
development would be spilling over the valley side, whereas it is currently within the valley setting of the Wey. The cumulative impact of both sites of high ground being developed is an issue which should be considered in detail in views from the National Park. The location of Alton within the valley is key to its character and also that of the adjacent National Park. The LVIA assesses incorrectly against SQ1 as follows: The description of the views from the South Downs Way is an example not an exclusion of all other views as clearly this would be inappropriate and inaccurate. It would be helpful if the consultants could prepare a block ZTV for both sites so that the cumulative impacts of development on the valley sides can be properly assessed. Rights of Way With these developments there should be serious investment in access links in and around the settlement of Alton; one such route that is being developed at the moment is the Writers Way. The specification and development of the Writers Way could be enhanced through investment but options for all Rights of Way linking to the National Park should be considered with this level of development. The applicant should be asked to pay the costs to Hampshire CC for investigating and implementing improvements.

EHDC - Landscape Officer - I am concerned about the proposal to extend development up to the highest part of the site adjacent to Ackender Wood. This would put the ancient woodland under extreme recreation pressure from the adjacent population therefore I consider that this highest part of the site should be retained as public open space. A wide landscape buffer between woodland/meadowland and housing will be necessary to reduce the impacts on the protected habitats. I question the conclusion of the LVIA for land east of Selborne Road 'There will be some harm/loss as a result of the proposals but this will not be an overriding change...' I agree that the interest features of the SDNP will not be materially affected by the proposed development and that screen planting will prevent adverse visual effects on users of the A31. However, I am concerned about the negative effect on the character of the approach to Alton from the south, which although not tranquil or a designated landscape, is still largely rural, with fields sloping down to the road from the east. The development proposals show the lower level field and the sloping field above it filled with new houses, the roofs of which would be visible above the existing boundary planting and through the large gap created by the access road. This impact could be mitigated by locating the public open space on the lower field and by restricting development of the sloping field to the northern half. This would involve concentrating the new housing in the eastern half of the site in order to minimise impact on the important gateway to Alton from the south (and to the national park from Alton).

I remain concerned about the landscape impacts of the proposal to extend development up to the highest part of the Lord Mayor Treloar Hospital site adjacent to Ackender Wood due to the future recreation pressure on the woodland. Dense planting of the landscape buffer between woodland and housing will be necessary to reduce the impacts on the protected habitats. I accept however, that the proposed structure planting that has been included in the eastern half of the site should screen the housing from distant views over time.
EHDC - Arboricultural Officer - No objection in principle to the outline elements of this application for residential development on the east side of Selborne Road or the Lord Mayor Treloar Hospital Site. Part B, The Lord Mayor Treloar Hospital site does remove some trees that are the subject of a Tree Preservation Order without good arboricultural reason and so is not strictly in accordance with policy C6 of the currently adopted local plan. The point at which the highway passes through the southern end of the woodland belt, marked as WG3 will result in the loss of a greater number of trees than is shown. I would expect that all the trees to the south of the highway would also need to be removed for safety reasons because they would be exposed to wind pressures that they have never been exposed to before and because of their proximity to the existing development to the south. It would be worth considering moving the highway to a more natural space in the woodland to the north of the tree marked 47 on the plan which would have a much lesser impact on the local landscape. Strong objection is raised against the full application (Part 2) sections i to iv ad section e. This part of the application removes a large number of trees, subject to a Tree Preservation Order, at the north eastern end of area A1 and A2 of Tree Preservation Order (EH30)1976. (Part of Area A1 is also within The Butts Conservation Area) It will also remove Group 2 and Group 3 of Tree Preservation Order (EH532)2002 which are the most important trees at the northern end of Winchester Road, giving the lane it’s rural character. In my view this proposal would cause significant damage to the character of the local landscape and would spoil what is currently an attractive entrance to the town rather than improving it as claimed. There is no good arboricultural reason to justify this removal the proposal is, therefore, contrary to policy C6 of the currently adopted local plan.

I note the further comments from the agent. I still do not accept that there is sufficient Arboricultural justification for the removal of all of G3 and all but 1 tree in G2 of Tree Preservation Order (EH532). My previous consultation comments, therefore, remain unaltered.

HCC - County Ecologist - Thank you for re-consulting me in relation to the recently submitted and amended Addendum Ecology Report EDP286_06d (EDP, November 2014). In summary, I consider that the information provided is now sufficient to enable the LPA to have confidence that the issue of impacts to protected species have been addressed in sufficient detail. I strongly recommend that a fully-detailed ecological mitigation plan is secured via condition. I have no significant additional comments to make beyond those provided in my consultation response dated 24th October 2014, which I have repeated below with some minor amendments: This development will affect dormice, which receive strict legal protection under UK law by the Wildlife and Countryside Act 1981 (as amended) and under EU law by the Conservation of Habitats and Species Regulations 2010 (commonly referred to as the Habitats Regulations). Where developments affect European Protected Species (EPS), permission can be granted unless the development is likely to result in a breach of the EU Directive underpinning the Habitats Regulations and is unlikely to be granted an EPS licence from Natural England to allow the development to proceed under a derogation from the law. Will the development result in a breach of the EU Directive? Yes, unmitigated, the development has potential to result in harm to individual dormice and result in impacts to the favourable conservation status of dormice locally via habitat loss, severance and
fragmentation. Is the development unlikely to be licensed? An EPS licence can only be granted if the development proposal is able to meet three tests: the consented operation must be for ‘preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment’; (Regulation 53(2)(e)) there must be 'no satisfactory alternative' (Regulation 53(9)(a)); and the action authorised 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range' (Regulation 53(9)(b)). It is for you as the case officer to assess the proposals against the first two tests you may wish to ask for further information from the applicant as if the proposals are unacceptable from a development control perspective they would not be granted an EPS licence. In order to assess the development against the third test, sufficient details must be available to show how killing/injury/disturbance of dormice will be avoided and how any loss or damage to habitat will be avoided or, if not avoided, compensated. Further detail has now been provided on the predicted extent of dormouse habitat loss and a very useful plan (Annex EDP2) illustrates the location and extent of habitat loss and creation (at least for the bulk of the application site). There will now be a net increase in appropriate habitat of c.870m2, although it is acknowledge that the extent of habitat loss/gain within the land to the east of Selborne Road is at present not known and so the calculations do not include this (I am assuming). It is estimated (see section C.1.3) that buffering of the main north-south hedgerows in the eastern site will add c.1200m2 of new habitat and, presumably, further gains can be made by buffering all other boundary features. The key mitigation strand here is the buffering and protection of the existing hedgerow/scrub habitat which has been confirmed as supporting dormice and which will clearly be essential for maintaining the favourable conservation status of the species locally. The report (section C.1.2) states that 'any hedgerows adjacent to proposed residential dwellings will be buffered by a minimum of 5m'. Establishing the future treatment of all retained habitat is essential to providing an effective, realistic and workable mitigation strategy, especially as the layout of any future development plots is apparently unknown at present, as is the extent of habitat to be impact to the east of Selborne Road, a significant limitation to the assessment. In my opinion, there should be a minimum 5m buffer along all sections of retained habitat (excluding access points) and not just where residential dwellings abut. There would appear to be ample space to allow such a measure and full details of such should be provided within any future reserved matters application. If you are minded to grant permission, could I suggest that all ecological mitigation, compensation and enhancement measures are secured via a suitably-worded planning condition, such as: Prior to the commencement of any development activities a fully-detailed scheme of site-wide ecological mitigation, compensation and enhancement measures (to include but not necessarily be restricted to: site plan showing all ecological features; location, extent, composition and ongoing management of mitigation/compensation/enhancement habitat; measures to protect and retain existing ecological features) shall be submitted to, and agreed in writing by, the Local Planning Authority. Such details shall be in accordance with the outline mitigation and enhancement measures detailed within the Addendum Ecology Report EDP286_06 (EDP, October 2014). Any such measures shall thereafter be implemented in strict accordance with the agreed details, unless otherwise agreed in writing by the Local Planning Authority.
Natural England - Natural England's comments in relation to this application are provided in the following sections. Statutory nature conservation sites no objection. Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites. Protected landscapes. Having reviewed the application Natural England does not wish to comment on this development proposal. The development however, relates to the South Downs National Park. We therefore advise you to seek the advice of the National Park Authority. Protected species. We have not assessed this application and associated documents for impacts on protected species. Natural England has published Standing Advice on protected species. You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation. Local sites If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application. Biodiversity enhancements This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. Landscape enhancements. This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

Environmental Health Services - Pollution - I have reviewed the noise assessment and air quality assessment and agree with the conclusions in the reports. The noise assessment demonstrates that it should be possible to achieve acceptable internal noise levels across the majority of the site, however mitigation measures will be required for some properties. The air quality assessment demonstrates that mitigation measures need to be implemented to limit impacts associated with fugitive dust and fine particulate emissions during the construction phase of the proposed development. Once completed the proposed development is likely to have a moderate adverse impact on existing local receptors, but air quality will remain below the relevant national air quality objectives across the development and the surrounding local area. I recommend that the following conditions are attached to any permission you are minded to grant: 1) Construction work shall not begin until a scheme for protecting the proposed development from noise has been submitted to and approved by the Local Planning Authority; all such works which form part of the scheme shall be completed before any part of the dwellings are occupied. The scheme shall include details of noise mitigation measures to be applied to affected dwellings, including the specification for glazing and sound attenuated ventilation, to meet the recommendations of the noise assessment report by WYG, Job Number A084747-1, Issue 3. 2) No development shall take place, including any works of demolition, until a Construction Environmental Management Plan has been submitted to, and
approved in writing by, the local planning authority. Thereafter all works shall be carried out in accordance with the approved Statement throughout the construction period. The Statement shall provide for: i) the parking of vehicles of site operatives and visitors ii) loading and unloading of plant and materials iii) storage of plant and materials used in constructing the development iv) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate v) wheel washing facilities vi) measures to control the emission of dust and dirt during construction vii) measures to control noise and vibration during construction viii) a scheme for recycling/disposing of waste resulting from demolition and construction works. 3) Demolition and/or construction works shall not take place outside 0800 hours to 18:00 hours Mondays to Fridays and 08:00 hours to 13:00 hours on Saturdays and at no time on Sundays or Bank Holidays unless approved in writing by the Planning Authority.

Environmental Health Services - Contaminated Land - Two desktop studies (Ref.00043043-004 and LW24317/Rev2/ds), dated April 2014 and December 2013 respectively, relating to potential contamination issues at the above site, have been reviewed and I have the following comments to make regarding content: Both reports satisfactorily address requirements for submission of desktop studies to EHDC. Preliminary risk assessments for both reports have identified potential contaminants of concern. An intrusive site investigation is therefore required for both sites of this hybrid application to enable assessment of the potential pollutant linkages identified from the preliminary conceptual site model in each desktop study. Investigations should proceed in accordance with the conclusions and recommendations of these reports. Conditions are suggested.

EHDC Drainage - The site is located in Flood Zone 1 (low probability of flooding) and I am not aware of any historic flooding or drainage issues affecting the site. An FRA dated March 2014 has been submitted in support of this development which states that run-off will be attenuated on site and discharge will be limited to greenfield rates. This confirms there will be no increase in flood risk elsewhere. An outline drainage strategy based on infiltration techniques has been provided and ground conditions appear to be suitable, subject to detail design. There is also the option for an overflow to the adjacent Lavant Stream. Foul drainage will connect to the public foul sewer and Thames Water are currently carrying out a capacity check/feasibility study. No objections in principle, subject to detailed design and EA approval. Drainage matters can be covered by Conditions supported by drainage calculations and site percolation tests. A detailed maintenance management plan will be required to cover all drainage features which remain private.

No objection to foul drainage, subject to the Grampian condition required by Thames Water being imposed on any permission.
Further to my letter of 28 November 2014, reference HA/2014/115696/03-L01, an error in that response has been identified. Please see below a revised response regarding the above application. We have no objection to the granting of planning permission for either of these sites.

Land At Lord Mayor Treloar Hospital Site, Chawton Park Road

Environment Agency position

We would be happy to remove our objection to this site subject to the imposition of a condition requiring surface water scheme to be submitted. We have added the condition below:

Condition
No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year with an allowance for climate change critical storm will not exceed the run-off from the existing developed site or a return to Greenfield rates, following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include details of how the scheme shall be maintained and managed after completion.
Reason - To prevent the increased risk of flooding, both on and off site.

Land East Of Selborne Road, Alton

Environment Agency Position
The Environment Agency maintains its position that the development is acceptable provided that a condition is included that requires the surface water drainage scheme for the site to be approved by the local planning authority, as set out in our letter HA/2014/115696/02 dated 1 July 2014.

Advice to Applicant

We have identified that there are modelled flood zones within the area where the new access link road from Winchester Road to Selbourne Road is proposed. Any finalised design and layout should ensure that the road does not enter or impact on these zones. If the road does encroach into these flood zones compensation for any loss or impact on the floodplain will need to be provided.
Economic Development - Economic Development does not object to the application subject to mitigation for impact on employment. In order achieve sustainable economic growth, East Hampshire has to tackle key issues and challenges such as skills, training and employment, alongside provision of housing. Economic Development recognises that an increase in housing development will result in an increase in population and thus a need to address local employment matters. Therefore, the Economic Development seeks measures to mitigate for skills shortages, increase apprenticeship opportunities, reduce unemployment and provide career opportunities for residents. Measures included in the Local Employment and Training agreement may include:

An agreement to assist in the placement of the apprentices and unemployed from the local area into jobs within the construction phase of the development.

- Negotiate obligations including; direct labour agreements, training, work experience and apprenticeships to be implemented during the construction phase of the project and following completion date (if required).
- Negotiate an economic contribution towards the Get East Hants Working Initiative - a successful local initiative aimed at linking up residents with local employers through apprenticeships, promoting job creation and business growth.

Chawton Parish Council - Summary. The Council notes with reluctance that the South Alton area must accept substantial housing but considers the layout proposed fails to mitigate the impact of such a large development. It fails to secure the infrastructure from which the community of Alton and its surrounding villages can best benefit. This Paper sets out the particular issues which if addressed would enable that development to be integrated in a way which minimises degradation of the environment and secure better use of the funds made available to the community as in consequence of the development. Chawton Park Road and Northfield Lane. The Parish Council does not accept that the application can be approved on the basis that the County Council will deal with works in Chawton Park Road and Northfield Lane at a later stage. THE WYG Transport Assessment of April 2014 contains some but insufficient recognition of these issues which were raised at the consultation stage. The Parish Council believes that proposals will; Increase materially the amount of traffic running southwest along Chawton Park Road. It is already dangerous at the 90 degree turn into Northfield Lane and under the railway bridge in Northfield Lane. Fail to create a satisfactory pedestrian footway on the sections of Chawton Park Road within the Parish Fail to enable the cycle way which in theory exists within Chawton Park Road but which is not in fact a safe and secure reality, to operate successfully and safely as an access to the cycle network in Chawton Park Woods. This is potentially an ideal way for those seeking air and exercise in the Open Access Land provided by the Forestry Commission voluntary dedication under the CROW Act. Safety is already at risk and increased traffic from the new development increases that danger and is therefore unacceptable Put at further risk those seeking to walk under the railway bridge in Northfield Lane and those on horseback accessing Chawton Park Woods. It must be a condition of any consent that under the bridge there be alternate working for vehicles with a secure footway, cycleway and bridge way paid for and provided as part of the development and not merely something for consideration for future work. This is recognised by the WYG Transport Assessment @ 3.6.4. and that must be translated into firm conditions for implementation prior to any housing being occupied. Fails to preserve the long
term potential for an Alton western bypass which, while at present regarded by many as unaffordable must remain an option and may become an essential part of Alton's infrastructure in terms of its substantial overall development in the Local Plan period. This is ignored by the Transport Assessment and is a vital issue for consideration by the Alton wider community. 2 The potential traffic lights at the junction of Chawton Park Road and the A 339 are welcomed but must be part of an initial overall traffic plan, to be in place prior to any construction traffic starting work on site. 3 The reconstruction of the Butts railway bridge and the associated roundabout These are not considered to be a correct or even desirable community benefit. In particular it is considered the existing bridge: a is of such historic importance it should be retained and listed. Public records show: 1861 Act for construction of railway from London to Alton, Alresford and Winchester by the London and South Western Railway Company, dated 28 June 1861. (41M95/3) 1861 28 June, The subscribers were:- Rt Hon Lord Ashburton, Sir James Francis Doughty Titchborne Bart, Edward Knight, Robert Cole, James Winter Scott, John Wood, Henry Hall, Henry Joyce Mulcock, Jacob Hagen, John Dunn, John Thomas Maine, Charles Wooldridge, Edward Parsons, Charles Collis, James Calvert, John Huggins, Henry Snelling and James Covey taking 15,000 shares at £10 each. First Directors:- Edward Knight, Henry Hall, Henry Joyce Mulcock, Robert Cole, Jacob Hagen and John Wood. 1860s Alton, Alresford and Winchester Railway Printed map with ms additions showing two versions of proposed railway line from Alton via Chawton. (39M89/E/B280) Knight archive. Cross section of proposed railway line no. 2. (39M89/E/B281) Knight archive. 1861 Tracing of the site of the proposed Alton, Alresford and Winchester Railway in Chawton, on land belonging to Edward Knight. (land required for railway coloured red), 1861. (39M89/E/B486) Knight archive. The railway and the bridges at the Butts are an integral part of that history. Not only is it an integral part of local history that is enhanced by the intimate involvement of the Knight family of Chawton, the Knights being the local landowners and descendants of Jane Austen's brother. Preservation and enhancement of the bridge not its destruction should therefore be a prime objective. b serves as a suitable pinch point to restrict traffic speed and sight lines could readily be improved. The very need for an improvement at Butts Bridge is challenged. Pinch points to reduce speed were encouraged elsewhere so why remove the one provided by Butt's Bridge. It is noteworthy that WYG (the developer's consultants) on the September consultations by EHDC on the Local Plan amendments noted the specific reference to the bridge improvements had been removed. A principle failure is the provision of safe pedestrian and disabled access across the roundabout to the part of Winchester Road now truncated by the A31. This constitutes the primary pedestrian access to Chawton and its enhancement is key to establishing sustainability non car born access to Chawton with its Jane Austen heritage and the South Downs National Park. This must be engineered into the footways and central reservation on the Selborne Road section of the A339. Chawton is a major tourist venue as the central place of resort for the worldwide visitors seeking the Jane Austen Heritage. The proposals fail to take account of the issue of non car borne access to Chawton relegating the issue to a bog standard footway layout. The provision of a single re-aligned roundabout could be engineered to allow enhanced safety, accommodate with improved sight lines the link to the truncated section of the Winchester Road and allow access onto that roundabout from any new development. It is clearly possible, cheaper and allows the Chawton Triangle to remain inviolate as vital part of the Chawton Alton gap. Linking into the truncated section of the Winchester Road via the new roundabout on the A339 also serving the lower slopes of the
Borovere development is opposed. The suggested amendments to the Winchester Road truncated section and the A339 at Butts Bridge makes that new link unnecessary, makes the essential pedestrian cycle links clearer and easier to maintain and avoids the intrusion into the Chawton Triangle which must be retained as part of the natural environment. The environment of residents in the truncated section of Winchester Road will be preserved without the loss of part of the Chawton Triangle to an intrusive road extension from the new proposed A339 junction. 4 On the slopes below Ackender Wood Lord Mayor Treloar County Park is proposed. A small car park is shown. In practice this would be used by those using the Forestry Commission land designated as Open Access Woodland under the CROW Act 2000 and car parking for that purpose is valuable. The new small country park however is not useful given the hundreds of acres of woodland available and within which public access could be easily enhanced by the car park and but improved surfacing to existing walks. The availability of this very substantial area of Open Access Forestry Commission countryside means that a countryside park is not a sensible or useful compensatory benefit to the public to offset the detriment caused by the development. The car parking should be enhanced over that proposed to improve pedestrian access to the Forestry Commission land. This would secure public benefited substantially increasing access to the countryside for air and exercise. 5 Car parking and access should not be provided off Chawton Park Road but from the A339 accessed near the existing bridleway onto Ackender Wood (opposite Whitedown Lane). This would co-ordinate with the car parking mentioned above. If the development round the Community Hospital was accessed by a new roundabout in addition to the car park it should be considered if the new development could be accessed from that roundabout on the A339 avoiding all the problems of access from Chawton Park Road. 6 The location of the housing on the Treloars site should be varied a The removal of the new parkland and the revision of the entrance to the housing on the former hospital land to the A339 means no new traffic would use Chawton Park Road and its use for pedestrian and cycle access could be enhanced. In addition by removing the housing from immediately alongside Chawton Park Road land it could be gifted to EHDC or Alton Town Council as a site for an leisure access or considered as part of the co-ordinated recreation with the sports ground opposite and the Alton Sports Centre. b i. It is realised that remote planners may consider that accessing building on the lowers slopes rather than above Alton Hospital to be obviously the better location. Chawton Parish Council does not accept that; the topography of the slope makes it far less prominent than most elevated sites. It will also be against the substantial background of the Forestry Commission open access woodland from Ackender Wood along to Bushy Lease Wood. ii. Leaving undeveloped the most westerly field in the development in Chawton Park Road north of the recreation ground would provide a green belt between the development and Ackender Wood down to Chawton Park Road. This has a clearer boundary with the developed areas rather than rather than intruding to the south west into the open land of the valley and along to Chawton Park Wood itself a further vital area of Forestry Commission access. It would have the added advantage of leaving that area available for recreational use as the proposals for such facilities in Alton evolve. This allows for integration with the new or refurbished Sports centre which the Parish fully supports and imaginative and co-ordinated built and open air recreational facilities. 7 Further improvements to A339 Selborne Road/ A31 connectors. The existing north and southbound connectors to the A31 must be improved as part of the development. Matt Grist for the developers at the December presentation felt the landowner would not want reorganise the proposed roundabout to take it
to the slip road off the A31 but if the single roundabout solution previously mentioned is implemented improvements to these connectors are easily made. They need to be fully upgraded as part of the proposals, not as a possible later matter for the County Council: the new development's traffic will make the present defects worse. It will impact on traffic in Chawton which is a matter of concern the Parish is seeking to address in its emerging Parish Plan. It is noted and was raised at the recent open day on the emerging Alton Neighbourhood Plan, the issue of these roundabouts on the sliproads from the A31 are not addressed and this seems simply to be that the issue is not one in the minds of the relevant authorities. It is key that it is addressed and if it is not addressed within this application will not be addresses at all. In particular: a. traffic from the south egressing the A31 is forced to travel towards the Butts Bridge roundabout and then return up the A339 towards Selborne if it wishes to go in the Selborne direction. This is complex and creates a simpler 'rat run' through the Chawton Village section of the Winchester Road and Wolfs Lane. Chawton is in process of completing its Parish Plan and rat running traffic is identified as an issue which requires facilitation of correct routes by roundabouts at the 2 connectors with the A31/A339. The position of Chawton as the hub of Jane Austen tourism makes care in this matter of even greater importance as tourists from round the world must be able to wander at ease in the heart of the village from which through traffic has been removed. b. traffic exiting the A31 southbound to the A339 meets a junction with no roundabout, an accident record and poor sight lines at the cross road with Wolfs Lane. A roundabout at that junction is essential to take addition traffic generated by the development much of which will use the junction. Fully adequate land already exists within the curtilage of the road network at this point so no additional land needs to be acquired. There is a real safety issue and the Transport Assessment while discussing the capacity of the junctions @ 8.6 gives the implication that capacity is the issue whereas safety and rat running elsewhere, particularly through Chawton, are of greater importance and need to be included in the proposals. 8 The proposed housing on the lower slopes of Borovere Farm are part of the Chawton Alton gap and also breach the desirable objective of preventing new development round Alton being in areas which do impact on the green approaches to the town. The location of housing should therefore be varied to leave those lower slopes undeveloped. If necessary displaced housing would be better provided on the Lord Mayor Treloar's Hospital site where it will have materially less impact on Alton's green gateways. 9. Infrastructure: Schools. The application will clearly create a substantial impact on Schools. It will require a new school or material extensions to existing Schools, including the successful and over subscribed Chawton School, which plays a very important binding role within the local community. No sensible view on sustainability can be made until a firm, publicly supported route to Schools enhancement is settled. This must be based round enhancing and building on the best existing local schools. This cannot be left for future decision, it must be planned in to the wider infrastructure to support, build upon and safeguard those establishments and the reputation for high educational standing they have made. No properly informed planning decision can be made until the way forward is agreed and funding has to be in place to ensure the necessary facilities are in place prior to occupation of new housing. Sewerage. In the recent floods residents of Chawton were subject to polluted water flooding down from Farrington. Properties by the Lavant Stream were required to use portable toilets because of the lack of capacity of the foul drainage system. This situation is about to be made worse by the developments in Four Marks, particularly Boyneswood Road, currently under consideration. The clear common factor is all drain into
the Alton Sewerage Works which is inadequate. Thames Water is notorious for its tardy response to sewerage provision. If the scheme were to be approved it must be on the basis of a Grampian Condition requiring the robust enhancement of the sewerage system over whole area served by the Alton Sewerage Works to ensure capacity for current and planned needs. The funding saved, we understand over £8,000,000 with payments not required for ransom strips should be used for community benefit and to relieve pressures accentuated by the development particularly: a by substantially increasing the contribution to the new Sports centre. If the new centre is to reach the standards East Hampshire District Council and the community seek then this sum is entirely inadequate for enhanced and renewed sports facilities in Alton. b augmenting the proportion of affordable housing on site c enhancing pedestrian and cycle links from Alton to the area and on to Chawton and the South Downs National Park should be after careful community consultation. This should include active encouragement and facilitating these links as access to Chawton School d roundabouts on both the A31 interconnectors for safety and enhancement of the environment for residents and visitors. The consequential safety improvements would be substantial particularly at the Wolves Lane, Selborne Road interconnection with the southbound off slip road from the A31 and save later expense.

Beech Parish Council - OBJECT - Beech Parish Council object to this application as they are extremely concerned about the effects of the increased traffic. There will be increased traffic on Whitedown Lane and a bottleneck will be created by the new traffic lights at the junction of Chawton Road and Whitedown Lane. There will be more traffic using Beech as a rat run and increased traffic on the A339 Basingstoke Road will make it more hazardous pulling out of the junction with Medstead Road. There will also be more traffic backing up on the A339 waiting to turn off at the junction with Whitedown Lane. Beech Parish Council are also extremely concerned about the environmental effects of the increased traffic as well as the increased demand on the local infrastructure and the additional surface water runoff from the proposed new development.

Alton Town Council - Comments on planning applications considered at the full council committee meeting held on Thursday 19 June 2014 at Alton Assembly Rooms object for the following materials reasons: 1. Impact on Planning Policy - (i) Town Design Statement - Whilst both elements of the housing application are for outline planning permission, it is considered from the limited information available that there would be a breach of the skyline. The protection of this is a key requirement of the Town Design Statement 2008, derived from the extensive consultation undertaken with the Alton community. (ii) Joint Core Strategy - The council, with no information being made available to it, is unable to verify the developers' stance on offering only 20% affordable housing, which is contrary to the Joint Core Strategy, Section CP13 Affordable Housing on Residential Development. 2. Flood Zone - (i) There is insufficient clarity in the information submitted as to the proximity of the proposed new road to a Flood Zone 3 area. 3. Environment Designations - (i) The Council has no way of verifying whether environmental designations are met or are likely to be met as it has had no access to the confidential Botanical Survey and Badger Survey. (ii) The council is concerned at the introduction of confidential reports being inaccessible and would register their disapproval, noting that nature does not follow boundaries. 4. Landscape Impact - (i) The council repeats its previous comments regarding the breach of skyline on both housing development sites. (ii)
The proposed West of Selborne Road development clearly breaches the Chawton gap and is going outside of the settlement boundary. (iii) The proposal to replace the existing historical bridge with a wider, newly designed bridge is not in keeping with the existing southern gateway to the town which is viewed as an important historic landmark. (iv) Insufficient attention has been paid to the aesthetic impact on the Butts itself of the proposed new bridge and is seen as a poor solution that has been put forward by the developers. It is suggested that alternative designs such as a bowstring arch design will have less visual impact. (v) There is concern at the close proximity of the proposed housing at the top of the Treloar site with Ackender Wood. The council considers that the area should be kept as an open space to mitigate any adverse impact on the wood and footpaths.

5 Noise - Observation: in noting the substantial housing proposal as part of the application, it is acknowledged that there would be an increase in noise levels associated with housing development and the proposed access for the Treloar site would impact on those living in Chawton Park Road. Observation: concern regarding noise impact as a result of the widening of the Butts Bridge and the arrival of larger HGV using the route as a cut through to the M3 from the A3. This cannot be substantiated until the Traffic & Transport Survey currently being commissioned by HCC/EHDC delivers its report at the end of the year.

6. Residential Amenity - (i) The application for Highway Works makes no provision for the safety of pedestrians, cyclists and other road users at the Butts Bridge - pedestrians having to negotiate 2 lanes of traffic at the Winchester Road roundabout; equally there is no refuge as you come out of town. There is little attention if any applied to pedestrian safety and the proposal in its current form provides no adequate solution for the safety of all road users, irrespective of mode. Observation: the council strongly recommends that any new development at the Treloar site must be designed and built to the adoptable standard.

7. Historic Environment - (i) The Council has insufficient information available to determine whether it is appropriate for a new bridge to be built or whether the preserving of an historic landmark is more appropriate. Observation: the Council welcomes the developers' agreement to retaining the water tower at the top of the Treloar site. Observation: The Council recommends that Robertson House on the Treloar site be considered worthy of preservation and possibly converted into flats.

8. Highways Public Transport - (i) The Council was unanimous in its comment that the application was premature and there was insufficient information available at this time until the Traffic & Transport Survey currently being jointly commissioned by HCC and EHDC is available at the end of 2014. This survey is to look at the holistic impact on the town of all planning developments currently being submitted at 4 sites across the town and the resultant impact on the road network infrastructure. (ii) The Council also noted that the information on traffic used in the submission was inadequate, being completely out of date and the inclusion of it was not viewed favourably. (iii) No provision has been included for cycleways, or to upgrade to the junction of Whitewdown Lane with the Basingstoke Road. (iv) The proposed traffic calming measure at the Bridge in Northfield Lane was considered to be inadequate for the potential increase in traffic deriving from the Treloar development. (v) No provision has been included to negate increased traffic flows at the Whitewdown Lane/Chawton Park Road junction. (vi) The Council would like to see the extension of the 30 mph limit to include any proposed development of the sites. (v) The Council would prefer to see a roundabout at the Treloar site entrance.

9. Availability of Community Services - (i) There is no provision for community enhancements within the scheme. The Whitewdown Ward currently has one pub, a doctors' surgery (and now a recently added pharmacy) but no shops. Observation: Councillors noted that Phase 1 of the Treloar
site development originally included a community building, but this failed to materialise. 10. Infrastructure - (i) Insufficient visual splays due to the design of the proposed new bridge construction, would lead to vehicles approaching the roundabout from Whitedown Lane not having a clear site of vision of traffic leaving the town along Butts Road until the last minute. (ii) A girder bridge is proposed to replace the Whitedown Lane arch. Whilst the girder span is specially stated (see drawing 60225063/CIV/DRG/LMT/105), the girder depth from its top to bottom is not. Since this is a detailed Planning Application and since the span and depth are 'of the essence' of such a bridge proposal we consider the application is incomplete and should be refused. 11. Green Infrastructure, Open Space & Ecology - (i) Members were gravely concerned that this application could be viewed as premature and a measured attempt to avoid new legislation being introduced in 2016 regarding the design & efficiencies of new house builds which provides that should a development commence before the date of introduction the remainder of the development does not need to comply with the new legislation. (ii) The council did not feel that adequate attention had been given to the proposed open space on the proposed Borovere site which was viewed as too little and in the wrong place. (iii) With no detailed information available at this stage as to the housing design, materials to be used etc, the council suggest that all development in Alton should be of the highest standard, using good quality materials and comply with all requirements irrespective of start date with the 2016 legislation due to be introduced regarding ecology and sustainable materials. Observation: Consideration should be given to open space being committed to provide for much needed allotment provision in the town and to alleviate an ever growing waiting list. 12. Availability of Utilities, Water, Gas, Electricity, Broadband & Telephone - (i) South East Water and Thames Water have both confirmed that the water supply and sewage infrastructure in Alton is inadequate and is currently under severe stress and requires upgrading. Observation: local knowledge states that the current Treloar site has suffered a number of electricity outages and low water pressure, both of which require further investigation before any further development of the site. Observation: whilst acknowledging that developers can enter into a Grampian Agreement with utility companies, it is widely known that Alton has suffered from flooding and sewage contamination following the heavy rains of 2013/14 and as a consequence urge the planning authority to determine that such agreements should more than adequately provide for all proposed developments in an holistic way, not on individual planning applications as currently presented. 13 Availability of Education facilities - (i) Inaccurate information is contained within the submitted documentation from the developers regarding educational facilities in the Whitedown Ward and refers to the Whitedown Special School (which closed in 2006). In noting that some provision has been allocated for an extension of The Butts Primary School; all schools in Alton are over-subscribed and the proposed £2.6m investment are viewed as totally inadequate and need to be reviewed against current data and future predictions against housing developments. 14. Foul and Surface Water Draining - (i) Councillors considered that the treatment of foul water on site at Borovere may end up polluting the Lavant stream and that further work is required to improve the provision for dealing with foul water. (ii) The Environment Agency in its comments has said that surface drainage on the Borovere site is inadequate. (iii) Thames Water has suggested that any Grampian Agreement put in place would take 3 years which conflicts with planning permissions awarded that state that development should commence within 2 years. (iv) Local knowledge indicates that Chawton Park Road is prone to flooding issues and more detailed information would be required to
satisfy these concerns of surface drainage onto Chawton Park Road. 15. Affordable Housing -
(i) The Council notes that insufficient information is available to enable a comment as to
whether the 20% proposed affordable housing on the two sites is substantiated by the
developers' submission. (ii) Councillors are disappointed that with waiting lists as defined: 473
- awaiting 1 bedroom dwelling 235 - awaiting 2 bedroom dwelling 77 - awaiting 3 bedroom
dwelling Developers have submitted a lower percentage inclusion of affordable housing within
the scheme which is not compliant with the Joint Core Strategy. 16. Housing Mix, materials
and design - (i) With only outline planning permission being sought for both the Treloar and
Borovere site, no detailed information is available against which to compare or understand
what is proposed for the two sites. However, councillors recommend that 2.5 storeys would
be the maximum limited on housing heights (which is 2 storey with dormers in roof). (ii) The
council reiterates its earlier comments that only the highest grade of materials should be used
in the construction of any housing development.

Further comments - The Committee repeats its previous comments OBJECT As stated
previously, Alton Town Council intends to await publication of the jointly commissioned HCC
& EHDC Transport Survey which will provide an holistic report for Alton which is due in
December 2014.

Representations

125 letters have been received in respect of the development and the comments are
summarised below.

a) Replacing the bridge is a travesty;
b) Development will not enhance the town;
c) No requirement for the Country Park;
d) Drainage systems need improving;
e) Doctors, schools and other support services need improving;
f) There are already highway safety concerns in the area;
g) The development will result in the loss of an attractive gateway to Alton;
h) Inadequate plans for sewage and flooding;
i) Loss of woodland, flora and fauna;
j) Ecological surveys are inadequate;
k) Need to have regard to findings of Alton Highway Study;
l) Development is not sustainable;
m) Needs to be considered in line with all the other applications in Alton;
n) Loss of important greenfields;
o) Harm to the character of the area;
p) Loss of bridge will result in an increase in rat running;
q) Reduces gap between Alton and Chawton;
r) Good scheme in an ideal location;
s) Concerns over condition of River Wey;
t) Lack of affordable housing;
u) Will increase housing stock for local people and people wishing to move back to Alton;
v) Alton will lose its simple market town character;
w) Concerns over traffic impacts on Ackender Road;
x) No mention of barn owls which inhabit the small water tower; and
y) Insufficient jobs in Alton which will result in it becoming a commuter town.

In addition a petition with 1041 signatures, collected on line and in person, has been submitted raising many of the issues detailed above.

**Determining Issues**

1. Development plan and material considerations.
2. Principle of development.
3. Deliverability.
4. Balance and mix of housing types.
5. Design and layout of the proposed development and its impact upon visual amenity and landscape character.
6. Access, movement and highway safety.
8. Drainage and flood risk.
9. Impacts upon bio-diversity.
10. Impacts on trees.
11. Impact upon heritage and archaeology.
12. Ground contamination.
13. Air pollution.
14. Infrastructure and developer contributions
15. Other material considerations and relevant planning issues raised by objectors

**Planning Considerations**

1. Development plan and material considerations.

As required by section 38(6) of the Planning and Compulsory Purchase Act (2004), *applications must be determined in accordance with the development plan, unless material considerations indicate otherwise*. The development plan for East Hampshire District comprises the 'saved' policies of the 2006 East Hampshire District Local Plan: Second Review and the policies set out in the adopted East Hampshire Local Plan Joint Core Strategy (May 2014).

The application site is located outside the Settlement Policy Boundaries (SPB) with policies in the JCS supporting appropriate residential development within settlement boundaries, and only supporting exceptions schemes in countryside locations. Therefore this application was advertised as a departure from the local plan.
Due regard must be given to Government advice contained within the National Planning Policy Framework (NPPF), which advocates the 'genuinely plan-led' system as one of the core planning principles for the planning system. Paragraph 14 of the NPPF advises that a presumption in favour of sustainable development is seen as the golden thread running through both plan-making and decision making, which means; "approving development proposals that accord with the development plan without delay, and; where the development plan is, absent, silent, or out-of-date, granting planning permission unless any adverse impacts of doing so would add significantly to and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole, or, specific policies in the framework indicate development should be restricted."

Five Year Housing Land Supply

Whilst the starting point in the consideration of planning applications is the development plan, adoption of the JCS has revised the District's housing requirements. Paragraph 47 of the NPPF states that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land.

The Council’s latest housing land supply figures show that the District has achieved a 5 year supply of land for housing (including a 5% buffer). The latest assessment was dated 1st January 2015 and identified a 5 year housing supply figure of 5.09 years. This means that housing supply policies within the Joint Core Strategy are considered to be up-to-date and can be afforded full weight.

It should be noted that in order to maintain a five year housing land supply it is necessary for the Authority to continue granting appropriate planning consents to maintain the supply of houses coming forward. If this is not done then there is a significant danger that the supply will reduce.

The Interim Housing Policy Statement (IHPS)

To aid the process of considering and guiding residential developments coming forward on sites which are outside of settlement policy boundaries, but not on allocated sites or within the South Downs National Park area, the Council has adopted interim supplementary planning guidance entitled "Interim Policy Statement of Housing - Facilitating Appropriate Development" (IHPS). At the time of writing the IHPS was still a material consideration but in the light of the 5 year housing supply consideration a report is going to Cabinet on 28th January which recommends that Cabinet recommend to Council that the IHPS be rescinded. It is considered that the IHPS can be given little weight.

Applications will also need to comply with any remaining saved policies in the East Hants District Local Plan: Second Review, where applicable. Part of the Treloar Hospital site is allocated in the Local Plan: Second review as a housing site for 150 dwellings. This allocation has not come forward due to the difficulties of providing adequate access.
**Alton Neighbourhood Plan**

The Neighbourhood Plan for Alton is a material consideration in the determination of planning applications. As set out in the JCS, Alton must accept housing development totalling at least 1,682 dwellings in the period from 2011 to 2028. Of this number, 982 are already earmarked for allocated sites, and some already built. This leaves a minimum of a further 700 to be located on sites identified in the SHLAA statement. Those sites are capable of accommodating more than the 700 minimum required and, therefore, the Alton Neighbourhood Plan (ANP) will allocate appropriate sites.

The Town Council has undertaken a public consultation event to seek views on Housing and Transportation issues affecting Alton. The first topic area is to determine which housing development sites might best meet local housing needs and place shaping aspirations. The results of the exercise are currently being collated. Whilst the Neighbourhood Plan is a material consideration little weight can be given to it at this early stage of its development.

**Housing land supply considerations**

In spite of recent consents there is still a shortfall in housing supply for the district. The requirement for maintaining a 5 year supply (plus 5% buffer) is a rolling target, which is imposed on Councils through Government policy. The spatial strategy set out by the JCS is to distribute new housing throughout the key settlements within the district outside of the SDNP. The amount of housing is based on the identified settlement hierarchy as follows:

- Alton – 700 new homes
- Horndean - 700 new homes
- Clanfield – 200 new homes
- Liphook – 175 new homes
- Four Marks/South Medstead - 175 new homes
- Rowlands Castle - 150 new homes
- Other villages outside the South Downs National Park – 150 new homes

This strategy focuses the majority of new housing development to the market towns of Alton, Horndean and Clanfield, which are classified as market town, large local service centre and small local service centre respectively.

Currently, no planning permissions have been granted in Alton. The significant major applications submitted could provide some 1125 new homes to contribute towards the total requirement of 700 stated above. If granted permission, this proposal of around 529 dwellings would also help satisfy the total housing requirement of the settlement. This fact should be given significant weight in the decision making process having regard to the need to provide sufficient housing within the settlement and maintain the 5 year housing land supply position.
There are also significant benefits of securing affordable housing provision to meet identified local needs. This scheme proposes 20% affordable housing which is not policy compliant, policy CP13 requires 40% affordable housing. The applicant has submitted a viability assessment which has been independently assessed by the District Valuer. The conclusion is that given the need to provide a replacement bridge and also the contributions towards Alton Sports Centre, the scheme can only provide 20% affordable housing. The NPPF at paragraph 173 indicates that schemes need to be able to deliver competitive returns to developers and landowners once obligations have been taken into account. Having regard to this and the requirement to replace the Butts Bridge and provide contributions to the Sports Centre, the level of affordable housing proposed is considered to be acceptable. It should be noted that if this scheme was not being delivered at this volume i.e. both sites being brought forward together, then economically it would be unable to deliver the bridge and other contributions.

2. Principle of development

Locational suitability

Whilst the sites are outside the settlement policy boundary they are adjacent to it and are considered to be natural extensions to the town.

The sites have been seen to be achievable in terms of its inclusion in the Strategic Housing Land Availability Assessment (SHLAA), which identifies a need to utilise Greenfield sites to achieve the housing requirements for Alton.

In terms of the location of the site relative to services and facilities offered by Alton, the site is situated approximately 1.5km walking / cycling distance from Alton Town Centre and is a similar distance to the train station which offers frequent services during the day, evenings and also on a Sunday to regional destinations.

A number of bus stops are close to the site on Butts Road and Chawton Park Road. These are identified in the Transport Assessment and are considered to increase the sustainability credentials of the proposal.

In accessibility terms, the site is in a reasonably sustainable location, which weighs in support of the scheme.

In terms of visual integration, there is residential development to the south of the Lord Mayor Treloar site. This is a greenfield site and would extend the built form of development into the countryside north of the settlement boundary. The land does rise in level particularly on the upper levels but in essence this is seen as a natural extension to the existing estate. Amendments were received during the course of the application which have reduced the level of development on the upper limit and increased the amount of strategic planting to screen the development on the upper level over time. It is considered that this will adequately mitigate the limited visual impact of the development.
The land to the east of Selborne Road has the potential to appear more prominent as it is situated on a major route into Alton where currently there is no frontage development. It will, therefore, change the character of this area of Alton. There is, however, substantial screening along the frontage and this will significantly reduce the visual impact. The character of Alton is seen as development spilling up the slopes around the town and this will follow that pattern. It is considered that the existing and proposed planting will reduce the impact of the development to an acceptable level.

Policy CP10 (Spatial Strategy for Housing) of the JCS advises that housing should be accommodated through development and redevelopment opportunities within existing settlement policy boundaries in the first instance. It is considered that there is no policy requirement for the applicant to demonstrate that sequentially their site is the most sustainable location for development in Alton. While there is an identified Plan period need for 700 dwellings in the settlement area as set out in the adopted JCS, there is no sound basis on which to refuse the application on the grounds that there are other alternatives which may, or may not be, more sustainable.

3. Deliverability

The NPPF, in a footnote to paragraph 47, clarifies that:
“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”

The application has been supported by a Utilities Statement which gives consideration to the supply of water, electricity, gas and telecommunications to the site, in consultation with the utility providers. This concludes that the development could be supplied with normal network service supplies without prohibitive reinforcements to networks. This is corroborated through the consultation exercise on this application, when no objections have been made by utility suppliers.

The main infrastructure commitment is the redevelopment of the Butts Bridge. The viability assessment demonstrates that the finance has been accounted for to deliver this and there has been close liaison throughout the schemes development between the applicant and East Hampshire Railways, the operators of the Watercress Line. There is no reason to believe that the replacement of the Butts Bridge cannot be delivered within an acceptable timetable to ensure delivery of the scheme.
4. **Balance and mix of housing types**

The application has been submitted on the basis of developable areas with no clear housing number proposed. It is considered that around 529 houses could be delivered but it should be noted that this is an outline application in relation to these matters and those details will be confirmed through the submission of further reserved matters applications.

The affordable housing provision would need to be secured through a legal agreement, with triggers for the transfer of the affordable housing land / units to an acceptable Registered Provider. The applicant has provided draft Heads of Terms for a legal agreement which include the provision of 20% affordable housing.

For these reasons the proposal satisfies the aims of policies CP11 and CP13 of the JCS.

5. **Design and layout of the proposed development and impact upon visual amenity and landscape character**

In simplistic terms, the amount of housing proposed falls within the threshold for allocated housing within Alton, which is appropriate to the size and role of Alton as set out within the JCS.

Policy CP29 of the JCS stipulates that new development will be required, to seek exemplary standards of design, ensure that layout and design contribute to local distinctiveness and sense of place, to be sympathetic to its setting, makes a positive contribution to the overall appearance of the area, be accessible to all and minimises the opportunity for crime.

In respect of layout, density, scale and design, these are matters that will be properly addressed through the submission of reserved matters.

The issue in respect of impact on character and landscape has been addressed above and it is considered that the level of landscaping and strategic planting proposed will adequately mitigate against the limited visual impact that the development is considered to have.

In terms of Open Space, the scheme proposes a Country park of just under 8ha as well as the relocation of the SINC within the site and the provision of a play area. All these lie within the Lord Mayor Treloar site.

Within the Selborne Road site there would be strategic planting of 2ha of strategic planting together with 0.4ha of new public open space. This would be detailed through the reserved matters applications and is considered to be acceptable.

The Council’s adopted “Guide to Developer Contributions” also requires sites within 2km of Alton Sports Centre to make a contribution of £10,000 per dwelling towards improvements to this facility. The applicant has agreed to this and it will be secured through the S106 agreement.
Visual Impact to the character and appearance of the area

As discussed above, landscape impact is a key consideration in the assessment of this proposal and to assist in the evaluation of this impact the application is supported by individual Landscape and Visual Impact Assessments (LVIA) for both parts of the site. The LVIA concludes that the development would be acceptable in landscape and visual terms.

The Landscape Officer does have some minor concerns but accepts that the mitigation is likely to adequately screen the development and prevent significant visual intrusion.

A landscape condition will be required for details of hard and soft landscape at reserved matters stage, including substantial strategic tree planting along the site boundaries and within the site, in particular the Lord Mayor Treloar site.

On this basis it is considered that whilst there will be some impact in relation to the development of a Greenfield site any impacts can be properly mitigated and that it is not possible to sustain an objection on landscape character grounds.

South Downs National Park has expressed initial concerns about the visual impact of elements of the scheme. There have been ongoing discussions between the Park Authority and the applicants and revised comments are expected.

6. Access, movement and highway safety

The consultation response from Hampshire County Council is replicated above. It can be seen that detailed discussions have taken place with the applicants and revised details and plans have been received.

All the various highway improvements:

- Replacement of Butts Bridge
- Enlarged roundabout at the Butts junction
- Roundabout to access Selborne Road site
- Priority junction to serve Chawton Road
- Signalisation of Chawton Park Road/Whitedown Lane
- Traffic calming on Northfields Road

are considered to be necessary and acceptable in principle. In terms of Whitedown Lane/Basingstoke Road, whilst there will be some impact on this junction the costs involved with bringing forward the Butts Bridge junction is considerable and therefore it is suggested that the agreed contribution of £225,000 be flexibly worded to allow a proportion to be allocated to this site if alternative funding from other sites does not come forward.
The draft findings of the Alton Transport Plan show that the Butts Bridge is already operating at over-capacity and that a solution needs to be found for this junction. The proposal offers a viable solution that accords with the draft conclusions of the Plan. The Plan also concludes that, even if a western by-pass were to be built for the town, this junction would continue to operate at over-capacity and a solution would, in any event, need to be found to improve the Butts Bridge junction.

It is considered that the works required are significant and will significantly benefit the town. It would not be possible to provide these improvements were it not for the large scale of this development. Piecemeal development throughout the town would not guarantee that these necessary improvements would come forward.


Given that siting, design, etc, are matters to be dealt with through reserved matters applications it is considered that it is not possible to make a fully informed assessment at this stage. However, given the relationship of nearby residential properties to the site, it is considered highly likely that a scheme can be designed which will not raise any amenity issues.

8. Drainage and flood risk

Flood Risk

The layout shows that the built form of development would be located on land that would be entirely within Flood Zone 1 which is at the lowest risk of flooding.

Surface Water Drainage

The Council’s Drainage Engineer is not aware of any historic flooding issues. The drainage strategy does also allow for an option for an overflow to the Lavant Stream. He has commented that the proposed SUDS drainage scheme should be feasible subject to more detailed site investigation. A reserved matters application will require a detailed SUDs surface water drainage scheme. In addition a detailed drainage layout together with a maintenance management plan, will also be required for all SUDs features which will remain private.

Foul Water Drainage

Should permission be granted then Thames Water would like a 'Grampian Style' condition imposed relating to agreement of a drainage strategy detailing any on and/or off site drainage works.
Under the requirements of the Water Industry Act 1991, water companies have a statutory obligation to provide capital investment in strategic treatment infrastructure to meet development growth. Section 98 of the Act provides a legal mechanism through which the appropriate infrastructure can be requested by a developer to provide drainage to a specific location. As such, it is considered that the issues of foul water disposal could be satisfactorily controlled through a pre-commencement condition.

**Water Supply**

The Government’s “Planning Practice Guidance” advises that; “Planning for the necessary water supply would normally be addressed through the Local Plan. Water supply is therefore unlikely to be a consideration for most planning applications. Exceptions might include:
- large developments not identified in Local Plans that are likely to require a large amount of water; and/or
- where a Local Plan requires enhanced water efficiency in new developments as part of a strategy to manage water demand locally and help deliver new development.

In this case, while the development is large in scale, the amount of housing should be accommodated for within scale of housing allocated for Alton within the Joint Core Strategy, which is supported by an evidence base and a Sustainability Appraisal. Consequently, it is not considered that there are robust grounds that stand against the scheme based on this issue.

It is noted that there are no objections from the Environment Agency subject to conditions.

9. Impacts upon bio-diversity

The site is an undeveloped greenfield site and the application is supported by an Ecological Assessment Report. The main site of interest is the Lord Mayor Treloar Hospital site.

There is a SINC located within that site which is to be retained. This covers two areas of grassland habitat. The adjacent Ackender and Alexander Woods are also a SINC. A management plan is required for the woodland area and the area retained within the site. Other areas of chalk grassland are to be relocated as part of the proposal and re-established within the proposed county park.

The scheme seeks to retain the features of greater ecological importance such as hedgerows and mature/semi-mature trees, though there will be the loss of some hedgerows which will need to be justified at reserved matters stage.

There are protected species on both sites including badgers, bats, reptiles, dormice, various birds including barn owls and various invertebrates.

The County Ecologist is broadly content with the level of survey effort employed at this site and the range of mitigation, compensation and enhancement measures described is appropriate to the identified impacts.
The mitigation, compensation and enhancement measures will need to be secured through a suitably worded condition which requires the provision of a fully detailed ecological mitigation strategy at reserved matters stage.

Natural England has raised no objection to the development.

For these reasons the proposed development is considered to comply with Government guidance contained within the NPPF and Policy CP21 of the JCS in this regard.

10. Impact on trees

The principle trees and woodland within the two housing sites and county park are to be retained. The main impact on trees relates to the highway and bridge works.

The creation of a highway link to Winchester Road from Selborne Road includes the loss of beech trees on the southern side of Winchester Road. Whilst these trees are an important feature along this part of the road, the Arboricultural Report shows that they are diseased and reaching the end of their life. The loss of these trees is regretted but they would be lost shortly in any event. The landscape details to be submitted as reserved matters would allow for replacement trees to be secured as part of the works to the highway.

The second area of concern regarding trees relates to the loss of trees on the western side of the railway embankment adjacent to the bridge works. The trees are not good individual specimens but have a group value and add to the setting of the edge of the Conservation Area. In order to achieve the bridge works, the embankment needs to be cut back and remodelled, with the resultant loss of the trees on this part. The tree loss cannot be avoided for these works to be carried out and, when balanced against the benefits of the overall scheme, the loss is considered to be acceptable. Again, replacement planting can be secured as part of the landscaping reserve matter.

11. Impact upon heritage and archaeology

Policy CP30 (Historic Environment) of the JCS requires development proposals to conserve and, where possible, enhance the District’s historic assets and their setting.

The site itself does not contain any listed buildings and is not within a conservation area. It is however adjacent to the Butts Conservation Area and close to the Chawton Conservation Area. The Grade II listed French Horn Public is also adjacent to the Butts Bridge. The Grade II listed Museum at Treloar Hospital is approximately 200m from the site.
It is considered there is no significant impact on either the Conservation Areas or the listed buildings but the loss of the Bridge is considered to be relevant. The bridge is clearly a landmark within Alton and therefore is of particular historic interest. In order to assess the significance of the harm as set out at paragraph 135 of the NPPF regard has to be had to the significance of the non-designated heritage asset and a balanced judgement made having regard to the benefits of the scheme. The Conservation Officer has done that judgement and concluded that the public benefits outweigh the loss of the bridge.

Robertson House and the two water towers are also considered to be of interest. The water towers will be retained, one of which is to be retained as part of the bat mitigation measures. Robertson House is also to be retained. It is considered that it would be difficult to object to the scheme on the basis of this.

The County Archaeologist raises no objection to the development and recommends that the assessment, recording and reporting of any archaeological deposits present should be secured through the attachment of a suitable condition to any planning consent that might be granted. It is also advised that the applicant should consider undertaking archaeological field assessment of the site at the earliest opportunity and this should certainly be undertaken before any detailed application is submitted. This should take the form of trenched evaluation, although it should also take into account any geotechnical information.

For these reasons it is considered that the proposal is in accordance with the aims of Policy CP30 of the JCS and Government advice contained within the NPPF.

12. Ground contamination

The application has been supported by a Geo-Environmental Phase 1 Desk to assess the likely geotechnical and chemical characteristics of the soil and ground water environment of the site.

The Council’s Contaminated Land Office comments that there have been two separate desktop studies. The content of the report satisfactorily addresses requirements for submission of desktop study reports to EHDC. The preliminary risk assessment has identified potential contaminants of concern. An intrusive site investigation is therefore required to be undertaken and which needs to assess the potential pollutant linkages identified in the preliminary conceptual site model of the desktop study. Asbestos screening will also be required. This can be the subject of suitably worded conditions.

The development is, therefore, considered to satisfy the requirements of Policy CP27 of the JCS in this regard.
13. Air Pollution

The application is supported by an Air Quality Assessment. The Council’s Environmental Health Officer has reviewed the submitted assessment and commented that he agrees with the conclusions of the report. Should permission be granted, the construction phase has the potential to adversely impact existing residential amenity therefore the Environmental Health Officer recommends that a condition relating to the agreement of a Construction Environmental Management Plan is appended to any permission granted. As such the proposal is considered to be in accordance with the aims of Policy CP27 of the JCS in this regard.

14. Infrastructure and developer contributions

To meet the provisions of JCS and saved Local Plan policies, following assessment of the valuation report submitted, the proposal would secure the provision of 20% affordable housing and make contributions via s106 obligation, including:

- employment and training package
- travel plan
- economic contribution to Alton Leisure Centre
- integrated transport measures
- off-site highway works -
- community project worker
- public open space (not already provided on site)
- replacement of Butts Bridge
- a commuted sum of £5,057 per eligible dwelling for extensions to primary schools in Alton and £1,683 per eligible dwelling for secondary education to be paid to HCC.
- structural planting
- retention of water towers
- translocation of chalk grassland outside of SINC
- management and maintenance of open spaces
- provision of Country Park, bond towards maintenance of county park and associated parking
- contribution towards replacement of Alton Sports Centre (£10,000 per dwelling)

The HCC Education officer has responded and advised contributions to be necessary towards supporting and expanding primary school facilities. A contribution per unit (excluding 1 bedroom dwellings) is sought and would provide a substantial but commensurate contribution to local requirements, in line with County Council guidance on contributions.

Other contributions will be based on the requirements set out in the council’s supplementary document (Guide to Developers Contributions 2012). In this respect the scheme would attract needs for contributions towards non-provided for elements of public open space (i.e. playing fields) within the scheme and towards a community project worker resource to help facilitate social integration between housing types/tenures within the scheme.
A S106 covering any planning permission would also secure the following:
- Provision and maintenance in perpetuity of landscape planting and ecology buffers
- On-site provision of public open space and children’s play space and maintenance in perpetuity
- Matters of general management and maintenance in perpetuity of other common areas including of the access and estate roads, surface water drainage systems
- Tenure split for affordable housing, stipulating 30% intermediate (shared ownership) and 70% affordable rent.
- Occupancy criteria stipulating a cascade for occupancy of affordable rent units within the settlement, then adjoining parishes and then wider to the District.

15. Other material considerations and relevant planning issues raised by objectors

A significant amount of local objection has been received to this scheme. While the majority focuses on the fact that this land is outside of the settlement policy boundary and constitutes greenfield loss/development, important other issues have been raised. The majority are addressed by the report above.

**Infrastructure**

In respect of the availability of school places notably the scheme would make a substantial financial contribution towards primary education capacity within the catchment. This reflects the request made by the School Organisation Officer at Hampshire County Council.

In respect of other utilities, that are noted to be already under strain, statutory undertakers are responsible for the provision of drainage, clean water supply and electricity. Infrastructure provision responds to development and either no objection have been raised, or no comments have been received from the undertakers contacted. In respect of infrastructure provision, employment availability and public transport, it is salient that most sites in Alton would be similarly affected and that the amount of housing proposed here stills falls within the amount of development planned for in the settlement under the JCS. In respect of employment, over the short term housing development can offer modest local economic benefits and has the potential to boost local employment for trades people. Hence, the development includes elements of employment, including training, within the S106 obligation.

**Overdevelopment**

Objectors consider there to be an overdevelopment of the site and the local area. In respect of the latter the report describes the present housing shortfall and the policy approach to meeting this challenge, which is being adopted in the form of the Neighbourhood Plan by the Council. In any event the JCS will look similarly to provide for 700 dwellings within Alton. Turning to the site itself, the scheme makes an effective use of the land. The counter-point to reducing density is that additional land will need to be developed. Overall the character and design quality of the proposed development is considered to be good.
In respect of cumulative development it is the case that the JCS put forward 700 dwellings within Alton as an acceptable amount of housing, having regard to the spatial strategy and supporting evidence base. Alton is receiving significant pressure for potential new housing in the form of multiple applications and EIA screening opinions. The site is a SHLAA site, and there are a number of other SHLAA sites within the settlement but this carries no weight in the determination of an application which must be taken on its own merits.

Conclusion

The NPPF advocates a presumption in favour of sustainable development. Any adverse impacts of the proposal would need to significantly and demonstrably outweigh the benefits.

In terms of benefits, it is acknowledged that the proposal would provide around 529 new dwellings in the district to boost housing supply and contribute towards addressing the need for dwellings in Alton. Furthermore, 20 per cent of these units would be affordable. The other contributions to be sought under a S.106 legal agreement arising from the needs directly generated by this development would be towards formal public open space provision, highway improvements including the replacement of the Butts Bridge, provision of the Country Park, Alton Sports Centre contributions, improving education provision as well as economic contribution towards on site jobs. These are all positive benefits that will result from the development. However, the S.106 legal agreement has not been completed.

The sites are a natural extension to the settlement with little adverse landscape impact. The benefits associated with the scheme are significant and the harm is considered to be limited. It is therefore considered that having regard to the NPPF and the presumption in favour of sustainable development that the development is sustainable and permission should be granted.

RECOMMENDATION

That:
A. the solicitor to the Council be authorised to draw up a Section 106 legal agreement and;
B. provided that by 29th April 2015 all relevant parties enter into the Section 106 agreement with the Council to secure:
   i. employment and training package
   ii. travel plan
   iii. economic contribution to Alton Leisure Centre
   iv. integrated transport measures
      • off-site highway works - Improvements to the Chawton Park Road/Whitedown Lane junction
      • traffic management measures on Chawton Park Road and Northfields Lane
      • improvements to Whitedown Lane/Basingstoke Road
      • walking and cycling linkages from the site(s) to the Town Centre
      • wider mitigation measures identified in the Alton Transport Study
      • financial contribution of £225,000
• delivery of off-site highway works as shown on drawings B14149001-C (The Butts/Selborne Road access roundabout) and B14149-007-B (Chawton Park Road access)
• Traffic Management Plan for Butts Improvement works
• Travel Plan and associated assessment and monitoring fees and Travel Plan Bond
• Construction Traffic Management Plan
  v. community project worker
  vi. public open space (not already provided on site)
  vii. replacement of Butts Bridge
  viii. a commuted sum of £5,057 per eligible dwelling for extensions to primary schools in Alton and £1,683 per eligible dwelling for secondary education to be paid to HCC.
  ix. structural planting
  x. retention of water towers and Robertson House
  xi. translocation of chalk grassland outside of SINC
  xii. management and maintenance of open spaces
  xiii. provision of Country Park, bond towards maintenance of county park and associated parking
  xiv. contribution towards replacement of Alton Sports Centre (£10,000 per dwelling)
  xv. provision and maintenance in perpetuity of landscape planting and ecology buffers
  xvi. on-site provision of public open space and children’s play space and maintenance in perpetuity
  xvii. matters of general management and maintenance in perpetuity of other common areas including of the access and estate roads, surface water drainage systems
  xviii. provision of affordable housing and tenure split for affordable housing, stipulating 30% intermediate (shared ownership) and 70% affordable rent.
  xix. occupancy criteria stipulating a cascade for occupancy of affordable rent units within the settlement, then adjoining parishes and then wider to the District.

then the Executive Head Planning and Development be authorised to grant OUTLINE AND FULL PERMISSION subject to the conditions set out below.

However, in the event that a satisfactory legal obligation to secure points i-xix above is not secured by 29th April 2015 then outline permission will be refused under the Council’s adopted scheme of delegation.

1 Conditions in respect of Full Application

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason - To comply with the requirements of Section 51 of the Planning and Compulsory Purchase Act 2004.
2 Conditions in respect of Outline Application

Applications for the approval of the matters referred to herein shall be made within a period of three years from the date of this permission. The development to which the permission relates shall be begun not later than whichever is the later of the following dates:-

(i) three years from the date of this permission; or

(ii) two years from the final approval of the said reserved matters, or, in the case of approval on different dates, the final approval of the last such

Reason - To comply with the provisions of Section 92(2) of the Town and Country Planning Act, 1990.

3 No development, or if a phasing plan has first been agreed in writing by the Local Planning Authority no development of the individual phase, shall start until plans and particulars showing the detailed proposals for all the following aspects of the development or the individual phase as appropriate have been submitted to and approved in writing by the Local Planning Authority. These details shall comprise the 'reserved matters' and shall be submitted within the time constraints referred to in Condition 2 and comprise:-

a) Access: meaning the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network;

b) Appearance: meaning the aspects of any building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture;

c) Landscaping: meaning the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes screening by fences, walls or other means, the planting of trees, hedges, shrubs or grass, the formation of banks, terraces or other earthworks, the laying out or provision of gardens, courts or squares, water features, sculpture, or public art, and the provision of other amenity features;

d) Layout: meaning the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development;
e) Scale: meaning the height, width and length of each building proposed within the development in relation to its surroundings;

f) A site survey showing the position, type and spread of all existing trees on the site and a schedule detailing the size and a schedule detailing the size and physical condition of each tree and, where appropriate, the steps to be taken to bring the tree(s) to be retained to a satisfactory condition and also details of any proposals for the felling, lopping, topping or up-rooting of any tree;

g) Arrangements to be made for the future maintenance of landscaped and other open areas;

h) The provision to be made for the parking, turning, loading and unloading of vehicles;

i) Details of a scheme for foul and surface water drainage to include the layout of foul sewers and water drains;

j) The provision of street lighting, street furniture, lighting (including security lighting), bollards etc;

k) The provision to be made for the storage and removal of refuse from each part of the development;

l) The phasing of the development;

Each of the above matters shall be implemented in accordance with the approved details before either any part of the development is occupied, or in accordance with an agreed phasing plan, whichever is the later, unless otherwise first agreed in writing by the Local Planning Authority.


The development hereby permitted shall be carried out in accordance with the following approved plans and particulars:

Application form
Site-wide Reports
Transport Assessment (Including Draft Framework travel Plan)
Noise Assessment (Including Vibration)
Air Quality Assessment Report
Utilities Assessment
Planning statement
Statement of Community Involvement
HP98081/0001D - Location plan
Land East of Selborne Road plans
Edp/286/36H - Indicative Masterplan
Edp/286/67B - Built form Storey Heights
Edp/286/72B - Phasing Plan
Design and Access Statement
Energy Statement
Flood Risk Assessment
Correspondence re Archaeological Assessment
Geo-Physical Survey
Findings of Arboricultural Assessment
Ecological Appraisal
Landscape and visual impact assessment
Phase 1 Contamination Assessment
Lighting Assessment
Nightscapes Assessment
Lord Mayor Treloar plans
LMT-DWG-MAS-APP-HGT-001 - Built Form Storey Heights Parameter plan
LMT-DWG-MAS-APP-OSP-001 - Green Infrastructure Parameter plan
LMT-DWG-MAS-APP-PAB-001 - Planning Application Boundary
LMT-DWG-MAS-APP-ZON-001 - Development Parcels and Land use Parameter plan
LMT-DWG-MAS-ILL-SWD-001 - Conceptual Surface Water Drainage plan
LMT-DWG-MAS-ILL-TPO-001 - Tree Removal and protection Plan
LMT - 04009B - Phasing Plan
Design and Access Statement
Energy statement
Flood Risk assessment
Historic Environment Desk Based Assessment
Arboricultural Advice
Landscape and Visual Impact Assessment
GEO-Environmental Desk Study
Artificial lighting assessment
Asbestos re-Inspection assessment
Extended Phase 1 Habitat Survey
Botanical survey
Reptile Survey
Ornithological Report
Invertebrate Survey
Hedgerow Survey
Fungi survey
Dormouse Survey
Bat Survey
Supplement Bat Report
Outline Ecological Mitigation and Management Strategy
5 That no development shall take place until the applicant has secured the implementation of a programme of archaeological assessment in accordance with a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority.

Reason - To assess the extent, nature and date of any archaeological deposits that might be present and the impact of the development upon these heritage assets.

6 That no development shall take place until the applicant has secured the implementation of a programme of archaeological mitigation of impact in accordance with a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority.

Reason - To mitigate the effect of the works associated with the development upon any heritage assets and to ensure that information regarding these heritage assets is preserved by record for future generations.
Following completion of archaeological fieldwork a report will be produced in accordance with an approved programme including where appropriate post-excavation assessment, specialist analysis and reports, publication and public engagement. 

**Reason** - To contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment and to make this publicly available. In the first instance this should take the form of archaeological trenched evaluation, potentially informed by geophysical survey as proposed in the Desk Based Assessment submitted with the application. The results of the geophysical survey and trenched evaluation should be submitted with any detailed application and will inform the nature of any further mitigation that might be necessary.

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No development shall start on site until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year with an allowance for climate change critical storm will not exceed the run-off from the existing developed site or a return to Greenfield rates, following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before any part of that phase of the development is first occupied. The scheme shall also include details of how the scheme shall be maintained and managed after completion.

**Reason** - To prevent the increased risk of flooding, both on and off site.

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No development shall start on site until details of the foul water drainage has been submitted to and approved in writing by the Local Planning Authority. The development works shall be carried out in accordance with the approved details before any part of the development is occupied and shall be retained thereafter.

**Reason** - To ensure adequate provision for foul drainage.

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No development shall start on site until a construction method statement has been submitted to and approved in writing by the Planning Authority, which shall include:

(a) A programme of and phasing of demolition (if any) and construction work; 
(b) The provision of long term facilities for contractor parking; 
(c) The arrangements for deliveries associated with all construction works, including the hours when such deliveries are to take place; 
(d) Methods and phasing of construction works; 
(e) Access and egress for plant and machinery;
(f) Protection of pedestrian routes including public rights of way during construction;
(g) Location of temporary site buildings, compounds, construction material, and plant storage areas;
(h) Controls over dust, noise, and vibration during the construction period;
(i) Provision for storage, collection, and disposal of rubbish from the development during construction period; and
(j) Re-use of on site material and spoil arising from any site clearance or demolition work.

Demolition and construction work shall only take place in accordance with the approved method statement.
Reason - In order that the Planning Authority can properly consider the effect of the works on the amenity of the locality.

11 All trees, shrubs and other natural features not scheduled for removal shall be fully safeguarded during the course of the site works and building operations. No work shall commence on site until all trees, shrubs or features to be protected are fenced with:

   a) 1.2m minimum height chestnut paling to BS.1722 Part 4 securely mounted on 1.2 minimum height timber posts driven firmly into the ground; or

   b) 2.4m minimum height heavy duty hoardings securely mounted on scaffold poles:
      (i) For trees and shrubs the fencing shall follow a line 1.0m outside the furthest extent of the crown spread, unless otherwise agreed in writing by the Local Planning Authority;
      (ii) For upright growing trees at a radius from the trunk not less than 6.0m, or two thirds of the height of the tree which ever is the greater;
      (iii) For other natural features along a line to be agreed in writing by the Local Planning Authority.

Such fencing shall be maintained during the course of the works on site. No unauthorised access or placement of goods, fuels or chemicals, soil or other materials shall take place inside the fenced area.
Reason - To ensure that trees, shrubs and other natural features to be retained are adequately protected from damage to health and stability throughout the construction period.
Prior to the commencement of development an Arboricultural Method Statement and Tree Protection Plan shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

**Reason** - To ensure that the trees on and around the site are adequately protected from damage to their health and/or amenity value.

No development shall start on site until a fully-detailed scheme of site-wide ecological mitigation, compensation and enhancement measures (to include but not necessarily be restricted to: site plan showing all ecological features; location, extent, composition and ongoing management of mitigation/compensation/enhancement habitat; measures to protect and retain existing ecological features) is submitted to, and agreed in writing by, the Local Planning Authority. Such details shall be in accordance with the outline mitigation and enhancement measures detailed within the Outline Ecological Mitigation and Management Strategy (WSP, October 2014) and the Addendum Ecology Report EDP286_06 (EDP, October 2014). Any such measures shall thereafter be implemented in strict accordance with the agreed details, unless otherwise agreed in writing by the Local Planning Authority.

**Reason** - To conserve and enhance biodiversity in accordance with the Conservation Regulations 2010, the Wildlife & Countryside Act 1981, the NERC Act 2006, NPPF and with Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy.

No development shall start on site until the following details have been submitted to and approved in writing by the Planning Authority:-

(a) a scheme outlining a site investigation and risk assessments designed to assess the nature and extent of any contamination on the site.

(b) a written report of the findings which includes, a description of the extent, scale and nature of contamination, an assessment of all potential risks to known receptors, an update of the conceptual site model (devised in the desktop study), identification of all pollutant linkages and unless otherwise agreed in writing by the Planning Authority and identified as unnecessary in the written report, an appraisal of remediation options and proposal of the preferred option(s) identified as appropriate for the type of contamination found on site.

and (unless otherwise first agreed in writing by the Planning Authority)

(c) a detailed remediation scheme designed to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment. The scheme should include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of
works, site management procedures and a verification plan outlining
details of the data to be collected in order to demonstrate the completion
of the remediation works and any arrangements for the continued
monitoring of identified pollutant linkages.
The above site works and details submitted shall be in accordance with
the approved scheme and undertaken by a competent person in
accordance with DEFRA and the Environment Agency’s ‘Model
Procedures for the Management of Land Contamination, CLR 11’.
Reason - To ensure that risks from land contamination to the future users
of the land and neighbouring land are minimised, together with those to
controlled waters, property and ecological systems, and to ensure that the
development can be carried out safely without unacceptable risks to
workers, neighbours and other offsite receptors.

Before any part of the development or phase of development is occupied
or used (unless otherwise first agreed in writing by the Planning Authority)
a verification report demonstrating the effectiveness of the remediation
works carried out and a completion certificate confirming that the
approved remediation scheme has been implemented in full shall both
have been submitted to and approved in writing by the Planning Authority.
The verification report and completion certificate shall be submitted in
accordance with the approved scheme and undertaken by a competent
person in accordance with DEFRA and the Environment Agency’s ‘Model
Procedures for the Management of Land Contamination, CLR 11’.
Reason - To ensure that risks from land contamination to the future users
of the land and neighbouring land are minimised, together with those to
controlled waters, property and ecological systems, and to ensure that the
development can be carried out safely without unacceptable risks to
workers, neighbours and other offsite receptors.

All development on that phase of development shall be stopped
immediately in the event that contamination not previously identified is
found to be present on the development site and details of the
contamination shall be reported immediately in writing to the Planning
Authority.

Development shall not re-start on site until the following details have been
submitted to and approved in writing by the Planning Authority:-

(a) a scheme outlining a site investigation and risk assessments
designed to assess the nature and extent of any contamination on the
site.
(b) A written report of the findings which includes, a description of the extent, scale and nature of contamination, an assessment of all potential risks to known receptors, an update of the conceptual site model (devised in the desktop study), identification of all pollutant linkages and unless otherwise agreed in writing by the Planning Authority and identified as unnecessary in the written report, an appraisal of remediation options and proposal of the preferred option(s) identified as appropriate for the type of contamination found on site.

and (unless otherwise first agreed in writing by the Planning Authority)

(c) A detailed remediation scheme designed to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment. The scheme should include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works, site management procedures and a verification plan outlining details of the data to be collected in order to demonstrate the completion of the remediation works and any arrangements for the continued monitoring of identified pollutant linkages; and before any part of the development is occupied or used (unless otherwise first agreed in writing by the Planning Authority) a verification report demonstrating the effectiveness of the remediation works carried out and a completion certificate confirming that the approved remediation scheme has been implemented in full shall both have been submitted to and approved in writing by the Planning Authority.

The above site works, details and certification submitted shall be in accordance with the approved scheme and undertaken by a competent person in accordance with DEFRA and the Environment Agency’s ‘Model Procedures for the Management of Land Contamination, CLR 11’.

**Reason** - To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

17

No development shall start on site until plans of the site showing details of the existing and proposed ground levels, proposed finished floor levels, levels of any paths, drives, garages and parking areas and the proposed completed height of the development and any retaining walls have been submitted to and approved in writing by the Planning Authority. The details shall clearly identify the relationship of the proposed ground levels and proposed completed height with adjacent buildings. Each phase of the development thereafter shall be carried out in accordance with the approved details.
**Reason** - To ensure that a satisfactory relationship results between the new development and adjacent buildings, open countryside and public areas.

18 **Before any part of the development is first occupied** a verification report and completion certificate shall be submitted in writing, to the Planning Authority, confirming that the built development hereby permitted incorporates measures that provide at least 10% of the predicted energy requirement from on-site renewable sources, or, provided that first agreed in writing by the Planning Authority before development starts on site, an alternative means of achieving an equivalent energy saving.

The developer shall nominate a competent person for the purpose of assessing and providing the above required report and certificate to confirm that the completed works incorporate such measures as to provide the required energy savings.

The energy saving works set out in the above report shall thereafter be maintained so that the required energy saving is sustained at the certified level for the lifetime of the development.

**Reason** - To ensure that the development incorporates necessary mitigation and adaptation measures with regard to climate change.

19 All hard and soft landscape works shall be carried out in accordance with the approved details and in accordance with the recommendations of the appropriate British Standards or other recognised codes of good practice. These works shall be carried out in the first planting season after practical completion or first occupation of the development, whichever is earlier, unless otherwise first agreed in writing by the Local Planning Authority.

Any trees or plants which, within a period of 5 years after planting, are removed, die or become seriously damaged or defective, shall be replaced as soon as is reasonably practicable with others of species, size and number as originally approved unless otherwise first agreed in writing by the Local Planning Authority.

**Reason** - To ensure the provision and establishment of a reasonable standard of landscape in accordance with the approved designs.

20 No development shall commence on site until a scheme for protecting the proposed development from noise has been submitted to and approved by the Local Planning Authority; all such works which form part of the scheme shall be completed before any part the dwellings are occupied.

**Reason** - In the interests of the amenity of residents of the proposed scheme.
Informative Notes to Applicant:

1 In accordance with paragraphs 186 and 187 of the NPPF East Hampshire District Council (EHDC) takes a positive and proactive approach and works with applicants/agents on development proposals in a manner focused on solutions by:

- offering a pre-application advice service,
- updating applications/agents of any issues that may arise in the processing of their application and where possible suggesting solutions, and,
- by adhering to the requirements of the Planning Charter.

In this instance the agent was provided with pre-application advice and was updated of any issues after the initial site visit.

2 Please note that there is a Section 106 Agreement that applies to this permission.

CASE OFFICER: Julia Mansi 01730 234236
SECTION 1  Item 01  Land at Lord Mayor Treloar Hospital Site, Chawton Park Road, and land East of Selborne Road Alton

Indicative masterplan
SECTION 1  Item 01  Land at Lord Mayor Treloar Hospital Site, Chawton Park Road, and land East of Selborne Road Alton

Parameter plan
SECTION 1 Item 01 Land at Lord Mayor Treloar Hospital Site, Chawton Park Road, and land East of Selborne Road Alton

Roundabout plan
SECTION 1   Item 01   Land at Lord Mayor Treloar Hospital Site, Chawton Park Road, and land East of Selborne Road Alton

Access plan
Appendix 1

Archaeology Section - Thank you for consulting me regarding the above planning application. I would concur with the analysis and conclusions of the desk based assessment submitted with the application. Although there are no archaeological finds or features currently known from within the development site itself the wider archaeological context of the site makes it likely that previously unidentified archaeological deposits are present within the site. Any such deposits would be disturbed by groundworks associated with the development. While there is no reason to believe that this would present an overriding concern the assessment, recording and reporting of any archaeological deposits that might be present should be secured through the attachment of suitable conditions to any planning consent that might be granted. For instance: 1) That no development shall take place until the applicant has secured the implementation of a programme of archaeological assessment in accordance with a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority. Reason: To assess the extent, nature and date of any archaeological deposits that might be present and the impact of the development upon these heritage assets. 2) That no development shall take place until the applicant has secured the implementation of a programme of archaeological mitigation of impact in accordance with a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority. Reason: To mitigate the effect of the works associated with the development upon any heritage assets and to ensure that information regarding these heritage assets is preserved by record for future generations. 3) Following completion of archaeological fieldwork a report will be produced in accordance with an approved programme including where appropriate post-excavation assessment, specialist analysis and reports, publication and public engagement. Reason: To contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment and to make this publicly available. In the first instance, as indicated in the desk based assessment, geophysical survey should be undertaken, followed by trenched evaluation. The results of these assessments will inform the nature of any subsequent archaeological mitigation that might necessary. I note that there has already been geophysical survey undertaken for part of the application area the next stage of assessment for this area would be archaeological trenched evaluation.

Conservation Officer - Outline residential development at Land East of Selborne Road Due to its location close to the Butts Conservation the design and layout of the development will be key to the success of the scheme. However, the site is largely screened from the conservation area and as such the proposed access that is subject of this outline permission to would not have an adverse impact. I would recommend that any future designs as part of reserved matters should try and respond positively to the local context. Outline residential development at the Former Lord Mayor Treloar Hospital The site is set some distance from Chawton and Butts Conservation Areas and listed buildings with the nearest being the Museum at Treloar Hospital which now acts as a store. In terms of these designated heritage assets it is not considered that this proposal will have an adverse impact. The site cannot be easily viewed from any of these sites and as such will not impact on their setting. Within the site there are a number of buildings that related to the former Lord Mayor Treloar Hospital.
However, many of these could not be classified as non-designated heritage assets. Of the buildings the two water towers and Robertson House are of local historic interest. The water towers in particular are of interest. The older of the two (Water Tower B on plans) which is constructed of three octagonal tanks supported on polygonal brick structure is certainly of some architectural merit. The smaller (Water Tower A on plans) dates from the 1920s when the hospital was reconstructed, and appears to be in good structural order. Both of them, in my view, could be adapted for another use or could even be retained as folly's that would provoke interest within the landscape. Aside from their intrinsic interest, retention would help to keep alive the memory of what was the former hospital. I note in the Historic Desk Based Assessment that Water Tower A is to be retained for ecological purposes but I would like to see Water Tower B to be retained for its historic local interest and architectural qualities. Robertson House appears to be have been one of the original hospital buildings constructed in the early 20th century. Although altered from its original state and in a particularly poor state of repair I would consider the building to be of local interest. You can still appreciate that this was a handsome building and again is one of the few remaining links with the site's history as a hospital. Indeed the Planning Brief produced by EHDC states: 'Robertson House should be retained and converted to provide residential apartments, unless its removal can be justified.' Little justification is given in the application for its removal other than the cost of refurbishing the building is too high. As explored above it is my view that the building does warrant retention even in its current form and I would recommend that it is integrated into the overall scheme. If refurbished it would certainly make a positive impact on the area particularly due to its dominant position in the landscape. Works associated with the construction of a replacement railway bridge following removal/demolition of existing The main issues for consideration are the significance of the asset, implications of the proposal on the significance of the asset and the conservation area and whether there are public benefits that outweigh the loss of the building. The key policies in the NPPF to be considered in the assessment of this application are as follows: NPPF 134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. 135. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. A local heritage asset is defined as:- 'A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Local heritage assets are valued components of the Historic Environment'. It is my view that Butts Bridge is a Local Heritage Asset that meets the definition shown above. It forms an attractively gateway feature to Alton and is of architectural merit clearing defining its history as part of the watercress line. Although local heritage assets are not protected from demolition by national legislation, the NPPF is clear that the effect on such an asset, or its setting, is a material planning consideration. Butts Bridge has strong historic associations with the development and evolution of the town and it's social history. As a result it can be concluded that the building has strong historical and communal value especially as a landmark within Alton. Given the significance of the building outlined above it is concluded that the total demolition and loss of the heritage asset will amount to NPPF 'substantial harm'. However, the NPPF does go on to say that where there is
harm to the heritage asset this has to be weighed against the public benefit which is explored below. Impact on wider conservation area and design of bridge. Although located outside the Butts Conservation Area the bridge nonetheless makes an important contribution to the character of the conservation area as it forms an attractive gateway feature. In assessing the impact of the demolition of the bridge on the significance of the setting of the conservation area it is considered that the proposal will not preserve or enhance the character and appearance of the conservation. However, the level of harm caused is considered to be less than substantial. Although planning permission is not sought at this time for the details of the bridge deck cladding the overall design of the bridge needs to be considered. It is recognised that there are numerous technical and financial restrictions that constrain the applicants ability to address all the design issues with the bridge. Whilst the design of the bridge is not necessarily of a landmark style I do not believe it will have an negative impact in the conservation area. I would prefer the brick cladding of the abutments and wingwalls to be a re-use of the bricks from the masonry arch and wingwalls. There are some shortcomings with the scheme particularly with the layout of the roundabout but it is not considered that these are enough to justify refusal in their own right. Public Benefits As before the concerns expressed about the demolition of the existing bridge must be balanced against the very real and demonstrable benefits the new bridge and associated highway works would bring to the wider community. It is claimed in the proposal the following public benefits will occur it granted permission: - Deliver open market housing to meet local need and the requirements of the NPPF and the East Hampshire/ South Downs National Park Joint Core Strategy; - Deliver much needed affordable housing; - Address existing highway problems at Butts Junction, including the widening of Butts Bridge over Whitedown Lane; - Supply funding towards the construction of a replacement Sports Centre and leisure facilities for Alton and the surrounding area; and - Provide a new publicly accessible 8 hectare Country Park for the town. It above points are to be delivered as part of the proposal it would appear that therefore the public benefits of the scheme could be considered significant enough to outweigh any perceived harm to the to the non designated heritage asset that is Butts Bridge. Impact on Grade II listed French Horn PH & tank trap The applicants have not addressed the impact the proposal might have on the Grade II listed PH that sit close to the Bridge. Whilst I am not convinced there will be any impact this should be addressed in the submission as currently it is devoid of detail on this point. It should also be noted that on the south east side of the existing bridge, adjacent to the roundabout, a concrete tank trap survives from the 2nd World War. Whilst not a thing of beauty, it does have local historical value and should be preserved in the locality. Conclusion I believe that the proposed bridge will potentially preserve the appearance of the nearby conservation area but there is a degree of harm in the loss of the existing railway bridge which is part of Alton's heritage. It is also recognised that there are numerous technical and financial restrictions that constrain the applicants ability to address all the design issues of the bridge that have been raised. On balance, the significant public benefits the proposal is likely to bring would on balance justify accepting any harm the removal and reconstruction of the bridge might have.
Hampshire and Isle of Wight Wildlife Trust - Thank you for providing the additional information with regard to the above referenced application. As you are aware we have previously commented on this application, our reference 14.06.09 Lord Mayor Treloar Hospital, Alton. In that response we objected to the proposals and also expressed concern that the Botanical Survey Report (1) for the proposed development site had been kept confidential. We have now been provided with the Botanical Survey Report and the Badger Survey Report (2). Having reviewed the additional information provided we must again question why the Botanical Survey Report has been kept confidential, since it would appear that there is no information within it that would be considered to be of a confidential nature and no justification has been included within the report. In fact the most notable aspect of this report is that the majority of the proposed development site has not been subjected to a botanical survey. As you will be aware, in our previous response we objected to the proposals since they included the development of Lowland Calcareous Grassland, which has been identified under Section 41 of the Natural Environment and Rural Communities (NERC) Act, as a habitat type of principal importance. In addition the proposed development site includes the development of land that has been designated for its nature conservation value. Given that the Botanical Survey did not even survey the majority of the site, it is likely that any assessment of impacts will be inaccurate and therefore we wish to reaffirm our objection to this application. Our principal concerns for objection remain the same as those identified in our previous response, which are as follows; The loss of a species-rich chalk grassland habitat; and the loss of/deterioration of designated SINC sites as a result of the development proposals and through increased recreational pressure. As we have already stated Lowland Calcareous Grassland has been identified as a habitat of principal importance under Section 41 of the NERC Act. The nearby woodland SINC is considered to be of County importance due to the presence of notable plant species, and the SINC sites comprise unimproved calcareous grassland. This has been highlighted within the Botanical Report. The diversity and abundance of species on meadows that have a high floristic value have been well documented, and the Wildlife Trusts nationally are running a campaign to save species rich meadows for the important role they play in supporting biodiversity, including invertebrate fauna. We note that the invertebrate report (3) only recorded nine species of butterfly, which is surprising given the species diversity if the meadow. Figure 2 Survey Area of the Invertebrate Report provides a map indicating the site boundary, the allocated site boundary and the locations of the SINCs. It would be useful to clarify whether the site boundary and the survey boundary are one of the same as this is not clear. Given that the botanical survey did not include the entire site, it may also be the case that the invertebrate, and other surveys did not, which may explain why only nine species of butterfly were recorded. Conclusion. In conclusion, and further to reviewing the additional information we wish to re-affirm our objection to this application. The development site includes the loss of a species-rich habitat type (Lowland Calcareous Grassland), which has been identified as a habitat of principal importance under Section 41 of The NERC Act. In addition the development includes the development of SINC sites which have been designated for their nature conservation value, which is contrary to locally adopted and national planning policies. Sites that have been designated for their nature conservation should not be included within development plans, and their inclusion is contrary to many of your own and national planning policies. The above advice is given based on the information made available at this time and may change should further or amended details be submitted. If you wish to discuss these matters further, then please do not hesitate to do so. I also ask...
that you keep the Trust informed of the progress and outcome of this application. 1 WSP (2014) Lord Mayor Treloar College, Alton Botanical Survey 2 WSP (2014) Lord Mayor Treloar College, Alton Badger Survey 3 WSP (2014) Lord Mayor Treloar College, Alton Invertebrate Survey. As you are already aware, concerned members have alerted us to potential threats to the fields that are included within the former Lord Mayor Treloar Hospital part of this application. These fields form the north-eastern part of the proposed development site, and are currently not designated for their nature conservation value (for ease of reference these areas are detailed as E, F, G, I, the location for LEAP and LAP and the proposed country park site, as indicated on the Green Infrastructure Parameter Plan1). In addition the development site includes two areas that are designated for their nature conservation value (Lord Mayor Treloar College SINC (in two parts)), and extensive woodland that forms the north-eastern boundary of the site is also designated a SINC. To back up these concerns we have been provided with a list of species that have been recorded within the meadow, as indicated above. We have also reviewed information held on the HBIC database for the local area including the Lord Mayor Treloar Hospital SINC and the nearby Ackender/Alexandra Wood SINC. This information confirms the species richness of both the development site and the adjacent ancient woodland site. In commenting on this application we have reviewed the following documents; EDP (2014) Land East of Selborne Road, Alton Ecological Appraisal WSP (2013) Lord Mayor Treloar, Alton Extended Phase 1 Habitat Survey WSP (2014) Lord Mayor Treloar Hospital, Hampshire Ornithological Report WSP (2014) Former Lord Mayor Treloar Hospital, Hampshire Outline Ecological Mitigation and Management Strategy; WSP (2014) Lord Mayor Treloar, Alton Hedgerow Survey; WSP (2014) Lord Mayor Treloar, Alton Invertebrate Survey; WSP (2014) Lord Mayor Treloar, Alton Reptile Survey; WSP (2014) Lord Mayor Treloar, Alton Bat Survey (Activity and Emergence Surveys); WSP (2014) Lord Mayor Treloar, Alton Dormouse Survey. Unfortunately we are aware that the Botanical Report that supports this application is being kept confidential. Given that the floristic value of the site is likely to be one of the greatest constraints to this application, we consider that it is unacceptable for this report to be kept confidential, without good reason. To date we have not received justification for its confidentiality and therefore as a consultee would expect sight of it in order that we may fully assess the impacts of the proposals on the botanical interest at the site. Having reviewed the submitted reports and in the absence of certain information pertaining to the site, we object to the proposals for the site. Our principal concerns for objecting to this application area as follows; The loss of a species-rich chalk grassland habitat; and the loss of/deterioration of designated SINC sites as a result of the development proposals and through increased recreational pressure. We would also like to state that whilst we acknowledge that this application is for outline permission only, the information provided seems too vague for a robust assessment of the ecological impacts to be made. We therefore consider that further more detailed information, including a detailed mitigation strategy will be required before a decision on this application can be made. Designated Sites We note that the proposals for the site include the development of approximately two-thirds of the Lord Mayor Treloar Hospital SINC. On a point of principle the Wildlife Trust is opposed to the development of sites that have been designated for their nature conservation value. We acknowledge that measures are proposed to ensure that the remainder of the SINC is protected and that the part of Ackender/Alexandra Wood SINC included within the boundary line will not form part of the development. However we have serious concerns that the remainder of the Lord Mayor Treloar Hospital SINC will be compromised by increased
recreational pressure and nutrient enrichment as a result of the development proposals, a fact that is acknowledged in the Outline Ecological Mitigation and Management Strategy (Paragraph 2.1.8). We are also concerned that increased recreational pressure as a result of the development proposals, will negatively impact on the ecological features of the Ackender/Alexandra Wood SINC. We note that a 15 metre buffer is proposed between the site and the Ackender/Alexandra Wood SINC, which is the minimum requirement as per Natural England's guidance. The issues of recreation pressure from developments situated on the edge of ancient woodland sites are well documented and we do not consider that the proposals to date are sufficient to prevent a deterioration of this designated site.

Protected/Important Habitats and Species As we have previously stated, unfortunately the botanical surveys in support of this application have been kept confidential and therefore it has not been possible for the Trust to assess the true ecological impacts of this application. However, we have been able to assess the SINC habitats via the HBIC database, and have been provided with a summary of plant species present within the meadow which forms the eastern part of the Lord Mayor Treloar Hospital development site. Having reviewed the information that we have been provided with, it would appear that the majority of the site comprises species-rich calcareous grassland. In addition, the adjacent ancient woodland site is a known species rich habitat, which supports an extremely rare grass, Wood Barley Hordelymus europaeus. The species richness of both sites will undoubtedly suffer as a result of the proposals, with the majority of the grassland being either lost to the development, or managed for the purpose of recreation. The net result will be a loss in the species diversity at the site. Policy CP21 of the adopted East Hampshire District Local Plan: Joint Core Strategy (2014) requires that ‘development proposals must maintain, enhance and protect the District’s biodiversity and its surrounding environment’. New development will be required to: a) maintain, enhance and protect district wide biodiversity, in particular the nature conservation designations. i) Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar (International); ii) Sites of Special Scientific Interest (SSSI) and National Nature Reserves (National); iii) Sites of Importance for Nature Conservation (SINC) (Hampshire) [our emphasis] and Local Nature Reserves (LNR). b) extend specific protection to, and encourage enhancement of, other sites and features which are of local value for wildlife, for example important trees, rivers, river corridors and hedgerows, but which are not included in designated sites [our emphasis]. The National Planning Policy Framework requires local authorities to ‘minimise impacts on biodiversity’ and should ‘promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations’. The information that we have confirms that the grassland habitats within the site comprise species-rich chalk grassland (Lowland Calcareous Grassland), which has been identified under Section 41 of the Natural Environment and Rural Communities (NERC) Act as a habitat type of principle importance. The saved Policy C3 of the adopted Local Plan 2006 states that ‘planning permission will not be granted for proposals likely to harm the nature conservation interests of Sites of Importance for Nature Conservation (SINCs)’. In addition Policy C4 states 'Where sites, other than those identified in Policies C2 and C3, have been identified as having local nature conservation interest the Council will have full regard for their scientific significance and nature conservation value when assessing development proposals that may affect those sites'. The proposals included within this application involve the loss of a site that has been designated for its nature conservation value and have the potential to result in the deterioration of the features of
nature conservation value of another. They also involve the development of a habitat type which has been identified as being of principle importance within the UK. The development proposals are therefore contrary to your adopted Policy CP21a and b of the Core Joint Strategy (2014), the saved policies of the Second Review Local Plan (2006) and the policies included in the NPPF. Ecological Mitigation and Management Strategy We again acknowledge that this document is in support of an outline application but consider that the management prescriptions do not seem to recognise the existing high ecological value of the site. For example Paragraph 2.1.11 states that 'A network of grassland will be retained on Site, notably the proposed Country Park in the east of the Site provides the opportunity to retain and manage larger section of grassland in combination with narrower strips along the edges of retained woodland and hedgerows. This habitat type will form a key part of the green infrastructure network on Site, and reflecting the underlying chalk substrate new area will be managed to promote a diverse, calcareous grassland botanical community'. Paragraph 3.2.5 refers to 'newly created calcareous grassland, or land receiving translocated turves (and associated substrate)'. It extremely concerning that the above statement appears not to acknowledge the existing high botanical diversity of the site. Unfortunately it is impossible for us to compare our data with the applicants' ecologist, since the botanical report is confidential, as we have already stated. But promoting an area of land as 'diverse, calcareous grassland', within a new Country Park that will be used by residents to exercise their dogs is unlikely to prove successful. Given the likely issues such as nutrient enrichment (dog fouling), trampling of vegetation, required cutting regimes etc, it is likely that the proposals will result in a net loss of biodiversity from the site. General Comment We have referred to the issue of confidentiality of certain documents previously within this response and can see no good reason why the Botanical Report has been withheld. We have to question the legality of withholding and document from a public consultation process without good reason. We have requested this information, but at the time of writing this response have received no response to our request. If the outstanding information is made available we will be expecting to be given the standard consultation period to review this document. If however the document is not made available we may be minded to issue a Freedom of Information request for this information within the provisions of the Freedom of Information Act (2000). Conclusion In conclusion, the Wildlife Trust objects to this application since the development proposals include the loss of a species-rich habitat type (Lowland Calcareous Grassland), which has been identified as a habitat of principle importance under the Section 41 of The NERC Act. In addition the development includes the development of SINC sites which have been designated for their nature conservation value, which is contrary to locally adopted and national planning policies. We are also opposed to the fact that some documents have been submitted confidentially with this application, most notably the Botanical Report. If this document is not made available we may be minded to submit a Freedom of Information request, since we do not consider it appropriate to withhold important documents from a public consultation process. The above advice is given based on the information made available at this time and may change should further or amended details be submitted. If you wish to discuss these matters further, then please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.
HCC - Rights of Way Officer (Access Devt Team) - Please accept this response as being that of the Highway Authority in respect of Public Rights of Way (PRoW). Our chief concern with this application is with the landscape and visual impacts for users of the public rights of way that run alongside both of the proposed sites, and particularly the proposal for new development on that part of the Lord Mayor Treloar (LMT) site immediately to the east of Chawton Footpath 1. Notwithstanding the screening and other mitigation measures proposed within the Design and Access Statement, this will have an urbanising impact on what is currently a rural path with fields on either side. On that basis, we would be inclined to object to this application. One possibility for offsetting this impact would be to make provision for improving the local rights of way network, for example by providing an off-road link for walkers, horseriders and cyclists to the north-west of Chawton Park Road between Mounters Lane (Alton Restricted Byway 506) and Chawton Bridleway 4. This would enable users of those rights of way to avoid a dangerous on-road link identified by local users consulted during research for the Countryside Access Plan for Hampshire (see www.hants.gov.uk/countryside-access-plans). It would also contribute to the ‘wider green network that will promote permeability into and out of the new and existing neighbourhood’ (LMT Design & Access statement page 42) and the ‘strong green infrastructure network, which promotes sustainable movement, biodiversity and recreation’ envisaged on page 45. These intentions within the D&A statement link closely with the work that the Countryside Service is doing in East Hampshire and across the rest of the county to implement the Countryside Access Plan. In the interests of ensuring coherence with the wider countryside access network, we would ask the applicant to consult this department of Hampshire County Council at an early stage in the next phase of planning accessible green infrastructure and sustainable transport links within and around this development. We would be grateful if this could be included in the decision notice if permission is granted.

Thames Water - Waste Comments Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following ‘Grampian Style’ condition imposed. ‘Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed’.

Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval. Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 020 8507 4890 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via
www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system. Water Comments Supplementary Comments We would recommend that developers produce drainage strategies as part of their evidence base when submitting their planning applications. The drainage strategy should be produced in consultation with Thames Water to show that capacity exists in both the on and off site infrastructure or that it can be provided ahead of occupation. Where additional infrastructure is required the strategy should go on to identify what infrastructure is required, where and funded by who. Early contact with the Thames Water, Developer Services Department on telephone number 0845 8502777 is advised.

HCC - School Organisation Officer - Thank you for the opportunity to comment on the proposed development for the former Lord Mayor Treloar Hospital site. In terms of school places Alton is full and forecast to remain so for the foreseeable future. Consequently any development brought forward within Alton will require a contribution to be paid towards the expansion of the schools within the town or the provision of a new school. The application on the website does not give the number of dwellings proposed but as a guide I would anticipate a sum of £5,057 per dwelling towards the cost of an expansion to the primary places in the town. If a new school is required I will be seeking a site of 2ha (at nil cost) together with a contribution of £6,278 per dwelling towards the cost of the new provision. Similarly there may be a need to expand the secondary provision (dependent upon the number of dwellings proposed). I trust this will be sufficient as a response to the application and I will be able to be more specific when actual numbers of dwellings are known and I will be happy to update this response at that time.

Hampshire Fire and Rescue Service - I confirm that I have received a copy of your application dated 14 May 2014. One of my inspectors has considered the information provided and the following comments are made: Building Regulations: Access for Firefighting Access and facilities for Fire Service Appliances and Firefighters should be in accordance with Approved Document B5 of the current Building Regulations. Hampshire Act 1983 Section 12 - Access to the proposed site should be in accordance with Hampshire Act 1983 Sect, 12 (Access to buildings within the site will be dealt with as part of the building regulations application at a later stage). Access roads to the site should be in accordance with Approved Document B5 of the current Building Regulations. Fire and Rescue Services Act 2004 The following recommendations are advisory only and do not form part of any current legal requirement of this Authority. Access for High Reach Appliances High reach appliances currently operated by the Hampshire Fire and Rescue Service exceed the maximum
requirements given in Section 17 of the Approved Document B. When considering high rise buildings these variations should be considered as additions and incorporated as follows. Structures such as bridges, which a high rise appliance may need to cross should have a maximum carrying capacity of 26 tonnes. Where the operation of a high reach vehicle is envisaged, a road or hard standing is required 6m wide. In addition, the road or hard standing needs to be positioned so that its nearer edge is not less than 3m from the face of the building. Water Supplies Additional water supplies for fire fighting may be necessary. You should contact the Community Response Support, Hampshire Fire and Rescue Headquarters, Leigh Road, Eastleigh, SO50 9SJ (risk.information@hantsfire.gov.uk) to discuss your proposals. Sprinklers Hampshire Fire and Rescue Service (HFRS) would strongly recommend that consideration be given to include the installation of Automatic Water Suppression Systems (AWSS) as part of a total fire protection package to: Protect Life; Protect Property, Heritage, the Environment and our Climate; Help promote and sustain Business Continuity; and Permit design freedoms and encourage innovative, inclusive and sustainable architecture. The use of AWSS can add significant benefit to the structural protection of buildings from damage by fire. HFRS are fully committed to promoting Fire Protection Systems for both business and domestic premises. Support is offered to assist all in achieving a reduction of loss of life and the impact on the wider community. Fire fighting and the Environment Should a serious unsuppressed fire occur on the premises, the water environment may become polluted with 'fire water run-off' that may include foam. The Fire Service will liaise with the Environment Agency at any incident where they are in attendance and under certain circumstances, where there is a serious risk to the environment, a 'controlled burn' may take place. This of course could lead to the total loss of the building and its contents. Premises occupiers have a duty to prevent and mitigate damage to the water environment from 'fire water run off' and other spillages. Further guidance on preventing pollution can be found in the following environment Agency publications: Managing Fire Water and Major Spillages: PPG18: Pollution Incident Response Planning: PPG21 Controlled Burn: PPG28 Timber Framed Buildings These types of buildings are particularly vulnerable to severe fire damage and fire spread during the construction phase. The UK Timber Frame Association publication '16 Steps to Fire Safety on Timber Frame Construction Sites' provides guidance on this issue and is available from <http://uktfa.com/> This guidance should be read in conjunction with the 'Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation', published by the Construction Confederation And The Fire Protection Association (Sixth Edition, ISBN 1-902790-33-2) Copies of the 'Joint Codes of Practice' and useful sister publication, 'Construction Site Fire Prevention Checklist' (Second edition, ISBN 1-902790-32-4), are available for purchase from the FPA (www.thefpa.co.uk <http://www.thefpa.co.uk>) and from Construction Industry Press (www.cip-books.com <http://www.cip-books.com>)
EHDC Housing Officer - Memorandum

Date: 5th June 2014

To: Julia Mansi

From: Mark Barnett

Re: Proposal: Outline application (all matters reserved, except access) for:

a) Residential development (with a net developable area of 7.12 hectares) at land east of Selborne Road;
b) Residential development (with a net developable area of 11.5 hectares) and provision of a country park on land at the former Lord Mayor Treloar Hospital, Chawton Park Road

Site Address: Lord Mayor Treloar Hospital and land East of Selborne road, Alton

Case No: 30021/056/OUT

This application proposes 20% affordable housing, which falls short of the 40% target of CP13 in the JCS. The policy allows for individual circumstances and viability to be taken into account when considering the amount of affordable housing. There is some reference within the application that a financial contribution towards the provision of a new sports facility will be made which may be the justification for a lower percentage of affordable housing. I would recommend that further supporting evidence is provided with the application to demonstrate it is appropriate to provide 20% affordable housing on this site.

The housing need for affordable rented accommodation in Alton is very high, as detailed below: (figures taken from Hampshire Homechoice Register):

- 1 bed: 473
- 2 bed: 235
- 3 bed: 77
- 4 bed: 23

Total: 808

Included within these figures are applicants with a local connection to Alton (live, work or have family there). The JCS policy CP.13 affords priority to eligible, local households in need, bidding for new affordable rented homes through the Hampshire HomeChoice allocation process. However, the allocation process must allow a cascade to the wider EHDC District to ensure that private funding can be secured to procure the affordable homes. The numbers of applicants with this local connection are currently:

- 1 bed: 290
- 2 bed: 105
- 3 bed: 35
- 4 bed: 12

Total: 442

In addition to the housing need for rented accommodation there are a further 72 households registered with the Help to Buy Agent requiring intermediate housing in Alton. The majority of this need is for two and three bedroom accommodation. The size, type, location and tenure of the affordable housing provision should be agreed with Housing Development prior to the submission of a full or reserved matters application. This should be secured through a suitable legal agreement, with triggers for the transfer of the affordable housing land / units to an acceptable Registered Provider. As a guide to the applicant I would recommend the following affordable mix, as a starting point, with the tenure split as 70% affordable rent to 30% intermediate:

- 1 beds: 25%
- 2 beds: 50%
- 3 beds: 20%
- 4 beds: 5%

The affordable homes should be genuinely pepper-potted throughout the development as required by policy CP.13. The Design and Quality of the affordable homes should be to HCA standards to ensure eligibility for grant, if available. In summary this application does not currently meet the requirements of CP.13 and insufficient evidence to support a lower percentage of affordable housing has been supplied. Mark Barnett Housing Development Officer.

Highways Development Planning Strategic Transport -

Preliminary Design Check

I can confirm that subsequent to our previous response a preliminary design check submission has been submitted by the Applicant. This process has enabled the Highway Authority to undertake a detailed review of the off-site highway elements of the scheme.
The Highway Authority have considered the operational performance, safety, design and deliverability of the proposals. The proposed improvement scheme to deliver an enlarged roundabout at The Butts junction and a roundabout to access the Selborne Road element of the site as set out on drawing B14149001C are acceptable in principle. The proposed priority junction to serve the Chawton Road aspect of the development as shown on drawing B14149-007-B is also considered acceptable. In order to implement the highway works set out on these drawings it will be necessary for the Applicant to enter into a Section 278 Agreement with the Highway Authority.

The design checking process has identified a preferred approach for the proposed signalisation of the Chawton Park Road/Whitedown Lane junction and traffic calming on Northfields Lane and this is discussed further below.

**Chawton Park Road/ Whitedown Lane junction**

The design check submission included proposals to signalise the above junction and this has been reviewed in terms of operation and design.

Whilst the applicant has demonstrated that the proposed signalised junction is deliverable in design terms, the operation of the proposed junction in the post development scenario is of concern. The LINSIG modelling outputs demonstrate that once the pedestrian crossing phase is called every cycle, which the Highway Authority consider realistic for the peak periods, the signals are forecast to generate additional queuing on Chawton Park Road over the existing layout. A technical note submitted by the applicant set out to address these issues, and included revised modelling of the existing layout. The modelling outputs are summarised below;

<table>
<thead>
<tr>
<th>Arm</th>
<th>AM Peak</th>
<th>PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>RFC</td>
<td>Queue (PCU)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>2014 Base</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chawton Park Road</td>
<td>0.674</td>
<td>2.00</td>
</tr>
<tr>
<td>A339 Whitedown Lane (N)</td>
<td>0.341</td>
<td>0.93</td>
</tr>
<tr>
<td><strong>2020 Base</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chawton Park Road</td>
<td>0.732</td>
<td>2.60</td>
</tr>
<tr>
<td>A339 Whitedown Lane (N)</td>
<td>0.364</td>
<td>1.04</td>
</tr>
<tr>
<td><strong>2020 Base + Committed</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>‘Do Nothing’</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chawton Park Road</td>
<td>0.742</td>
<td>2.73</td>
</tr>
<tr>
<td>A339 Whitedown Lane (N)</td>
<td>0.373</td>
<td>1.09</td>
</tr>
</tbody>
</table>
As set out above, Chawton Park Road is shown to be operating over theoretical capacity during the future year (2020) plus committed development and proposed development scenario and mitigation of the development related impact at this junction therefore remains justified.

However, on-site observations of the operation of the existing junction during peak periods reveal that while queues do form on Chawton Park Road, these often disperse quickly, and opportunities are also afforded to vehicles exiting, when the adjacent controlled crossing facility is called, which is frequent during peak times. The above modelling summary is based upon assumptions that queuing is sustained throughout peak periods and is therefore considered to represent a ‘worst case scenario.’

It is also difficult to forecast the impact resulting from the significant improvement scheme at ‘The Butts’ junction and traffic management measures on Chawton Park Road in terms of the redistribution of both existing and future traffic movements through this junction. The Highway Authority are therefore minded that introducing signals at this junction prior to occupation of the development is premature and monitoring of post development conditions should be undertaken in order to ensure the optimum mitigation scheme is delivered. A contribution of £125,000 has been agreed with the Applicant in order for the Highway Authority to take this forward.

**Chawton Park Road/Northfields Road traffic calming**

The design check submission also set out proposals to provide a highway narrowing under the existing bridge on Northfields Road. As set out in our previous response, in order to effectively manage traffic speeds, this should be delivered in the context of a wider traffic management scheme. The Highway Authority have therefore agreed a contribution figure of £100,000 to deliver a comprehensive traffic management scheme on Chawton Park Road/Northfields Road. This approach will ensure that the local community are able to influence the scheme, and the County Council will undertake public consultation on a range of traffic management options.

**Whitedown Lane/Basingstoke Road**

The Transport Assessment work demonstrates that the proposed development will result in detriment to the operation of the Whitedown Lane/Basingstoke Road junction and it would be reasonable for the developer to contribute towards improvements at this junction.
It is however also acknowledged that the cost associated with delivering the improvement to ‘The Butts’ junction is considerable and whilst the Highway Authority retain the view that securing a contribution figure towards improvements at this junction can be justified, it is also acknowledged that this junction is to operate at theoretical capacity in the future year scenario in the absence of the proposed development. It is therefore recommended that the agreed contribution of £225,000 set out above be flexibly worded in the Section 106 Agreement to allow a proportion to be allocated to the Whitedown Lane/Basingstoke Road, should funding from alternative development sites not come forward.

Pedestrian and cycle linkages

As set out in our previous response, the Highway Authority are satisfied that both sites are conveniently located in terms of sustainable access to key services. Whilst existing routes are in place, the East Hampshire District Council Transport Statement highlights a number of pedestrian and cycle improvement schemes between the site(s) and Alton town centre. It is therefore considered reasonable for a proportion of the agreed Contribution to be spent on these schemes, particularly given the National Cycle Network passes the site.

Section 106 requirements

**Financial Contribution**

As set out above the Highway Authority have agreed a Contribution figure of £225,000 with the applicant which is to be secured towards the following mitigation measures:

- Improvements to the Chawton Park Road/Whitedown Lane junction
- Traffic management measures on Chawton Park Road and Northfields Lane
- Improvements to Whitedown Lane/Basingstoke Road
- Walking and cycling linkages from the site(s) to the Town Centre
- Wider mitigation measures identified in the Alton Transport Study

These schemes are directly related to the proposed development in terms of both proximity to the proposed development site, and operational impact as documented in the Transport Assessment.

The Contribution of £225,000 is also considered reasonable as it has been calculated using a first principles approach based on the cost of delivering the specific infrastructure required to support the development proposals.

The above Contribution requirement is in line with both Local and National Policy. East Hampshire District Council’s Joint Core Strategy sets out that developments need to “plan for new highway infrastructure that will reduce congestion, improve highway safety, increase accessibility to the District’s town and district centres and enhance economic prosperity of the District”. The National Planning Policy Framework also confirms that development needs to be supported by ‘improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.’
Travel Plan

As set out previously, a framework travel plan has been submitted to support the planning application. This will be utilised to form the basis of a full travel plan document prior to occupation of development and will be secured via the Section 106 Agreement along with the Highway Authority’s assessment and monitoring fees of £16,500. It will also be necessary for a bond to be provided for the cost of measures set out in the Travel Plan to ensure these are delivered by the Applicant.

Off-site Highway works

The site access arrangements and improvement scheme to ‘The Butts’ junction will be secured by way of Section 106 Agreement. It will be necessary for these works to be technically approved and undertaken prior to commencement of development under the terms of a Section 278 Agreement.

Delivery of ‘The Butts’ improvement scheme will undoubtedly be sensitive and the Highway Authority will require a bespoke Traffic Management Plan for these works to be secured by way of the Section 106 Agreement.

Recommendation

In light of the above, the Highway Authority raise no objection to the proposed development subject to the following Section 106 Obligations;

- Financial contribution of £225,000
- Delivery of off-site highway works as shown on drawings B14149001-C (The Butts/Selborne Road access roundabout) and B14149-007-B (Chawton Park Road access)
- Traffic Management Plan for Butts Improvement works
- Travel Plan and associated assessment and monitoring fees and Travel Plan Bond

Construction Traffic Management Plan

Highways Development Planning Strategic Transport – Initial response. Thank you for the opportunity to comment on the above planning application. The application is for outline consent for residential development of between 480-590 residential units across the two sites. A Transport Assessment (TA) has been prepared and submitted with the application to consider the impact of the proposed development. In the interest of providing a robust assessment, the Transport Assessment considered a higher development figure of 650 dwellings. This letter considers the TA and other supporting information. Local Policy Considerations The Transport Assessment identifies relevant local and national planning and transport policy, and particularly identifies the National Planning Policy Framework (NPPF), the East Hampshire Core Strategy (now adopted), as well as the HCC Local Transport Plan and the East Hampshire District Transport Statement. In addition to these adopted policies and strategies, it is noteworthy that the County Council and the District Council have jointly commissioned further transport work in the Alton area, which will develop further the
strategies outlined in the District Transport Statement. This work is ongoing and expected to be complete in the autumn. Proposed Site Access Selborne Road Site It is proposed that the Selborne Road site would be served by a single vehicular access which would be provided directly off the A339 Selborne Road and would take the form of a new four arm roundabout, which would also serve as a revised access to Winchester Road. This new link to Winchester Road will be included as a part of a wider improvement scheme, including the replacement of the existing railway bridge, which would see the northern end of Winchester Road closed to vehicular traffic. The works are shown in principle on drawing A_13 Rev A. As part of the proposals, the 30 mph speed limit would be extended from its current position to a point between the proposed site access and the A31 northbound on/off-slips. The access off the A339 would also provide access to the site for pedestrians and has been designed to incorporate crossing facilities (using the splitter islands as pedestrian refuges. The footways at the site access will link into new footway/cycleway links that will run from the site access and north along the A339 Selborne Road to the junction between Selborne Road/Winchester Road/Whitedown Lane/Butts Road, thus linking into the wider footway network towards the town. A further pedestrian access would be provided to the north of the site and provide a link to Borovere Lane. In accordance with the County Council's Section 278 processes, a Preliminary Design Check has been submitted to consider the safety, design and deliverability of the proposed site access roundabout and associated works. Until the design check is concluded, the County Council cannot provide formal comment on the proposed site access arrangements. This process is ongoing, and it is expected that the design check will be concluded by the end of September. Lord Mayor Treloars (LMT) Site. The Lord Mayor Treloar site would also be served by a single vehicular access. This access would be provided directly from Chawton Park Road and is proposed as a new priority 'give-way' T-junction, as shown in principle on drawing A_15. The proposals would see a localised widening of Chawton Park Road to ease the movement around the bend and int%ut of the site access. The provision of the site access would also require the extension of the 30mph speed limit. The proposed site access would also cater for pedestrians with a footway proposed along the site access road. In addition to the footway along the site access, a new short section of footway is proposed along Chawton Park Road and would route pedestrians north to a point where they can cross Chawton Park Road and continue on the existing footway that runs along the southern side of the road. In addition to the footway provision at the site access, footway links will also be provided to the existing residential estates to the south of the proposed development. Similar to the Selborne Road Site access, the County Council is currently considering the proposed site access arrangements through its Section 278 Design Check processes. On conclusion of this process a formal view on the current proposed access to the LMT Site will be provided. Local Highway Network In terms of the local highway network, the following have been identified as key junctions in terms of traffic movements to and from the site: A339 Whitedown Lane/Butts Road/ Selborne Road/Winchester Road; A339 Whitedown Lane/Chawton Park Road; A339 Whitedown Lane/B3349 Basingstoke Road; A31/A32/Northfield Lane/Winchester Road; and A31/A339 Selborne Road on/off-slips. Traffic surveys of these junctions have been carried out and the impact of the proposed development has been assessed within the TA. This is considered further below. Personal Injury Accident Record An assessment was made of the accident records in the local area over the last 5 years. In total 52 collisions were recorded of which 44 resulted in 'slight' injury, 7 in 'serious' injury and 1 was 'fatal'. The majority of these accidents occurred at local junctions; 26 of these
accidents occurred at the A31 / A32 junction. Of the 26 collisions, 19 were recorded as 'slight', 6 were recorded as 'serious' and 1 was recorded as 'fatal'. While there have been a number of collisions at the junction, and while there are some common factors, the geometry of and alignment of the junction does not appear to be a factor in these collisions. There have been a total of 7 injury collision accidents at or on the approach to the Butts junction in the five year period from 2008 to 2013. Of the 7 collisions, 6 were recorded as 'slight' and 1 was recorded as 'serious'. The proposed scheme would add significant traffic to this junction, and is proposing improvement works to the junction which would fundamentally change the junction form. 2 accidents occurred at the A339 / Chawton Park Road junction. The development adds significant additional movement to this junction, but is also proposing improvement to the junction to add signals. 8 accidents occurred at the A339 / A31 slips (3 eastbound, 5 westbound). There is not any clear pattern in the accidents recorded that would be likely to be exacerbated by the proposed development.

Vehicle Trip Generation. The TA presents an assessment of the likely level of vehicular trips that would be generated by the proposed development assuming 350 dwellings on the LMT site and 300 dwellings on the Selborne Road site. The table below, taken from the TA, sets out the proposed number of vehicle trips for both development sites within the South Alton Masterplan. LMT (350) 1480 41 120 161 117 58 175 Selborne (300) 1269 35 103 138 100 50 150 Total 2749 76 223 299 217 109 326

The trip rates used to provide the assessment are considered to be reasonable and reflective of the likely travel demand generated by the proposed development. Trip Distribution. The TA has considered how the likely traffic that would be generated by the proposed development would be distributed onto the local transport network. This assessment has been based upon local census data for the Alton Ashdell and Alton Whitedown wards. The assessment identifies that trips will be dispersed across the network, with some 40% trips accessing the A31, 15% accessing the A339, 30% trips accessing the Butts Road to and from the town centre and 7% accessing the B3006. The assessment is considered to provide a reasonable assessment of the likely trip distribution demands that would arise from the proposed development.

Forecast Years and Traffic Growth In order to provide a sound baseline of data to consider the proposals against, the Transport Assessment presents the results of a series of traffic surveys that were carried out on local roads in late 2013. The coverage of the traffic surveys was previously agreed with the County Council and it is considered that this provides a good base of data to assess the proposals against. As the application is made in 2014, background traffic growth has been applied to the 2013 survey flows to represent a 2014 base using TEMPRO, and also to a 2020 future year scenario. The use of TEMPRO ensures that the impacts from rises in car use / ownership are included in the assessment, as well as local growth that would result from other local development. In addition to applying TEMPRO growth factors the TA has directly included the potential development at Will Hall Farm. This is considered appropriate. Impact on the local highway network Due to the interactivity between the junctions on the local highway network, and the specific constraints at the Butts junction, in order to consider the future operation of the local transport network a PARAMICS micro-simulation traffic model has been developed. PARAMICS Modelling This network model has been built to assess the impact of the proposed developments and covers the A339 Whitedown Lane junction with Chawton Park Road, the Whitedown Lane bridge narrowing, the Butts junction at Whitedown Lane / Butts Road and the junction with Winchester Road. The network also extends south past the Selborne Road development. The assessment has been carried out to consider two scenarios; The existing network as it
stands on the ground now and as represented in the 2013 traffic surveys. A future network (2020) which takes account of the proposed improvements to the Butts junction with new railway bridge, a signalised improvement of the Chawton Park Road junction and the proposed site access with diverted access to Winchester Road. The results of the junction capacity modelling that has been undertaken using the PARAMICS model show that without improvement, there would be significant queuing and delay occurring at the Butts junction and on its approaches. This is exacerbated significantly by the proposed development the subject of this application. In order to address this, the developer has proposed improvement to the junction which would comprise replacement and widening of the existing bridge, replacement of the existing two roundabouts with one single roundabout, and relocation of the Winchester Road access. The proposed mitigation measures have been considered through the PARAMICS assessment and it is demonstrated that the development traffic can be accommodated on the highway network. In particular the Butts Bridge and Chawton Park Road junction improvements would provide improvement in terms of journey time and queue length reduction over the existing junction operation, and would be sufficient to fully mitigate the impact of the proposed development, and local committed development. Further junction assessment In addition to the Butts junction, there are a number of other local junctions which were considered within the Transport Assessment. This does not however include modelling of the future operation of the proposed site access junctions, which should be provided. A339 Whitedown Lane/Chawton Park Road. The TA carried out an assessment using the PICADY computer software programme to consider the impact of the proposed development. This assessment identified that the proposed development would have a significant detrimental impact on the operation of the junction, and that the junction would fail to operate within capacity. Significant queues would occur particularly on Chawton Park Road in the AM peak. In order to address this, the applicant has proposed signalisation of the junction. This has been modelled using the LINSIG assessment programme, which identifies that should the junction be signalised, it would operate within capacity, and that the works would be sufficient to mitigate the impact of the development. A339 Whitedown Lane/B3349 Basingstoke Road The TA modelled the future operation of the A339 Whitedown Lane I Basingstoke Road junction, which is currently a three-arm priority junction. The Assessment, using the PICADY programme, demonstrated that on Whitedown Lane the junction currently operates close to its design capacity, and that queuing regularly occurs during the AM peak. During the PM peak the junction is shown to operate well. The PICADY Modelling tested the impact that the proposed development would have and it is shown that the additional traffic generated by the proposed development would have a detrimental impact on the junction, and would increase queuing. This is particularly true for the AM peak where queues on Whitedown Lane would rise from 4.5 vehicles to 16 vehicles in the left approach lane and 5.5 vehicles to 19 vehicles turning right. Queues during the PM peak would also increase, particularly for traffic seeking to turn right from Basingstoke Road to Whitedown lane, with queues rising from 4 vehicles to 13 vehicles. At this time the applicant does not propose any changes at this junction. It is considered that the proposed development is likely to have a significant impact at this junction and that improvement to this junction needs to be investigated further. Potential improvement of this junction is identified in the adopted East Hampshire District Transport Statement. The County Council is also concerned that the modelling assumes there is space for the projected queuing at this junction, when observations of the existing road network would suggest that the proposed queues cannot be accommodated for both the Whitedown Lane left and right
turns, which would result in a further deterioration of performance. This needs to be considered further. A31/A32/Northfield Lane/Winchester Road The TA has assessed the impact of the A31 I A32 roundabout junction using the ARCADY assessment programme. This has shown that the junction currently operates comfortably within capacity and that remains true when the additional traffic that would be generated by the proposed development and other local growth is added to the junction. A31/A339 Selborne Road on/off-slips An assessment using the PICADY programme has been made of the operation of the A31 I A339 slips. It is shown that the existing slip roads operate well within capacity and that the proposed development will not have any material impact on their future operation. Butts Junction As outlined above, the existing junction fails to operate within capacity and as a result the development has proposed improvement of the junction, to deliver additional capacity to resolve the existing and future operational issues at the junction, and also to provide improved access for all modes of travel through the junction. The proposed alterations, which are shown in principle on drawing A_13 Rev A, comprise the replacement of the existing railway bridge on Whitedown Lane and the provision of a new roundabout junction between Selborne Road/Whitedown Lane and Butts Road (replacing the two existing roundabouts). The works would see the closure (for vehicular access) of Winchester Road which would be served by a new link off the proposed site access roundabout off the Selborne Road. Whilst in performance terms the works have been shown to be able to mitigate the additional traffic that would arise from the proposed development, the County Council needs to be satisfied that the works comply with relevant design standards and the alterations proposed to the local network are suitable and safe. In order to consider this properly a Preliminary Design Check has been submitted. Until the design check is concluded, the County Council cannot provide formal comment on the proposed alterations. This process is ongoing, and it is expected that the design check will be concluded by the end of September. Chawton Park Road Signals As outlined above, the existing configuration of the A339 I Chawton Park Road junction would be unable to cope with the expected traffic growth from the proposed development. In order to mitigate the traffic predicted to be generated by the proposed development, it is therefore proposed that the junction be signalised, as shown in principle on drawing A_14. As has been shown through the PARAMICS assessment, and the LINSIG assessment too, the proposed signalisation would improve the capacity of the junction, and will also improve pedestrian facilities as signalised controlled crossing points will be included into the junction including a new controlled The design of the works does however need to be fully considered and in order to achieve this a Preliminary Design Check has been submitted. On conclusion of this assessment, the County Council will be in a position to provide advice on the suitability of the proposed signalisation of the junction. A Technical Note that outlines the alternative options (rather than signalisation) considered for this junction has also been requested and it is understood will shortly be provided. Northfield Lane Priority Narrowing To discourage traffic from using Northfield Lane and Chawton Park Road as a 'rat-running' route, it is proposed to narrow the carriageway to 3.25 m adjacent that the railway bridge on Northfield Lane, as shown in principle on drawing A 16. This is currently being considered by the County Council through its Section 278 processes. It is however considered at this time that the works should be part of a comprehensive scheme of management rather than an isolated feature, and further consideration will need to be given to this. Pedestrian and Cycle Connectivity It is shown in the Transport Assessment that there are a number of services and destinations within a
reasonable walking and cycling distance from the two sites. In order to promote sustainable travel, it will be necessary to ensure that both sites are linked to facilities by safe, attractive and appropriate facilities. The adopted District Transport Statement identifies a number of improvements to walking and cycling linkages to the town from the sites, and it would be appropriate for the development to make a contribution towards the delivery of pedestrian and cycle improvements. Within both development sites pedestrian movement will be catered for by way of a network of footways that will run throughout each of the sites. Each site has also identified potential points of connection to the wider local pedestrian and cycle network. As the application is for Outline consent for the residential areas of the application, layout is a matter to be reserved. It will be important that in the event planning consent is granted, at the reserved matters stage the layout of the site is carefully considered and that all opportunities to link the proposed development to the local walking and cycling network are taken. The TA has identified that in order to encourage access to the Country Park element of the scheme, improved crossing facilities will be required on Whitedown Lane. The details of these works have not been defined and as such, should consent be granted, a condition should be attached to required details to be agreed and the improved crossing facilities to be provided.

Public Transport Both application sites are served by local bus services, primarily the Service 38 (two-hourly service between Alton and Petersfield) and Service 64 (half-hourly service between Winchester and Alton). These services, particularly the Service 64, provide a reasonable level of service that would appeal to some residents of the site. Bus stops for both sites are located within a reasonable walking distance of 450m from the centre of the site (5 minutes walk). It will be necessary when layout of the two sites are considered at the reserved matters stage that convenient routes to connect the residential populations with the bus stops are provided. Opportunities to re-location bus stops closer to the sites should also be explored. In addition there is the potential to upgrade the bus stop facilities to make using public transport more attractive to the future residents.

Travel Plan

In order to support the outline planning application a Framework Travel Plan has been produced to cover both the South Alton Masterplan sites. The FTP outlines an approach to promoting sustainable travel, that would need to be worked up in more detail should permission be granted. The development and implementation of Travel Plans would need to be secured within a Section 106 Agreement, along with the payment of assessment and monitoring fees to the County Council, in accordance with the Guidance document. Transport Contribution In accordance with the adopted Hampshire County Council Transport Contribution Policy, a transport contribution will be required to mitigate the impact of the development. This would be used to provide sustainable transport infrastructure to encourage future residents to travel sustainable, and to offset the traffic impact of the development. At this time no agreement has been made on the payment of a transport contribution.

Conclusion

The Transport Assessment has provided a reasonable assessment of the impact of the proposed development and has promoted a package of mitigation measures designed to accommodate the impact of the proposed development traffic. With the exception of the A339 Whitedown Lane/B3349 Basingstoke Road junction this has been shown to provide sufficient mitigation to offset the traffic impact of the proposed development. Notwithstanding this, at this time there is insufficient certainty that the mitigation package proposed can be delivered and will meet the relevant standards, and as such the County Council is carrying out a Preliminary Design Check of the works. The TA has identified that the development will impact A339 Whitedown Lane/B3349 Basingstoke Road and at this time no mitigation is proposed. This will need to be
considered further by the applicant. Additionally, no assessment work has been provided to consider the future operation of the proposed Selborne Road Roundabout, and the priority junction to Chawton Park Road that would serve the development sites. This should be provided. At this time no transport contribution at this time has been agreed.

Recommendation At this time it has not been demonstrated that the access and mitigation package to the site is deliverable and meets relevant highway standards. The County Council is currently conducting a Preliminary Design Check of the proposed highway alterations, on conclusion of which we will be in a position to advise further. Further information is also needed on other elements of the scheme, as outlined in this letter. Should your Council be minded to determine the application in advance of this process having been completed, we would recommend that the application be refused for the following reasons. The Transportation Assessment as submitted does not adequately or accurately demonstrate the likely impact of the development or the deliverability of the proposed improvements to the local highway network and therefore in the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that the significant movements generated could not be accommodated adequately on the existing transport network. This would result in a severe impact on the road safety and operation of the local transport network contrary to the NPF and Policy CP31 of the adopted East Hampshire District Local Plan: Joint Core Strategy. In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that it would result in the users of the development being unable to make use of sustainable transport opportunities. This would result in a greater number of trips by private car which will create a severe impact on the local transport network and environment contrary to the NPF and Policy CP31 of the adopted East Hampshire District Local Plan: Joint Core Strategy. In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that proposed access is inadequate to accommodate the development safely. This would result in an unacceptable impact on the safety of users of the development and adjoining highway contrary to the NPF and Policy CP31 of the adopted East Hampshire District Local Plan: Joint Core Strategy.

South Downs National Park Authority - Principle of Development The East Hampshire Joint Core Strategy makes an allocation of a minimum of 700 new homes at Alton and these development proposals, should they be considered acceptable by EHDC, while potentially being seen as premature to the Alton Neighbourhood Plan, would help in meeting that allocation target and add to EHDC’s housing land supply position for the part of the district outside of the National Park. Landscape Impact The height of the land proposed for development at both the Treloar site and land east of Selborne Road is a big concern. For the Treloar site, development on the upper slopes to the west of the site would appear unrelated to Alton being located in the Wey Valley and this land is clearly high on the valley side and visible from higher ground within the National Park from some distance. Also the change of character from farmland to a country park would be detrimental to these views owing to the artificialness of the layout high on the valley side. This is likely to adversely affect the setting of the National Park and its special qualities. The corresponding opposite valley side land to the East of Selborne Road - is also high land to the south of the site which would mean that development would be spilling over the valley side, whereas it is currently within the valley
setting of the Wey. The cumulative impact of both sites of high ground being developed is an
issue which should be considered in detail in views from the National Park. The location of
Alton within the valley is key to its character and also that of the adjacent National Park. The
LVIA assesses incorrectly against SQ1 as follows: The description of the views from the
South Downs Way is an example not an exclusion of all other views as clearly this would be
inappropriate and inaccurate. It would be helpful if the consultants could prepare a block ZTV
for both sites so that the cumulative impacts of development on the valley sides can be
properly assessed. Rights of Way With these developments there should be serious
investment in access links in and around the settlement of Alton; one such route that is being
developed at the moment is the Writers Way. The specification and development of the
Writers Way could be enhanced through investment but options for all Rights of Way linking
to the National Park should be considered with this level of development. The applicant
should be asked to pay the costs to Hampshire CC for investigating and implementing
improvements.

EHDC - Landscape Officer – Initial landscape comments: The LVIA for Lord Mayor Treloar
Hospital site acknowledges that 'the introduction of new built form and soft landscaped areas
within the site is anticipated to result in permanent changes to the character and visual
amenity of the Site and surrounding receptors. This change is typically a negative effect
where green open space is converted to built form.' However it states that 'the effects on
sensitive receptors will be mitigated wherever possible through mitigation measures such as
management of trees; careful use of materials and lighting, limitation of building heights, use
of street trees and creation of hedgerow trees. I consider that these mitigation measures
could be effective in integrating the proposed housing in the southern half of the site into the
landscape, providing that existing trees and protected habitats are retained. However I am
concerned about the proposal to extend development up to the highest part of the site
adjacent to Ackender Wood. This would put the ancient woodland under extreme recreation
pressure from the adjacent population therefore I consider that this highest part of the site
should be retained as public open space. A wide landscape buffer between
woodland/meadowland and housing will be necessary to reduce the impacts on the protected
habitats. I question the conclusion of the LVIA for land east of Selborne Road 'There will be
some harm/loss as a result of the proposals but this will not be an overriding change...' I
agree that the interest features of the SDNP will not be materially affected by the proposed
development and that screen planting will prevent adverse visual effects on users of the A31.
However, I am concerned about the negative effect on the character of the approach to Alton
from the south, which although not tranquil or a designated landscape, is still largely rural,
with fields sloping down to the road from the east. The development proposals show the lower
level field and the sloping field above it filled with new houses, the rooves of which would be
visible above the existing boundary planting and through the large gap created by the access
road. This impact could be mitigated by locating the public open space on the lower field and
by restricting development of the sloping field to the northern half. This would involve
concentrating the new housing in the eastern half of the site in order to minimise impact on
the important gateway to Alton from the south (and to the national park from Alton).

Comment Date: Tue 09 Dec 2014
I remain concerned about the landscape impacts of the proposal to extend development up to the highest part of the Lord Mayor Treloar Hospital site adjacent to Ackender Wood due to the future recreation pressure on the woodland. Dense planting of the landscape buffer between woodland and housing will be necessary to reduce the impacts on the protected habitats. I accept however, that the proposed structure planting that has been included in the eastern half of the site should screen the housing from distant views over time.

EHDC - Arboricultural Officer - North - No objection in principle to the outline elements of this application for residential development on the east side of Selborne Road or the Lord Mayor Treloar Hospital Site. Part B, The Lord Mayor Treloar Hospital site does remove some trees that are the subject of a Tree Preservation Order without good arboricultural reason and so is not strictly in accordance with policy C6 of the currently adopted local plan. The point at which the highway passes through the southern end of the woodland belt, marked as WG3 will result in the loss of a greater number of trees than is shown. I would expect that all the trees to the south of the highway would also need to be removed for safety reasons because they would be exposed to wind pressures that they have never been exposed to before and because of their proximity to the existing development to the south. It would be worth considering moving the highway to a more natural space in the woodland to the north of the tree marked 47 on the plan which would have a much lesser impact on the local landscape. Some redesign of the layout to north of WG3 should also be required as having houses within 5 metres of the canopy edge of the trees will result in post development pressure to have the trees removed. There will be similar problems with the properties shown to the west of the group marked as TG13 which should also be redesigned. Finally, for this part of the development, There is one house shown immediately east of WG2 that will be completely overshadowed by trees on the raised bank and within WG2. It would be unreasonable to expect anyone to live in such close proximity to these trees and indefensible at any appeal to try and justify. The solution should be to remove the dwelling rather than the trees. Strong objection is raised against the full application (Part 2) sections i to iv ad section e. This part of the application removes a large number of trees, subject to a Tree Preservation Order, at the north eastern end of area A1 and A2 of Tree Preservation Order (EH30)1976. (Part of Area A1 is also within The Butts Conservation Area) It will also remove Group 2 and Group 3 of Tree Preservation Order (EH532)2002 which are the most important trees at the northern end of Winchester Road, giving the lane it's rural character. In my view this proposal would cause significant damage to the character of the local landscape and would spoil what is currently an attractive entrance to the town rather than improving it as claimed. There is no good arboricultural reason to justify this removal the proposal is, therefore, contrary to policy C6 of the currently adopted local plan.

Comment Date: Fri 12 Sep 2014

Arboricultural Officer - I note the further comments from the agent. I still do not accept that there is sufficient Arboricultural justification for the removal of all of G3 and all but 1 tree in G2 of Tree Preservation Order (EH532). My previous consultation comments and my comments made to the planning case officer in an e-mail dated 15 July 2014, therefore, remain unaltered.
HCC - County Ecologist - I have provided a rather lengthy response but I consider this essential in providing you with as comprehensive an opinion as I can give at this stage hopefully what follows will be far simpler. This complex application is accompanied by a huge amount of relevant information, the bulk of which is included within a series of reports produced by WSP. After a detailed review of the following documents I hope I have been able to distil the main ecological issues in relation to the proposals. The primary documents are: Extended Phase 1 Habitat Survey (June 2014); Outline Ecological Mitigation and Management Strategy (April 2014) Bat Survey (Activity and Emergence Surveys) (April 2014); Dormouse Survey (April 2014); Ornithological Report (April 2014); Reptile Survey (April 2014); Fungi Survey (April 2014); Hedgerow Survey (April 2014); Invertebrate Survey (April 2014); and Confidential Badger and Botanical Survey report (April 2014). In addition to the reports listed above I have also reviewed other relevant information such as Design & Access Statements and site plans. In line with the hybrid nature of the application I have provided comments on the outline and full parts separately, but in ecological terms it would seem sensible to treat both areas together this is one criticism I have of the application as presented: it is rather disjointed. The fact that the information pertaining to ecology is spread over numerous documents makes it very difficult to access the pertinent detail easily given the complexities involved it would have been most useful to be able to review a single document summarising the full range of issues (the Outline Ecological Mitigation and Management Strategy for LMT fulfils some of this need but does not e.g. include any maps showing proposed/existing plans). Overall, the LMT application is the key issue and is of a substantial scale and therefore has potential to result in significant ecological impacts. The copious ecological information provided is generally of a good standard and I have few concerns in respect to the scope of works or the methods employed there has after all been much pre-application discussion between the applicant’s ecologists and EHDC ecological advisors. There are particular sensitivities in relation to this application site, with a number of interested third parties providing detailed comments in respect to ecological matters. Where possible I have attempted to include pertinent third party comments (e.g. those from the Hampshire & Isle of Wight Wildlife Trust (HWT)). There is generally a lack of coherence between the various ecological assessments and the plans as proposed (and as detailed on the illustrative masterplan) most if not all of the ecological reports make reference to not having a clear idea of proposals and this has obvious implications in terms of assessing impacts. Outline Application Lord Mayor Treloar Hospital Locally-designated Sites The proposals entail the loss/partial loss of areas of land designated as Sites of Importance for Nature Conservation (SINC), as well as likely recreational impacts to a second SINC located to the north of the site. A significant area of the application site is designated as Lord Mayor Treloar Hospital SINC, covering two separate areas of grassland habitat. Development affecting SINCs is contrary to Policy C21 (a)(iii) of the recently-adopted East Hampshire District Local Plan: Joint Core Strategy (New development will be required to: a) maintain, enhance and protect district wide biodiversity, in particular the nature conservation designations: iii) Sites of Importance for Nature Conservation (SINC) (Hampshire). In simple terms this proposal will result in the loss of SINC habitat due to development activities. The important question is therefore whether this proposal will result in harm to the features for which the SINC was designated, namely its calcareous grassland habitat the answer would appear to be yes. In addition, consideration must be given to potential impacts to the adjacent Ackender Wood/Alexandra Wood SINC. The SINCs are a resource of significant local value.
and, through their designation, that value extends to the county as a whole: SINCs are recognised parts of the natural heritage of the County and should be treated accordingly. Locally-designated sites are also featured within the NPPF, which recognises their intrinsic role in delivering a coherent nation-wide network of wildlife sites. Both my predecessors and I have requested an opinion from EHDC on the perception and status of SINC within East Hampshire when these conflict with land allocated for development: as no response has been received I can only advise that Policy CP21 stands and that the LPA must ensure that these sites are maintained, enhanced and protected through the planning system: as a general principle I must advise against any proposal which results in a net loss of SINC-quality habitat and I would expect any potential impacts to SINC to be avoided. Development should follow the established principles of ecological mitigation (as detailed within NPPF) of ‘avoid-minimise-compensate’, with compensation only applicable as a last resort when all other options have been explored and discounted. I note that policy CP21 is not discussed in relevant section on p.11 of the LMT D&A Statement (WSP, April 2014). Vegetation Detailed botanical surveys have been undertaken by WSP on the two SINC sites (as well as less detailed surveys of the application site as a whole) and consequently the application contains copious highly-detailed information on the composition of the vegetation communities present.

To summarise, Ackender Wood/Alexandra Wood SINC comprises a typical lowland woodland dominated by ash, oak and beech with an understorey dominated by hazel. The ground flora is generally rich and includes a number of ancient woodland indicator species. Also present is the County Scarce species herb paris. This woodland (although not homogeneous in composition or structure throughout) is considered to be of County importance (the SINC designation infers a default value at County level). Some smaller areas of woodland are of less botanical interest and are thus assessed of being of value at the site level only. Lowland Deciduous Woodland is listed as a Priority Habitat under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. I consider it imperative that there is a long-term management plan for the woodland, to include security, access and interpretive media I believe this is a matter that can be dealt with through condition. The Lord Mayor Treloar Hospital SINC comprises species-rich unimproved calcareous grassland which is described as being in transition between a distinct chalk grassland assemblage and a more typical, but still rich, neutral grassland one. The key factor here is the relatively unimproved nature of the site a rare occurrence in the county and the wider country. There are also some areas of scrub encroachment which are indicative of the detrimental effects of the relaxation/removal of grazing in recent years. Nevertheless, the grassland remains an excellent example of lowland calcareous meadow and is of high botanical interest. The SINC designation is certainly warranted and therefore this habitat is demonstrably of County value despite its degraded nature. Calcareous grassland is also listed as a Priority Habitat under Section 41 of the NERC Act 2006 and all LPAs are required to have regard to their protection. I would concur with the statement in paragraph 6.3.2 of the (surprisingly confidential) botanical report that the LMT SINC ‘should be retained in its entirety with appropriate buffers to prevent direct effects upon the grassland communities’. As detailed above, unless a strong justification is given for the loss of SINC habitat I must advise compliance with policy CP21. If, as seems inevitable, the development proposals here cannot be fulfilled without at least some impacts to SINC habitat (WSP D&A Statement Figures 5.7 and 5.13 do not show the same impacts) then I consider it essential that the long-term management (in perpetuity) of both SINC are secured through developer contributions after all, there would be no impact were it
not for this proposal. I consider this issue to be of the utmost importance and therefore request that additional detail is provided at the outline stage to demonstrate firstly exactly what the impacts will be (nowhere can I find any detailed assessment of the exact impacts (quantitative and qualitative)) and how they will be fully mitigated (plus Figure 5.13 of the D&AS appears to show total loss of the most easterly and species rich section of grassland SINC). I can see no firm justification as to why the loss of SINC habitat is required have other designs been explored. Why cannot the grassland SINC be retained in its entirety: there would appear to be ample space. The loss and subsumption of a valuable ecological resource (contributing to County and National biodiversity objectives) should not be seen as the first viable option. This would also seem to be at odds with Policy CP17 of the JCS which promotes 'maintaining a district-wide network of local wildlife sites, wildlife corridors and stepping stones between these sites and other areas of natural green space to prevent the fragmentation of existing habitats and to allow species to respond to the impacts of climate change by making provision for habitat adaptation and species migration'. It is important that further details are provided at this stage. A hedgerow survey has highlighted the presence of two hedgerows considered to fulfil criteria as 'Important' under the Hedgerow Regulations 1996. The illustrative masterplan shows that these hedges (which are contiguous) will be directly affected by the proposals. Any future submission will require detailed information on the exact impacts to all hedgerows and a strategy for mitigation their loss/disturbance this may include transplantation if necessary. I have also recently been informed through a third-party consultee that the open grassland at the eastern edge of the application site is highly species-rich and may in fact be of greater botanical importance than currently known. Apparently this area supports a diverse flora including numerous orchid spikes of several species. In addition, there is apparently a September 2013 record of the very rare grass wood barley from Ackender Wood this species is extremely rare and of great conservation value. Badgers: The confidential badger report identifies a total of three active setts and a number of additional holes, not all of which are immediately attributable to this species. In any case, badgers are present on site and it is estimated that all activity relates to a single social group: I see no reason to doubt this and consider that the survey has provided a sound assessment of the current situation. I am in agreement with the desire to retain and protect all setts on site and, given their location, I see no reason why this should not be achievable. Recommendations for outline mitigation measures are provided and I concur with these. I expect detailed badger mitigation measures to be provided at full/reserved matters stage and so, for now, I would suggest that badger mitigation (to include updating surveys and detailed protection and enhancement measures) is best achieved through a site-wide Ecological Mitigation Plan prior to commencement of development activities. Bats Surveys have identified at least eight bat species within the site, a respectable total for any site in the UK. This total includes the rare barbastelle, an uncommon but widespread species across Hampshire, but it is the assemblage of bats here that is of most value. Roosts have been confirmed from three buildings Buildings B, H and I. Transect surveys have identified bat activity across the entire site, with concentrations of activity around key vegetated I would prefer to see some further investigation of the identity of the mouse-eared (or Myotis) bats. There are seven species of mouse-eared bat in the UK (including the very rare Bechstein's bat) and so to at least attempt to identify the species places a considerable limitation on the results this is after all lumping together nearly half of all British bat species, many of which have very differing conservation status (see Table 11 of bat survey report). Standard bat call
analysis software such as Sonobat, Batsound or Analook allow specific discrimination and it would be very useful to understand whether any such analysis was carried out on Myotis calls. Without knowing which species we are dealing with how can impacts be assessed I am unsure as to why no emergence surveys were undertaken on the bunker (Building I), considering this building is potentially an important resource for bats locally (including a hibernation site). It is a shame that peak season surveys were not designed to cover this potentially important feature. Again, how are impacts to be assessed without knowledge of the current situation No detailed surveys of trees offering bat potential have been undertaken. Ground level inspections revealed a total of six trees offering high potential for bats to date none of these trees has been inspected using climbing surveys (I am personally unconvinced of the efficacy of these) or Phase 2 surveys (the preferred method of establishing presence/likely absence). I acknowledge the clarification on the discrepancy between the statement (paragraph 4.2.4 of the bat report) that all buildings offering high potential for bats should, in accordance with current BCT survey guidelines, be subject to three survey events when such buildings were in reality only subject to two survey events. I am willing to admit that the surveys were undertaken within the recognised optimum period but, as a point of principle, the industry best practice guidance is there for a reason and should, unless fully justified (e.g. not for commercial reasons), be followed: the number of surveys is designed to give the surveyor the best chance of detecting important evidence and enabling roost characterisation. Roost status can change within any season, especially where environmental variables may result in atypical behaviour (e.g. late formation of maternity roosts, maternity roost being moved between sites). I also suggest that a fixation with maternity roosts is not entirely helpful all bat roosts are important in terms of the favourable conservation status of the local population. Without fully-detailed roost characterisation we cannot be certain of the likely range of impacts. The bat report (5.3.7) states that detailed proposals are ‘not known at the time of writing’ so I would query how impacts can be assessed in a robust manner when no firm layout plan has been provided. Outline bat mitigation measures are provided and, in general, I concur with these. I strongly agree that additional survey effort is needed (tree surveys, further Phase 2 surveys of buildings) in order to understand impacts and that the results of the existing and updated surveys should be used to further refine the broad mitigation measures provided. The retention of key linear habitats such as woodland edge and internal/boundary hedging is essential, but of similar importance is the provision of expanses of unlit open space. A lighting strategy (specific to bats) will need to be produced to demonstrate how the impacts of artificial lighting will be avoided importantly, evidence will need to be provided post-completion to demonstrate how any agreed strategy has been correctly implemented. The absence of any commitment from the adjacent developer/landowner to maintain, manage or monitor the previously-installed bat mitigation (the so-called Bat House and Bunker) should serve as an example of why mitigation measures should be subject to long-term obligation, secured through planning/legal agreement the impacts to legally-protected species would not occur were it not for the proposals and so it is entirely the responsibility of the developer to ensure that any mitigation/compensation is fit for purpose and remains so in perpetuity. Any necessary remedial works are also the responsibility of the developer. This development is highly likely to affect bats, which receive strict legal protection under UK law by the Wildlife and Countryside Act 1981 (as amended) and under EU law by the Conservation of Habitats and Species Regulations 2010 (commonly referred to as the Habitats Regulations). Where
developments affect European protected species (EPS), permission can be granted unless the development is likely to result in a breach of the EU Directive underpinning the Habitats Regulations and is unlikely to be granted an EPSM licence from Natural England to allow the development to proceed under a derogation from the law. Will the development result in a breach of the EU Directive Highly likely. There will be potential loss of bat roosts within buildings and trees and, unmitigated, the proposals would result in harm/disturbance to bats. Is the development unlikely to be licensed An EPS licence can only be granted if the development proposal is able to meet three tests: the consented operation must be for ‘preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment’; (Regulation 53(2)(e)) there must be 'no satisfactory alternative' (Regulation 53(9)(a)); and the action authorised ‘will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range’ (Regulation 53(9)(b)). It is for you as the case officer to assess the proposals against the first two tests you may wish to ask for further information from the applicant. In order to assess the development against the third test, sufficient details must be available to show how killing/injury/disturbance of bats will be avoided and how the loss or damage to bat roosts will be compensated. In this case, although the application is in part outline, there are outstanding issues in relation to bats which do not allow a robust assessment to be made. At this time I advise that additional information is provided which will allow the LPA to understand the likely impacts to bat species. Without full information at the point of determination it is not possible for the LPA to ensure that any impacts are known and acceptable, to engage with the Habitats Regulations, and to be able to secure any necessary mitigation. Dormice Dormouse presence has been confirmed from the edge of the woodland to the north of the application site and, sensibly, presence is assumed for any area of suitable habitat within and surrounding the site. I have no issues with the approach taken here but do request that an actual impact assessment is provided: for example, there is no quantitative assessment of impact (extent of habitat being lost) and no population estimation this stems from a lack of clarity about the actual proposals and the extent of habitat to be impacted. There is also an issue in respect to indirect impacts arising from construction and operation. Based on my review of the illustrative masterplan it would appear that the main areas of woodland habitat will be buffered, but there is severance of several of the key hedgerow/tree belt habitats within the site, and many of the retained habitats are immediately adjacent to gardens: no discussion of this is provided. Broad measures for mitigation are recommended but I would expect firmer wording and a commitment to carrying out the measures proposed. I would therefore ask that clarification is provided on the issues discussed above, ideally through an outline dormouse impact assessment and mitigation strategy (perhaps in line with that submitted by WSP as part of Test Valley Borough Council application 10/00242/OUTN at Picket Piece) with submission of these details I could agree that sufficient information has been provided to allow determination of the outline application. The LPA must be able to secure an achievable site-wide mitigation plan at the point of decision. Birds Wintering and breeding bird surveys have been undertaken and a fairly typical assemblage has been recorded. Barn owl aside, there are no species of particular conservation concern and, in any case, it is likely that overall impacts will be relatively limited i.e. restricted to impacts associated with areas of direct habitat loss such as hedgerows. No ground-nesting species were considered to breed. Overall I am content that the outline mitigation measures provided
are suitable and that a detailed site-wide ecological management plan submitted at full/reserved matters stage can address specific impacts to all bird species. Reptiles Three species of common reptile slow-worm, adder and grass snake have been recorded on site in good numbers. The population of slow-worms is considered to be exceptional. On the basis of the reptile population the site is assessed as being of District value, and the presence of two snake species means the site should be classed as a 'Key Reptile Site' according to Froglife criteria. In any case, the site is clearly important for reptile species and therefore mitigation measures will be required to ensure that these animals are not harmed by the proposals and that they can continue to occur within and surrounding the site. A set of reasonable outline mitigation measures are provided, entailing a capture and translocation exercise to remove animals from the developable area and place them within suitable buffer habitat at the boundaries as well as within the proposed open greenspace to the east. Overall I have no particular concerns in respect to these methods and would therefore request that full details of any mitigation strategy are provided at the full/reserved matters stage. Invertebrates A detailed invertebrate survey has been undertaken and concludes that the site does not support any species of particular conservation value. However, the assemblage is strongly linked to the presence of species-rich calcareous grassland and so the loss or degradation of this habitat is likely to impact a wide number of invertebrate species this illustrates the value of the SINC beyond its boundaries, contributing to wider biodiversity issues in line with national policy. Recommendations are somewhat vague but in essence it is concluded that the retention and appropriate management of semi-natural grassland (the SINC and other areas) will provide the structural diversity required to support the current assemblage. Summary Further information would be welcome on: Bat assessment of trees and buildings ID of mouse-eared bats Status of grassland to east Extent of grassland SINC to be lost Implications of wood barley presence Firmer mitigation proposals esp. bats, dormouse, SINC Further to the provision of this information, I would be happy to suggest that a suitably-worded condition could secure the necessary assurances in terms of site-wide ecological mitigation, enhancement and monitoring. Full Application Butts Bridge and Land East of Selborne Road, Alton This part of the application is accompanied by an Ecological Appraisal (EDP, April 2014) - in addition to this report I have reviewed various other relevant documents In general the issues at this site are less complex than at LMT although not insignificant. This site comprises a series of improved species-poor grass fields with associated boundary hedgerows and woodland strips. In general terms the site is of limited botanical value. I have no particular concerns in respect to the vegetation communities at this site provided that the key features of ecological interest (boundary features) are retained and buffered from impacts this is especially pertinent in light of confirmed evidence of hazel dormice. In terms of legally-protected species, a series of field surveys have highlighted the presence of badgers, several foraging/commuting bat species, hazel dormice, reptiles and a range of nesting bird species. These species are predominantly associated with the linear boundary features. Hazel dormouse Presence has been confirmed from hedgerow habitat within the south of the application site and it is therefore assumed that any suitable habitat is likely to support the species. Whilst I have no overall concerns in respect to the surveys I do query the extent to which proposed mitigation measures are suitable for securing through planning. The proposed mitigation is presented as a series of recommendations and not firm commitments given the full nature of this application it is imperative that the LPA is able to secure any necessary ecological mitigation. I would therefore ask that the dormouse mitigation strategy is
revisited and made more definitive, especially given that we have a preferred route for the spine road and thus impacts are quantifiable. I am certain that this application will require a European Protected Species Mitigation (EPSM) licence the spine road will, regardless of whether existing gaps are being used, sever and fragment dormouse habitat and through vegetation removal may result in direct loss of habitat and harm to individual dormice. Future development of fields is likely to present further issues. An amended report should include detail on the three Habitat Regulations derogation tests and how this application meets those three tests. Badgers An outlier sett has been noted in the southern section of the application site and it is clear that badgers are currently active here. Whilst the sett is within habitat to be retained there are clearly potential issues to be considered. A sensible recommendation for updating surveys is made and I would wish to see this secured. I consider that as with most other protected species issues at this site, the provision of an updated site-wide ecological mitigation strategy is the best method for ensuring that ecological constraints are adequately assessed and afforded the requisite level of protection throughout and post-development. Bats Surveys have recorded no evidence of roosting bats within the site, although there are several trees scheduled for removal which have not apparently been subject to any survey: I would welcome clarification of this, as the LPA requires reasonable effort to be made to predict impacts prior to planning decisions being made. Whilst I am supportive of updating surveys prior to felling, I do not see how the full impacts of the proposals can be assessed if initial survey work is lacking. Manual and automated activity surveys have identified a moderate number of bat species foraging and commuting within the site, an assemblage of species typical of open countryside sites in Hampshire. In general the surveys are fine but again I would query why it has not been possible to identify mouse-eared bats to species level: nearly half the British bats are of this genus so their identification is important to understanding impacts: they are not all of the same conservation significance. Some further detail would be welcome. A set of mitigation recommendations are provided which are generally suitable but again these are presented as ‘optional’ rather than firm commitments given this is a full application I would expect more detailed measures, linked explicitly to the proposals. At present the report reads as if the extent of the proposals in not known: if impacts cannot at this stage be quantified or qualified then the LPA is entitled to request further details prior to making a decision. Reptiles A moderate number of slow-worms has unsurprisingly been recorded from boundary habitats and therefore mitigation recommendations entail protection and enhancement of these features (in line with measures for other species). I have no concerns in respect to reptiles provided that standard measures are used when undertaking construction works within suitable habitat. Birds. Whilst no bespoke surveys were undertaken, incidental field records noted several series of conservation concern (linnet, house sparrow, song thrush) as well as a small colony of nesting barn swallows within a building. As with other species, a set of generic mitigation measures are presented which entail retention of linear features: I agree that this should provide suitable protection and enhancement for the most suitable bird habitat. Summary The key issues for which I consider additional detail is need at this stage are: More specific mitigation measures, linked to actual proposals Clarification on lack of bat tree surveys in advance of application submission Again, as with LMT, I would be content to recommend that a site-wide ecological mitigation and enhancement plan is secured via condition once the matters above have been addressed.
Thank you for consulting me on this application, in this instance in relation to amended ecological information provided. The recently-submitted Addendum Ecology Report (EDP, July 2014) is in relation to the outline application for land at Butts Bridge and Land East of Selborne Road, Alton and comprises updated ecological survey and mitigation information for the site. I have the following comments: Trees and Bats. An updated assessment has been provided for a total of five trees/tree groups around Butts Bridge and nearby roundabouts, each of which has been classified as being Category 2 i.e. offering low potential for supporting roosting bats. The only potential roosting feature is dense ivy cladding. I am content to agree that the likelihood of roosting bats occurring within these trees in limited and that the mitigation measures proposed are appropriate. These entail the visual inspection, using aerial survey, of impacted trees and the use of Phase 2 survey methods (dusk-dawn) where necessary. It will of course be the responsibility of the applicant to ensure that any necessary licensing is in place should bat roosts be encountered. Further details of outline bat mitigation measures are provided: these entail bat boxes on trees and details are sufficient for outline permission. Myotis species Some further clarification of the identification of mouse-eared bats is provided, which is welcome. I should add that if, as suggested, even experienced bat ecologists do not routinely attempt specific identification of nearly half of all British species then perhaps it is time that consultant ecologists utilised trapping methods routinely to enable more informed assessments: I cannot think of any other group of legally-protected organisms whereby the experts are content to leave a significant proportion of species unidentified. Contrary to popular opinion, there are several well-publicised resources providing just the type of detailed information that does allow, in many cases, Myotis bats to be identified by call analysis (e.g. British Bat Calls by Dr Jon Russ, training courses on difficult call analysis run by Sandy Sowler and Bat Conservation Trust). The calls analysed (admittedly a small sample) appear to indicate that Daubenton’s bat (a very common and widespread species, often associated with water) occurs. None of the analysed calls appears to indicate any rare species such as Bechstein’s or Alcathoe. I am content that in this instance we are unlikely to receive any further clarification on bat identification and that the generic landscape mitigation measures proposed are likely to cater for bat species found on site. Bat Mitigation In addition to the bat boxes mentioned above, there are generic recommendations for ensuring that site lighting is appropriately designed so as to minimise disruption to bat species. I would expect detailed measures to be provided at any future reserved matters application it is imperative that the applicant’s ecologists and lighting consultants communicate in order to find a workable design which provides for both people and wildlife. There is an abundance of scientific evidence that artificial lighting can have a detrimental impact on bat species as well as other organisms and therefore its use in the open countryside, (most importantly in areas not previously illuminated, but including changes to existing lighting) should be minimised as far as reasonably possible. There are many technical solutions to minimising the deleterious impacts of lighting for example, LED lighting contains no UV component (lux measurements do not include UV levels and are not therefore wholly suitable for gauging ecological impact) and is thus generally less attracting to invertebrate species. It is perfectly feasible to provide adequate illumination for all residential and transport uses with modern LED lamps. LED lamps using ‘warmer’ frequencies (e.g. Philips Clearfield/Clearsky) are purportedly less harmful still. In line with current lighting
industry guidance (see Institute of Lighting Professionals guidance PLG04), there should also be conditioned post-completion monitoring of any lighting scheme to ensure that it meets the permitted specifications. The Institute of Lighting Professionals has published detailed professional guidance on how to avoid and minimise excessive or unnecessary light spillage (see Guidance Notes for the Reduction of Obtrusive Light GN01:2011). Both national and local planning policy provide justification for avoiding and minimising unnecessary illumination, especially where this may conflict with nature conservation interests (NPPF: 'planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation'). Hazel Dormice Some further clarification has been provided on the issue of dormouse mitigation, with Appendix EDP3 detailing the proposed measures using the current European Protected Species Mitigation licensing method statement template. I should like to add here that much of the disruptive work with high potential to impact dormice falls within the full application (e.g. all access arrangements around the new roundabout, new access onto the housing site requiring e.g. 35m of hedge/trees to be removed, other areas with unknown percentage lost). Given that (in my understanding) the highways/access arrangements including the Spine Road constitute a full application I am uncertain as to why there are no firm quanta known for hedgerow removal surely at this stage such details must be decided If the extent of habitat loss is unknown, how can the extent of impact be quantified or even qualified Full applications require fully-detailed mitigation measures. The generic measures, in respect to the outline application areas (i.e. development parcels within main site), detailed within this updated information are considered appropriate at this time but the LPA will require fully-detailed mitigation measures alongside any future reserved matters application. This information should include (but not necessarily be restricted to): location, extent, timing and methods of all vegetation removal affecting potential/confirmed dormouse habitat; assessment of effects of fragmentation, isolation, habitat loss and disturbance (noise, light etc.) and their predicted impact at the population level on dormice locally; details of ongoing habitat management and monitoring measures; and details of site-wide lighting scheme. There is a very real possibility that this development proposal could result in permanent impacts to local dormouse populations and therefore the LPA is, in line with NPPF and local planning policy, entitled to expect high-quality and fully workable mitigation, compensation and enhancement measures. Summary The bat mitigation measures proposed are considered acceptable and no additional work is necessary at this stage. However, there is still some ambiguity in relation to dormouse mitigation. My understanding is that the spine road and associated highways works require full permission and will on their own result in potentially considerable impacts to the local dormouse population. There appears to be conflation with the full and outline aspects of this application, with a lack of detail for some areas (e.g. spine road dimensions, landscaping/planting plans) resulting in a corresponding lack of fine detail in respect to dormouse impacts and mitigation: it would seem prudent to be in a position whereby the full impacts are understood and a workable dormouse mitigation strategy is in hand. I would request that for the full aspects of this application a fully detailed dormouse mitigation plan is proposed.

Comment Date: Thu 31 Jul 2014
Thank you for consulting me on this application, in this instance in relation to information provided regarding a recent botanical survey of grassland habitats. The amended information comprises a Botanical Walkover Survey letter report (WSP< 10th July 2014) which details the results of a recent botanical survey of an area of grassland habitat lying outside the boundaries of the grassland SINCs. The requirement for this survey came about due to correspondence from the Hampshire & Isle of Wight Wildlife Trust (HWT), highlighting the potential importance of the non-SINC grassland as species-rich semi-improved grassland as identified by a third party. HWT also raised the issue of the potential presence of the rare wood barley grass within the adjacent woodland and so a detailed survey was undertaken for this species. The survey methods are well-explained and I am content that this was not, as is admitted, a full National Vegetation Classification-level assessment but rather a detailed visual investigation designed to note as many plant species as possible. The methods are suitable for the level of information required. The survey has highlighted that the non-SINC areas contain a variety of lowland grassland types, ranging from species-poor improved leys to meadows with affinities to species-rich lowland hay meadow. It would appear that the most botanically-diverse areas are situated to the north/north-west of the site. Unhelpfully, the report does not include a site map showing the various compartments surveyed (I assume the reader is expected to refer to earlier report maps for reference). Whilst I am content to recommend that no further survey effort is required in terms of botanical surveys, there does appear to be some discrepancy between this report and the purported findings of the as-yet-unavailable third party survey results which appear to indicate that one area of meadow contains at least three different orchid species. Without more specific information it is impossible to verify this assertion and to identify the areas in question: all that can be said is that the current survey (the only one we actually have results for) did not record more than a single orchid species and did not conclude that any of the grassland was of top quality. Without any survey evidence to refute the findings of the current report, I can only recommend that no additional works are needed at this stage and that it is likely that any areas of current botanical interest outside the SINCs have been identified, and will be retained within the proposed greenspace and subject to appropriate management.

Comment Date: Thu 07 Aug 2014

Thank you for consulting me in relation to the submitted Dormouse Mitigation Strategy (EDP, August 2014). This draft document provides a little further detail in respect to proposed dormouse mitigation measures at the application site this additional detail was requested by EHDC following the submission of the previous Addendum Ecology Report (EDP, July 2014). It has become increasingly apparent (due to survey works carried out for recent applications in and around Alton) that this landscape is well-populated by hazel dormice and that these animals are clearly persisting within supposed suboptimal habitat i.e. agricultural hedgerows with minimal woodland. The greatest threat therefore to the favourable conservation status of this species locally is the loss of suitable hedgerow habitat either direct loss (habitat removal) or indirect (gradual degradation due to development). Some clarification has now been provided in respect to the quanta of existing dormouse habitat (hedgerow) to be lost/impacted by the proposals this has been estimated to be in the region of 1,500-1,600m2, exceeding 10% of all available dormouse habitat within the site. This detail is useful as it enables the loss to be placed within context I would take a less optimistic view than that given i.e. the
proposed habitat loss will equate to 'just 13%' of the estimated total for the site in my opinion; this is a substantial chunk of habitat which may indeed have population-level impacts at the site/local scale. Habitat loss is not 'limited' but rather sizeable. I would also take a less optimistic view on the apparent negligible impact due to the use of existing hedgerow gaps to accommodate the access road. It would seem to be logical (based on what we know and can reasonably assume about dormouse movements and reactions to road barriers) that a metalled road is likely to be more of a substantial barrier than the existing grassland/cultivated ground within the current gaps. I also note that the combined loss of hedgerow habitat adjacent to existing gaps (i.e. off Selborne Road and the two within the site) is estimated at 15m: I am certain that the loss is considerably greater than this (assuming the hedgerows are at least 1-2m in width). In any case, it is the presence of a metalled road (plus lighting) which will also result in impact, not simply the quanta of habitat loss. I therefore question whether the use of existing gaps, plus the loss of over 10% of all available dormouse habitat would mean 'minimal impact to existing habitat corridors and connectivity' is it being suggested that the existing hedgerow gaps are barriers to dormouse movement I do not consider therefore that the potential impacts arising from isolation and fragmentation have been addressed in sufficiently realistic detail. The site layout plan shows no habitat connectivity between the north and south of the site whatsoever. I also note that the proposed new habitat creation has overestimated the extent of habitat created by a factor of 10. The proposals would result in 210m² of habitat not 2,100m². Therefore, the proposals would result in a net loss of dormouse habitat, an unacceptable scenario. Perhaps there has been a typographical error.

In summary, I reiterate my advice from my previous response dated 23rd July 2014, that dormouse mitigation should include (but not necessarily be restricted to): location, extent, timing and methods of all vegetation removal affecting potential/confirmed dormouse habitat; assessment of effects of fragmentation, isolation, habitat loss and disturbance (noise, light etc.) and their predicted impact at the population level on dormice locally; details of ongoing habitat management and monitoring measures; and details of site-wide lighting scheme. There is a very real possibility that this development proposal could result in permanent impacts to local dormouse populations and therefore the LPA is, in line with NPPF and local planning policy, entitled to expect high-quality and fully workable mitigation, compensation and enhancement measures.

Comment Date: Mon 13 Oct 2014

Thank you for re-consulting me on this application, in this instance in relation to a series of updating ecological reports: A Bat Activity Analysis (Myotis identification) report (WSP, August 2014), a 2014 Further Bat Survey (WSP, August 2014), a BSBI Records 2013-14 plan (WSP, September 2014) and an Outline Ecological Mitigation and Management Strategy (WSP, October 2014). In summary, I am now content that the outstanding ecological matters have been satisfactorily resolved and that no further ecological works are required at this stage. I would therefore recommend that ecological mitigation, compensation and enhancement measures are secured via condition. Myotis bats I had previously requested further exploration of mouse-eared or Myotis bat species calls and so the submission of a report investigating these species is welcomed. Further analysis of bat echolocation recordings has allowed the identification of four or possibly five Myotis species, adding substantially to the knowledge of the site’s bat assemblage which now stands at 12 species. The four species
identified with a good degree of confidence are the four commonest and most widespread Natterer’s, Brandt’s, whiskered and Daubenton’s whilst there is a single recording from May 2014 which has putatively been assigned to Bechstein’s bat. This species is extremely rare nationally and undoubtedly under-recorded: whilst there are no known roosts of the species locally it is perfectly feasible that unknown populations could occur throughout the wider landscape. Given the absence of records of this species from the remainder of the year it would not appear that the species is a regular occurrence. The call analysis has proved very useful and, whilst it may not result in any substantial amendments to mitigation, it has at least allowed a fuller understanding of the value of the site to bats overall and confirmed that the site supports a good assemblage of bats. Bat surveys 2014 In order to supplement Phase 1 and 2 bat surveys carried out at the site in 2012, updating Phase 2 surveys were conducted on four built structures in July 2014 Buildings B, E, H and I. The last of these was subject to automated detector surveys for a prolonged period. The surveys recorded roosting bats only within B, but roosting was suspected within E, the water tower. Overall, the 2014 survey results did not confirm any roosting activity substantially different from that previously recorded and it is considered that bat roosting activity is broadly unchanged. I am content to agree with this conclusion. This development is highly likely to affect bats, which receive strict legal protection under UK law by the Wildlife and Countryside Act 1981 (as amended) and under EU law by the Conservation of Habitats and Species Regulations 2010 (commonly referred to as the Habitats Regulations). Where developments affect European protected species (EPS), permission can be granted unless the development is likely to result in a breach of the EU Directive underpinning the Habitats Regulations and is unlikely to be granted an EPSM licence from Natural England to allow the development to proceed under a derogation from the law. Will the development result in a breach of the EU Directive Yes. There will be loss of bat roosts within buildings and, unmitigated, the proposals would result in harm/disturbance to bats. The loss of semi-natural vegetation and general disturbance arising from development in this location will undoubtedly impact upon foraging and commuting bats species. These impacts are likely to affect the favourable conservation status of bat species locally. Is the development unlikely to be licensed An EPS licence can only be granted if the development proposal is able to meet three tests: the consented operation must be for ‘preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment’; (Regulation 53(2)(e)) there must be ‘no satisfactory alternative’ (Regulation 53(9)(a)); and the action authorised ‘will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range’ (Regulation 53(9)(b)). It is for you as the case officer to assess the proposals against the first two tests you may wish to ask for further information from the applicant. In order to assess the development against the third test, sufficient details must be available to show how killing/injury/disturbance of bats will be avoided and how the loss or damage to bat roosts and/or habitat will be compensated. In this case, I consider that the submitted information does allow a good understanding of the likely impacts and how these will be addressed through mitigation, compensation and enhancement measures. Fully detailed measures should be submitted alongside any future reserved matters application. Ecological Mitigation and Management Strategy Overall, the new EMMS provides a useful overview of the existing ecological constraints and the measures proposed to avoid, mitigate and compensate any impacts. I strongly recommend that a fully-detailed, site-wide EMMS is
provided at the reserved matters stage so that there is a single document able to be used and referred to by all parties and which provides clear and concise instructions for the ongoing protection and management of ecological features. In my previous consultation response dated 6th June 2014 I provided detailed advice on various issues. One of the key issues was the treatment of the Lord Mayor Treloar Hospital SINC which is set to be partly destroyed by these proposals. I queried whether any meaningful consideration had been given by the applicant to retaining the SINC in its entirety, given that there would appear to be ample space to accommodate a very modest area of designated calcareous grassland habitat. 

Policy C21 (a)(iii) of the recently-adopted East Hampshire District Local Plan: Joint Core Strategy (New development will be required to: a) maintain, enhance and protect district wide biodiversity, in particular the nature conservation designations: iii) Sites of Importance for Nature Conservation (SINC) (Hampshire) provides clear advice on how SINCs should feature within the planning process. Therefore, I can only advise that these proposals are in contravention of Policy CP21 and should be unacceptable on that basis. I do however agree that the mitigation measures proposed translocation of turves, management of retained SINC habitat are suitable: it is the principle of SINC damage which is the issue and it is for EHDC to decide on how it wishes to treat SINCs. I note that the applicant has provided no further information on the SINC and the justification for its partial loss. This issue aside, I am broadly content with the level of survey effort employed at this site and the range of mitigation, compensation and enhancement measures described is appropriate to the identified impacts. Given the scale of this development proposal and its significant impact on this local landscape, EHDC should expect the very highest level of ecological mitigation. Therefore, if you are minded to grant outline permission could I recommend that ecological mitigation, compensation and enhancement measures are included within a detailed site-wide plan to be secured via condition. This document should form the basis of all ongoing ecological management of this site. Prior to the commencement of any development activities a fully-detailed scheme of site-wide ecological mitigation, compensation and enhancement measures (to include but not necessarily be restricted to: site plan showing all ecological features; detailed measures to protect and retain existing habitats and species; lighting plan; location, extent, composition and ongoing management of mitigation/compensation/enhancement habitat; detailed woodland management plan) shall be submitted to, and agreed in writing by, the Local Planning Authority. Such details shall be in accordance with the outline mitigation, compensation and enhancement measures detailed within the Outline Ecological Mitigation and Management Strategy (WSP, October 2014). Any such measures shall thereafter be implemented in strict accordance with the agreed details, unless otherwise agreed in writing by the Local Planning Authority and all mitigation features shall be retained and maintained in perpetuity. Reason: to provide ecological protection and enhancement in accordance with Conservation Regulations 2010, Wildlife & Countryside Act 1981, NERC Act 2006, NPPF and Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy.

Comment Date: Mon 13 Oct 2014

Thank you for re-consulting me in relation to the recently submitted and amended Addendum Ecology Report EDP286_06 (EDP, October 2014). In summary, I consider that the information provided is now sufficient to enable the LPA to have confidence that the issue of
impacts to the European protected hazel dormouse has been addressed in sufficient detail. I strongly recommend that a fully-detailed ecological mitigation plan is secured via condition. This development will affect dormice, which receive strict legal protection under UK law by the Wildlife and Countryside Act 1981 (as amended) and under EU law by the Conservation of Habitats and Species Regulations 2010 (commonly referred to as the Habitats Regulations). Where developments affect European Protected Species (EPS), permission can be granted unless the development is likely to result in a breach of the EU Directive underpinning the Habitats Regulations and is unlikely to be granted an EPS licence from Natural England to allow the development to proceed under a derogation from the law. Will the development result in a breach of the EU Directive Yes, unmitigated, the development has potential to result in harm to individual dormice and result in impacts to the favourable conservation status of dormice locally via habitat loss, severance and fragmentation. Is the development unlikely to be licensed An EPS licence can only be granted if the development proposal is able to meet three tests: the consented operation must be for ‘preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment’; (Regulation 53(2)(e)) there must be ‘no satisfactory alternative’ (Regulation 53(9)(a)); and the action authorised ‘will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range’ (Regulation 53(9)(b)). It is for you as the case officer to assess the proposals against the first two tests you may wish to ask for further information from the applicant as if the proposals are unacceptable from a development control perspective they would not be granted an EPS licence. In order to assess the development against the third test, sufficient details must be available to show how killing/injury/disturbance of dormice will be avoided and how any loss or damage to habitat will be avoided or, if not avoided, compensated. Further detail has now been provided on the predicted extent of dormouse habitat loss and a very useful plan (Annex EDP2) illustrates the location and extent of habitat loss and creation (at least for the bulk of the application site). There will now be a net increase in appropriate habitat of c.870m², although it is acknowledge that the extent of habitat loss/gain within the land to the east of Selborne Road is at present not known and so the calculations do not include this (I am assuming). It is estimated (see section C.1.3) that buffering of the main north-south hedgerows in the eastern site will add c.1200m² of new habitat and, presumably, further gains can be made by buffering all other boundary features. The key mitigation strand here is the buffering and protection of the existing hedgerow/scrub habitat which has been confirmed as supporting dormice and which will clearly be essential for maintaining the favourable conservation status of the species locally. The report (section C.1.2) states that ‘any hedgerows adjacent to proposed residential dwellings will be buffered by a minimum of 5m’. Establishing the future treatment of all retained habitat is essential to providing an effective, realistic and workable mitigation strategy, especially as the layout of any future development plots is apparently unknown at present, as is the extent of habitat to be impact to the east of Selborne Road, a significant limitation to the assessment. In my opinion, there should be a minimum 5m buffer along all sections of retained habitat (excluding access points) and not just where residential dwellings abut. There would appear to be ample space to allow such a measure and full details of such should be provided within any future reserved matters application. If you are minded to grant permission, could I suggest that all ecological mitigation, compensation and enhancement measures are secured via a suitably-worded planning condition, such as: Prior
to the commencement of any development activities a fully-detailed scheme of site-wide ecological mitigation, compensation and enhancement measures (to include but not necessarily be restricted to: site plan showing all ecological features; location, extent, composition and ongoing management of mitigation/compensation/enhancement habitat; measures to protect and retain existing ecological features) shall be submitted to, and agreed in writing by, the Local Planning Authority. Such details shall be in accordance with the outline mitigation and enhancement measures detailed within the Addendum Ecology Report EDP286_06 (EDP, October 2014). Any such measures shall thereafter be implemented in strict accordance with the agreed details, unless otherwise agreed in writing by the Local Planning Authority. Reason: to provide ecological protection and enhancement in accordance with Conservation Regulations 2010, Wildlife & Countryside Act 1981, NERC Act 2006, NPPF and Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy.

Comment Date: Thu 13 Nov 2014

Thank you for consulting me on this application, which now includes revised layouts for proposed development plots at the main LMT site as well as revisions to road layouts near Butts Bridge. In summary, given complex nature of this application it would be most useful for the applicant’s ecological advisors to provide comment on whether these revisions require any amendments to the existing ecological mitigation proposals. For instance, will the new road layouts affect previously-safeguarded hedgerow habitat which may support hazel dormice. Are any trees to be impacted? Rather than me spending an inordinate amount of time reviewing current and former proposals, it would be prudent for an opinion to be give by the application team as to the potential implications, if any, of the revised layout.

Comment Date: Tue 09 Dec 2014

Thank you for re-consulting me in relation to the recently submitted and amended Addendum Ecology Report EDP286_06d (EDP, November 2014). In summary, I consider that the information provided is now sufficient to enable the LPA to have confidence that the issue of impacts to protected species have been addressed in sufficient detail. I strongly recommend that a fully-detailed ecological mitigation plan is secured via condition. I have no significant additional comments to make beyond those provided in my consultation response dated 24th October 2014, which I have repeated below with some minor amendments: This development will affect dormice, which receive strict legal protection under UK law by the Wildlife and Countryside Act 1981 (as amended) and under EU law by the Conservation of Habitats and Species Regulations 2010 (commonly referred to as the Habitats Regulations). Where developments affect European Protected Species (EPS), permission can be granted unless the development is likely to result in a breach of the EU Directive underpinning the Habitats Regulations and is unlikely to be granted an EPS licence from Natural England to allow the development to proceed under a derogation from the law. Will the development result in a breach of the EU Directive? Yes, unmitigated, the development has potential to result in harm to individual dormice and result in impacts to the favourable conservation status of dormice locally via habitat loss, severance and fragmentation. Is the development unlikely to be licensed? An EPS licence can only be granted if the development proposal is able to meet three tests: the consented operation must be for ‘preserving public health or public safety or
other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment'; (Regulation 53(2)(e)) there must be 'no satisfactory alternative' (Regulation 53(9)(a)); and the action authorised 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range' (Regulation 53(9)(b)). It is for you as the case officer to assess the proposals against the first two tests you may wish to ask for further information from the applicant as if the proposals are unacceptable from a development control perspective they would not be granted an EPS licence. In order to assess the development against the third test, sufficient details must be available to show how killing/injury/disturbance of dormice will be avoided and how any loss or damage to habitat will be avoided or, if not avoided, compensated. Further detail has now been provided on the predicted extent of dormouse habitat loss and a very useful plan (Annex EDP2) illustrates the location and extent of habitat loss and creation (at least for the bulk of the application site). There will now be a net increase in appropriate habitat of c.870m², although it is acknowledge that the extent of habitat loss/gain within the land to the east of Selborne Road is at present not known and so the calculations do not include this (I am assuming). It is estimated (see section C.1.3) that buffering of the main north-south hedgerows in the eastern site will add c.1200m² of new habitat and, presumably, further gains can be made by buffering all other boundary features. The key mitigation strand here is the buffering and protection of the existing hedgerow/scrub habitat which has been confirmed as supporting dormice and which will clearly be essential for maintaining the favourable conservation status of the species locally. The report (section C.1.2) states that 'any hedgerows adjacent to proposed residential dwellings will be buffered by a minimum of 5m'. Establishing the future treatment of all retained habitat is essential to providing an effective, realistic and workable mitigation strategy, especially as the layout of any future development plots is apparently unknown at present, as is the extent of habitat to be impact to the east of Selborne Road, a significant limitation to the assessment. In my opinion, there should be a minimum 5m buffer along all sections of retained habitat (excluding access points) and not just where residential dwellings abut. There would appear to be ample space to allow such a measure and full details of such should be provided within any future reserved matters application. If you are minded to grant permission, could I suggest that all ecological mitigation, compensation and enhancement measures are secured via a suitably-worded planning condition, such as: Prior to the commencement of any development activities a fully-detailed scheme of site-wide ecological mitigation, compensation and enhancement measures (to include but not necessarily be restricted to: site plan showing all ecological features; location, extent, composition and ongoing management of mitigation/compensation/enhancement habitat; measures to protect and retain existing ecological features) shall be submitted to, and agreed in writing by, the Local Planning Authority. Such details shall be in accordance with the outline mitigation and enhancement measures detailed within the Addendum Ecology Report EDP286_06 (EDP, October 2014). Any such measures shall thereafter be implemented in strict accordance with the agreed details, unless otherwise agreed in writing by the Local Planning Authority. Reason: to provide ecological protection and enhancement in accordance with Conservation Regulations 2010, Wildlife & Countryside Act 1981, NERC Act 2006, NPPF and Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy.
Natural England - Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. The Wildlife and Countryside Act 1981 (as amended) The Conservation of Habitats and Species Regulations 2010 (as amended) The National Park and Access to the Countryside Act 1949 Natural England’s comments in relation to this application are provided in the following sections. Statutory nature conservation sites no objection Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites Protected landscapes Having reviewed the application Natural England does not wish to comment on this development proposal. The development however, relates to the South Downs National Park. We therefore advise you to seek the advice of the National Park Authority. Their knowledge of the location and wider landscape setting of the development should help to confirm whether or not it would impact significantly on the purposes of the designation. They will also be able to advise whether the development accords with the aims and policies set out in the National Park management plan. Protected species We have not assessed this application and associated documents for impacts on protected species. Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a ‘reasonable likelihood’ of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy. You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation. The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer’s responsibility) or may be granted. If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk. Local sites If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application. Biodiversity enhancements This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that ‘Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’. Section 40(3) of the same Act also states that ‘conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Landscape
enhancements. This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

Environmental Health Services – Pollution - Thank you for consulting Environmental Health on the above hybrid outline application to develop land East of Selborne Road and land at the Former Lord Mayor Treloar Hospital in Alton. I have reviewed the noise assessment and air quality assessment and agree with the conclusions in the reports. The noise assessment demonstrates that it should be possible to achieve acceptable internal noise levels across the majority of the site, however mitigation measures will be required for some properties. These include some western and southern facades along Selborne Road and the A31 on the land East of Selborne Road section of the site, and some southern facades along Chawton Park Road and the A31 on the Land at Former Lord Mayor Treloar Hospital section of the site. A range of mitigation measures are detailed in the noise assessment prepared by WYG which need to be incorporated into the final design of the development. The air quality assessment demonstrates that mitigation measures need to be implemented to limit impacts associated with fugitive dust and fine particulate emissions during the construction phase of the proposed development. Once completed the proposed development is likely to have a moderate adverse impact on one existing local receptor, but air quality will remain below the relevant national air quality objectives across the development and the surrounding local area. I recommend that the following conditions are attached to any permission you are minded to grant: 1) Construction work shall not begin until a scheme for protecting the proposed development from noise has been submitted to and approved by the Local Planning Authority; all such works which form part of the scheme shall be completed before any part the dwellings are occupied. Note: The scheme shall include details of noise mitigation measures to be applied to affected dwellings, including the specification for glazing and sound attenuated ventilation, to meet the recommendations of the noise assessment report by WYG, Job Number A084747-1, Issue 3. 2) No development shall take place, including any works of demolition, until a Construction Environmental Management Plan has been submitted to, and approved in writing by, the local planning authority. Thereafter all works shall be carried out in accordance with the approved Statement throughout the construction period. The Statement shall provide for: i) the parking of vehicles of site operatives and visitors ii) loading and unloading of plant and materials iii) storage of plant and materials used in constructing the development iv) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate v) wheel washing facilities vi) measures to control the emission of dust and dirt during construction vii) measures to control noise and vibration during construction viii) a scheme for recycling/disposing of waste resulting from demolition and construction works. 3) Demolition and/or construction works shall not take place outside 0800 hours to 18:00 hours Mondays to Fridays and 08:00 hours to 13:00 hours on Saturdays and at no time on Sundays or Bank Holidays unless approved in
writing by the Planning Authority. If you have any queries, please do not hesitate to contact me. Gemma Richards, Senior Environmental Health Officer

Environmental Health Services - Contaminated Land - Memorandum To: Planning Department From: Simon Downs Our Ref: CONS/74572/14 Your Ref: 30021/056 Date: 23 May 2014 Protective Marking Category: Restricted Re: Land at Lord Mayor Treloar Hospital Site, Chawton Park Road, Alton, GU34 1RF Two desktop studies (Ref.00043043-004 and LW24317/Rev2/ds), dated April 2014 and December 2013 respectively, relating to potential contamination issues at the above site, have been reviewed and I have the following comments to make regarding content: Both reports satisfactorily address requirements for submission of desktop studies to EHDC. Preliminary risk assessments for both reports have identified potential contaminants of concern. An intrusive site investigation is therefore required for both sites of this hybrid application to enable assessment of the potential pollutant linkages identified from the preliminary conceptual site model in each desktop study. Investigations should proceed in accordance with the conclusions and recommendations of these reports. Given the ubiquitous nature of asbestos within the environment, both investigations are to ensure that asbestos screening is undertaken for all samples analysed. I would strongly advise that to avoid potential requirements for additional site visits for the purpose of further sampling, the contractor contacts me to discuss what sampling has been undertaken to date. Site investigations are to be in accordance with best practice as outlined in BS10175:2011. Soil sampling should be detailed enough to characterise potential contamination at both surface and at depth where risks have been identified to receptors. Gas monitoring is to be in accordance with best practice as outlined in CIRIA C665 and BS8576:2013. As a development sensitive to contamination and given the findings of the desktop study, the following conditions are recommended to be attached to the Decision Notice IC05 - Phased site investigation, excluding a desktop study IC06 - Validation of remedial works IC07 - Unsuspected contamination found on site In the event that unsuspected contamination is found all development work must stop immediately and the LPA informed. To help ensure developers submit information to the standard expected by this Authority, Environmental Health has put together a leaflet entitled "Development on Potentially Contaminated Land", available as a download on the following East Hampshire District Council website: http://www.easthants.gov.uk/ehdc/formsfordownload.nsf/0/48B4B42BDBF269DC80257C7C0052B5D1/$File/Developers_Guide-Contaminated_Land_v4_2014.pdf At the back of this document is a template for a Completion Certificate which can be used to document all site investigation work undertaken on site. A certificate of this nature is required to be submitted to the LPA before discharge of the final contaminated land condition can occur. Simon Downs Contaminated Land Officer

EHDC Drainage Consultant - The site is located in Flood Zone 1 (low probability of flooding) and I am not aware of any historic flooding or drainage issues affecting the site. An FRA dated March 2014 has been submitted in support of this development which states that run-off will be attenuated on site and discharge will be limited to greenfield rates. This confirms there will be no increase in flood risk elsewhere. An outline drainage strategy based on infiltration techniques has been provided and ground conditions appear to be suitable, subject to detail design. There is also the option for an overflow to the adjacent Lavant Stream. Foul
drainage will connect to the public foul sewer and Thames Water are currently carrying out a capacity check/feasibility study. No objections in principle, subject to detailed design and EA approval. Drainage matters can be covered by Conditions DE05, DE20 and DE21, supported by drainage calculations and site percolation tests. A detailed maintenance management plan will be required to cover all drainage features which remain private.

Comment Date: Tue 11 Nov 2014

The site is located in Flood Zone 1 (low probability of flooding) and a FRA dated March 2014 has been submitted to support the application. However, the drainage strategy is based on a desktop study indicating that a SUDS based system should be satisfactory. The post development impermeable area is estimated and the drainage layouts are indicative. Foul drainage is stated as connecting to the public foul sewerage system, but states that a fallback would be an on-site sewage treatment facility. This latter option is not acceptable for a development of this size and reference should be deleted. Objection pending receipt of further information confirming the site drainage in more detail, supported by geotechnical site investigation.

Comment Date: Tue 09 Dec 2014

No objection to foul drainage, subject to the Grampian condition required by Thames Water being imposed on any permission.

Environment Agency - According to the 'Schedule of Submitted Plans and Documents', there are two Flood Risk Assessments (FRA), one for each site. The FRA for Land East of Selborne Road is available to review on the Council's website. The FRA for Land at Lord Mayor Treloar Hospital Site has not been submitted. Environment Agency position Objection 1 - In the absence of a flood risk assessment (FRA) for Land at Lord Mayor Treloar Hospital, we object to this application and recommend refusal of planning permission until a satisfactory FRA has been submitted. Reason - The application lies within Flood Zone 1 defined by the Technical Guide to the National Planning Policy Framework (NPPF) as having a low probability of flooding. However, the proposed scale of development may present risks of flooding on-site and/or off-site if surface water run-off is not effectively managed. Footnote 20 of paragraph 103 of the NPPF requires applicants for planning permission to submit an FRA when development on this scale is proposed in such locations. An FRA is vital if the local planning authority is to make informed planning decisions. In the absence of an FRA, the flood risks resulting from the proposed development are unknown. The absence of an FRA is therefore sufficient reason in itself for a refusal of planning permission. Overcoming our objection You can overcome our objection by undertaking an FRA which demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we will consider whether there is a need to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection. We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal reconsultation. Our objection will be maintained until an adequate FRA has been submitted. Environment Agency position Objection 2 - In the absence of an acceptable Flood Risk Assessment (FRA) we object to the
grant of planning permission and recommend refusal on this basis for the following reason:
The Selborne Road FRA has not demonstrated that the storage volume required to attenuate
surface water run-off from the critical 1 in 100 chance in any year storm event, with an
appropriate allowance for climate change, can be provided on site. Reason Flood Risk
Assessment at Land East of Selborne Road. We have reviewed the FRA for Land East of
Selborne Road by Stephen Wilson Partnership Ltd dated March 2014. The applicant has set
out that the preferred method of disposal of surface water is by infiltration. An initial
calculation has been undertaken setting out that a storage volume of approximately 6000m3
is required to manage the additional run-off from the development. Multiple soakaway
features are proposed with potential for areas of swales. The applicant explains that
additional storage could be provided within subtle balancing pond/ storage basins. Whilst we
welcome the methodology, no infiltration testing has been submitted in accordance with BRE
365 to demonstrate that infiltration is achievable at the site. In the absence of infiltration tests,
a desk top study considering a worst case infiltration rate should be included with supporting
calculations. The FRA should also consider an indicative back up attenuation scheme if
infiltration is not possible at detailed design. This will need to show sufficient space on site to
provide enough attention storage to reduce rates to existing levels. Supporting calculations
should be submitted to demonstrate there is adequate space on site. Overcoming our
objection The applicant must demonstrate through their surface water strategy that the
proposed development will not create an increased risk of flooding from surface water.
Surface water for up to the 1 in 30 year storm event should be safely contained within the
proposed drainage network. It is acceptable to partially flood the site in the 1 in 100 year plus
suitable allowance for climate change storm event. However, this water should be safely
contained on site. Where this flooding will be within roads or pathways, the applicants must
ensure that safe access and egress is still available. The surface water strategy should show
discharge volumes (and rates) from the site will not increase as a result of the proposed
development, up to a 1 in 100 year storm with a suitable allowance for climate change;
Increases in Surface water volume post development If it is identified that the volume of runoff
will be increased then the difference should be disposed of by way of infiltration or, if this is
not feasible because of the soil type, discharged from the site at flow rates below 2 l/s/ha.
Where is not feasible, the limiting discharge for the 30- and 100-year return periods will be
constrained to the mean annual peak of runoff for the Greenfield site (referred to as QBAR in
IoH Report 124). Advice to LPA/Applicant Guidance on the preparation of surface water
strategies can be found in the Defra/Environment Agency publication “Preliminary rainfall
runoff management for developments”. Guidance on climate change allowances can be found
within the National Planning Policy Framework Technical Guidance. The applicant should, as
part of the surface water strategy, demonstrate that the requirements of any local surface
water drainage planning policies have been met and the recommendations of the relevant
Strategic Flood Risk Assessment and Surface Water Management Plan have been
considered. The CIRIA publication ‘C635 Designing for exceedance in urban drainage Good
practice’ contains advice on surface water conveyance and storage. The document can be
accessed at www.ciria.com/suds/ciria_publications.htm Surface water run-off should be
controlled as near to its source as possible through a sustainable drainage approach to
surface water management (SuDS). The variety of SuDS techniques available means that
virtually any development should be able to include a scheme based around these principles.
Further information on SuDS can be found in: PPS25 Practice Guide CIRIA C522 document
Land East of Selborne Road We previously commented and objected to the FRA for Land East of Selborne Road. We have now reviewed the recently submitted addendum to the FRA for Land East of Selborne Road dated June 2014. The addendum considers infiltration based on a conservative infiltration rate and in the absence of infiltration testing, a backup attenuation scheme has been considered. Environment Agency position We would be happy to remove our objection to this site subject to the imposition of a condition requiring surface water scheme to be submitted. We have added the condition below: Condition No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year with an allowance for climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include details of how the scheme shall be maintained and managed after completion. Reason To prevent the increased risk of flooding, both on and off site. Land at Lord Mayor Treloar Hospital Site We previously objected due to the Land at Lord Mayor Treloar Hospital Site FRA not being present. We have now reviewed the FRA for Land at Lord Mayor Treloar Hospital Site dated April 2014 by AECOM. The applicant has set out that the preferred method of disposal of surface water is by infiltration. However, no infiltration testing has been submitted in accordance with BRE 365 to demonstrate that infiltration is achievable at the site. In the absence of infiltration tests, a desk top study considering a worst case infiltration rate should be included with supporting calculations The FRA should also consider an indicative back up attenuation scheme if infiltration is not possible at detailed design. This will need to show sufficient space on site to provide enough attention storage to reduce rates to existing levels. Supporting calculations should be submitted to demonstrate there is adequate space on site. Environment Agency position In the absence of an acceptable Flood Risk Assessment (FRA) we object to the grant of planning permission and recommend refusal on this basis for the following reason: The applicant has not demonstrated that the storage volume required to attenuate surface water run-off from the critical 1 in 100 chance in any year storm event, with an appropriate allowance for climate change, can be provided on site. Overcoming our objection The applicant must demonstrate through their surface water strategy that the proposed development will not create an increased risk of flooding from surface water. Surface water for up to the 1 in 30 year storm event should be safely contained within the proposed drainage network. It is acceptable to partially flood the site in the 1 in 100 year plus suitable allowance for climate change storm event. However, this water should be safely contained on site. Where this flooding will be within roads or pathways, the applicants must ensure that safe access and egress is still available. The surface water strategy should show discharge volumes (and rates) from the site will not increase as a result of the proposed development, up to a 1 in 100 year storm with a suitable allowance for climate change;
Increases in Surface water volume post development If it is identified that the volume of runoff will be increased then the difference should be disposed of by way of infiltration or, if this is not feasible because of the soil type, discharged from the site at flow rates below 2 l/s/ha. Where is not feasible, the limiting discharge for the 30- and 100-year return periods will be constrained to the mean annual peak of runoff for the Greenfield site (referred to as QBAR in IoH Report 124). Advice to LPA/Applicant Guidance on the preparation of surface water strategies can be found in the Defra/Environment Agency publication "Preliminary rainfall runoff management for developments". Guidance on climate change allowances can be found within the National Planning Policy Framework Technical Guidance. The applicant should, as part of the surface water strategy, demonstrate that the requirements of any local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered. The CIRIA publication 'C635 Designing for exceedance in urban drainage Good practice' contains advice on surface water conveyance and storage. The document can be accessed at www.ciria.com/suds/ciria_publications.htm Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). The variety of SuDS techniques available means that virtually any development should be able to include a scheme based around these principles. Further information on SuDS can be found in: PPS25 Practice Guide CIRIA C522 document Sustainable Drainage Systems design manual for England and Wales CIRIA C697 document SuDS manual

Comment Date: Tue 11 Nov 2014

Thank you for consulting the Environment Agency on the above planning application which was received on 11 November 2014. Environment Agency position We object to this application because it has failed to meet the requirements of the second part of the flood risk Exception Test and recommend that planning permission be refused on this basis for the following reasons: Rees Whilst the proposed housing development is acceptable the applicant has failed to compensate or account for the runoff from the proposed new access road from Winchester Road to Selborne Road. The proposed access route runs through the modelled flood zone 3 for the Upper River Wey. Until this is element of the development is accounted for in the applicant's Flood Risk Assessment (FRA) we object to the proposed development. The Planning Practice Guidance on Flood Risk and Coastal Change requires the Exception Test to be applied in the circumstances shown in tables 1 and 3 (paragraphs 065 and 067). Paragraph 102 of the NPPF makes clear that both elements of the Test must be passed for development to be permitted. Part 2 of the Test requires the applicant to demonstrate in a site specific flood risk assessment that the development will be safe, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall. Whilst the application for the housing element of the development lies within Flood Zone 1 the proposed new access road from Winchester Road to Selborne Road falls within Flood Zone 3 defined by the NPPF as having a high probability of flooding. Development of the access road which is classed as essential infrastructure is only appropriate in these areas following application of the Sequential Test and where the Exception Test has been applied in full and has been passed. In this instance the submitted flood risk assessment (FRA) fails to: 1. Demonstrate that the development is 'safe' 2. Increases flood risk in the surrounding area Overcoming our
objection It will need to be shown that any increase in built footprint within the 1 in 100 year plus 20% allowance for climate change flood extent can be directly compensated for. This is necessary to prevent the new development reducing floodplain storage and displacing flood waters, thereby increasing flood risk elsewhere. Level for level floodplain compensation is the preferred method of mitigation. If it is not possible to provide level for level floodplain compensation then other forms of mitigation may be considered if agreed with the local planning authority. The FRA must demonstrate that level for level compensation has been considered, explain why it was not possible to provide it and detail how any associated risks from the chosen form of mitigation can be minimised. In addition to this the Local Authority must be satisfied that they can enforce a condition to maintain these voids as designed and that an adequate maintenance plan is in place to ensure the voids remain open for the life time of the development. If the Local Authority are not satisfied that alternative mitigation measures are appropriate then the applicant should revise their development proposals to ensure that there will be no increase in built footprint on this site. Note to applicant Level for level compensation is the matching of volumes lost to the flood plain through increases in built footprint with new flood plain volume by reducing ground levels. Please note for this to be achievable, it requires land on the edge of the floodplain and above the 1 in 100 year with an allowance for climate change to be available. A comparison of ground levels (topographical survey) with modelled floodplain levels will show land above the 1 in 100 year plus climate change floodplain to be used as compensation. In accordance with the Planning Practice Guidance (Reference ID: 7-043-20140306), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome. If you have any queries regarding the information set out above please contact me using the details given below.

Land At Lord Mayor Treloar Hospital Site, Chawton Park Road

Environment Agency position

We would be happy to remove our objection to this site subject to the imposition of a condition requiring surface water scheme to be submitted. We have added the condition below:

Condition
No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year with an allowance for climate change critical storm will not exceed the run-off from the existing developed site or a return to Greenfield rates, following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include details of how the scheme shall be maintained and managed after completion.

Reason - To prevent the increased risk of flooding, both on and off site.
Land East Of Selborne Road, Alton

Environment Agency Position

The Environment Agency maintains its position that the development is acceptable provided that a condition is included that requires the surface water drainage scheme for the site to be approved by the local planning authority, as set out in our letter HA/2014/115696/02 dated 1 July 2014.

Economic Development - Does not object to the application subject to mitigation for impact on employment. In order to achieve sustainable economic growth, East Hampshire has to tackle key issues and challenges such as skills, training and employment, alongside provision of housing.

Economic Development recognises that an increase in housing development will result in an increase in population and thus a need to address local employment matters. Therefore, the Economic Development seeks measures to mitigate for skills shortages, increase apprenticeship opportunities, reduce unemployment and provide career opportunities for residents. Measures included in the Local Employment and Training agreement may include:

- An agreement to assist in the placement of the apprentices and unemployed from the local area into jobs within the construction phase of the development.

- Negotiate obligations including: direct labour agreements, training, work experience and apprenticeships to be implemented during the construction phase of the project and following completion date (if required).

- Negotiate an economic contribution towards the Get East Hants Working Initiative - a successful local initiative aimed at linking up residents with local employers through apprenticeships, promoting job creation and business growth.

The applicant recognises the need to support local employment as evidenced in Chapter 8 of the Planning Statement (application case no. 55428/001).

Policy reference

- The East Hampshire District Local Plan Policy CP5 seeks to encourage developments which a promote workforce skills and employment and address barriers to employment.

- Para 5.27 states that ‘... planning obligations will be sought on development proposals to promote workforce skills and employability’. (Ref: East Hampshire District Local Plan: Joint Core Strategy - Local Plan Policy CP5)

- The National Planning Policy Framework (NPPF) acknowledges the need to support economic growth through the planning systems. See NPPF Paras: 8, 10, 19, 152, 187.
Summary The Council notes with reluctance that the South Alton area must accept substantial housing but considers the layout proposed fails to mitigate the impact of such a large development. It fails to secure the infrastructure from which the community of Alton and its surrounding villages can best benefit. This Paper sets out the particular issues which if addressed would enable that development to be integrated in a way which minimises degradation of the environment and secure better use of the funds made available to the community as in consequence of the development. Chawton Park Road and Northfield Lane. The Parish Council does not accept that the application can be approved on the basis that the County Council will deal with works in Chawton Park Road and Northfield Lane at a later stage. THE WYG Transport Assessment of April 2014 contains some but insufficient recognition of these issues which were raised at the consultation stage. The Parish Council believes that proposals will; Increase materially the amount of traffic running southwest along Chawton Park Road. It is already dangerous at the 90 degree turn into Northfield Lane and under the railway bridge in Northfield Lane. Fail to create a satisfactory pedestrian footway on the sections of Chawton Park Road within the Parish Fail to enable the cycle way which in theory exists within Chawton Park Road but which is not in fact a safe and secure reality, to operate successfully and safely as an access to the cycle network in Chawton Park Woods. This is potentially an ideal way for those seeking air and exercise in the Open Access Land provided by the Forestry Commission voluntary dedication under the CROW Act. Safety is already at risk and increased traffic from the new development increases that danger and is therefore unacceptable Put at further risk those seeking to walk under the railway bridge in Northfield Lane and those on horseback accessing Chawton Park Woods. It must be a condition of any consent that under the bridge there be alternate working for vehicles with a secure footway, cycleway and bridge way paid for and provided as part of the development and not merely something for consideration for future work. This is recognised by the WYG Transport Assessment @ 3.6.4. and that must be translated into firm conditions for implementation prior to any housing being occupied. Fails to preserve the long term potential for an Alton western bypass which, while at present regarded by many as unaffordable must remain an option and may become an essential part of Alton's infrastructure in terms of its substantial overall development in the Local Plan period. This is ignored by the Transport Assessment and is a vital issue for consideration by the Alton wider community. 2 The potential traffic lights at the junction of Chawton Park Road and the A 339 are welcomed but must be part of an initial overall traffic plan, to be in place prior to any construction traffic starting work on site. 3 The reconstruction of the Butts railway bridge and the associated roundabout. These are not considered to be a correct or even desirable community benefit. In particular it is considered the existing bridge: a is of such historic importance it should be retained and listed. Public records show: 1861 Act for construction of railway from London to Alton, Alresford and Winchester by the London and South Western Railway Company, dated 28 Jun 1861. (41M95/3) 1861 28 June, The subscribers were:- Rt Hon Lord Ashburton, Sir James Francis Doughty Titchborne Bart, Edward Knight, Robert Cole, James Winter Scott, John Wood, Henry Hall, Henry Joyce Mulcock, Jacob Hagen, John Dunn, John Thomas Maine, Charles Wooldridge, Edward Parsons, Charles Collis, James Calvert, John Huggins, Henry Snelling and James Covey taking 15,000 shares at £10 each. First Directors:- Edward Knight, Henry Hall, Henry Joyce Mulcock, Robert Cole, Jacob Hagen and John Wood. 1860s
Alton, Alresford and Winchester Railway. Printed map with ms additions showing two versions of proposed railway line from Alton via Chawton. (39M89/E/B280) Knight archive. Cross section of proposed railway line no. 2. (39M89/E/B281) Knight archive. 1861 Tracing of the site of the proposed Alton, Alresford and Winchester Railway in Chawton, on land belonging to Edward Knight, (land required for railway coloured red), 1861. (39M89/E/B486) Knight archive. The railway and the bridges at the Butts are an integral part of that history. Not only is it an integral part of local history that is enhanced by the intimate involvement of the Knight family of Chawton, the Knights being the local landowners and descendants of Jane Austen’s brother. Preservation and enhancement of the bridge not its destruction should therefore be a prime objective. b serves as a suitable pinch point to restrict traffic speed and sight lines could readily be improved. The very need for an improvement at Butts Bridge is challenged. Pinch points to reduce speed were encouraged elsewhere so why remove the one provided by Butt’s Bridge. It is noteworthy that WYG (the developer’s consultants) on the September consultations by EHDC on the Local Plan amendments noted the specific reference to the bridge improvements had been removed. A principle failure is the provision of safe pedestrian and disabled access across the roundabout to the part of Winchester Road now truncated by the A31. This constitutes the primary pedestrian access to Chawton and its enhancement is key to establishing sustainability non car born access to Chawton with its Jane Austen heritage and the South Downs National Park. This must be engineered into the footways and central reservation on the Selborne Road section of the A339. Chawton is a major tourist venue as the central place of resort for the worldwide visitors seeking the Jane Austen Heritage. The proposals fail to take account of the issue of non car borne access to Chawton relegating the issue to a bog standard footway layout. The provision of a single re-aligned roundabout could be engineered to allow enhanced safety, accommodate with improved sight lines the link to the truncated section of the Winchester Road and allow access onto that roundabout from any new development. It is clearly possible, cheaper and allows the Chawton Triangle to remain inviolate as vital part of the Chawton Alton gap. Linking into the truncated section of the Winchester Road via the new roundabout on the A339 also serving the lower slopes of the Borovere development is opposed. The suggested amendments to the Winchester Road truncated section and the A339 at Butts Bridge makes that new link unnecessary, makes the essential pedestrian cycle links clearer and easier to maintain and avoids the intrusion into the Chawton Triangle which must be retained as part of the natural environment. The environment of residents in the truncated section of Winchester Road will be preserved without the loss of part of the Chawton Triangle to an intrusive road extension from the new proposed A339 junction. 4 On the slopes below Ackender Wood Lord Mayor Treloar County Park is proposed. A small car park is shown. In practice this would be used by those using the Forestry Commission land designated as Open Access Woodland under the CROW Act 2000 and car parking for that purpose is valuable. The new small country park however is not useful given the hundreds of acres of woodland available and within which public access could be easily enhanced by the car park and but improved surfacing to existing walks. The availability of this very substantial area of Open Access Forestry Commission countryside means that a countryside park is not a sensible or useful compensatory benefit to the public to offset the detriment caused by the development. The car parking should be enhanced over that proposed to improve pedestrian access to the Forestry Commission land. This would secure public benefited substantially increasing access to the countryside for air and exercise. 5 Car parking and access should not be provided off
Chawton Park Road but from the A339 accessed near the existing bridleway onto Ackender Wood (opposite Whitedown Lane). This would co-ordinate with the car parking mentioned above. If the development round the Community Hospital was accessed by a new roundabout in addition to the car park it should be considered if the new development could be accessed from that roundabout on the A339 avoiding all the problems of access from Chawton Park Road. 6 The location of the housing on the Treloars site should be varied a The removal of the new parkland and the revision of the entrance to the housing on the former hospital land to the A339 means no new traffic would use Chawton Park Road and its use for pedestrian and cycle access could be enhanced. In addition by removing the housing from immediately alongside Chawton Park Road land it could be gifted to EHDC or Alton Town Council as a site for an leisure access or considered as part of the co-ordinated recreation with the sports ground opposite and the Alton Sports Centre. b i. It is realised that remote planners may consider that accessing building on the lowers slopes rather than above Alton Hospital to be obviously the better location. Chawton Parish Council does not accept that; the topography of the slope makes it far less prominent than most elevated sites. It will also be against the substantial background of the Forestry Commission open access woodland from Ackender Wood along to Bushy Lease Wood. ii. Leaving undeveloped the most westerly field in the development in Chawton Park Road north of the recreation ground would provide a green belt between the development and Ackender Wood down to Chawton Park Road. This has a clearer boundary with the developed areas rather than rather than intruding to the south west into the open land of the valley and along to Chawton Park Wood itself a further vital area of Forestry Commission access. It would have the added advantage of leaving that area available for recreational use as the proposals for such facilities in Alton evolve. This allows for integration with the new or refurbished Sports centre which the Parish fully supports and imaginative and co-ordinated built and open air recreational facilities. 7 Further improvements to A339 Selborne Road/ A31 connectors. The existing north and southbound connectors to the A31 must be improved as part of the development. Matt Grist for the developers at the December presentation felt the landowner would not want reorganise the proposed roundabout to take it to the slip road off the A31 but if the single roundabout solution previously mentioned is implemented improvements to these connectors are easily made. They need to be fully upgraded as part of the proposals, not as a possible later matter for the County Council: the new development's traffic will make the present defects worse. It will impact on traffic in Chawton which is a matter of concern the Parish is seeking to address in its emerging Parish Plan. It is noted and was raised at the recent open day on the emerging Alton Neighbourhood Plan, the issue of these roundabouts on the sliproads from the A31 are not addressed and this seems simply to be that the issue is not one in the minds of the relevant authorities. It is key that it is addressed and if it is not addressed within this application will not be addresses at all. In particular: a. traffic from the south egressing the A31 is forced to travel towards the Butts Bridge roundabout and then return up the A339 towards Selborne if it wishes to go in the Selborne direction. This is complex and creates a simpler 'rat run' through the Chawton Village section of the Winchester Road and Wolfs Lane. Chawton is in process of completing its Parish Plan and rat running traffic is identified as an issue which requires facilitation of correct routes by roundabouts at the 2 connectors with the A31/A339. The position of Chawton as the hub of Jane Austen tourism makes care in this matter of even greater importance as tourists from round the world must be able to wander at ease in the heart of the village from which through traffic has been removed. b. traffic exiting
the A31 southbound to the A339 meets a junction with no roundabout, an accident record and poor sight lines at the cross road with Wolfs Lane. A roundabout at that junction is essential to take addition traffic generated by the development much of which will use the junction. Fully adequate land already exists within the curtilage of the road network at this point so no additional land needs to be acquired. There is a real safety issue and the Transport Assessment while discussing the capacity of the junctions @ 8.6 gives the implication that capacity is the issue whereas safety and rat running elsewhere, particularly through Chawton, are of greater importance and need to be included in the proposals. 8 The proposed housing on the lower slopes of Borovere Farm are part of the Chawton Alton gap and also breach the desirable objective of preventing new development round Alton being in areas which do impact on the green approaches to the town. The location of housing should therefore be varied to leave those lower slopes undeveloped. If necessary displaced housing would be better provided on the Lord Mayor Treloar’s Hospital site where it will have materially less impact on Alton’s green gateways. 9. Infrastructure: Schools. The application will clearly create a substantial impact on Schools. It will require a new school or material extensions to existing Schools, including the successful and over subscribed Chawton School, which plays a very important binding role within the local community. No sensible view on sustainability can be made until a firm, publicly supported route to Schools enhancement is settled. This must be based round enhancing and building on the best existing local schools. This cannot be left for future decision, it must be planned in to the wider infrastructure to support, build upon and safeguard those establishments and the reputation for high educational standing they have made. No properly informed planning decision can be made until the way forward is agreed and funding has to be in place to ensure the necessary facilities are in place prior to occupation of new housing. Sewerage. In the recent floods residents of Chawton were subject to polluted water flooding down from Farringdon. Properties by the Lavant Stream were required to use portable toilets because of the lack of capacity of the foul drainage system. This situation is about to be made worse by the developments in Four Marks, particularly Boyneswood Road, currently under consideration. The clear common factor is all drain into the Alton Sewerage Works which is inadequate. Thames Water is notorious for its tardy response to sewerage provision. If the scheme were to be approved it must be on the basis of a Grampian Condition requiring the robust enhancement of the sewerage system over whole area served by the Alton Sewerage Works to ensure capacity for current and planned needs. The funding saved, we understand over £8,000,000 with payments not required for ransom strips should be used for community benefit and to relieve pressures accentuated by the development particularly: a by substantially increasing the contribution to the new Sports centre. If the new centre is to reach the standards East Hampshire District Council and the community seek then this sum is entirely inadequate for enhanced and renewed sports facilities in Alton. b augmenting the proportion of affordable housing on site c enhancing pedestrian and cycle links from Alton to the area and on to Chawton and the South Downs National Park should be after careful community consultation. This should include active encouragement and facilitating these links as access to Chawton School d roundabouts on both the A31 interconnectors for safety and enhancement of the environment for residents and visitors. The consequential safety improvements would be substantial particularly at the Wolfs Lane, Selborne Road interconnection with the southbound off slip road from the A31 and save later expense.
OBJECT - Beech Parish Council object to this application as they are extremely concerned about the effects of the increased traffic. There will be increased traffic on Whitedown Lane and a bottleneck will be created by the new traffic lights at the junction of Chawton Road and Whitedown Lane. There will be more traffic using Beech as a rat run and increased traffic on the A339 Basingstoke Road will make it more hazardous pulling out of the junction with Medstead Road. There will also be more traffic backing up on the A339 waiting to turn off at the junction with Whitedown Lane. Beech Parish Council are also extremely concerned about the environmental effects of the increased traffic as well as the increased demand on the local infrastructure and the additional surface water run off from the proposed new development.

Alton Town Council -

Comment Date: Wed 14 May 2014

COMMENTS ON PLANNING APPLICATIONS CONSIDERED AT THE FULL COUNCIL COMMITTEE MEETING HELD ON THURSDAY 19 JUNE 2014 AT ALTON ASSEMBLY ROOMS OBJECT for the following materials reasons: 1. Impact on Planning Policy - (i) Town Design Statement - Whilst both elements of the housing application are for outline planning permission, it is considered from the limited information available that there would be a breach of the skyline. The protection of this is a key requirement of the Town Design Statement 2008, derived from the extensive consultation undertaken with the Alton community. (ii) Joint Core Strategy - The council, with no information being made available to it, is unable to verify the developers’ stance on offering only 20% affordable housing, which is contrary to the Joint Core Strategy, Section CP13 Affordable Housing on Residential Development. 2. Flood Zone - (i) There is insufficient clarity in the information submitted as to the proximity of the proposed new road to a Flood Zone 3 area. 3. Environment Designations - (i) The Council has no way of verifying whether environmental designations are met or are likely to be met as it has had no access to the confidential Botanical Survey and Badger Survey. (ii) The council is concerned at the introduction of confidential reports being inaccessible and would register their disapproval, noting that nature does not follow boundaries. 4. Landscape Impact - (i) The council repeats it previous comments regarding the breach of skyline on both housing development sites. (ii) The proposed West of Selborne Road development clearly breaches the Chawton gap and is going outside of the settlement boundary. (iii) The proposal to replace the existing historical bridge with a wider, newly designed bridge is not in keeping with the existing southern gateway to the town which is viewed as an important historic landmark. (iv) Insufficient attention has been paid to the aesthetic impact on the Butts itself of the proposed new bridge and is seen as a poor solution that has been put forward by the developers. It is suggested that alternative designs such as a bowstring arch design will have less visual impact. (v) There is concern at the close proximity of the proposed housing at the top of the Treloar site with Ackender Wood. The council considers that the area should be kept as an open space to mitigate any adverse impact on the wood and footpaths. 5 Noise - Observation: in noting the substantial housing
proposal as part of the application, it is acknowledged that there would be an increase in
noise levels associated with housing development and the proposed access for the Treloar
site would impact on those living in Chawton Park Road. Observation: concern regarding
noise impact as a result of the widening of the Butts Bridge and the arrival of larger HGV
using the route as a cut through to the M3 from the A3. This cannot be substantiated until the
Traffic & Transport Survey currently being commissioned by HCC/EHDC delivers its report at
the end of the year. 6. Residential Amenity - (i) The application for Highway Works makes no
provision for the safety of pedestrians, cyclists and other road users at the Butts Bridge -
pedestrians having to negotiate 2 lanes of traffic at the Winchester Road roundabout; equally
there is no refuge as you come out of town. There is little attention if any applied to pedestrian
safety and the proposal in its current form provides no adequate solution for the safety of all
road users, irrespective of mode. Observation: the council strongly recommends that any new
development at the Treloar site must be designed and built to the adoptable standard. 7.
Historic Environment - (i) The Council has insufficient information available to determine
whether it is appropriate for a new bridge to be built or whether the preserving of an historic
landmark is more appropriate. Observation: the Council welcomes the developers' agreement
to retaining the water tower at the top of the Treloar site. Observation: The Council
recommends that Robertson House on the Treloar site be considered worthy of preservation
and possibly converted into flats. 8. Highways Public Transport - (i) The Council was
unanimous in its comment that the application was premature and there was insufficient
information available at this time until the Traffic & Transport Survey currently being jointly
commissioned by HCC and EHDC is available at the end of 2014. This survey is to look at the
holistic impact on the town of all planning developments currently being submitted at 4 sites
across the town and the resultant impact on the road network infrastructure. (ii) The Council
also noted that the information on traffic used in the submission was inadequate, being
completely out of date and the inclusion of it was not viewed favourably. (iii) No provision has
been included for cycleways, or to upgrade to the junction of Whitedown Lane with the
Basingstoke Road. (iv) The proposed traffic calming measure at the Bridge in Northfield Lane
was considered to be inadequate for the potential increase in traffic deriving from the Treloar
development. (v) No provision has been included to negate increased traffic flows at the
Whitedown Lane/Chawton Park Road junction. (vi) The Council would like to see the
extension of the 30 mph limit to include any proposed development of the sites. (v) The
Council would prefer to see a roundabout at the Treloar site entrance. 9. Availability of
Community Services - (i) There is no provision for community enhancements within the
scheme. The Whitedown Ward currently has one pub, a doctors' surgery (and now a recently
added pharmacy) but no shops. Observation: Councillors noted that Phase 1 of the Treloar
site development originally included a community building, but this failed to materialise. 10.
Infrastructure - (i) Insufficient visual splays due to the design of the proposed new bridge
construction, would lead to vehicles approaching the roundabout from Whitedown Lane not
having a clear site of vision of traffic leaving the town along Butts Road until the last minute.
(ii) A girder bridge is proposed to replace the Whitedown Lane arch. Whilst the girder span is
specially stated (see drawing 60225063/CIV/DRG/LMT/105), the girder depth from its top to
bottom is not. Since this is a detailed Planning Application and since the span and depth are
'of the essence' of such a bridge proposal we consider the application is incomplete and
should be refused. 11. Green Infrastructure, Open Space & Ecology - (i) Members were
gravely concerned that this application could be viewed as premature and a measured
attempt to avoid new legislation being introduced in 2016 regarding the design & efficiencies of new house builds which provides that should a development commence before the date of introduction the remainder of the development does not need to comply with the new legislation. (ii) The council did not feel that adequate attention had been given to the proposed open space on the proposed Borovere site which was viewed as too little and in the wrong place. (iii) With no detailed information available at this stage as to the housing design, materials to be used etc, the council suggest that all development in Alton should be of the highest standard, using good quality materials and comply with all requirements irrespective of start date with the 2016 legislation due to be introduced regarding ecology and sustainable materials. Observation: Consideration should be given to open space being committed to provide for much needed allotment provision in the town and to alleviate an ever growing waiting list. 12. Availability of Utilities, Water, Gas, Electricity, Broadband & Telephone - (i) South East Water and Thames Water have both confirmed that the water supply and sewage infrastructure in Alton is inadequate and is currently under severe stress and requires upgrading. Observation: local knowledge states that the current Treloar site has suffered a number of electricity outages and low water pressure, both of which require further investigation before any further development of the site. Observation: whilst acknowledging that developers can enter into a Grampian Agreement with utility companies, it is widely known that Alton has suffered from flooding and sewage contamination following the heavy rains of 2013/14 and as a consequence urge the planning authority to determine that such agreements should more than adequately provide for all proposed developments in an holistic way, not on individual planning applications as currently presented. 13 Availability of Education facilities - (i) Inaccurate information is contained within the submitted documentation from the developers regarding educational facilities in the Whitedown Ward and refers to the Whitedown Special School (which closed in 2006). In noting that some provision has been allocated for an extension of The Butts Primary School; all schools in Alton are over-subscribed and the proposed £2.6m investment are viewed as totally inadequate and need to be reviewed against current data and future predictions against housing developments. 14. Foul and Surface Water Draining - (i) Councillors considered that the treatment of foul water on site at Borovere may end up polluting the Lavant stream and that further work is required to improve the provision for dealing with foul water. (ii) The Environment Agency in its comments has said that surface drainage on the Borovere site is inadequate. (iii) Thames Water has suggested that any Grampian Agreement put in place would take 3 years which conflicts with planning permissions awarded that state that development should commence within 2 years. (iv) Local knowledge indicates that Chawton Park Road is prone to flooding issues and more detailed information would be required to satisfy these concerns of surface drainage onto Chawton Park Road. 15. Affordable Housing - (i) The Council notes that insufficient information is available to enable a comment as to whether the 20% proposed affordable housing on the two sites is substantiated by the developers' submission. (ii) Councillors are disappointed that with waiting lists as defined: 473 - awaiting 1 bedroom dwelling 235 - awaiting 2 bedroom dwelling 77 - awaiting 3 bedroom dwelling Developers have submitted a lower percentage inclusion of affordable housing within the scheme which is not compliant with the Joint Core Strategy. 16. Housing Mix, materials and design - (i) With only outline planning permission being sought for both the Treloar and Borovere site, no detailed information is available against which to compare or understand what is proposed for the two sites. However, councillors recommend that 2.5 storeys would
be the maximum limited on housing heights (which is 2 storey with dormers in roof). (ii) The
council reiterates its earlier comments that only the highest grade of materials should be used
in the construction of any housing development.

Comment Date: Mon 14 Jul 2014

No Consultations have been made on this case

Comment Date: Fri 12 Sep 2014

OBJECT and the Committee repeats its previous comments of 19th June However, the
committee does note with interest the amendments and welcomes the proposals put forward.

Comment Date: Fri 28 Nov 2014

No Consultations have been made on this case

Comment Date: Tue 09 Dec 2014

The Committee repeats its previous comments OBJECT As stated previously, Alton Town
Council intends to await publication of the jointly commissioned HCC & EHDC Transport
Survey which will provide an holistic report for Alton which is due in December 2014.