



**Representations made for Regulation 16 Consultation for the Alton Neighbourhood Plan between the dates of Friday 10<sup>th</sup> July – Friday 21<sup>st</sup> August**

AEH01 – Johnson

AEH02 – Voller Architects

AEH03 – Ministry of Defence

AEH04 – Highways England

AEH05 – Turley obo Martin Grant Homes & Persimmon Homes

AEH06 – Natural England

AEH07 – Historic England

AEH08 – Lee Short

AEH09 – Froyle Settled Estate

AEH10 – WYG

AEH11 – Environment Agency

AEH12 – South Downs National Park Authority

AEH13 – CgMs Consulting obo David Miesels

AEH14 – Hampshire County Council

AEH15 – Waverley Borough Council

Hannah Collier

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**From:** [REDACTED]  
**Sent:** 20 July 2015 17:38  
**To:** EHDC – Neighbourhood Plans Shared  
**Subject:** Alton Neighbourhood Plan

Dear Sirs,

I have read this plan and been to a number of the meetings whilst it was being prepared. During that process the Molson Coors site in Alton was still operating actively as a brewery. It is not now and I think that the potential of the site for housing development should be investigated. If there is a possibility of such development it throws doubt on whether some of the sites already earmarked for housing need to be developed at all especially those which are more visually obtrusive. Maybe the Plan should look at housing allocation on alternative bases namely with and without the Coors site being used for housing or possibly becoming available for housing at some future time.

Gary Johnson

**Hannah Collier**

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**From:** James Voller <[REDACTED]>  
**Sent:** 21 July 2015 23:36  
**To:** EHDC – Neighbourhood Plans Shared  
**Subject:** Representation relating to Land off Wilsom Road, between 60-86 in Alton, SHLAA site AL026.

Dear Victoria Potts,

Thank you for your email requesting our final Neighbourhood Development Plan representation relating to Land off Wilsom Road, between 60-86 in Alton, SHLAA site AL026.

I would therefore like to emphasise the following benefits of allocating this site for residential development:

- A very sustainable location: Alton mainline railway station 700m (12 mins walk), town centre 800m (15 mins walk) via Ashdell Road with bus stops in Wilsom Road.
- Southerly position in the town allows easy vehicular access onto A31 via Mill Lane, without passing through town centre.
- Smaller development was favoured by Alton residents in Neighbourhood Plan consultation.
- 40% affordable housing will be provided.
- No flood risk.
- Land is deliverable.
- The site is currently disused and overgrown without use or function.
- The proposal is an infill development between two existing residential pockets along Wilsom Road.
- The Alton Neighbourhood Plan proposes to allocate land opposite the site for commercial development.
- HCC Highways have been consulted and feedback on site access is positive.

Various consultants studies and reports are in process, and a planning application will be submitted early 2016.

Thank you.

Yours sincerely,

James Voller

**VOLLER ARCHITECTURAL DESIGN**

James Voller MCIAT, Director

Hollyhock House, 1A Anstey Mill Lane, Alton, Hants, GU34 2QP

Tel: [REDACTED]  
Mob: [REDACTED]  
E-mail: [REDACTED]  
Web: [www.vollerarchitectural.com](http://www.vollerarchitectural.com)





Ministry  
of Defence

AEH-03

## Defence Infrastructure Organisation

East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
GU31 4EX

Safeguarding Department  
Statutory & Offshore

Defence Infrastructure Organisation  
Kingston Road  
Sutton Coldfield  
West Midlands  
B75 7RL

Tel: [REDACTED] Tel (MOD): 94421 3656

Fax: +44 (0)121 311 2218

E-mail: [DIO-safeguarding-statutory@mod.uk](mailto:DIO-safeguarding-statutory@mod.uk)

[www.mod.uk/DIO](http://www.mod.uk/DIO)

Dear Sir/Madam

27 July 2015

### **Neighbourhood Plan Alton**

Thank you for consulting the Ministry of Defence (MOD) in relation to the above consultation.

The proposed area of Alton lies within the statutory safeguarding aerodrome and birdstrike safeguarding consultation zone surrounding RAF Odiham.

The main concern within the aerodrome safeguarding zone relates to potential development which may inhibit or infringe defence operational capability. With respect to Alton, we would need to be consulted on any development exceeding 91.4m in height.

Alton is encompassed by the statutory birdstrike safeguarding zone, therefore any development including large areas of open water, Sustainable Urban Drainage Schemes, landfill sites etc need to be reviewed by this office. This is due to the potential of such schemes to attract and or host large flocking bird specie hazardous to air traffic.

I trust this adequately explains our position on this matter.

Yours sincerely

[REDACTED]  
Louise Dale  
Assistant Safeguarding Officer (Statutory & Offshore)  
DIO Safeguarding

**Hannah Collier**

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**From:** Batty, Helen [REDACTED]  
**Sent:** 05 August 2015 12:38  
**To:** EHDC – Neighbourhood Plans Shared  
**Subject:** RE: NOTIFICATION OF PUBLICITY OF THE ALTON NEIGHBOURHOOD DEVELOPMENT PLAN

Thank you for referring the Alton Neighbourhood Plan to Highways England.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Any development proposals that might impact on the SRN should be referred to Highways England at the earliest opportunity but, being some distance from the location area, I have no comment to make on this occasion.

Kind regards

**Helen Batty, Assistant Asset Manager**

Highways England, Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ

Tel [REDACTED]

N.B Working days Tues-Thurs

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**From:** EHDC – Neighbourhood Plans Shared [mailto:neighbourhoodplans@easthants.gov.uk]  
**Sent:** 21 July 2015 14:58  
**To:** CCC  
**Subject:** FW: NOTIFICATION OF PUBLICITY OF THE ALTON NEIGHBOURHOOD DEVELOPMENT PLAN

Good Afternoon,

Apologise for the delay in getting this to you, it has only just bounced back in on our system.

Please see the email below.

Kind regards,

Hannah

Dear Sir/Madam,

**NOTIFICATION OF PUBLICITY OF THE ALTON NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012**

I write to inform you, as a consultation body or consultee identified in the Alton Consultation Statement that we are now in receipt of the final submission version of the Alton Neighbourhood Plan along with all accompanying documentation required under Regulation 15.

### **What documents comprise the ‘plan proposal’?**

The plan proposal comprises the following documents:

- (a) A map identifying the area to which the proposed neighbourhood development plan relates;
- (b) A consultation statement;
- (c) The proposed neighbourhood development plan;
- (d) A statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990

### **Where can the plan proposal be inspected?**

Details of the plan proposal and downloadable copies of the relevant documents can be found on our website at:

<http://www.easthants.gov.uk/AltonNP>

In addition, the full suite of evidence supporting the plan can be found at:

[http://www.alton.gov.uk/AltonTownCouncil/neighbourhood\\_plan-16530.aspx](http://www.alton.gov.uk/AltonTownCouncil/neighbourhood_plan-16530.aspx)

If required hard copies of all of the documents listed above are available from East Hampshire District Council, or copies of the plan can be viewed at:

- East Hampshire District Council, Penns Place, Petersfield, GU31 4EX
- Alton Town Council, Alton, Hampshire GU34 1HD (Monday – Thursday 9am to 5pm and Friday 9 to 4.30 p.m)
- Alton Community Centre, Amery St, Alton, Hampshire GU34 1HN (Monday – Friday 9am to 5pm)
- Alton Library, Vicarage Hill, Alton GU34 1HT (9.30am - 5pm except: Tuesday and Thursday 9.30am - 7pm, Wednesday 9.30am - 1pm, Sunday Closed)
- Alton Assembly Rooms, High St, Alton, Hampshire GU34 1BA (Monday – Friday 9am to 5pm)

### **How and by when must you make representations?**

Representations can either be sent via email using the above address or by hard copy to:

Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
GU31 4EX

It is a requirement that the plan must be made available for publicity for a minimum of six weeks. To ensure that you have adequate time in which to respond, submissions will be accepted until **5pm on Friday 21 August 2015**. All responses will then be forwarded to the plan’s examiner once they are appointed. In the interests of fairness to all respondents no late submissions will be accepted.

In addition, when making your representation, please can you indicate whether you wish to be informed of any decision EHDC make under Regulation 19 in relation to the outcome of the examination.

In the meantime, if you have any questions regarding the process at this stage or in future or have any problems accessing any of the links set out above please do not hesitate in contacting me.

Yours Sincerely



Victoria Potts  
**Planning Policy Team Manager**

Planning Policy  
East Hampshire District Council, Penns Place,  
Petersfield, Hampshire, GU31 4EX  
Direct Tel: 01730 234280  
Email: [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)  
[www.easthants.gov.uk](http://www.easthants.gov.uk)

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**Hannah Collier**

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**From:** Rachel Lamb [REDACTED]  
**Sent:** 12 August 2015 16:56  
**To:** EHDC – Neighbourhood Plans Shared  
**Cc:** Ryan Johnson  
**Subject:** Cadnam Farm - Representations to Alton Neighbourhood Plan  
**Attachments:** Cadnam Farm - Response to Alton Neighbourhood Plan.pdf

Dear Sirs,

In connection with the above, please find attached representations to the Alton Neighbourhood Plan submitted on behalf of our clients Martin Grant Homes and Persimmon Homes (South Coast). We trust the enclosed is self-explanatory however please do not hesitate to contact me if you have any queries.

Kind regards,

Rachel

**Rachel Lamb**  
Associate Director



6th Floor North  
2 Charlotte Place  
Southampton SO14 0TB

T [REDACTED]  
M [REDACTED]

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12 August 2015  
**Delivered by email**

Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
GU31 4EX

Dear Sirs

## **REPRESENTATIONS TO ALTON NEIGHBOURHOOD PLAN CONSULTATION IN RELATION TO CADNAM FARM, ALTON**

These representations have been prepared by Turley on behalf of our clients Martin Grant Homes and Persimmon Homes (South Coast). They relate to the Alton Neighbourhood Plan regulation 16 consultation as publicised by East Hampshire District Council.

Our clients are joint owners of the site known as Cadnam Farm, located to the north of Alton. The site is allocated within the Neighbourhood Plan for housing purposes (site HO3c) and outline planning permission was granted at the site for up to 275 dwellings in May 2015 (ref 55428/001).

Our clients are generally supportive of the Neighbourhood Plan and in particular they welcome the allocation for Cadnam Farm and its associated policy (HO3c). Our only comment at this stage relates to bullet point 6 of the proposed policy which refers to highway works related to the scheme as follows:

*“Include a new scheme of vehicular access into and out of the site from Gilbert White Way, as well as off-site improvements to Anstey Lane and the junction of Anstey Lane and Anstey Road, with a potential requirement for further off-site contributions towards the creation of greater highways capacity within the town. Any application will also include measures to increase the access afforded to residents to existing or future public transport services;”*

Our clients are concerned with the underlined wording above on the basis that it seems to infer that additional financial contributions could be required. We appreciate that this policy may have been drafted before the outline planning permission was issued for the site but would suggest that this wording is removed on the basis that the financial contributions in relation to the proposals (including for off-site highway works) are now agreed and set out in the signed s106 agreement for the scheme. As such, there will not be a further opportunity to seek any additional financial contributions.

6th Floor North  
2 Charlotte Place  
Southampton  
SO14 0TB

T 023 8072 4888 [turley.co.uk](http://turley.co.uk)

We trust this is clear however please do let me know if you have any queries or require any additional information.

Yours sincerely



Rachel Lamb  
**Associate Director**



Hannah Collier

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**From:** Barker, Francesca (NE) <[REDACTED]>  
**Sent:** 14 August 2015 10:54  
**To:** plan@alton.gov.uk; EHDC – Neighbourhood Plans Shared  
**Subject:** Submission Draft Alton Neighbourhood Plan

**NOTIFICATION OF PUBLICITY OF THE ALTON NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012**

Dear Victoria,

Thank you for consulting Natural England on the Submission version of the Alton Neighbourhood Plan.

We have no further comments to make above the comments that we provided previously (copied below).

If you have any queries, please don't hesitate to contact me.

Warmest wishes,

Francesca Barker

Land Use Lead Adviser

Dorset, Hampshire and Isle of Wight Area Team

Natural England

Area 3A Nobel House,  
17 Smith Square,

London SW1P 3JR

Tel: 0300 060 0873

Mob: [REDACTED]

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

If you have just sent me a land use consultation, please resend to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) or, for any other land use query, please contact our Land Use Planning Enquiry line (0300 060 3900) in the first instance.

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**From:** Barker, Francesca (NE)  
**Sent:** 16 March 2015 16:55

To: plan@alton.gov.uk  
Subject: HPRM: Alton Neighbourhood Plan

Dear Steve,

Thank you for consulting Natural England on Alton's Neighbourhood Plan.

We have reviewed the document and have the following comments to make:

It is disappointing that there is not a Neighbourhood Development Plan Objective for the protection, maintenance and enhancement of the natural environment and the South Downs National Park in this Neighbourhood Plan.

The parish has 6 Sites of Importance for Nature Conservation (SINC), which from our records include: Applesome Wood, Great Wood, Hungry Copse, B3349 New Odiham Road, Lord Mayor Treloar Hospital and Ackender Wood/Alexandra Wood. Alton also has ancient woodland, and Biodiversity Action Plan Habitats located within the Plan Boundary which have barely been mentioned. Although we understand that this NP does not wish to replicate policies contained within EHDC's JCS (such as CP21), a Natural Environment Policy/Objective would help to raise the importance of the natural environment for the community of Alton.

The South Downs National Park also lies adjacent to the parish. Recognition that development within Alton could impact the "breathtaking views" from the National Park, which is a special quality, should be stated within the NP. Again a policy which recognises the proximity of the National Park and refers to the National Park Management Plan would help to raise the importance of this nationally designated landscape which is on the parish's doorstep.

**Site Allocations:**

Housing Site 2: Treloar

From our records, the blue and red developable areas on this site allocation contains SINCS and BAP habitats: lowland calcareous grassland and deciduous woodland. We suggest that the policy for this allocation specifically refers to JCS policy CP21, in particular:

**a) maintain, enhance and protect district wide biodiversity, in particular the nature conservation designations**

**iii) Sites of Importance for Nature Conservation (SINC) (Hampshire) and Local Nature Reserves (LNR).**

**e) ensure wildlife enhancements are incorporated into the design to achieve a net gain in biodiversity by designing in wildlife and by ensuring that any adverse impacts are avoided where possible or, if unavoidable, they are appropriately mitigated for, with compensatory measures only used as a last resort.**

We have no further comments to make regarding this Neighbourhood Plan.

If you have any queries, please don't hesitate to contact me.

Warmest wishes,

Francesca Barker

Land Use Lead Adviser

Dorset, Hampshire and Isle of Wight Area Team

Natural England

Area 1C Nobel House,  
17 Smith Square,

London SW1P 3JR

Tel: 0300 060 0873

Mob: 07766 504185

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

If you have just sent me a land use consultation, please resend to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) or, for any other land use query, please contact our Land Use Planning Enquiry line (0300 060 3900) in the first instance.

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

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**Hannah Collier**

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**From:** Small, Martin <[REDACTED]>  
**Sent:** 14 August 2015 19:55  
**To:** EHDC – Neighbourhood Plans Shared  
**Subject:** NOTIFICATION OF PUBLICITY OF THE ALTON NEIGHBOURHOOD DEVELOPMENT PLAN  
**Attachments:** 2015-08-14 - Alton Neighbourhood Plan -MS -comments on submission.doc

Dear Sir or Madam,

Thank you for your e-mail of 10<sup>th</sup> July advising Historic England of the publicity of the Alton Neighbourhood Development Plan. Please find attached our comments (please note, these are being sent by e-mail only).

Thank you.

Yours faithfully,

Martin Small

Martin Small BA(Hons) BPI DipCM MRTPI  
Principal Adviser, Historic Environment Planning  
National Planning and Conservation Department

Direct Line: [REDACTED] | Mobile [REDACTED]  
Historic England | South East | Eastgate Court  
195-205 High Street | Guildford | GU1 3EH

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Historic England

Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire, GU31 4EX.

Our ref: HD/P5236/01/PC3  
Your ref:

Telephone  
Fax



14<sup>th</sup> August 2015

Dear Sir or Madam,

### **Notification of Publicity of the Alton Neighbourhood Development Plan**

Thank you for your e-mail of 10<sup>th</sup> July advising Historic England of the publicity of the Alton Neighbourhood Development Plan. As the Government's statutory adviser on the historic environment we are pleased to make the following comments.

We have previously expressed our general support for the Plan and specific support for the specific policy consideration for the locally distinctive character of Alton as a town, the consideration of the town's setting and the setting of the National Park and the integration of the Town Design Statement with the Plan.

We also particularly welcome the fourth principle of Policy DE2, although we would prefer it to refer to the "significance" of heritage assets and to include "*Proposals should seek to deliver public benefits by positively conserving heritage assets including measures to better reveal their significance and securing their uses that ensure they are maintained and enjoyed.*" However, these omissions are not so significant for us to consider that the Plan fails to meet any of the basic conditions.

We also particularly welcome the references to the Conservation Areas and listed buildings in Policies HO3(a), HO3(b) and HO3(e), archaeological investigation in Policy HO3(e) and conservation in Policy ES3 which we consider, if followed, provide sufficient protection for the historic environment in these potential developments.

We are therefore satisfied that the Plan meets the basic conditions as regards the historic environment.

We hope these comments are helpful. Please contact me if you have any queries.

Thank you again for consulting Historic England.

Cont'd



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH

Telephone 01483 25 2020 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Yours faithfully,



Martin Small  
Principal Adviser, Historic Environment Planning  
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

E-mail: 





Hannah Collier

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**From:** Lee Short [REDACTED]  
**Sent:** 17 August 2015 18:52  
**To:** EHDC – Neighbourhood Plans Shared  
**Subject:** Sewers

**Categories:** Green Category

With the proposed development of the 'Land adjacent Will Hall Farm' I am curious to the outcome of the Water Boards comments about the condition of the sewers along New Odiham Road. I understand that they said the sewers were not capable of sustaining the extra volume of the proposed development, without major works Your comments are invited Rgds L Short

Sent from my iPad

**Jenny Woodgate**

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**From:** Rebecca Altman [REDACTED]  
**Sent:** 20 August 2015 14:33  
**To:** EHDC – Neighbourhood Plans Shared  
**Cc:** Victoria Potts; Crispin Mahony  
**Subject:** Representation to the Alton Neighbourhood Plan Reg. 16 Consultation on behalf of the Froyle Settled Estate

**Attachments:** 150820 Rep to Alton NP on behalf of the Froyle Settled Estate.pdf; Froyle Settled Estate Response to Draft Alton Neighbourhood Plan 30 March 2015.pdf; Land at Howards Lane Site 1.pdf; Land at Howards Lane Site 2.pdf; Land at London Road Site 1.pdf; London Road Sites 2 and 3.pdf

Dear Victoria

Please find attached representation to the Alton Neighbourhood Plan, on behalf of the Froyle Settled Estate.

I confirm that I would like to be informed of any decision made by EHDC under Regulation 19 in relation to the outcome of the Neighbourhood Plan Examination.

Please do not hesitate to contact me if you have any queries or if any further information is required.

Thank you,

**Rebecca Altman**  
**Associate Planner**  
**Planning**

Savills, 2 Charlotte Place , Southampton, SO14 0TB

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 Mobile [REDACTED]  
 Email [REDACTED]  
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WNRU311387

20 August 2015



Planning Policy  
East Hampshire District Council  
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PETERSFIELD  
Hampshire  
GU31 4EX

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2 Charlotte Place  
Southampton SO14 0TB  
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savills.com

Dear Sir/ Madam

**ALTON NEIGHBOURHOOD PLAN CONSULTATION (REG. 16)  
REPRESENTATION ON BEHALF OF THE FROYLE SETTLED ESTATE**

This representation is made on behalf of the Froyle Settled Estate and is focused on the way in which the Neighbourhood Plan (NP) considers the needs of Holybourne Village. The specific comments relate to policies **HO3 (New housing site allocations)**, and **CH5 (Local Green Space and open space)**. A previous representation was made to the Town Council as part of the Draft Neighbourhood Plan consultation and a copy is enclosed with this letter for reference.

**Policy HO3**

In relation to the housing policies, the comments made to the Town Council at the Draft consultation stage still stand (as per the enclosed document), and it is not intended to repeat these. In summary, it is Savills view that by only proposing to allocate large scale housing sites within Alton, the NP fails to take account of the needs of the village of Holybourne, which lies within the NP area but is defined separately to Alton within the East Hampshire Settlement Hierarchy. Holybourne is defined as a Level 4 Settlement, and is recognised through the Adopted East Hampshire Local Plan: Joint Core Strategy (JCS), as a suitable location for small scale residential development. The Froyle Settled Estate owns land within Holybourne, as identified in the previous representation (sites at London Road and Howards Lane), which would offer suitable and sustainable locations for small scale residential development to support the on-going viability of the village and meet housing need. Location plans of the sites are enclosed with this representation.

**Policy CH5**

This policy identifies a number of open spaces within Alton and Holybourne, which are proposed to be designated as Local Green Spaces. Included among these is the Holybourne Play Area, which is located on the land at London Road, Holybourne (refer to enclosed plan for Land at London Road Site 1). To clarify, the land is owned by the Froyle Settled Estate and the Play Area is let to Alton Town Council. It is understood that the purpose of the proposed designations is to give the identified areas added protection from development to ensure their long term protection for recreational and leisure use.



Whilst the designation of Local Green Spaces is allowed for through the NPPF (paragraphs 76 and 77), paragraph 77 makes it clear that these types of designation will not be suitable for most open spaces. It outlines the following specific circumstances where a designation may be appropriate, as follows:

- *Where the green space is in reasonably close proximity to the community it serves;*
- *Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *Where the green area concerned is local in character and is not an extensive tract of land.*

Paragraph 76 and the National Planning Practice Guidance (NPPG, ID 37-007-20140306), further emphasises that Local Green Space designations should not be used in a way that would undermine sustainable development, including the need to identify sufficient land to meet development needs.

The Submission Neighbourhood Plan justifies the Local Green Space designation of the Holybourne Play Area, on the basis that it is the only publically accessible play area close to the village centre, provides attractive views and is well used by the local community. Whilst these points are not disputed, they are not considered sufficient to warrant special protection beyond that which is already provided by policies in the Adopted East Hampshire JCS, as explained below.

Through the JCS, all existing open spaces within East Hampshire are subject to protection in accordance with policy CP17. This policy states that any development resulting in the loss of a sport, recreation or play facility will only be permitted if it can be demonstrated that there is a surplus of provision, or that alternative facilities of equal or better quality and quantity can be provided in an equally accessible location. The policy therefore provides protection whilst also allowing for flexibility for redevelopment if the facility can be suitably provided in an alternative location, in accordance with paragraph 74 of the NPPF.

In Savills view, the proposal to designate the Holybourne Play Area as a Local Green Space would result in an onerous restriction on the potential future development of the site. Any such development would need to comply with the policies of the Adopted JCS and would only be able to take place if a suitable alternative location was found for the Play Area. This requirement is fully accepted by the landowners, who have previously put forward the option of relocating the Play Area to an adjacent site, which would be equally accessible to the local community. The proposed new location for the Play Area is indicated on the enclosed site plan, immediately adjacent to its existing location. The proposed designation of the Play Area as a Local Green Space is therefore superfluous, as it already benefits from adequate protection through existing Adopted policy and its relocation would ensure that it remains in long term recreational use for the continuing benefit of the local community.

For the reasons outlined, the proposed designation of the Holybourne Play Area as a Local Green Space should be removed.

## **Summary**

In summary, by not identifying any future sites for housing development within Holybourne, the NP will fail to support the long term development needs of this village, contrary to the strategic objectives of the Adopted East Hampshire JCS. Furthermore, the proposal to designate the Holybourne Play Area as a Local Green Space will place an unnecessary, onerous restriction on the long term development potential of a suitable and sustainable site within the village. The Froyle Settled Estate has the ability to bring forward a combined scheme, which would provide new high quality housing for the village, along with the relocation and long term retention of the Play Area for the benefit of the local community.

I trust these comments will be taken on board to ensure that the Neighbourhood Plan is in general conformity with the strategic policies of the Adopted Development Plan and contributes to the achievement of sustainable development, in accordance with basic conditions (d) and (e) as set out in the Localism Act 2011, and in accordance with the NPPF.

Yours sincerely

A solid black rectangular box used to redact the signature of Rebecca Altman.

Rebecca Altman  
**Savills Planning**

Encs

**30 March 2015**

### **Response to the Alton Draft Neighbourhood Plan on behalf of The Froyle Settled Estate**

These comments are submitted on behalf of The Froyle Settled Estate, mainly in response to the housing policies of the Draft Alton Neighbourhood Development Plan. Comments are also made separately in relation to Draft Policy CH5 of the Draft Plan. The comments relate specifically to Holybourne and cover the following matters.

- Housing provision in Holybourne
- Neighbourhood Plan site selection process
- Draft Policy CH5 (Local Green Space and Open Space)
- Details relating to Froyle Settled Estate sites at London Road and Howards Lane, Holybourne

#### Housing provision in Holybourne

Neighbourhood Plans are required to be in general conformity with the strategic policies in the development plan for the local area and contribute towards sustainability objectives. In this case, the development plan is the Adopted East Hampshire District Council (EHDC) Local Plan: Joint Core Strategy (JCS).

The Draft Neighbourhood Plan clearly highlights the need for housing, particularly affordable housing, within both Alton and Holybourne, and seeks to allocate land to accommodate at least 700 dwellings within the settlement in accordance with the housing need for Alton identified through the EHDC JCS.

However, the proposed allocation sites identified through the Draft Plan are all located within Alton, with no housing sites of any scale identified within Holybourne itself. This is considered to be contrary to East Hampshire Spatial Strategy for development, for the following reasons.

The settlement hierarchy within the JCS identifies Holybourne as a separate settlement to Alton, defined as a 'Level 4' settlement (other settlements with a settlement hierarchy). These settlements are noted to be suitable to accommodate some further small scale development which is consistent with maintaining and enhancing their character and which supports their sustainability. To meet this objective, policy CP10 of the JCS allocates at least 150 dwellings to the Level 4 settlements over the Plan Period from 2011 to 2028. However, the Neighbourhood Plan does not make any reference to the role of Holybourne as a separate village and, as previously noted, makes no provision for housing allocations within this settlement.

In accordance with the East Hampshire Spatial Strategy, to ensure that housing needs are met and that the sustainability and vitality of Holybourne is maintained over the Plan Period, it is considered that the Neighbourhood Plan should seek to identify an appropriate location for additional, small scale housing development within this village. Providing for additional sites within Holybourne would also help to contribute positively towards meeting the wider need for housing within the East Hampshire District, in accordance with the Adopted JCS.

### Site selection process

It is noted that the site selection process used to identify appropriate sites for housing allocation within Alton and Holybourne, only took account of sites that had been previously included in the East Hampshire District Council SHLAA. It is not considered that this approach provided the most comprehensive assessment of potential development sites.

The sites within Alton and Holybourne that were excluded from the East Hampshire SHLAA (2014), were excluded for various reasons, some relating to technical constraints which could potentially be addressed with further information. A reassessment of all SHLAA sites would therefore have identified whether there had been any change in circumstance or new information relating to excluded sites, which may address previous constraints identified by EHDC. This would have provided a more comprehensive and thorough assessment to underpin the Neighbourhood Plan process.

### Draft Policy CH5 – Local Green Space and Open Space

This draft policy proposes to designate and protect a number of areas of local green space as per the provisions of paragraphs 76 and 77 of the National Planning Policy Framework( NPPF). Included among the proposed designated green spaces is the Holybourne Play Area, which lies on land owned by The Froyle Settled Estate. The NPPF is clear in stating that the local green space designation will not be appropriate for most open space and should only be made in exceptional circumstances. The justification given for the proposed designation of the Holybourne Play area (page 72) is extremely brief and limited, and is considered insufficient to meet the requirements of NPPF paragraph 77.

Whilst our client does not oppose the objective of protecting such facilities, it would not be appropriate to designate the Play Area as a local green space without sufficient justification. Instead, the Play Area would be more appropriately protected as an area of public open space, in accordance with the provisions of Paragraph 74 of the NPPF, and as per Policy CP17 of the Adopted EHDC JCS. This policy allows existing facilities to be replaced if surplus to requirements, or relocated to an alternative suitable site:

*Development that results in the loss of a sport, recreation or play facility will only be permitted where it can be demonstrated that:*

- a) There is a surplus of provision according to the local open space and built facilities standards;*  
*or*
- b) Alternative facilities of equal or better quality and quantity can be provided in an equally accessible location.*

In summary, in the absence of sufficient justification, the Holybourne Play Area cannot be designated as a local green space and should instead be afforded the same level of protection as other open space within the District, as per the NPPF (paragraph 74) and policy CP17 of the Adopted EHDC Local Plan.



### Land at London Road and Howards Lane, Holybourne

Our client owns two areas of land within Holybourne, for which SHLAA submissions to EHDC have previously been made. Full details of these sites are set out within the original SHLAA submissions to EHDC and the key details are summarised below.

Two of the sites were initially included in the East Hampshire SHLAA but have subsequently been ruled out for development through the Neighbourhood Plan process. However, neither site has been ruled out due to any specific constraint or technical grounds and it is therefore considered that they warrant further review.

#### **Land at London Road, Holybourne (Site 1) – Included site within the East Hampshire SHLAA – ref. AL050**

This is a relatively small, level site, measuring approximately 0.86ha, and lies immediately adjacent to the settlement policy boundary of Holybourne. The site could accommodate up to 15 dwellings, although a smaller number of dwellings in a linear layout may also be appropriate, in keeping with the character of adjacent linear development. The site is currently occupied by the Holybourne children's play area, which is owned by our client and let to Alton Town Council. The proposal would be to relocate the play area to the adjacent land (also within the client's ownership), as part of any redevelopment (refer to comments on Draft Policy CH5). As the adjacent land is a designated Scheduled Ancient Monument, our client has previously discussed this proposal with English Heritage. In their response, English Heritage commented that the principle of having a playground on the site is acceptable, subject to detailed consideration of any impact on the site's heritage. Moving the play area would also provide the opportunity to enhance the facilities and would ensure that it is maintained and protected for the long term benefit of the community.

The EHDC SHLAA and the Neighbourhood Plan assessment both highlighted potential heritage constraints on the site, due to the presence of an adjacent Scheduled Ancient Monument (SAM) and the potential for archaeology. The site area does not extend into the site of the SAM and prior to any development taking place, a detailed archaeological assessment would be commissioned to identify any features of archaeological interest and any necessary mitigation measures. This constraint would therefore not prevent development coming forward. Neither the SHLAA nor the Neighbourhood Plan assessment identifies any other technical or environmental constraints that would prevent development being delivered on the site.

It is therefore requested that the site at London Road, Holybourne, is given further consideration by the Neighbourhood Plan Steering group, with the view to identifying it as a suitable site for small scale housing development.

#### **Land at London Road, Holybourne (Sites 2 and 3) – Excluded Sites within the East Hampshire SHLAA – ref. AL060 and AL061**

In addition to the smaller area of land at London Road, our client also owns the adjacent land which extends to the north and north-west. This was submitted to the East Hampshire SHLAA as two separate sites (Sites 2 and 3). Whilst it is recognised that land for such substantial development is not necessarily required within Holybourne at this stage in the Plan Period, we would like to draw

your attention to its availability should subsequent reviews of the Neighbourhood Plan or East Hampshire JCS identify a need for additional future development.

**Land off Howards Lane, Holybourne – Included in East Hampshire SHLAA – ref. AL064**

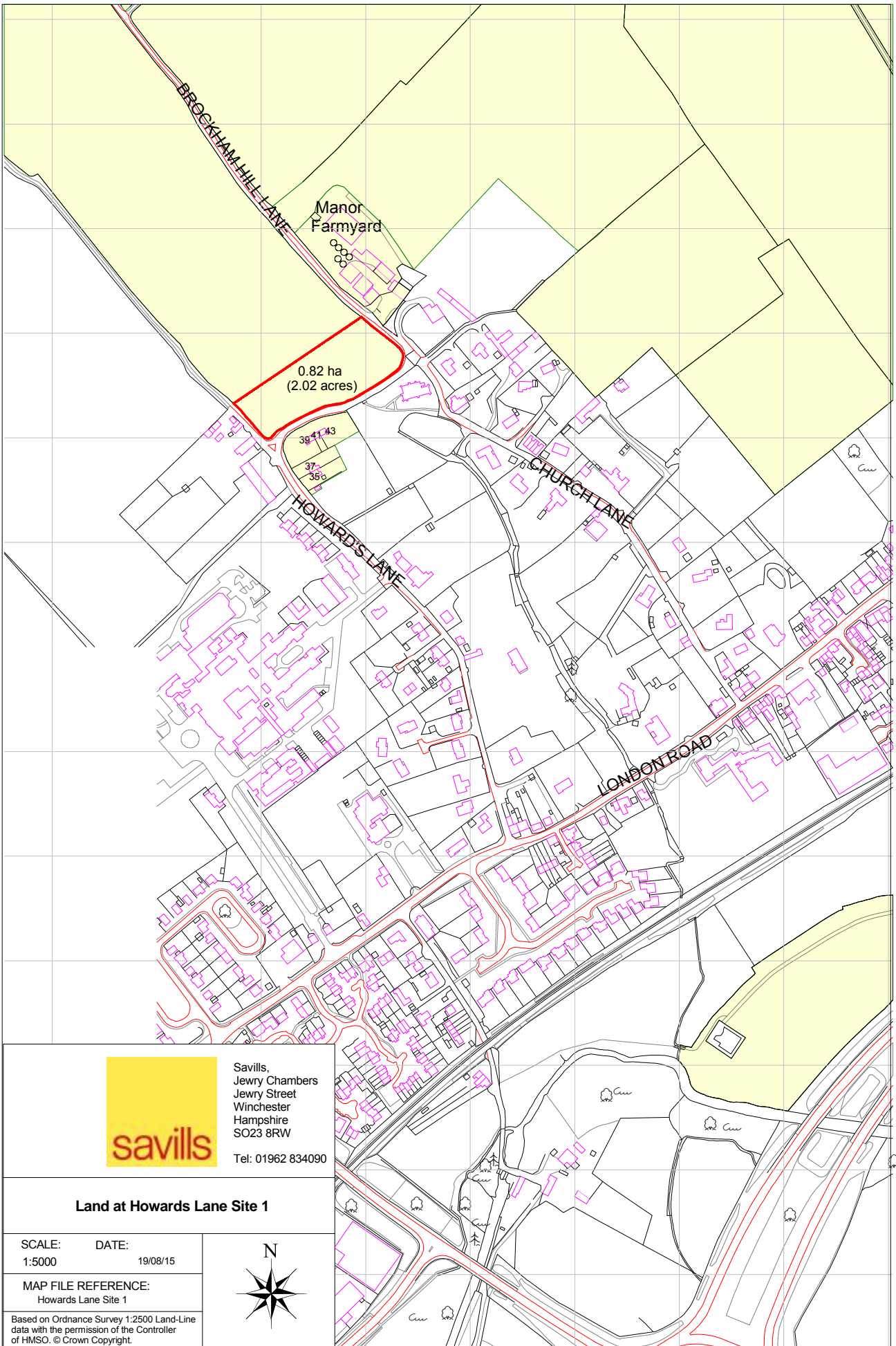
This site lies immediately adjacent to the settlement policy boundary of Holybourne, to the north of Howards Lane, close to the historic centre of the village. The site measures 0.82ha and would be suitable for a low density, small scale development, which would be designed to reflect and enhance the historic characteristics of the surrounding area. The site boundary does not extend any further into the countryside than existing built development either side, and a landscape boundary could be incorporated as part of the design to provide an attractive buffer between the adjacent countryside and new development.

The site lies adjacent to the Holybourne Conservation Area and there are listed buildings either side and opposite the site. The historic character of the adjacent area is highlighted as the main factor for which the site has been excluded for development through the Neighbourhood Plan process. However, there is no reason why a small scale development of this site could not be carefully designed to both complement and enhance the character of the area in which it is set. There are no other technical or environmental constraints which would prevent development being delivered on the site. It is therefore considered that a further review of this site should be carried out to consider its potential for a small scale housing development.

**Additional Land at Howards Lane, Holybourne – Excluded from East Hampshire SHLAA – ref. AL053**

As with the additional land associated with the London Road site, the Froyle Settled Estate also owns further land to the north of Howards Lane, which could potentially be suitable for additional future development. Part of the site was identified by East Hampshire District Council to be a site of archaeological potential, and therefore prior to any development taking place, a detailed archaeological survey would be conducted to identify any features and any necessary mitigation measures. Landscape impact could be satisfactorily mitigated through a detailed landscape and planting scheme and careful consideration of layout and design. There could also be the potential for improvements to be carried out to the existing local roads to address access concerns.

If any further details are required in relation to the sites mentioned above, please do not hesitate to contact: [raltman@savills.com](mailto:raltman@savills.com).



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 Jewry Chambers  
 Jewry Street  
 Winchester  
 Hampshire  
 SO23 8RW  
 Tel: 01962 834090

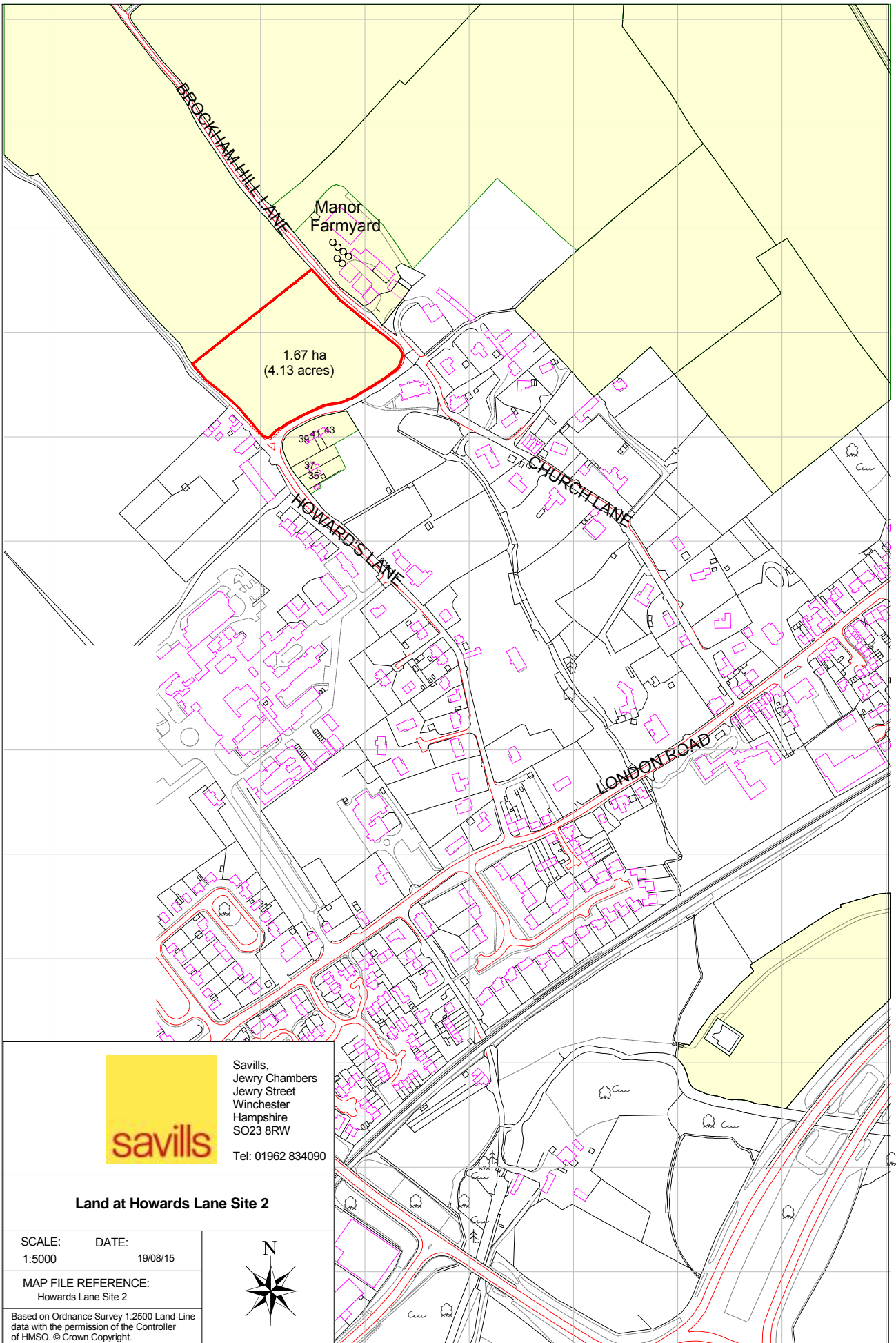
**Land at Howards Lane Site 1**

SCALE: 1:5000      DATE: 19/08/15

MAP FILE REFERENCE:  
 Howards Lane Site 1



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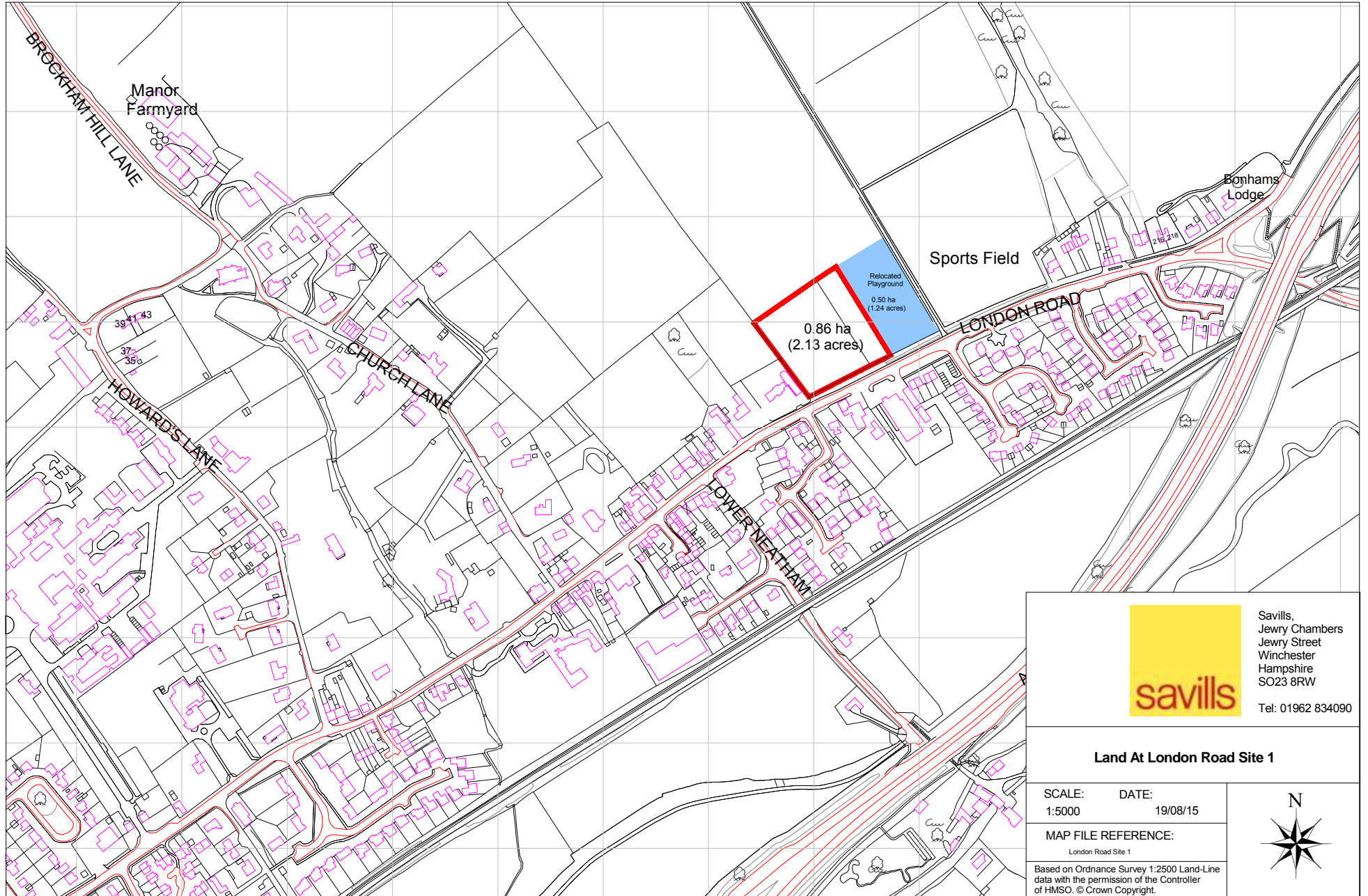
**Land at Howards Lane Site 2**

SCALE: 1:5000      DATE: 19/08/15

MAP FILE REFERENCE:  
 Howards Lane Site 2



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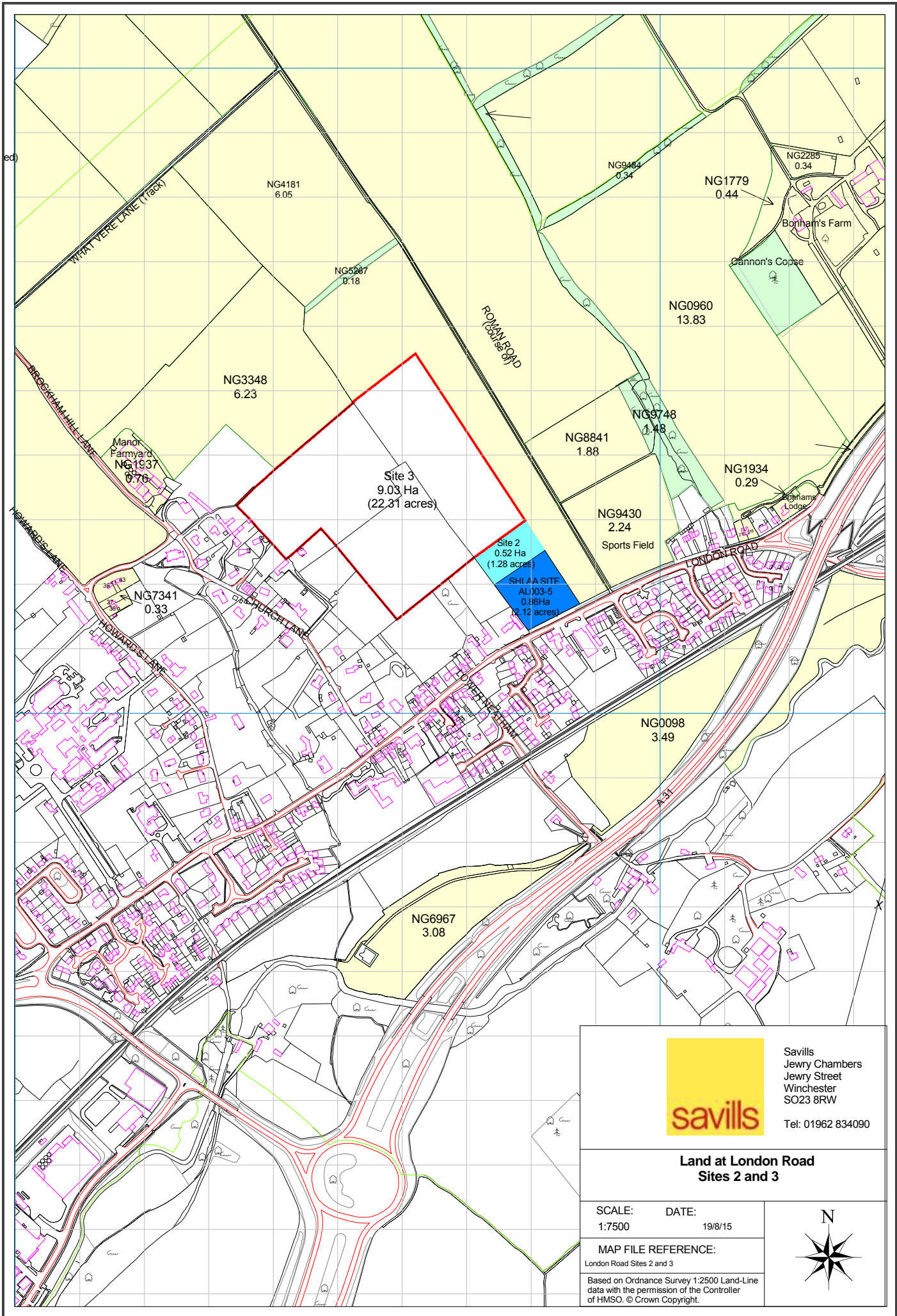
**Land At London Road Site 1**

SCALE: 1:5000      DATE: 19/08/15

MAP FILE REFERENCE:  
 London Road Site 1

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**Land at London Road  
 Sites 2 and 3**

SCALE: 1:7500      DATE: 19/8/15

MAP FILE REFERENCE:  
 London Road Sites 2 and 3

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**Jenny Woodgate**

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**From:** jon.bray [REDACTED]  
**Sent:** 21 August 2015 09:28  
**To:** EHDC – Neighbourhood Plans Shared  
**Cc:** christopher.hemmings; martin.hawthorne  
**Subject:** Alton Neighbourhood Plan: Submission Document 2011-2028, June 2015 (Reg 16)  
**Attachments:** Neighbourhood Plan Submission Plan Document - August 2015.pdf

Dear Sir/Madam,

Please find attached duly made representations in relation to the above. I would be grateful if you could please confirm receipt.

Should you have any queries or wish to discuss, please do not hesitate to contact me.

Kind regards,

**Jon Bray**  
Associate Director

Please [Click Here](#) for our Spring 2015 edition of the Planning & Environment newsletter.

**WYG**

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Job Ref: HP98081

Date: 21 August 2015

Victoria Potts  
Planning Policy Manager  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
GU31 4EX

Dear Ms Potts

**RE: ALTON NEIGHBOURHOOD PLAN: SUBMISSION DOCUMENT 2011-2028, JUNE 2015  
(REGULATION 16)**

This representation is made in response to the Alton Neighbourhood Plan Submission Document dated June 2015, which forms part of Regulation 16 of the Neighbourhood Plan (General) Regulations 2012.

WYG has previously submitted representations on behalf of the Homes & Communities Agency and Selborne Road Landowners to the Alton Neighbourhood Plan Steering Group via Alton Town Council on the Pre-Submission Consultation Draft Document (February 2015). A copy of this submission is appended to this representation.

The points raised in our representation to the Pre-Submission Neighbourhood Plan remain valid, and having read through the Submission Document, it appears that none of the amendments proposed in our response have been made to the Neighbourhood Plan.

As you will be aware planning permission was granted on 23<sup>rd</sup> July 2015 for the South Alton scheme, comprising outline consent for 529 dwellings at Lord Mayor Treloar and land to the east of Selborne Road (Borovere Farm), and full planning permission for the works to Butts Bridge and wider junction improvements at Selborne Road.

It is important that the planning permission is reflected in the Neighbourhood Plan otherwise it will be out-of-date upon adoption. In particular, the two respective masterplans for the Lord Mayor Treloar and Selborne Road sites should be replicated in the respective sections on the two housing allocations to show the location of land that has permission for residential development (please see appended plans). In addition, we would suggest a split of 280 dwellings at Lord Mayor Treloar and 249 dwellings at Borovere Farm to reflect the permission for 529 homes.

We would also reiterate (and therefore resubmit) the other points that have been previously made within the Pre-Submission Document, including our concerns about the evidence base, especially comments made within the Interim Sustainability Appraisal and the Landscape Capacity Study.

We would welcome the opportunity to explain our concerns with the Alton Neighbourhood Plan at the Examination.

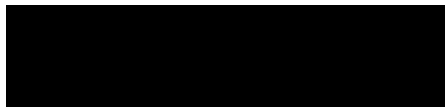






In the meantime, could you please keep me updated on progress with the Neighbourhood Plan.

Yours sincerely



**Martin Hawthorne**

Director

For and on behalf of WYG

cc. Kevin Bourner, HCA  
James Rowley, HCA  
Selborne Road Landowners



Job Ref: HP98081

Date: 27<sup>th</sup> March 2015

Mr M C Heelis MBE  
Chairman  
Alton Neighbourhood Plan Steering Group  
Alton Town Council  
Town Hall  
Market Square  
Alton  
Hampshire  
GU34 1HD

Dear Mr Heelis

### **Alton Neighbourhood Plan: Pre-Submission Consultation Draft, February 2015**

Thank you for the opportunity to respond to the Alton Neighbourhood Plan Pre-Submission Document that was issued for public consultation on 16<sup>th</sup> February 2015. As you are aware, the Homes & Communities Agency wrote to you on the 28<sup>th</sup> November 2014 (having attended your presentation on 22<sup>nd</sup> November 2014) expressing concerns about the deliverability of the Neighbourhood Plan in relation to the South Alton application and the implementation of works at Butts Bridge. This letter is set out at Appendix 1, and reinforces the point that due to the lack of public funds available to undertake the Butts Bridge improvement works, a housing scheme with circa 280 dwellings at Lord Mayor Treloar and circa 250 dwellings at Borovere Farm is required to ensure the financial deliverability of the scheme as a whole.

We subsequently met with you and members of the Steering Group on 23<sup>rd</sup> January 2015 to talk through these concerns, some of which have been addressed within the Pre-Submission Document, but others remain outstanding. The main concern is the Borovere Farm is only allocated currently for 100 dwellings, and that both the Lord Mayor Treloar and Borovere Farm sites exclude development on the upper parts. Within this context, we have major reservations about the evidence base that underpins the Neighbourhood Plan, particularly the landscape and sustainability analysis of the Lord Mayor Treloar and Borovere Farm sites. We set out these concerns at Appendix 2.

Prior to the commencement of the public consultation period, East Hampshire District Council approved planning permission for the South Alton scheme subject to the signing of a s.106 agreement. The hybrid scheme comprises outline permission for 529 dwellings and detailed permission for the widening of Butts Bridge and associated highways works. Once the s.106 agreement is signed and planning permission is granted, it appears logical to update the Neighbourhood Plan accordingly, especially as the work that supports the planning application provides a greater level of detail than the analysis of the Borovere Farm and Lord Mayor Treloar sites as set out within the Interim Sustainability Appraisal (December 2014) and the Landscape Capacity Study and SHLAA Site Assessment (June 2013).

The key amendments proposed to the Neighbourhood Plan are as follows:

- Table on Page 32 - For Land at Borovere Farm, the dwelling allocation should state circa 249 dwellings, and for Land at Lord Mayor Treloar the dwellings allocation should state circa 280 dwellings;

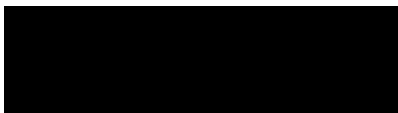




- Policy HO3(a) Land at Borovere Farm (Pages 36/37) - The gross site area is 9.4 hectares. The current red-line boundary of the site within the Neighbourhood Plan is incorrect and needs to be revised as shown on the parameter plan as submitted a part of the outline application (for convenience the plan is set out at Appendix 3). The net developable area of the site is 7.1 hectares, which would require changing the plan to show blue shading across the majority of the site with additional areas for public open space and structural landscaping as marked on the parameter plan. The number of units should be approximately 249 dwellings, which is a density of 35 dwellings per hectare. Paragraph 4 should be deleted, as the principle of housing development across the site has been established through the approval of the parameter plan. The last sentence of Paragraph 7 needs to be altered to ensure flexibility in the delivery of the wider highways works at Butt Bridge. We suggest the following amendment to the last sentence: "*These works to be completed in the first phase of the development*".
- Policy HO3(b) Land at Lord Mayor Treloar (Pages 38/39) - The whole site area within the ownership of the HCA is 26.4 hectares and the net developable area of the entire site is 11 hectares. The shaded areas need to be amended to show the northern field at Lord Mayor Treloar as blue, as per the parameter plan submitted as part of the South Alton application (The plan is set out at Appendix 3). The total number of units to be provided on the site is approximately 280 dwellings, which is a density of 25-26 dwellings per hectare. The publically accessible open space (country park) is circa 10 hectares in size. Paragraph 6 should be deleted to reflect the planning application and development on the northern field, as set out in the parameter plan. Paragraph 10 needs to be altered to ensure flexibility in the delivery of the wider highways works at Butts Bridge. We suggest the following amendment to the last sentence: "*These works to provide adequate access for pedestrians and cyclists (particularly on NCR224), and to be completed in the first phase of the development*".

I trust these changes are clear and we look forward to reviewing the next version of the Neighbourhood Plan in due course.

Yours sincerely



**Martin Hawthorne**  
**Director**

For and on behalf of WYG

cc: Kevin Bourner, HCA  
James Rowley, HCA  
Selborne Road Landowners



**Appendix 1: HCA Letter**



Homes &  
Communities  
Agency

Job ref: HP98081

Date 28 November 2014

Mr M C Heelis MBE  
Chairman  
Neighbourhood Plan Steering Group  
Alton Town Council  
Town Hall  
Market Square  
Alton  
Hampshire  
GU34 1HD

Dear Mr Heelis

#### **ALTON NEIGHBOURHOOD PLAN PRESENTATION 22 NOVEMBER 2014**

We write to you further to the Alton Neighbourhood Plan Steering Group presentation held on Saturday 22<sup>nd</sup> November 2014 to outline the emerging proposals for the Alton Neighbourhood Plan. We wish to take this opportunity to thank you for inviting the Homes and Communities Agency (HCA) to the exhibition which we understand seeks initial feedback from residents and landowners in Alton before a pre-submission plan is published for statutory consultation in February 2015.

Our concern is that the Neighbourhood Plan is required to be in conformity with the East Hampshire Joint Core Strategy but, as presented on Saturday, does not appear to be. It will not be able to deliver 340 of the houses required to be built on new sites and the required improvements at Butts Bridge.

The current draft of the Neighbourhood Plan proposes 340 houses at Lord Mayor Treloar. This site has been allocated for 150 houses since the Local Plan was adopted in 2004. Whilst the HCA welcomes the inclusion of Lord Mayor Treloar in the Neighbourhood Plan, the land shown in your presentation does not include the upper field, which is part of the outline application. Moreover, the total housing number from the site of 340 dwellings is simply unachievable given the constraints on the site, such as the existing Site of Importance for Nature Conservation (SINC), Tree Preservation Orders, topography and requirement for sustainable urban drainage systems (SUDs). In addition, the physical limitations of the Whitedown Lane/Chawton Park Road Junction preclude more than 280 houses in total.

The HCA has been endeavouring to develop this site but, due to the substantial highways improvements required at Butts Bridge, is only able to do so with the Selborne Road development. As this site is in near proximity to Lord Mayor Treloar, it is also justified that it

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homesandcommunities.co.uk



contributes to the highways improvements which are substantial at a value in excess of £4million plus the ransom value of the land. The HCA now has a viable solution, with the agreement of all landowners, and has submitted an outline planning application on behalf of the HCA and the landowners at Selborne Road. This is for a comprehensive scheme that delivers a package of housing development and infrastructure improvements to meet the housing policies within the East Hampshire Joint Core Strategy and Infrastructure Delivery Plan. This 'South Alton' scheme will deliver around 530 new homes, widen Butts Bridge and improve the junction, make significant contributions to the new Alton Sports Centre, create a new public country park at Lord Mayor Treloar and make appropriate contributions to the extension of primary and secondary schools. Collectively we are seeking to plan positively for the town and deliver a package of improvements in accordance with the National Planning Policy Framework, particularly seeking to boost the supply of housing within the development plan period, which is a key objective of the Homes and Communities Agency.

The land at Selborne Road (Borovere Farm) is included in the South Alton application in order to secure financial viability. The highways and infrastructure improvements required are just not viable based on Lord Mayor Treloar alone. We note that the current draft of the Neighbourhood Plan omits Selborne Road, which would result in HCA's land at Lord Mayor Treloar not coming forward and a shortfall of housing. We understand that it has been suggested that Butts Bridge could be funded by contributions from all of the development sites in Alton. In planning law this cannot be made to happen, as the works need to be directly related to the development concerned

The Neighbourhood Plan will need to have a robust and credible delivery strategy to be found sound at Examination. Therefore, where developments come forward under the CIL regulations, each allocated site should be responsible for addressing its own impacts, including highways impacts. For example, the HCA and Selborne Road landowners would pay for the Butts Bridge and junction improvements through a s.106/s.278 agreement, but would not make contributions towards any other improvements within the town, such as Anstey Lane/Anstey Road, which are not directly related to the South Alton scheme. Likewise, we assume that East Hampshire District Council would ask promoters at Cadnam Farm to tackle the Anstey Lane/Anstey Road improvements, but would not make payments for Butts Bridge etc. This approach enables development to come forward in a timely manner without the burden of 'catch all' s.106 agreement process, which is undeliverable in terms of planning law, CPO and ransom issues.

We also believe that the Neighbourhood Plan may be challenged based on the rationale for the exclusion of Borovere Farm from the Plan as set out in the 'Dwelling Site Selection Methodology and Supporting Narrative' (October 2014). HCA considers that this decision may not be based on valid planning reasons, especially as the East Hampshire District Council 2014 Strategic Housing Land Availability Assessment (SHLAA) identifies Borovere Farm as an available, suitable and achievable site (Ref: AL001) with no comments made on landscape matters (Page 76 of the 2014 SHLAA). It should also be noted that the previous Alton Study prepared by Urban Initiatives for EHDC in 2013 supported the principle of housing development at Borovere Farm. Also, landscape work submitted with the South Alton planning application demonstrates no harmful impacts on the South Downs National



Park or the setting of the town and no formal objection to HCA's current planning application has been made in relation to landscape matters by any Statutory Consultees.

We are of the view that the public consultation exercise undertaken by the Steering Group on 1<sup>st</sup> February 2014 identified that the land at Lord Mayor Treloar and at Selborne Road (Borovere Farm) are the preferred development sites, ahead of all the other sites in Alton. The South Alton scheme is highly sustainable given its proximity to the town centre, the A31, as well as Alton sports centre and the Butts primary school. In the light of the above, we believe that its allocation should be supported.

It is therefore our view that the Neighbourhood Plan housing site allocation proposals (site reference: AL002, AL005, AL026, AL033 & AL042) require a re-think in relation to the deliverability of Butts Bridge and required housing numbers. The only solution relating to housing delivery in South Alton that is credible and can be delivered within the timescale of 2017-2022 is the South Alton scheme. Within this context, the removal of Borovere Farm from the Neighbourhood Plan is therefore contrary to achieving its delivery and the site needs to be included as a housing allocation for circa 250 dwellings. In addition, the allocation at Lord Mayor Treloar needs to be amended to show the top field, and a capacity of circa 280 dwellings overall.

The HCA wish to support the Neighbourhood Planning process and Steering Group and we would welcome the opportunity to meet with you and explain the intricacies of the planning application, especially Butts Bridge. We look forward to hearing from you in the near future.

Yours sincerely

Kevin Bourner  
Head of Area  
Hampshire, Dorset, Isle of Wight team

cc: Steve Parkinson, Alton Town Council  
Julia Mansi, East Hampshire District Council  
Julia Potter, East Hampshire District Council  
Andrew Biltcliffe, East Hampshire District Council  
Simon Jenkins, East Hampshire District Council  
Stuart Jarvis, Hampshire County Council  
James Rowley, Homes & Communities Agency  
Kelly Hillman, Homes & Communities Agency  
Selborne Road Landowners



## Appendix 2: Critique of Interim Sustainability Appraisal and Landscape Capacity Study

At our developer meeting on 23<sup>rd</sup> January 2015, the Alton Neighbourhood Plan Steering Group stated that the reason they had not supported the full inclusion of both sites was explained on Page 2/3 of the 'Dwelling Site Selection Methodology and Supporting Narrative' (January 2015). This indicated that an evidence base had been produced for the Neighbourhood Plan that appeared to clearly show development on the top fields at Lord Mayor Treloar and Borovere Farm would create significant harm in landscape terms, and that development on the upper fields of the Borovere Farm site was unacceptable in the 2014 URS Sustainability Appraisal and SHLAA Landscape Capacity Study. As we explained at the meeting we did not believe there was any robust evidence to support the Steering Group's position. As promised at the meeting we have reviewed the information upon which the Steering Group based its conclusions, and in light of this WYG and its clients would like to challenge this evidence base, especially within the context of the recent resolution to grant planning permission for the South Alton scheme.

The applicant's detailed evidence as produced by consultants EDP and Aecom include fully documented Landscape and Visual Impact Assessments. All of these documents are available on the EHDC website (planning ref: 30021/056/FUL). The EHDC case officer dealing with the application (Julia Mansi) stated in her Committee Report (4<sup>th</sup> February 2015) that "The sites are a natural extension to the settlement with little adverse landscape impact".

Turning to the Neighbourhood Plan's evidence base, it is clear from an analysis of the Interim Sustainability Appraisal (December 2014) and the Landscape Capacity Study and SHLAA Site Assessment: Summary Report (June 2013) that only a brief assessment of the Lord Mayor Treloar and Borovere Farm sites have been undertaken. The assessments, unlike those supporting the application do not include any reference to viewpoints or photographs to inform the comments and conclusions made. We have picked out some of the commentary from the Sustainability Appraisal, as follows:

- Borovere Farm - "*The **Borovere Farm** site is constrained from a landscape perspective" (Page 30). "From the hill top i.e. the flat part of the site, there are distant views to the south (i.e. the National Park)". "Landscape impacts are a major consideration, given views from the National Park and approach to Alton from the south. The flat hill-top is most sensitive from a landscape perspective and should remain undeveloped". (Page 80)*
- Lord Mayor Treloar - "*From the hill top there are distant views north, over Alexandra Wood to rolling countryside north of Alton, and also views across large parts of Alton. The northern part of the site is visible from higher ground within the National Park from some distance."* (Page 81)

Both sets of comments refer to impacts to and from the South Downs National Park, although no evidence is provided in the reports to support these comments, in terms of views from public vantage points within the National Park or even the approach into Alton. The applicant's consultancy team has provided robust evidence (within the LVIA assessments and the structural landscaping proposals) that demonstrates that any impact can be mitigated, and that any landscape harm from public vantage points within the South Downs National Park is minimal. Indeed, Julia Mansi's presentation at the Planning Committee on the 4<sup>th</sup> February displayed a series of photographs that showed, she and the Council's landscape officer struggled to find any vantage points at all, never mind any harm from the National Park, which concurred with our analysis.

The Landscape Capacity Study and SHLAA Site Assessment (June 2013) also makes similar unsubstantiated comments, including:





- Borovere Farm - *"The SHLAA site extends up the hill to the highest part and despite the recent planting of hedgerows etc. residential development on this site would have a profound and adverse impact upon the character of the area" (Page 18).*

Again, as demonstrated at the 4<sup>th</sup> February Planning Committee in the Officer's Report, and indeed our landscape assessment, the residential development on the top field at Borovere Farm will not be visible from the A31, and cannot therefore be considered to have a profound and adverse impact.

Therefore, in our view the two reports are flawed as more in-depth analysis of both the Borovere Farm and Lord Mayor Treloar sites, as demonstrated through the work on the South Alton Hybrid application show that the landscape harm is limited.

We also note that the Sustainability Appraisal uses The Alton Study 2013 produced by Urban Initiatives as one of its key reference documents. This report is also fundamentally flawed, as the Borovere Farm site was included within a vast area of land on the southern slopes of Alton adjacent to the A31, and does not relate to the site as currently documented within the SHLAA, or indeed as now permitted. Therefore, The Alton Study should be disregarded as robust evidence.

Moreover, within the Sustainability Appraisal some of the comments in terms of the sustainability credentials of the Borovere Farm site are incorrect. On Page 252, there is the comment *"Borovere Farm - is closer to the town centre than Treloars, but it is not clear that a direct link could be established given the railway line acting as a barrier"*. This statement fails to recognise that there is a designated right of way from the top of Borovere Lane through the housing estate to Mount Pleasant Road, which provides easy access to the town centre within 900 metres.

On Page 253, there is this comment: *"Another important issue locally related to road and walking/cycling infrastructure, with a range of upgrades having been identified as necessary to ease congestion and improve safety. The Town Council has identified a list of the most pressing 'hot spots' (both from a traffic and pedestrian safety perspective), of which the Butts Bridge Junction is that which is most relevant to consideration of spatial strategy alternatives given proximity of the junction to the Borovere Farm site and also given the challenging (and hence expensive) nature of the upgrade required. The idea of a large scheme at Borovere Farm (Option 1) helping to fund the upgrade has been mooted for some time, although no details are known at the current time"* (Page 253). This is a perplexing statement given that the South Alton Hybrid application was submitted in April 2014, including a detailed application for the highways works at Butts Bridge and the Sustainability Appraisal was published in December 2014, and the applicants had also given a number of presentations to the Town Council on the application scheme. The statement also fails to reflect the role of the Lord Mayor Treloar site within the delivery of the Butts Bridge improvements.

In summary, the evidence base that underpins the Neighbourhood Plan is flawed in its analysis of the two sites at Lord Mayor Treloar and Borovere Farm as it fails to take into account more in-depth work as submitted as part of the South Alton Hybrid Planning Application and indeed the work of officers in supporting the application. A number of the comments as set out within these reports are either not substantiated with robust evidence or are factually incorrect. To conclude, the reasoning for the exclusion of the full extent of both sites as detailed within the January 2015 Site Selection report is fundamentally flawed.



## Appendix 3: South Alton Hybrid Application Parameter Plans



- Red Line Areas
- Residential Development: Parcels with Indicative tree planting
- Salsburgh Road Corridor
- Public Open Space
- Existing Strategic Planting retained and strengthened
- Phase 1 (net developable area 1.30ha)
- Phase 2 (net developable area 2.30ha)
- Phase 3 (net developable area 3.41ha)

Land Use	Area (hectares)	Area (Acres)
Residential Development	7.12	17.49
Salsburgh Road Corridor	1.10	2.72
POD	0.40	0.98
Existing Strategic Planting	3.90	4.370
<b>TOTAL</b>	<b>10.52</b>	<b>25.99</b>

Red Line Area	Hectares	Acres
	10.52	25.99



The Development Services Partnership  
 The Station, Salsburgh Road, Salsburgh  
 Salsburgh, Cheshire AL7 2SL  
 T 01256 34627  
 F 01256 34688  
 e info@edps.co.uk  
 www.edps.co.uk

date	HCA and Salsburgh Road Landowners
project title	Land East of Salsburgh Road, Alton
drawing title	Planting Plan
date	16 JULY 2014
drawing number	11300001
drawn by	WJ
checked by	WJ



**Jenny Woodgate**

---

**From:** PlanningSSD [REDACTED]  
**Sent:** 21 August 2015 10:19  
**To:** EHDC – Neighbourhood Plans Shared  
**Subject:** RE: NOTIFICATION OF PUBLICITY OF THE ALTON NEIGHBOURHOOD DEVELOPMENT PLAN - Environment Agency response

Dear Victoria Potts,

**ALTON NEIGHBOURHOOD DEVELOPMENT PLAN 2011-2028**

**SUBMISSION DRAFT VERSION 1.1 JUNE 2015**

Thank you for consulting the Environment Agency on the above document, which we received on 10 July 2015.

Having reviewed the Submission draft of the Alton Neighbourhood development plan, we have the following comments to make:

General Comments

We support the requirement for all sites to be built in line with sustainable development. We are pleased with the explicit recognition on page 35 (HO3: New Housing Site Allocations) regarding waste water disposal. It is very positive to see that developers will be requested to demonstrate there is adequate wastewater/sewerage capacity and surface water drainage, both onto and off the sites, to serve their specific development proposal. Also that where there is a capacity problem and no improvements are programmed by the water company, the developer needs to agree required improvements prior to the occupation of the development. This is essential to ensure that there is protection and to avoid pollution of the water environment.

We are also happy to see that the individual site requirements are highlighting the importance of ensuring that sites have adequate drainage and flood management provision as well as sewerage infrastructure and capacity. This should hopefully ensure that drainage is considered holistically and that proposed schemes are effective in their operation. Consideration may need to be given to the maintenance of any surface water features that are implemented.

Site Specific Comments

We are pleased to see that all the sites proposed in this document are being allocated in Flood Zone 1. Will Hall Farm (HO3 (e)) is obviously the exception to this. We are however satisfied that the development requirements for the site will ensure that the built development will be confined to the Flood Zone 1 area, with the Flood Zone 2 and 3 area including the River Corridor, being left free from development. This is following the flood risk management hierarchy of avoidance first, consistent with the guidance in National Planning Policy Framework (NPPF) which aims to ensure that areas at little or no risk of flooding from any source are developed in preference to areas of higher risk.

We hope that you find the above comments useful. If you require any further information, please do not hesitate to contact me using the details below.

Yours faithfully,  
Laura

Laura Lax  
Environment Agency - Solent and South Downs  
Sustainable Places, West

Tel: [REDACTED]  
Email: [REDACTED]

Our [Flood Risk Standing Advice](#) has been updated.

---

**From:** EHDC – Neighbourhood Plans Shared [<mailto:neighbourhoodplans@easthants.gov.uk>]  
**Sent:** 10 July 2015 15:13  
**Subject:** NOTIFICATION OF PUBLICITY OF THE ALTON NEIGHBOURHOOD DEVELOPMENT PLAN

Dear Sir/Madam,

**NOTIFICATION OF PUBLICITY OF THE ALTON NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012**

I write to inform you, as a consultation body or consultee identified in the Alton Consultation Statement that we are now in receipt of the final submission version of the Alton Neighbourhood Plan along with all accompanying documentation required under Regulation 15.

**What documents comprise the ‘plan proposal’?**

The plan proposal comprises the following documents:

- (a) A map identifying the area to which the proposed neighbourhood development plan relates;
- (b) A consultation statement;
- (c) The proposed neighbourhood development plan;
- (d) A statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990

**Where can the plan proposal be inspected?**

Details of the plan proposal and downloadable copies of the relevant documents can be found on our website at:

<http://www.easthants.gov.uk/AltonNP>

In addition, the full suite of evidence supporting the plan can be found at:

[http://www.alton.gov.uk/AltonTownCouncil/neighbourhood\\_plan-16530.aspx](http://www.alton.gov.uk/AltonTownCouncil/neighbourhood_plan-16530.aspx)

If required hard copies of all of the documents listed above are available from East Hampshire District Council, or copies of the plan can be viewed at:

- East Hampshire District Council, Penns Place, Petersfield, GU31 4EX
- Alton Town Council, Alton, Hampshire GU34 1HD (Monday – Thursday 9am to 5pm and Friday 9 to 4.30 p.m)
- Alton Community Centre, Amery St, Alton, Hampshire GU34 1HN (Monday – Friday 9am to 5pm)
- Alton Library, Vicarage Hill, Alton GU34 1HT (9.30am - 5pm except: Tuesday and Thursday 9.30am - 7pm, Wednesday 9.30am - 1pm, Sunday Closed)
- Alton Assembly Rooms, High St, Alton, Hampshire GU34 1BA (Monday – Friday 9am to 5pm)

**How and by when must you make representations?**

Representations can either be sent via email using the above address or by hard copy to:

Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield

Jennifer Howard

---

**From:** Chris Paterson <[REDACTED]>  
**Sent:** 21 August 2015 16:02  
**To:** EHDC – Neighbourhood Plans Shared  
**Subject:** SDNPA representation on Submission version of the Alton NDP  
**Attachments:** SDNPA response to Submission version of the Alton Neighbourhood Development Plan.pdf

Afternoon

Please find attached the SDNPA rep on the Alton NDP, please pass these comments onto the examiner for the purposes of the Alton Neighbourhood Plan examination

Kind Regards  
Chris

### South Downs Centre

Chris Paterson  
Communities Lead  
South Downs National Park Authority

Tel: [REDACTED] | Mobile: [REDACTED]  
South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH

Join in the South Downs GeoTour treasure hunt Find the secret caches hidden in fake bird boxes, hollow logs or false stones using your mobile phone or GPS, stamp your passport, collect points and claim your prize. Find out more at [southdowns.gov.uk/geocaching](http://southdowns.gov.uk/geocaching)

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21 August 2015

Planning Policy  
East Hampshire District Council  
Penns Place  
Petersfield  
Hampshire  
GU31 4EX

Dear Sir / Madam

Subject: South Downs National Park Authority (SDNPA) response to the submission version of the Alton Neighbourhood Development Plan.

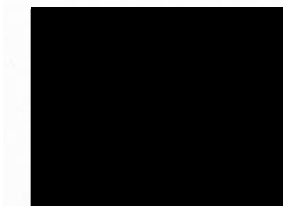
This representation sets out the South Downs National Park Authority's (SDNPA) formal response to the submission version of the Alton Neighbourhood Development Plan (ANDP). These are officer level comments prepared by SDNPA Planning Policy officers. Please can these comments be passed onto the appointed Examiner.

The SDNPA would like to commend the hard work and effort of the Neighbourhood Planning group and Alton Town Council in the preparation of the ANDP.

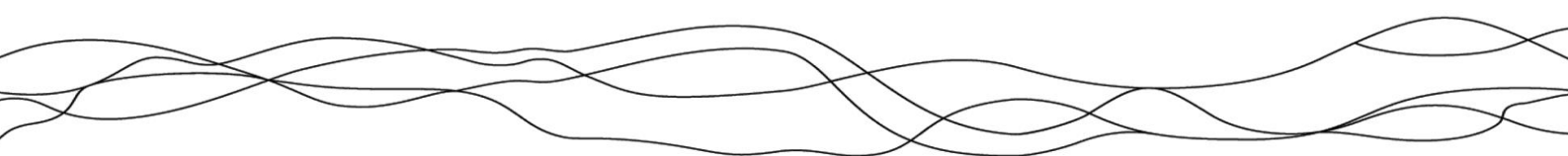
The SDNPA have made some general comments on the plan, specific comments in relation to four of the policies, detailed comments on two of the proposed sites and finally the SDNPA has also included comments which were provided previously on planning applications for two sites proposed in the Alton Neighbourhood Plan, namely Borovere Farm (site 1) and Treloar (site 2). These comments are set out in the following table. The comments made at outline planning permission stage have also been included at an appendix to provide further clarification on the SDNPA position in relation to these sites.

If you have any questions regarding our enclosed representation please do not hesitate to contact Communities Lead Chris Paterson who will be able to provide further clarification if necessary.

Yours Sincerely



Chris Paterson  
Communities Lead





## **SDNPA response to the submission version of the Alton Neighbourhood Development Plan**

### **General Comment on Alton Neighbourhood Development Plan**

The first purpose of National Park designation is the conservation and enhancement of the National Park's natural beauty, wildlife and cultural heritage. The SDNPA has an interest in Neighbourhood Plans outside the National Park that may have an impact on the setting (particularly on views towards and from the National Park, tranquillity impacts in relation to dark night sky, increase in traffic movements or recreational pressures in sensitive areas).

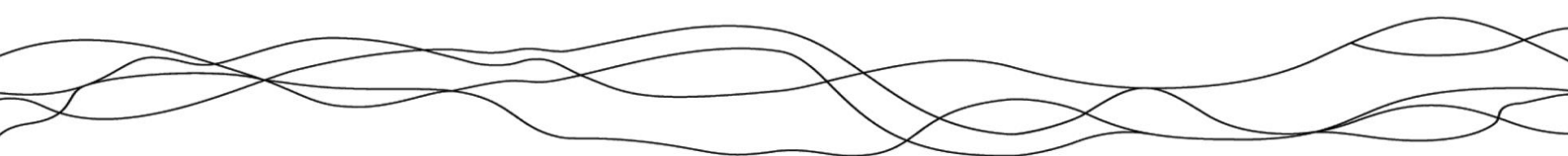
Alton is situated within a valley, and has a concealed setting from long distance views, including the Selborne Hangers. New major development proposals that may impact upon the landscape setting and skyline of the protected landscape would be of concern for the South Downs National Park. The Neighbourhood Plan has acknowledged the importance of protecting the National Park, by identifying one of the key objectives, to maintain Alton's landscape setting. The SDNPA has concern about the encroachment of development on the valley sides above Alton because we seek to retain its hidden nature. The SDNPA welcome the reference in paragraph 4 of section DE1 'not to compromise this setting through development on higher ground, including policies that allocate sites for housing'. The SDNPA also welcome the reference to protection of important views in Policy DE1, and the importance of protecting views referenced in policies HO3a and HO3b.

The market town of Alton serves as a retail centre for as many people outside the town as it does inside (acknowledged in the Plan). The aspiration to improve services and facilities will benefit residents of the National Park too given some of the neighbouring rural locations within it. Redeveloping Alton Sports Centre is welcomed, providing that a sensitive lighting scheme is obtained, site levels carefully considered and vegetation along the railway protected and enhanced (as likely to be a wildlife corridor).

The Local Plan for East Hampshire District Council (the area outside the National Park) will look at settlement gaps, such as that adjacent to Alton and Chawton, which will be of interest to us when work commences.

Some of the proposed allocated housing sites, such as Treloar or Borovere Farm, are on particularly elevated slopes, therefore sensitivity is heightened. It is important to ensure utilities and other services do not erode existing vegetation boundaries which help to soften potential views of roofscapes and these are strengthened wherever possible with native planting. This is in line with our first general point, that applicants ensure that the impact on the landscape setting and skyline is protected.

Design and layout, encouraging legibility and views out to the countryside beyond will help create a sense of place for the new developments if well thought out at the detailed design stages. As the majority of allocated sites are greenfield, enhancing biodiversity opportunities and connectivity of important habitats is important, as development may fragment wildlife corridors.



## **Comment on specific policy in Alton Neighbourhood Plan**

### **Policy DE1**

Policy DE1 recognises that views from the National Park is an important consideration, particularly from the south. However, it would be helpful if the allocations map showed the South Downs National Park boundary fully rather than just to the south. For example, East Worldham is shown, but not the fact it is also situated in the National Park. Views from the east are important too. The National Park boundary includes Binsted towards the northeast, heads south to Wyck, onto East and West Worldham and it is considered important to maintain a transition countryside landscape before you reach the built-up areas, outside the designation.

### **Policy TR3**

Connectivity to existing public rights of ways, especially long distance routes, such as the Hangers Way is seen as important. Therefore the Policy TR3 Pedestrian Networks in the Neighbourhood Plan is welcomed. This is one route for Alton residents to access the National Park. We also have a long term aspiration with our partners to create the 'Writers Way' through this area connecting villages and tourism routes, linking in our cultural heritage with Edward Thomas, Jane Austen and Gilbert White. The Neighbourhood Plan acknowledges that given the close proximity of the South Downs, it is seen as a potential gateway for visitors, especially given the above tourist destinations.

### **Policy CHI and CH2**

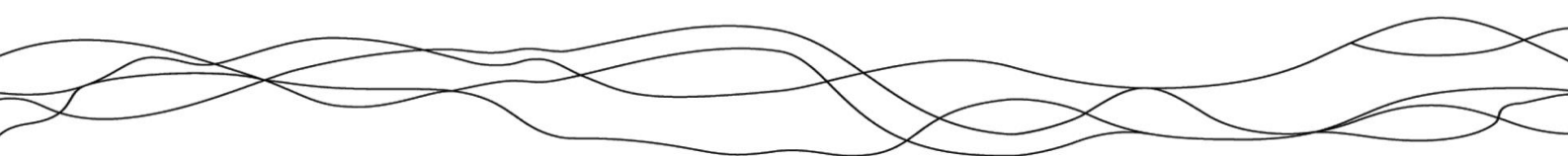
The intention of the policy is supported. The SDNPA would welcome the inclusion (either in supporting text or in policy wording) of a statement to ensure that the redevelopment of the community centre and sports centre consider the potential impact on the landscape setting of the National Park, where applicable. The location of new sports centre or community centre will obviously influence what impact these facilities may have on the landscape setting of the South Downs National Park.

## **Comment on proposed housing allocations in Alton Neighbourhood Development Plan - HO3(a) Land at Borovere Farm & HO3(b) Land at Lord Mayor Treloar (Phase 2)**

We have commented on the South Alton sites numbered one and two on the allocations plan, Treloar and Borovere Farm. These have been given outline planning permission to date, SDNPA comments at outline planning permission related primarily to the impact on the setting of the National Park and potentially for negative impacts on views from the National Park. Comments raised at outline planning permission have been attached to this representation for information.

"When examining the indicative SUDS system diagrams, (D&A Statement, figure 5.6 page 41) access routes have been used, but some of the soakaways / infiltration basins have been shown outside of the proposed built-up area. We are concerned that once detailed designs have been carried out, pressure to use some of the wooded areas/intervening vegetation that soften views of roof tops will be eroded. This is more of a concern for Lord Mayor Treloar site as this is particularly elevated, making views more likely – so sensitivity is heightened. This is a concern for other utilities too when at the detailed design stage.

Land East of Selborne Road (Borovere Farm), shows preliminary drainage strategy following the existing 'strategic planting' which separates the site into three land parcels. These tree belts are again important to reduce potential wider landscape impact. Pressure once at detailed stage to create further gaps for access, utilities and other infrastructure may occur. Relying on one access, with limited circulation may create poor legibility, and may not be realistic when further development of the scheme occurs.



The outline proposals have been assessed in the LVIA according to the available information. Were the application to be a full application the LVIA would assess the scheme on the basis of this more detailed information. For this reason, it is not seen as additional work for the LVIA to be revised according to further detailed design information. The layout of roads, buildings, precise information on scale and massing, together with more detail regarding levels information should be reassessed in order to ensure that the proposals have been subject to the correct level of scrutiny on landscape.

If applicants at the detailed design stage produce strong similarities to what is shown on the illustrative masterplans, the revision to the LVIA should be correspondingly minor. It would be proportionate to the development, and we hope that this will demonstrate that limited impact to the nearby National Park will occur. We have sought this due to the topography, and how developers choose to alter levels to accommodate the housing may achieve roofscapes that blend well or unsuccessfully. Whilst there may be immediate landscape changes to the local area, as indicated in previous comments, current LVIA work to date shows limited impact to the protected landscape itself, but we would like reassurance (reasons given above).

In relation to the proposed Country Park (which may be more appropriately named a Local Nature Reserve?), if this reflects the principles we suggested, this would minimise our concerns. A suitable long-term management plan could be secured by condition, showing how this can be accessed from the proposed and existing residents without the use of a car and how the ecological enhancements will be achieved.

In conclusion, we raise no objection to the current two masterplans, but may have concerns at detailed design stage if the above is not carefully considered. Phasing of the least sensitive sites in landscape terms is one option. There is also potential for these concerns to be mitigated in bullet points which support Policy HO3a and HO3b, by requesting that any supporting infrastructure related to development at these two sites (and other sites if appropriate) will not compromise screening through tree removal or loss of other screening.

**The following comments have been provided at Application stage for - HO3(a) Land at Borovere Farm & HO3(b) Land at Lord Mayor Treloar (Phase 2). It is considered appropriate to provide these comments in addition to those set out above in relation to the two sites which have the most potential to impact on the setting of the South Downs National Park.**

*Following previous comments, further site visits and assessment of the proposals, and consideration of responses from the LPA and the applicants, the SDNPA remains broadly concerned about the encroachment of development on the valley sides above Alton because the hidden nature of Alton within its valley setting is an absolute.*

*Both sites are assessed to have acceptable impacts in the LVIA(s) due to the screening effects of existing tree cover, distance and the presence of existing adjacent development. However, the presence of existing development is not a mitigating factor for views from the National Park as west Alton is largely hidden from view to the south including from Selborne hanger.*

*There is potential for roof lines and suburban character to impinge on the landscape character and views to the south of Alton (the National Park) particularly during leaf fall when tree cover will provide less screening. However, the current outline information supplied with the application suggests that this impact would be limited.*

*The existing trees and woodland which provide containment and structure for the proposed development are a risk; development would be highly visible owing to the topography without them. It is recommended that the LPA should be satisfied that achieving highways circulation and connectivity for services and other*

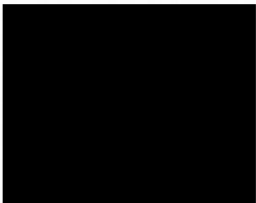
*developmental requirements around the site will not compromise screening through tree removal which may be unforeseeable at this time due to the outline nature of the scheme.*

*The proposed country park has the potential to appear artificial on the upper slopes of the valley when viewed from the National Park unless it is carefully designed to be consistent with surrounding landscape character. The comments of the applicant are noted in this respect however 'naturalistic' planting in a largely agricultural landscape is unlikely to appear natural in distant views and it is suggested that the masterplan for this area is drawn with close regard to local fieldscape and valley side character. There are many instances locally of open access land which is managed for agriculture— the National Trust holdings around Selborne are good examples. Following this approach would ensure that a recreational resource is locally appropriate without having a municipal or suburban character.*

*It is recommended that if the LPA is minded to approve the application, in addition to the above comments further LVIA refinement is undertaken at reserve matters stage in order to fully ascertain the impacts of the detailed proposals on existing screening, and to consider long distance views in detail.*

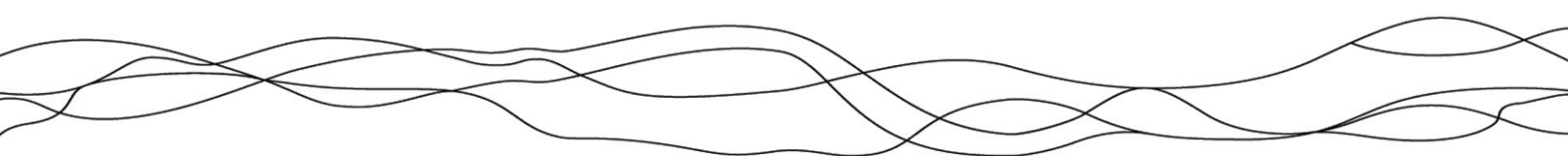
The comments above remain the position of the SDNPA, and the SDNPA would consider these comments should be considered in the examination of the ANDP.

Yours faithfully



Chris Paterson  
Communities Lead  
South Downs National Park Authority

Tel: [REDACTED] | Mobile: [REDACTED]  
South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH



**Jennifer Howard**

---

**From:** Emma Nash <[REDACTED]> on behalf of John Ferguson  
<john.ferguson@cgms.co.uk>  
**Sent:** 21 August 2015 16:30  
**To:** EHDC – Neighbourhood Plans Shared  
**Cc:** zEHDC - townclerk\_at\_alton.gov.uk; 'altonnp@gmail.com'; 'plan@alton.gov.uk';  
Bethan Hawkins; John Ferguson  
**Subject:** Representation for the Draft Alton Neighbourhood Plan - CgMs Ltd  
**Attachments:** CgMs Ltd - Alton Town Council - Land West of Old Odiham Road - 21.08.15.pdf

Dear Planning,

Please find attached our representations to the Draft Alton Neighbourhood Plan on behalf of our David Meisels for your consideration.

Kind regards,

**John Ferguson BSc (Hons), PG Dip TP, MRTPI**  
**Senior Associate Director**  
**Direct Dial:** [REDACTED]  
**Mobile:** [REDACTED]  
**Email Address:** [REDACTED]

## **CgMs Consulting**

Part of the RPS Group plc

*Planning, Archaeology & Historic Buildings Consultants*  
7<sup>th</sup> Floor, 140 London Wall, London EC2Y 5DN

**Tel: 020 7583 6767**

**Fax: 020 7583 2231**

[www.cgms.co.uk](http://www.cgms.co.uk)

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CC [REDACTED]

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Penns Place  
Petersfield  
Hampshire  
GU31 4EX

21<sup>st</sup> August 2015

Dear Sirs,

**SUBMISSION CONSULTATION ON THE DRAFT NEIGHBOURHOOD  
PLAN AUGUST 2015  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site (Site Location Plan at **Appendix A**). We have been following the neighbourhood planning process and have reviewed the public consultation material from the 22<sup>nd</sup> November 2014, the Pre-submission Consultation Draft Alton Neighbourhood Plan published in February 2015. In addition we have met with Alton Town Council on the 23<sup>rd</sup> January 2015 to discuss the site at land at west of Old Odiham Road.

We have now reviewed the submission draft of the Neighbourhood Plan (August 2015) which is detailed in the following letter of representation.

We believe there are a number of errors with the preparation and site selection process and evidence base, which we have previously pointed out but this has not been taken into consideration, which has led to an unsound choice of selected sites which has now been presented in the draft housing policy.

I trust these can be taken into account by the Neighbourhood Plan Steering Group and Town Council when the responses from this consultation are considered.

**Status of the Site**

CgMs submitted an application for the development of 98 residential dwellings, associated landscaping and transport provisions, at the Land west of Old Odiham Road in Alton, (LPA ref. 55097/001) which was refused on 23rd December 2014.

Our client is very disappointed their site was not included within the draft site options and the Housing Policy (HO3) which allocates new housing in Alton to specific sites.

## **Background to Representations**

On 2nd December 2014 (attached at **Appendix B**), CgMs made representations to Alton Town Council on the draft policy site options. Specifically representations were made on the site selection criteria, community support and landscape impacts. The representations detailed key discrepancies with the site and policy options. Specifically errors with the evidence base and initial sustainability assessment were identified, including appendix G which misrepresented our client's site in relation to the SHLAA Sustainability Assessment. It was therefore highlighted that the proposal site presented one of the most sustainable locations out of the SHLAA sites in Alton.

On 6<sup>th</sup> February 2015 (attached at **Appendix C**) CgMs reviewed the Council's draft Site Allocations Plan and the supporting evidence provided in the Sustainability Appraisal by URS. In addition to the above consultation, CgMs have highlighted that the following documents are unsound for the following reasons:

- Housing allocations within the draft Alton Neighbourhood Plan, that the Draft Site Allocations Plan relies on, do not go far enough to deliver sufficient levels of housing for Alton;
- The URS Sustainability Appraisal supports the site for housing but fails to test it as an option, despite recognising the importance of considering all alternatives.

CgMs have concluded from the consultations to date that the draft Site Allocations document also places too much emphasis on the Alton Neighbourhood Plan which is based on flawed and inaccurate evidence and should not determine the contents of the Local Plan. The Draft Site Allocations as drafted does not ensure it is doing all it can to support sustainable economic growth and maximise sustainable housing delivery in Alton.

On 30<sup>th</sup> March (**Attached at Appendix D**) CgMs reviewed Alton Town Council's Pre-submission consultation draft of the Neighbourhood Plan. The representations reviewed the inaccurate evidence base of the Neighbourhood Plan and the allocation process of new housing sites, including the draft policy HO3: New Housing Site Allocations. The representations highlighted a number of further inaccuracies with the site selection criteria as well as unsound evidence documents which have been used to draft policy HO3 and DE1 which has led to the exclusion of our site.

## **Alton Neighbourhood Plan Submission Consultation**

The Alton Neighbourhood Plan was submitted to East Hampshire District Council on 17<sup>th</sup> June 2015. The plan is now subject of a legal check to ensure it complies with the relevant provisions of the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004.

The purpose of the representations are to comment of the draft Plan with regard to meeting the 'Basic Conditions' required to make a Neighbourhood Plan and further legal tests of which will be applied during the examination of the draft Alton Neighbourhood Plan.

### *Basic Conditions*

Paragraphs 5 and 6 of Schedule 4B of the Town and Country Planning Act (TCPA) 1990 details the requirement of EHDC to undertake a check of the compliance of the plan. The relevant legal tests are set out in both the TCPA and relevant sections of the planning and compulsory Purchase Act (PCPA) 2004. It is then an obligation of EHDC to issue a written statement clarifying the compliance. Accordingly, the letter comprises the formal view of EHDC and recommends whether it should be made available for independent examination.

Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) sets out that a Plan must meet the 'Basic Condition' which include:

- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- (d) the making of the order contributes to the achievement of sustainable development,
- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- (f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and
- (g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

The above basic conditions have been reviewed against the Draft Alton Neighbourhood Plan and are considered in turn with regards to the evidence base, draft policy and the site at Land West of Old Odiham Road.

### *Legal Tests*

EHDC have assessed the draft Alton Neighbourhood Plan against both the TCPA 1990 and PCPA 2004. The EHDC Checklist is attached at **Appendix E**. The Legal tests are detailed below of which the Neighbourhood Plan needs to meet and these have been reviewed by CgMs in turn below and against the evidence base, draft policy and the site at Land West of Old Odiham Road.

#### *1. TCPA 1990 Schedule 4B Para 5*

Is the proposal in question a repeat proposal? (has EHDC refused a proposal under Para 12 or Section 61E or has it failed at referendum?)

CgMs agree with EHDC that the proposal is the Alton Neighbourhood Plan and therefore is not a repeat proposal.



*2. TCPA 1990 Schedule 4B Para 6(2)(a) and Section 61F*

Is the body who submitted the plan a qualifying body for the purposes of neighbourhood plan making?

CgMs agree with EHDC that Alton Town Council are a qualifying body to produce a Neighbourhood Plan.

*3. TCPA 1990 Schedule 4B Para 6(2)(b) and Section 61F*

Does the plan proposal comply with other relevant provisions made under Section 61F?

CgMs agree the administrative boundary that was designated as the neighbourhood area by EHDC following a 6 week period of consultation on 8<sup>th</sup> May 2014.

*4. TCPA 1990 Schedule 4B Para 1, Para 6(2)(c) and NP (General) Regulations 2012 Regulation 15*

Have the qualifying body submitted the following in a satisfactory form: 1. a map or statement identifying the area to which the plan relates; 2. a consultation statement 3. the proposed NDP; 4. a statement explaining how the NDP meets the 'basic conditions'. And 5 either an environmental report or a statement of reasons why an environmental assessment is not required

CgMs agree that the Neighbourhood Plan Area Map, a consultation statement, a statement setting out the reasons why an environmental assessment is not required and Basic Condition Statement has been submitted and published online. However, do not agree that all basic conditions have been complied with through the drafting of the Alton Neighbourhood Plan. This is dealt with further on page 6 of these representations.

*5. TCPA 1990 Schedule 4B para 4, para 6(2)(d) and NP (General) Regulations 2012 Regulation 15(2)(a)*

Has the qualifying body complied with the requirements of regulations made under Paragraph 4 of the TCPA Schedule 4B regarding the scope of pre-submission consultation?

CgMs agree that the Alton Neighbourhood Plan has met the requirements and processes required to consult relevant bodies in the preparation of the Alton Neighbourhood Plan as detailed within the supporting Consultation Statement. However, CgMS do not agree that comments received to date on the inaccurate evidence base, process for allocation sites and the housing policy have been taken into consideration to shape the draft Alton Neighbourhood Plan through the further stages of consultation.

CgMs do not agree that the selection of housing allocation sites underwent an SEA-compliant Sustainability Assessment Exercise as detailed on page 13 of the Consultation Statement. This is dealt with further on page 6 of these representations.

*6. TCPA 1990 Schedule 4B para 4, para 6(2)(d) and NP (General) Regulations 2012 Regulation 15(2)(a)*

Does the plan seek to grant or support planning permission for any development categorised as 'excluded development' under Section 61K of the TCPA 1990?

CgMs agree that the Alton Neighbourhood Plan does not contain policies relating to excluded development under section 61k of the TCPA 1990.

*7. PCPA 2004 Section 38A (2)*

Does the plan meet the definition of 'neighbourhood development plan' in that it sets out policies in relation to the development and use of land in the neighbourhood area?

CgMs agree that the plan meets the definition of a 'neighbourhood plan' in the sense that it includes policies for the administrative area. However, CgMs are in disagreement with the process of allocating sites and a number of the draft policies. This is dealt with further on pages 6 and 7 of these representations.

*8. PCPA 2004 Section 38B(1)(a)*

Does the 'neighbourhood development plan' (as defined under Section 38A) specify the time period for which it is to have effect?

CgMs agree that the period for the Neighbourhood plan to cover is from 2011 – 2028, therefore, mirroring the adopted East Hampshire District Local Plan: Joint Core Strategy.

*9. PCPA 2004 Section 38B(1)(c)*

Does the 'neighbourhood development plan' (as defined under Section 38A) relate to more than one neighbourhood area?

CgMs agree that the Alton Neighbourhood Plan does not relate to more than one neighbourhood area.

The following paragraphs consider the above tests, basic conditions alongside key areas of dispute of which representations have previously been made regarding the site at Land at west of Old Odiham Road. There are a number of inaccuracies in the process that has allocated the housing sites within the neighbourhood plan, which are set out in the below paragraphs.

### **Policy HO3: New Housing Site Allocations**

Draft Policy HO3 identifies six specific sites for housing to deliver the total allocation of 781 new dwellings over the plan period to 2028. Paragraph 47 of the NPPF identifies that Councils should ensure that their local plans meet the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area.

#### *The Housing Allocation*

This policy and the policy table relies on the delivery of every permitted scheme. In addition it has been detailed in recent appeal decisions the need to increase the 5% buffer to 20% to take account of the record of persistent under delivery of housing (Cheshire East Decision Appeal Decision Ref.APP/R0660/A/14/2216767). Therefore we do not believe that the relevant draft policy on Housing (HO3 'New Housing Site Allocations') has regard to the national policy and supporting guidance which

considers the requirement for a longer term view to be taken in addressing Housing. Therefore the draft neighbourhood plan does not meet basic condition a.

East Hampshire District Council have applied a 5% buffer to their Five Year Housing Land Supply. The document details that the council have exceeded the target set in relation to the revoked South East Plan (SEP) and the housing requirements of the East Hampshire District Local Plan: Second Review (1996 2011). The Council state that they have achieved the baseline housing requirement figure (practically) with 5,427 completions out of a requirement of 5,500 dwellings in 2011. However, the plan period of the Joint Core Strategy was back dated to April 2011 and there has been an identified under-provision over the last 3 years of the plan which required 592 dwellings to be delivered across the district per annum. Although it can be argued that an under provision should be assessed over a longer period of time, we consider that given the current market East Hampshire District Council have not substantially met targets to respond to the housing need. We therefore believe the council has persistently under delivered and a 20% buffer should be applied to account for this.

As detailed within the Draft Housing Policy HO3 the appropriate buffer to compensate for the prolonged under delivery has not been applied to the basis of the policy. The policy therefore restricts the number of dwellings that can be delivered on each site which is not a true representation of the housing allocation in Alton. A 20% buffer would increase the need for Alton to allocate sites to deliver 840 dwellings, rather than the currently proposed 781. This shortfall could be sustainability delivered on our client's site, Land West of Old Odiham Road. The NPPF supports the presumption of sustainable development (para 49) of which the draft neighbourhood plan fails to comply with and therefore, fails to contribute towards the achievement of sustainable development as detailed within basic condition (d) of Schedule 4B of the Town and Country Planning Act 1990.

### *The Delivery of Housing*

The draft Housing Policy further details each site and details the key elements of the proposal in line with a proposed masterplan. However, within these detailed policies the deliverability of the sites is not included and the draft policy relies upon the full allocation being fully delivered. The draft policy assumes that the sites are available and it is achievable and viable to deliver housing to meet the current housing needs.

Paragraph 6 of the NPPF states that to be considered 'deliverable' sites should be available now, offer a suitable location now, and be achievable with a realistic prospect that housing will be delivered within five years and in particular that the site is viable. We do not believe it is realistic that the total allocation of dwellings will be delivered within the 5 year period for the following reasons:

- a) Phasing of development, lead-in times and build rates for these strategic sites;
- b) Assumed supply from the sites without planning permission (these sites have yet to be considered through the local plan process and could be/are subject to local opposition); and
- c) Viability concerns regarding planning obligations and signed S106 agreements.

The delivery of the dwellings appended to the Five Year Housing Supply and which this draft policy is based upon is unrealistic within the five year period and therefore this should attract paragraph 14 of the NPPF 'Presumption in Favour of

Sustainable Development' due to the inaccuracies of the deliverability within the five year period. This policy consequently does not meeting the basic condition test as detailed under (a) 'having regard to national policy' and (d) 'contributes to the achievement of sustainable development' of Paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990.

### *The location of Housing*

The seventh core planning principle of the NPPF states '*allocations of land for development should prefer land of lesser environmental quality*'. Chapter 11 specifically requires great weight to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. It outlines the unacceptability of major development in these designated areas except in exceptional circumstances, and directs development away from these areas.

Unlike the majority of the rest of the district and other sites promoted through the SHLAA process our site is not subject to any specific designations by the Local Plan Proposals Map. The site adjoins Alton but is not within:

- Green Belt;
- Sites of Importance for Nature Conservation;
- Sites of Special Scientific Interest;
- Conservation Area;
- Special Area of Conservation (SAC);
- Special Protection Area (SPA);
- Local Gap;
- Area of Outstanding Natural Beauty.

It should be noted that a scheme located within Alton with similar planning principles (i.e. outside of the policy boundary) but of a larger scale was granted planning permission at committee on 4<sup>th</sup> February 2015 (Application ref. 30021/056 Land at Lord Mayor Treloar Hospital Site and Land East of Selborne Road, Alton). This was at a lesser sustainable location than Land West of Old Odiham but still considered by the council to be sustainable development that would significantly boost Alton's housing supply.

The site at Land West of Old Odiham Road therefore offers the opportunity for development on land that is not designated to be of specific natural/scientific/ecological value, and will ultimately reduce the pressure to develop higher quality natural environments that are subject to the above designations in other parts of the District.

### **Policy DE1: Town Setting and Natural Assets**

Draft Policy DE1 details that all new development in Alton must ensure that it is able to at least maintain wherever possible enhance the appearance and setting of the town.

The policy further details that 'new development must respect key views into and out of the town, in particular from the National Park to the south, through the preservation or preferably the enhancement of the important views afforded by the vistas and gateways leading into and out of Alton. Any new development should demonstrate how it has reacted positively to opportunities to enhance the

appearance of key entrances to the town'. This is in line with basic condition (c) of Schedule 4B of the Town and Country Planning Act 1990.

During the application process (LPA ref. 55097/001), CgMs worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This extensive exercise far exceeds the brief Landscape Capacity study undertaken for the SHLAA which has formed part of the evidence base for the Neighbourhood Plan. In addition, it should be noted that further inaccuracies within the Landscape Capacity study which forms a basis for the SHLAA site assessment were also identified, in particular the broad brush nature of and subjective view of the landscape impacts of the sites.

Therefore, this detailed evidence clearly demonstrated the impact of the site on the landscape is minimal and is contrary to the broad brush landscape capacity study the neighbourhood plan relies upon. Therefore, this more detailed approach objectively assessing the landscape impact of the site must attract material weight when considering the Site Allocations for housing in Alton and also highlights further inaccuracies within the draft policy DE1 included within the Neighbourhood Plan and the unsound evidence of which it is based upon. This therefore undermines the draft policy and prohibits this policy meeting basic condition (c) of Schedule 4B of the Town and Country Planning Act 1990.

## **Conclusions**

The site would assist and provide high quality housing for Alton to meet the current housing demand. The proposal site has the capacity to deliver housing which would respond to the short term delivery of significant housing. Delivery would be within 3 years and therefore would meet the short term housing need which other identified sites in East Hampshire cannot. In addition, the site would have a social and economic role and contribute towards the positive and sustainable growth of Alton. In summary, the site at Land West of Old Odiham Road is a highly sustainable form of development for Alton and the Draft Neighbourhood Plan should be reviewed before examination due to not meeting the following basic conditions;

- (a) Regard to national policies and advice contained in guidance issued by the Secretary of State;
- (b) Regard to the desirability of preserving or enhancing the character or appearance of any conservation area;
- (c) Regard to the achievement of sustainable development; and
- (d) General conformity with the strategic policies contained in the development plan.

Therefore as you can see there are a number of inaccuracies with the site selection criteria as well as unsound evidence documents which have been used to draft Policy HO3 and DE1 which has led to the exclusion of site Land West of Old Odiham Road. We therefore disagree with the above detailed policies due to the unsound evidence base which they have evolved from/therefore, we do not believe that the Draft Neighbourhood Plan meets the basic condition test and legal tests to take the submission document forward to examination by an independent inspector. We recommend that the draft Alton Neighbourhood Plan be re-drafted due to its unsound evidence base.

Please do not hesitate to contact me or Matthew Roe if you would like to discuss further.

East Hampshire District Council  
Land West of Old Odiham Road, Alton  
21<sup>st</sup> August 2015

---

Yours faithfully,



**John Ferguson**  
**Associate Director**

# **APPENDIX A**

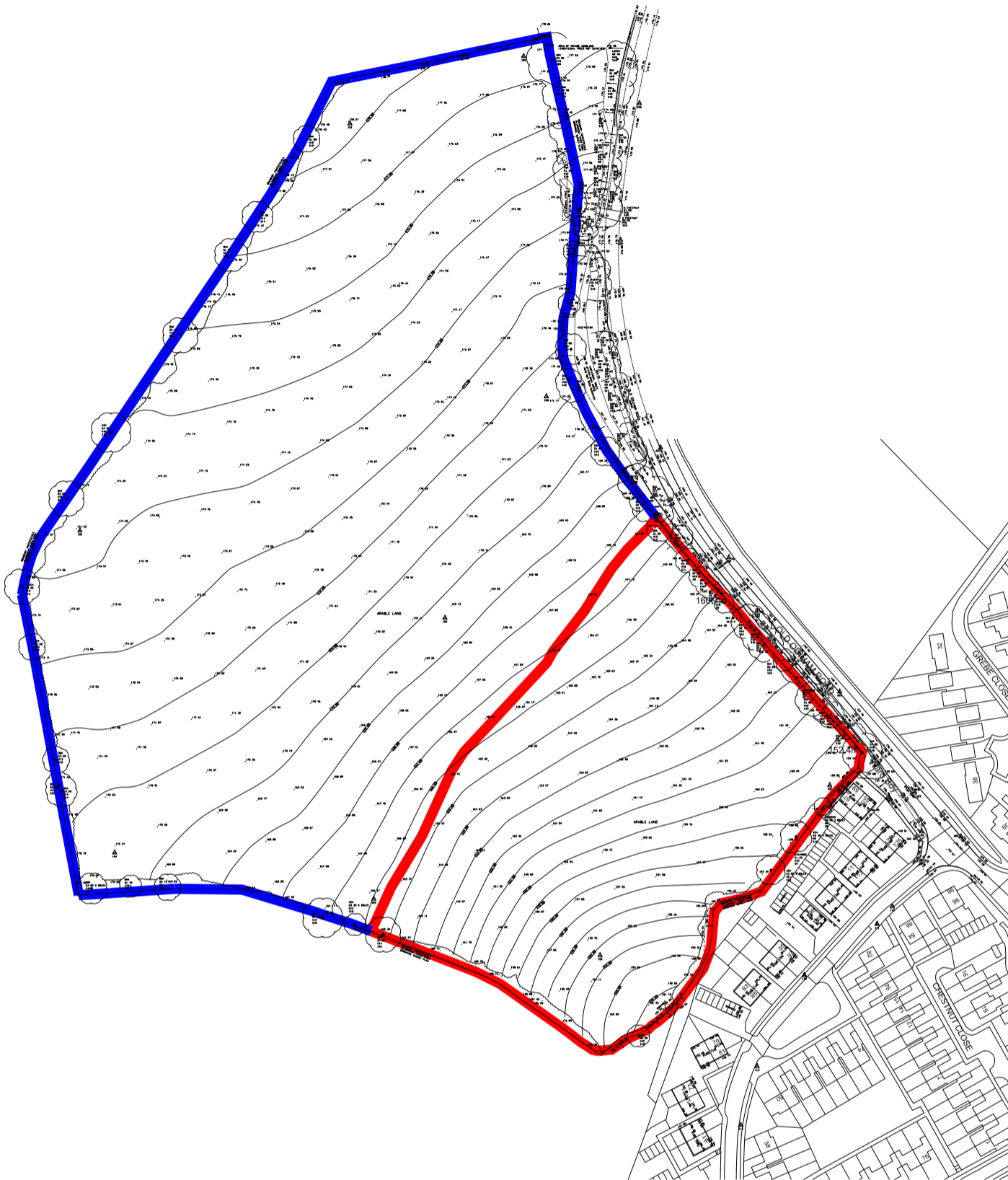
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 Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.  
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Key

— Site Application Boundary

— Ownership Boundary



P01	30.05.14	Planning Issue	PC	JH
Rev	Date	Description	Drawn	Chkd

Drawing Status  
**For Planning**

Client  
**David Meisels**

**JOHN THOMPSON & PARTNERS**



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Project  
**Land West of Old Oldham Road,  
 Alton**

Drawing Title  
**Site Location Plan**

Scale @ A3 1:2500 Job Ref. 00776

Drawing No. 00776 \_ S11 Revision P01

Scale Bar 0 20 40 60m





# **APPENDIX B**

SENT BY EMAIL TO [REDACTED]  
CC [REDACTED]

Our Ref: JF/JCG15532

Direct Dial: [REDACTED]

email address: [REDACTED]

Alton Town Council  
Town Hall  
Market Square  
Alton  
Hampshire  
GU34 1HD

2<sup>nd</sup> December 2014

Dear Sir,

**NEIGHBOURHOOD PLAN COMMENTS  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and have reviewed the public consultation material from the 22<sup>nd</sup> November 2014, where draft options were presented to the public.

Our client is very disappointed their site was not included within the draft site options.

We believe there are a number of errors with the site selection process and evidence base which has led to an unsound choice of selected sites. We would very much appreciate the opportunity to discuss these with you and try to address the concerns you have with our client's site within this letter.

I trust these can be taken into account by the Neighbourhood Plan steering group and Town Council when the consultation responses from the 22<sup>nd</sup> November are considered.

**Site Selection Criteria for Land West of Old Odiham Road**

***SHLAA Sustainability Appraisal***

The SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan has a number of errors that we have raised with EHDC and previously pointed out to you in a letter dated the 19<sup>th</sup> November 2014.

There were a number of errors with the initial sustainability assessment at appendix G of the SHLAA sustainability assessment that resulted in our site having a red box for access to employment (over 1600m away) and a yellow box for access to retail (over 800 metres away). The correct picture is retail provision within 500 metres of the site and employment provision within 1200 metres of the site. These boxes should therefore be changed to green for access to retail and yellow for access to employment.



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This therefore equates to 0 red, 4 yellow and 16 green boxes, making it the most sustainable site out of the sites selected in the Neighbourhood Plan. Giving the site a yellow box in Annex C of the ANP Site Selection Methodology is therefore incorrect, as is the evidence base this methodology is based on.

Site	SHLAA Sustainability Assessment		
	R	Y	G
AL005 Cadnam Farm	0	7	13
AI002 Borovere Farm and Lord Mayor Treloar	0	9	11
AL033 Will Hall Farm	0	7	13
Highmead House	1	5	14
AL026 Land of Wilsom Road	0	5	15
AL042 Land adjacent to convent	0	5	15
<b>Old Odiham Road</b>	<b>0</b>	<b>4</b>	<b>16</b>

As can be seen the site is therefore in the most sustainable location out of the SHLAA sites and has the most green boxes and least red and yellow boxes. It is certainly more sustainable than the other Neighbourhood Plan Sites. This should therefore be shown as green in Annex C of the ANP Site Selection Methodology. As you are aware paragraph 072 of the National Planning Practice Guidance requires Neighbourhood Plans to guide development to the most sustainable solutions, and that material produced as part of the Sustainability Appraisal of the Local Plan may be relevant, which is the case here.

### **Community Support**

We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications currently pending determination is of key note, and should be considered in addition to the neighbourhood plan feedback from February 2014.

The feedback from the February consultation into potential sites is potentially flawed, as it was based on the number of dwellings within the SHLAA allocation as opposed to the numbers of dwellings the different applications relate to, and the number of dwellings included in the most recent November neighbourhood plan draft allocations. The views therefore received from the February consultation were based on a very different number of dwellings at these sites than the most recent consultation.

A more accurate and up to date reflection of local views on the proposed housing numbers for the sites is encapsulated in the number of objections registered for each planning application at the key sites, currently in for planning, that should be considered along with the responses from the Neighbourhood Plan feedback from February 2014.

This is summarised in the table below.

<b>Site</b>	<b>No. units consulted on in February 2014</b>	<b>Rank from Neighbourhood Plan Feedback (1- most favourable, 5 least)</b>	<b>Number of units in application</b>	<b>No. objections to planning application</b>
Cadnam Farm	150	2	275	162
Borovere Farm and Lord Mayor Treloar	420	1	530	111
Will Hall Farm	150	5	200	350
Highmead House	100	4	120	134
AL026 Land of Wilsom Road	Not consulted		No app	
AL042 Land adjacent to convent	Not consulted		No app	
<b>Old Odiham Road</b>	<b>60</b>	<b>3</b>	<b>97</b>	<b>48</b>

As can be seen in this table, the application at Old Odiham Road has by far the least number of local objections of 48 for the current application, and a very similar amount of local opposition as Cadnams Farm from the neighbourhood plan feedback. This would place Old Odiham the second most popular site for development according to local opinion. Annex C of the ANP Site Selection Methodology should therefore reflect this and Old Odiham Road should be changed from red to a yellow or green.

### **Landscape Capacity Study: SHLAA Site Assessment**

The East Hants SHLAA Landscape Capacity Study: Sites Assessment provides a very broad brush, subjective view on the landscape impact of sites.

The study's comments on the Old Odiham Road site AL002-4 are the same as AL001-4 Highmead House.

As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land.*

This pre-application feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above, and considers the skyline of Alton can be retained.

Therefore at Annex C of the ANP Site Selection Methodology, for the Landscape Capacity Study: SHLAA Site Assessment, the box ticked red is incorrect and should be yellow, based on the above, which is a more accurate, objective and up to date review of the impact of developing the site on Alton's skyline.

### **Alton Town Design Statement**

Annex C of the ANP Site Selection Methodology puts a red box against the Alton Town Design Statement.

The Alton Town Design Statement seeks to preserve Alton's skyline. The above section and the Landscape Visual Impact Assessment of the application at Land West of Old Odiham Road clearly demonstrates development of the site can preserve Alton's skyline. Therefore against the Alton Town Design Statement at annex c of the ANP Site Selection Methodology the red box should be changed to yellow.

### ***Alton Study***

Annex C of the Alton Neighbourhood Plan Site Selection Methodology currently has a blank box for the Alton Study criteria.

This should be changed to green and 'yes', as the site is included within this study, as Option Two and within Growth Option 2.

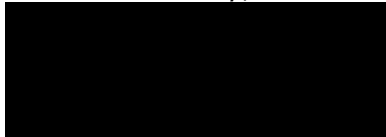
### ***Conclusion***

Therefore as you can see there are a number of inaccuracies with the site selection criteria as well as unsound evidence documents used at Annex C of the Alton Neighbourhood Plan Site Selection Methodology, which has led to the exclusion of site Land West of Old Odiham Road.

We would very much appreciate if we could organise a meeting with yourselves at the earliest opportunity to discuss your concerns with the site, and also how this site and the above can be seriously considered in further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

**John Ferguson**  
**Associate Director**

# **APPENDIX C**

Our Ref: JF/MR/15332

email address: [REDACTED]

Direct Dial: [REDACTED]

Planning, Regeneration and Economy  
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Hampshire  
GU31 4EX



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Dorset, Edinburgh,  
Kettering, Manchester,  
Newark

6<sup>th</sup> February 2015

Dear Sir / Madam,

**LAND WEST OF OLD ODIHAM ROAD, ALTON  
EAST HAMPSHIRE DISTRICT LOCAL PLAN PART 2: HOUSING AND  
EMPLOYMENT ALLOCATIONS (DRAFT SITE ALLOCATIONS PLAN)**

I write on behalf of my client, David Meisels, with regard to the Council's Local Plan Part 2: Housing and Employment Allocations (Draft Site Allocations Plan) which is currently out for public consultation. Our client wishes to make representations to this Draft Site Allocations Plan to promote their site Land West of Old Odiham Road, Alton (site plan attached at **Appendix A**).

This letter sets out the flawed process of the Draft Plan to rely on Neighbourhood Plan Allocations for housing sites in Alton, and should be read in conjunction with the representations made to the Call for Sites, 16<sup>th</sup> June 2014.

**Site Description**

The site comprises a 10 hectare field currently in use as arable farmland. The site is bound by housing to the south at Southview Rise, thick hedging and Old Odiham Road to the east, Averley Wood to the north and public open space to the west.

The site has been previously promoted through the SHLAA process. The site was promoted through the fifth tranche of sites in 2013, and the southern third of the site was included within the SHLAA (ref AL002-4 Land West of Old Odiham Road) as it was considered the landscape impact of this part of the site could potentially be mitigated, as well as a need for new sites to meet the identified housing need in the district.

The site was promoted through the sixth tranche in 2014, and the southern third was included within the SHLAA.

The site is available, suitable and achievable for residential development. Below sets out the suitability of the site and justification for its promotion in the Draft Housing and Employment Locations.

**Objections and Concerns**



Having reviewed the Council's draft Site Allocations Plan, the Alton Neighbourhood Plan and supporting evidence provided in the Sustainability Appraisal by URS, we consider the draft Site Allocations is currently unsound.

We are concerned the site, Land West of Old Odiham Road, has not been allocated for housing in the draft Site Allocations document. I have set out the three reasons of concern below:

- The Neighbourhood Plan, upon which the site Allocations Document is heavily reliant on, is founded on inaccurate evidence and is therefore unsound;
- Housing allocations within the draft Alton Neighbourhood Plan, that the Draft Site Allocations Plan relies on, do not go far enough to deliver sufficient levels of housing for Alton;
- The URS Sustainability Appraisal supports the site for housing but fails to test it as an option, despite recognising the importance of considering all alternatives.

### **Inaccurate Evidence Base**

Section 3.1 of the draft Site Allocations Plan states the site allocation process for housing in Alton will be addressed as part of the emerging Alton Neighbourhood Plan.

We fundamentally disagree with this approach that relies on the Neighbourhood Forum to allocate appropriate sites for housing.

There are a number of inaccuracies in the process that allocated the housing sites within the neighbourhood plan, which are set out below.

### ***SHLAA Sustainability Assessment, 2014***

One key inaccuracy of the evidence base for this plan, is the EHDC SHLAA Sustainability Assessment (2014), that the URS Sustainability Appraisal refers to. The SHLAA Sustainability Appraisal at Appendix G sets out the access to retail facilities and employment access, when assessing the sustainability of the SHLAA sites.

This has been incorrectly calculated. We have previously submitted representations pointing out this error (dated 11<sup>th</sup> November 2014, 19<sup>th</sup> November 2014 and 2<sup>nd</sup> December 2014 these are enclosed at **Appendix B**), which I have summarised below:

#### *Access to retail*

The categorisation given to the 'Access to Retail' of site reference AL047 is currently 'Yellow', the criteria for which is retail being 'between 800m and 1600m'. However, our research has identified that retail floor space is within 800m of the site. A Londis convenience store is within 500 metres of the site. In addition Wooteys Way retail parade is within 800 metres of the site.

This would put the site within the 'Green' category, which is defined as less than 800m.

### *Access to Employment*

The sustainability assessment defines access to employment as red i.e. over 1600m. However the site is within 1.2km of the High Street where there are offices and significant employment. The categorisation should therefore be changed to yellow to reflect this.

We requested that the Sustainability Appraisal be amended to reflect the above corrections on 11<sup>th</sup> November 2014, however the Neighbourhood Plan has been progressed without consideration to updated accurate evidence. We therefore consider the draft Neighbourhood Plan allocations are unsound, and this process should not be relied on to accurately allocate housing sites in Alton.

### **Landscape Capacity Study**

Further inaccuracies within the Landscape Capacity study which forms a basis for the SHLAA site assessment were also identified, in particular the broad brush nature of and subjective view of the landscape impacts of the sites.

CgMs submitted an application for the development of 98 residential dwellings, associated landscaping and transport provisions, at the site west of Old Odiham Road in Alton, (LPA ref. 55097/001) which was refused on 23<sup>rd</sup> December 2014. During the application (LPA ref. 55097/001), we worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This extensive exercise far exceeds the brief Landscape Capacity study undertaken for the SHLAA. As part of this exercise an extensive Landscape Visual Impact Assessment was undertaken alongside a Zone of Theoretical Vision, followed by a robust and very accurate photographic assessment of the key views.

This work was particularly appreciated and accepted by officers from EHDC in the pre-application feedback we had on the scheme, dated 7<sup>th</sup> January 2014. This states:

*'Having reviewed the work carried out to date, with the assistance of the Senior Landscape architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in land around the settlement. In my view this land area is less influential on many key views out of an across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produce. I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land.'*

This pre-application feedback was consistent with the landscape officer's consultation response to the application, who supported the application given the above, and considered the skyline of Alton can be retained.

Therefore, this detailed evidence clearly demonstrates the impact of the site on the landscape is minimal and is contrary to the broad brush landscape capacity study the neighbourhood plan relies upon. Therefore, this more detailed approach objectively assessing the landscape impact of the site must attract material weight when considering the Site Allocations for housing in Alton and also highlights further inaccuracies within the neighbourhood plan.

### ***Consultation Process of Draft Site Options of Neighbourhood Plan***

The consultation process of the neighbourhood plan was also flawed, further drawing attention to the inaccuracies and inconsistencies in the approach to the plan.

The consultation process for the document was flawed as it was based on the number of dwellings within the SHLAA allocation as opposed to the numbers of dwellings the different applications relate to, and the number of dwellings included in the most recent November neighbourhood plan draft allocations.

The views therefore received from the February consultation were based on a very different number of dwellings at these sites than the most recent consultation in November 2014.

Given the above it is clear that little weight should be placed on the allocations within the Alton neighbourhood plan, as it contains significant inaccuracies, flaws in the process and faulty evidence.

### **The Draft Site Allocations Document Places too much Reliance on the Neighbourhood Plan**

The neighbourhood plan should compliment the Local Plan, however it is our opinion that the draft Local Plan: Site Allocations document places too much emphasis on the evidence base and subsequent conclusions of the Alton neighbourhood plan. We consider this does not go far enough in allocating enough housing for Alton.

Paragraph 184 of the NPPF states 'neighbourhood plans should reflect these policies (in the Local Plan) and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the local plan or undermine its policies.'

Core Strategy Policy 10 requires the provision of a minimum of 700 dwellings in Alton. The Sustainability Appraisal for the East Hampshire Core Strategy tested seven housing number scenarios for Alton. Option 6 tested an allocation at Alton for 1,380 dwellings. When appraised for sustainability, Alton came out as a highly sustainable location for housing in terms of employment and economy and transport and accessibility. This therefore demonstrated Alton was capable of sustainably delivering well in excess of 700 new houses, and led to the Inspector changing the wording in the policy to a minimum of 700 new homes. However the draft neighbourhood plan only contains an allocation of 781 which caps the housing provision in Alton. This will restrict the delivery of housing in Alton, and requires all the allocated sites in Alton to be deliverable.

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a gold thread running through both plan-making and decision-making (paragraph 14).

NPPF paragraph 19 states the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth.

Therefore the Draft Site Allocations Plan should be an opportunity to allocate sites well in excess of 781 homes, to ensure it does all it can to support sustainable economic growth and maximise sustainable housing delivery. The Plan must consider the most sustainable locations for development, which URS Sustainability Appraisal considers the site west of Old Odiham Road to be.

The NPPF encourages Neighbourhood Plans to support Local Plans, the evidence for which clearly states that the land west of Old Odiham Road is a viable and sustainably justifiable site for extended housing.

The NPPF confirms this in Para 157, which requires Local Plans to plan positively for the development required in the area. It requires sites to be allocated to promote development and flexible use of land. We therefore consider this draft Local Plan to not fully meet the aspirational requirements of the NPPF.

### **The Evidence Base for the Draft Local Plan is Flawed**

The URS Sustainability Appraisal of the East Hants Site Allocations Plan relies on the SHLAA Site Assessment and Sustainability Appraisal prepared by East Hants.

This Sustainability Appraisal recognises the site ref. AL047 as a housing option within Appendix 4. The Appraisal then sets out potential issues to these housing sites and notes that the Land West of Oldiham Road (ref. AL047) is a suitable and sustainable option for extended housing growth.

Further, Appendix 4 goes on to note that should the site be developed, it would be an *'extension to the housing estate on the west side of Old Odiham Road, which is much less extensive than the estate on the other (eastern) side of the road.'* The Sustainability Appraisal concludes by stating *'as only the lower part of the site is proposed for development, landscape impacts would not be severe.'*

Despite this positive appraisal of the site west of Old Odiham Road, it has not been considered within the Draft Housing and Employment Site Allocations Plan due to the lack of recognition in the Neighbourhood Plan. This is a flawed approach, particularly due to the inaccuracies in the evidence base of the Neighbourhood Plan which we have outlined above. This contradicts paragraph 14 of the NPPF which calls for a presumption in favour of sustainable development.

In addition to this, the site has not been included within the preferred options within Appendix 6 of the appraisal. The Sustainability Appraisal needs to test Option 2 of Alton Study 2013 which includes sites to the north of Alton, in particular Land West of Old Odiham Road. As stated in paragraph 16.1.1 of the appraisal which reads: *'subsequent to the current consultation the Council will consider representations before preparing the formal draft 'Pre-*

*submission' version of the plan. It may also be necessary to undertaken further appraisal of site options (or alternatives, e.g. alternative uses for particular preferred sites) in order to inform preparation of the Pre-Submission Plan.'*

Therefore, the URS Sustainability appraisal should be re-run, to include a testing scenario that the includes sites to the north of Alton, including the site west of Old Odiham Road.

## **Conclusion**

Paragraph 154 of the NPPF requires Local Plans to be aspirational and should set out the opportunities for development. We consider the draft Site Allocations Document to be restrictive rather than aspirational, through lack of assessment of the most sustainable site in Alton for housing, land west of Old Odiham Road and thus excluding it from the proposed options.

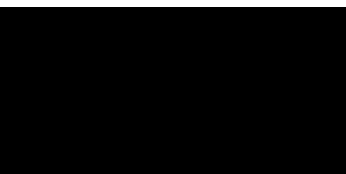
The draft Site Allocations document also places too much emphasis on the Alton Neighbourhood Plan which is based on flawed and inaccurate evidence and should not determine the contents of the Local Plan. The Draft Site Allocations as currently drafted does not ensure it is doing all it can to support sustainable economic growth and maximise sustainable housing delivery in Alton.

## **Next Steps**

We recommend that the Sustainability Appraisal undertaken by URS explores the option of the site west of Old Odiham Road further. In addition, as per our correspondence in November 2014 we are keen to ensure the Council are aware that the Neighbourhood Plan discounts the site for inaccurate reasons as it is based on a flawed evidence base and is therefore unsound.

In addition we consider the Draft Allocations Plan is an opportunity to allocate additional housing sites in Alton that are sustainable and can help deliver the significant housing need in Alton.

I trust this is acceptable. If you have any further questions do not hesitate to contact myself or Matt Roe and this office. I look forward to your formal confirmation of receipt.



**John Ferguson**  
**Associate Director**

# **APPENDIX A**

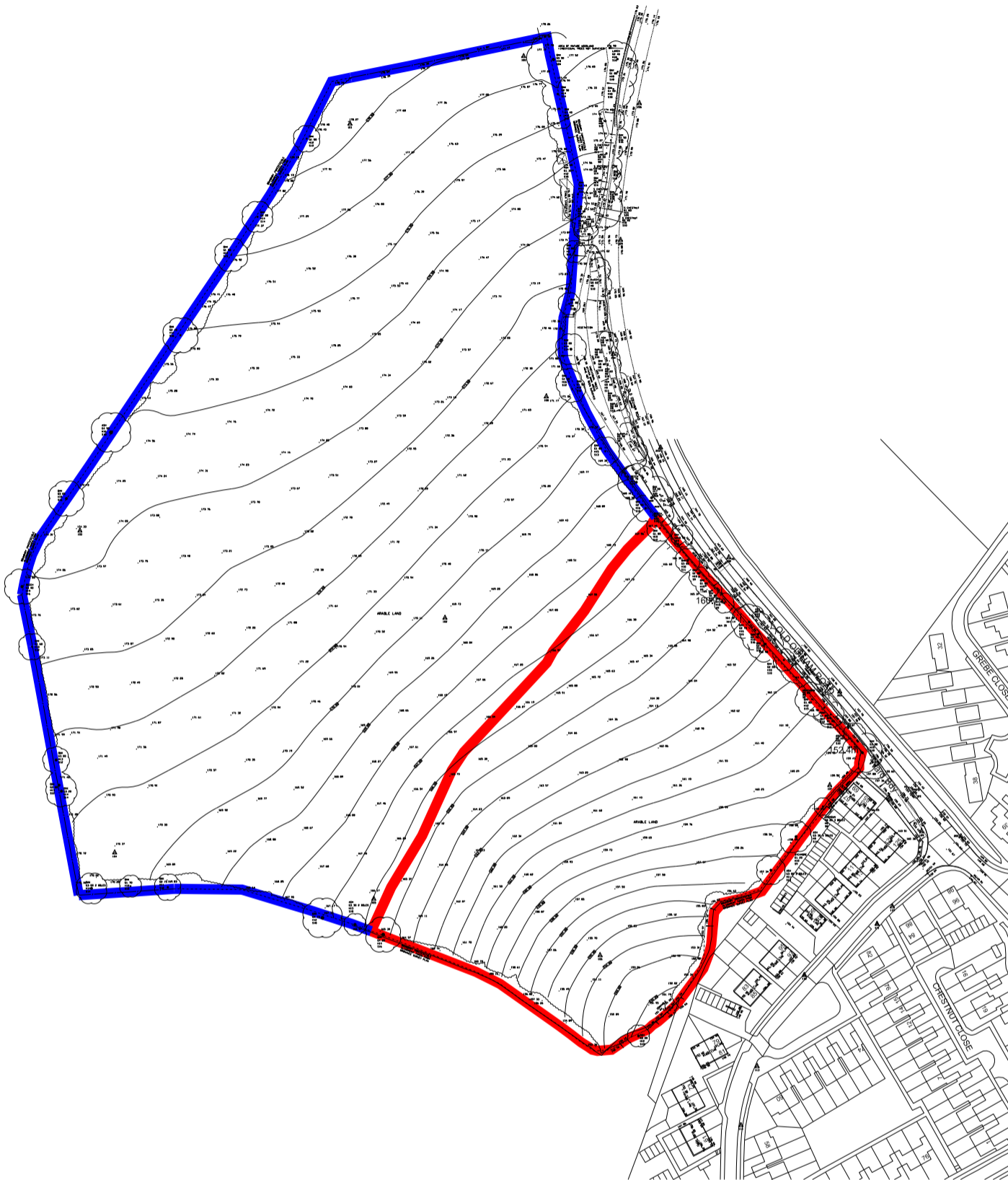
Notes:  
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 All construction information should be taken from figured dimensions only.  
 Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.  
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Key

— Site Application Boundary

— Ownership Boundary



P01	30.05.14	Planning Issue	PC	JH
Rev	Date	Description	Drawn	Chkd

Drawing Status  
**For Planning**

Client  
**David Meisels**

**JOHN THOMPSON & PARTNERS**



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Project  
**Land West of Old Oldham Road,  
 Alton**

Drawing Title  
**Site Location Plan**

Scale @ A3 1:2500 Job Ref. 00776

Drawing No. 00776 \_ S11 Revision P01

Scale Bar 0 20 40 60m



# **APPENDIX B**



SENT BY EMAIL TO [REDACTED]  
[REDACTED]

Our Ref: JF/JCG15532

Direct Dial: [REDACTED]

email address: [REDACTED]

Alton Town Council  
Town Hall  
Market Square  
Alton  
Hampshire  
GU34 1HD

2<sup>nd</sup> December 2014

Dear Sir,

**NEIGHBOURHOOD PLAN COMMENTS  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and have reviewed the public consultation material from the 22<sup>nd</sup> November 2014, where draft options were presented to the public.

Our client is very disappointed their site was not included within the draft site options.

We believe there are a number of errors with the site selection process and evidence base which has led to an unsound choice of selected sites. We would very much appreciate the opportunity to discuss these with you and try to address the concerns you have with our client's site within this letter.

I trust these can be taken into account by the Neighbourhood Plan steering group and Town Council when the consultation responses from the 22<sup>nd</sup> November are considered.

**Site Selection Criteria for Land West of Old Odiham Road**

***SHLAA Sustainability Appraisal***

The SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan has a number of errors that we have raised with EHDC and previously pointed out to you in a letter dated the 19<sup>th</sup> November 2014.

There were a number of errors with the initial sustainability assessment at appendix G of the SHLAA sustainability assessment that resulted in our site having a red box for access to employment (over 1600m away) and a yellow box for access to retail (over 800 metres away). The correct picture is retail provision within 500 metres of the site and employment provision within 1200 metres of the site. These boxes should therefore be changed to green for access to retail and yellow for access to employment.



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This therefore equates to 0 red, 4 yellow and 16 green boxes, making it the most sustainable site out of the sites selected in the Neighbourhood Plan. Giving the site a yellow box in Annex C of the ANP Site Selection Methodology is therefore incorrect, as is the evidence base this methodology is based on.

Site	SHLAA Sustainability Assessment		
	R	Y	G
AL005 Cadnam Farm	0	7	13
AI002 Borovere Farm and Lord Mayor Treloar	0	9	11
AL033 Will Hall Farm	0	7	13
Highmead House	1	5	14
AL026 Land of Wilsom Road	0	5	15
AL042 Land adjacent to convent	0	5	15
<b>Old Odiham Road</b>	<b>0</b>	<b>4</b>	<b>16</b>

As can be seen the site is therefore in the most sustainable location out of the SHLAA sites and has the most green boxes and least red and yellow boxes. It is certainly more sustainable than the other Neighbourhood Plan Sites. This should therefore be shown as green in Annex C of the ANP Site Selection Methodology. As you are aware paragraph 072 of the National Planning Practice Guidance requires Neighbourhood Plans to guide development to the most sustainable solutions, and that material produced as part of the Sustainability Appraisal of the Local Plan may be relevant, which is the case here.

### **Community Support**

We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications currently pending determination is of key note, and should be considered in addition to the neighbourhood plan feedback from February 2014.

The feedback from the February consultation into potential sites is potentially flawed, as it was based on the number of dwellings within the SHLAA allocation as opposed to the numbers of dwellings the different applications relate to, and the number of dwellings included in the most recent November neighbourhood plan draft allocations. The views therefore received from the February consultation were based on a very different number of dwellings at these sites than the most recent consultation.

A more accurate and up to date reflection of local views on the proposed housing numbers for the sites is encapsulated in the number of objections registered for each planning application at the key sites, currently in for planning, that should be considered along with the responses from the Neighbourhood Plan feedback from February 2014.

This is summarised in the table below.

<b>Site</b>	<b>No. units consulted on in February 2014</b>	<b>Rank from Neighbourhood Plan Feedback (1- most favourable, 5 least)</b>	<b>Number of units in application</b>	<b>No. objections to planning application</b>
Cadnam Farm	150	2	275	162
Borovere Farm and Lord Mayor Treloar	420	1	530	111
Will Hall Farm	150	5	200	350
Highmead House	100	4	120	134
AL026 Land of Wilsom Road	Not consulted		No app	
AL042 Land adjacent to convent	Not consulted		No app	
<b>Old Odiham Road</b>	<b>60</b>	<b>3</b>	<b>97</b>	<b>48</b>

As can be seen in this table, the application at Old Odiham Road has by far the least number of local objections of 48 for the current application, and a very similar amount of local opposition as Cadnams Farm from the neighbourhood plan feedback. This would place Old Odiham the second most popular site for development according to local opinion. Annex C of the ANP Site Selection Methodology should therefore reflect this and Old Odiham Road should be changed from red to a yellow or green.

### **Landscape Capacity Study: SHLAA Site Assessment**

The East Hants SHLAA Landscape Capacity Study: Sites Assessment provides a very broad brush, subjective view on the landscape impact of sites.

The study's comments on the Old Odiham Road site AL002-4 are the same as AL001-4 Highmead House.

As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land.*

This pre-application feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above, and considers the skyline of Alton can be retained.

Therefore at Annex C of the ANP Site Selection Methodology, for the Landscape Capacity Study: SHLAA Site Assessment, the box ticked red is incorrect and should be yellow, based on the above, which is a more accurate, objective and up to date review of the impact of developing the site on Alton's skyline.

### **Alton Town Design Statement**

Annex C of the ANP Site Selection Methodology puts a red box against the Alton Town Design Statement.

The Alton Town Design Statement seeks to preserve Alton's skyline. The above section and the Landscape Visual Impact Assessment of the application at Land West of Old Odiham Road clearly demonstrates development of the site can preserve Alton's skyline. Therefore against the Alton Town Design Statement at annex c of the ANP Site Selection Methodology the red box should be changed to yellow.

### ***Alton Study***

Annex C of the Alton Neighbourhood Plan Site Selection Methodology currently has a blank box for the Alton Study criteria.

This should be changed to green and 'yes', as the site is included within this study, as Option Two and within Growth Option 2.

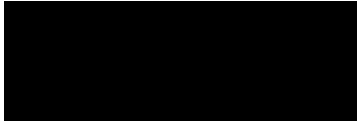
### ***Conclusion***

Therefore as you can see there are a number of inaccuracies with the site selection criteria as well as unsound evidence documents used at Annex C of the Alton Neighbourhood Plan Site Selection Methodology, which has led to the exclusion of site Land West of Old Odiham Road.

We would very much appreciate if we could organise a meeting with yourselves at the earliest opportunity to discuss your concerns with the site, and also how this site and the above can be seriously considered in further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours faithfully,

A solid black rectangular box redacting the signature of John Ferguson.

**John Ferguson**  
**Associate Director**

Our Ref: JF/JCG15532

Direct Dial: [REDACTED]

email address: [REDACTED]

Alton Town Council  
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Newark

19 November 2014

Dear Sir,

**NEIGHBOURHOOD PLAN – REQUEST FOR MEETING  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and understand there is a public consultation event on 22<sup>nd</sup> November where draft options will be presented.

I appreciate Alton is facing a challenging prospect with the need to find sites for a minimum of 700 new homes with no obvious or easy choice of where these should go.

To that extent we would very much appreciate a meeting with yourselves to discuss our site.

***Landscape Impact Concerns***

We particularly would like to discuss the concerns you may have regarding the impact of our proposals on Alton's skyline. As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Since our initial meetings and my last letter, CgMs have undertaken significant further assessment of the prominence and visibility of the site within key short, middle and long distance viewpoints. This work has been valuable in identifying available views of importance and helping to demonstrate the significance of the effects which development of the land (within potential key viewpoints) will cause. As you are aware a number of sites were put forward in the SHLAA process including land along the northern aspect of Alton. These sites, including this one, are elevated in the landscape and likely to lead to development that is more prominent and more influential on landscape character and the townscape setting of*

*Alton. The Council's Principal Landscape Officer reviewed these sites and I have mentioned his advice in my previous correspondence.*

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. While I do not think that the exercise can be relied on to have ruled out any and all public viewpoints I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints (which I have not visited to verify) seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land, having regard to the relevant goals of the NPPF and the Council's housing land supply shortfall.*

This initial feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above. We would very much welcome an opportunity to discuss this with you and take you through our landscape impact assessment, as we feel this may help reassure you of the landscape impact concerns of this site. We would also be willing to discuss other ways you consider could help minimise landscape impact.

**SHLAA Sustainability Assessment**

In addition you will see from the SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan, the site is the most sustainable out of the large sites currently in for planning. (There was an error with the initial sustainability assessment that resulted in our site having a red box for access to employment and a yellow box for access to retail. There is retail provision within 800 metres of the site and employment provision within 1200 metres of the site.) We have therefore requested this appraisal is amended to reflect this and it should therefore be corrected to show 0 red, 4 yellow and 16 green boxes.

Site	SHLAA Sustainability Assessment		
	R	Y	G
Cadnam Farm	0	7	13

Borovere Farm and Lord Mayor Treloar	0	9	11
Will Hall Farm	0	7	13
Highmead House	1	5	14
Old Odiham Road*	1	4	15

\*Sustainability assessment being challenged. It should read RED 0, YELLOW 4, GREEN 16

As can be seen the site is therefore in the most sustainable location.

### **Community Support**

We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications is quite telling. This is summarised below and as you will see our application has by far the least local objections of 48.

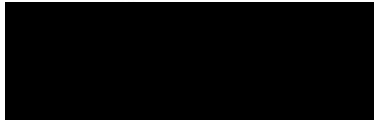
Site	Application Reference	Number of units	No. objections to planning app
Cadnam Farm	55428/001	275	162
Borovere Farm and Lord Mayor Treloar	30021/056	530	111
Will Hall Farm	55222/001	200	350
Highmead House	55250/001	120	134
Old Odiham Road	55097/001	97	48



As mentioned it would be appreciated if we could organise a meeting with yourselves to discuss your concerns with the site, and also if this site and the above could be seriously considered at your upcoming consultation event and further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours sincerely,



**John Ferguson**  
**Associate Director**

## Sophie Hinton

---

**From:** John Ferguson  
**Sent:** 11 November 2014 14:26  
**To:** 'Jennifer.howard@easthants.gov.uk'  
**Cc:** Bethan Hawkins  
**Subject:** 11.11.14 JF:JH East Hants Strategic Housing Land Availability Assessment - Site AL047.  
**Attachments:** East Hants Strategic Housing Land Availability Assessment 1.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Jennifer,

I email regarding the recently published East Hants Strategic Housing Land Availability Assessment and in particular the Appendices. I write on behalf of my client and the landowner of a site in Alton AL047 – Land West of Old Odiham Road.

We have concern with the accuracy of the sustainability appraisal of the sites at Appendix G. In particular access to retail facilities and access to employment have been calculated wrongly for the site.

### **Access to retail**

The categorisation given to the 'Access to Retail' of site reference AL047 is currently 'Yellow', the criteria for which is retail being 'between 800m and 1600m'. However, our research has identified that retail floor space is within 800m of the site. A Londis convenience store is within 500 metres of the site. In addition Wooteys Way retail parade is within 800 metres of the site.

This would put the site within the 'Green' category, which is defined as less than 800m.

### **Access to Employment**

The sustainability assessment defines access to employment as red i.e. over 1600m. However the site is within 1.2km of the High Street where there are offices and significant employment. The categorisation should therefore be changed to yellow to reflect this.

I trust the sustainability appraisal can be changed to reflect the above, and previous inaccuracies.

I attach maps and detail of distances to the facilities.

Please confirm receipt of this email and advise if you would like to discuss further.

Kind Regards

**John Ferguson BSc (Hons), PG Dip TP, MRTPI**

**Associate Director**

**Direct Dial:** [REDACTED]

**Mobile:** [REDACTED]

**Email Address:** [REDACTED]

## **CgMs Consulting**

*Planning, Archaeology & Historic Buildings Consultants*

7<sup>th</sup> Floor, 140 London Wall, London EC2Y 5DN

**Tel: 020 7583 6767**

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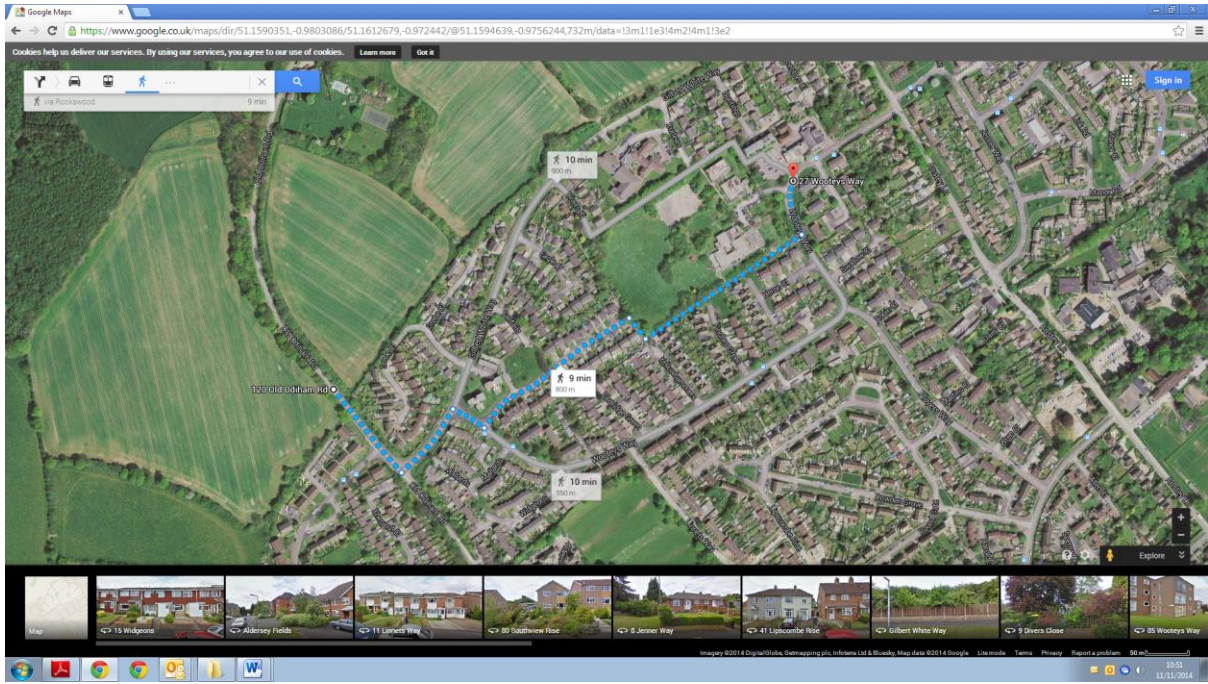
[www.cgms.co.uk](http://www.cgms.co.uk)

# East Hants Strategic Housing Land Availability Assessment

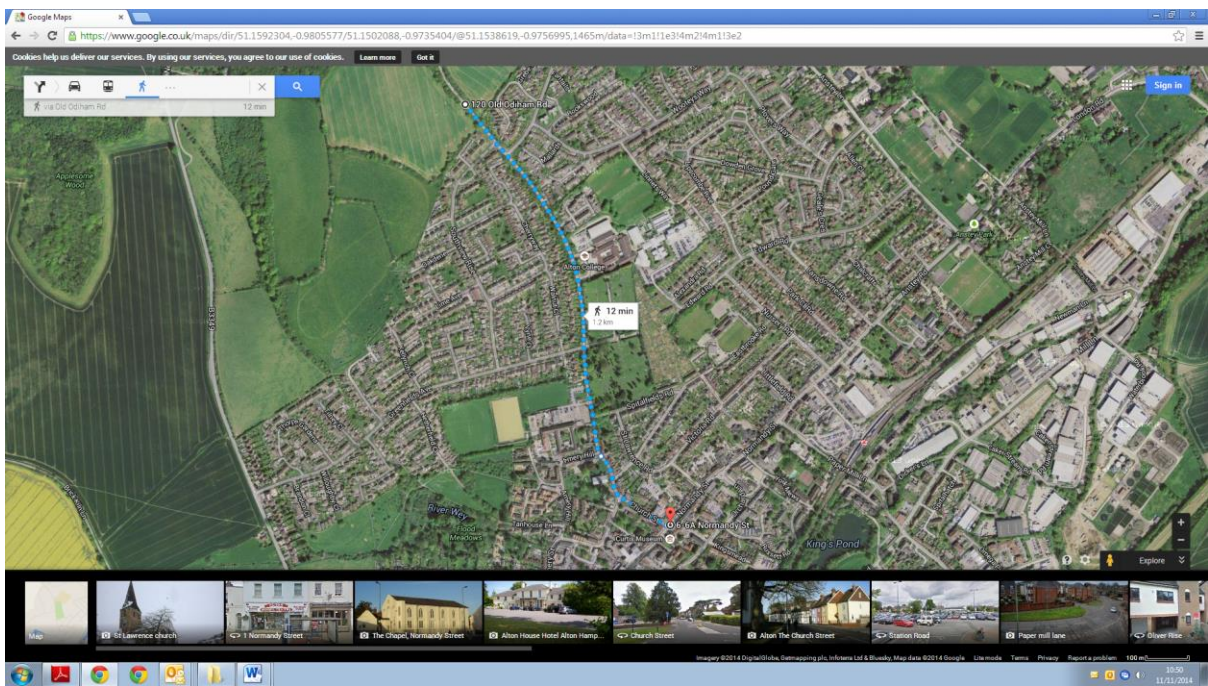
## AL047 – Land West of Old Odiham Road

### *Access to retail*





## Access to employment



# **APPENDIX D**



SENT BY EMAIL: [REDACTED]  
[REDACTED]  
[REDACTED]

Our Ref: JF/JCG15532  
Direct Dial: [REDACTED]  
email address: [REDACTED]

Alton Town Council  
Town Hall  
Market Square  
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Hampshire, GU34 1HD

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Offices also at:  
Birmingham, Cheltenham,  
Dorset, Edinburgh,  
Kettering, Manchester,  
Newark

30<sup>th</sup> March 2015

Dear Sir,

**PRE-SUBMISSION CONSULTATION DRAFT NEIGHBOURHOOD PLAN  
FEBRUARY 2015  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site (Site Location Plan at **Appendix A**). We have been following the neighbourhood planning process and have reviewed the public consultation material from the 22<sup>nd</sup> November 2014 and the Pre-submission Consultation Draft Alton Neighbourhood Plan published in February 2015. In addition we have met with you on the 23<sup>rd</sup> January 2015 (meeting request at **Appendix B**).

CgMs submitted an application for the development of 98 residential dwellings, associated landscaping and transport provisions, at the Land west of Old Odiham Road in Alton, (LPA ref. 55097/001) which was refused on 23rd December 2014.

Our client is very disappointed their site was not included within the draft site options and the Housing Policy (HO3) which allocates new housing in Alton to specific sites.

We believe there are a number of errors with the site selection process and evidence base, which we have previously pointed out but this has not been taken into consideration, which has led to an unsound choice of selected sites which has now been presented in the draft housing policy.

I trust these can be taken into account by the Neighbourhood Plan Steering Group and Town Council when the responses from this consultation are considered.

**Background to Representations**

On 2nd December 2014 (attached at **Appendix C**), CgMs made representations to Alton Town Council on the draft policy site options. Specifically representations were made on the site selection criteria, community support and landscape impacts. The representations detailed key discrepancies with the site and policy options. Specifically errors with the evidence base and initial sustainability assessment were identified, including appendix G which misrepresented our client's site in relation to the SHLAA Sustainability Assessment. It was therefore highlighted that the

proposal site presented one of the most sustainable locations out of the SHLAA sites in Alton.

On 6<sup>th</sup> February 2015 (attached at **Appendix D**) CgMs reviewed the Council's draft Site Allocations Plan and the supporting evidence provided in the Sustainability Appraisal by URS. In addition to the above consultation, CgMs have highlighted that the following documents are unsound for the following reasons:

- Housing allocations within the draft Alton Neighbourhood Plan, that the Draft Site Allocations Plan relies on, do not go far enough to deliver sufficient levels of housing for Alton;
- The URS Sustainability Appraisal supports the site for housing but fails to test it as an option, despite recognising the importance of considering all alternatives.

CgMs have concluded from the consultations to date that the draft Site Allocations document also places too much emphasis on the Alton Neighbourhood Plan which is based on flawed and inaccurate evidence and should not determine the contents of the Local Plan. The Draft Site Allocations as drafted does not ensure it is doing all it can to support sustainable economic growth and maximise sustainable housing delivery in Alton.

### **Inaccurate Evidence Base of the Neighbourhood Plan**

There are a number of inaccuracies in the process that allocated the housing sites within the neighbourhood plan, which are set out in the below paragraphs.

### **Policy HO3: New Housing Site Allocations**

Draft Policy HO3 identifies six specific sites for housing to deliver the total allocation of 781 new dwellings over the plan period to 2028. Paragraph 47 of the NPPF identifies that Councils should ensure that their local plans meet the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area.

#### *The Housing Allocation*

This policy and the policy table relies on the delivery of every permitted scheme. In addition it has been detailed in recent appeal decisions the need to increase the 5% buffer to 20% to take account of the record of persistent under delivery of housing (Cheshire East Decision Appeal Decision Ref.APP/R0660/A/14/2216767). The NPPF guidance requires a longer term view to be taken in addressing this issue.

East Hampshire District Council have applied a 5% buffer to their Five Year Housing Land Supply. The document details that the council have exceeded the target set in relation to the revoked South East Plan (SEP) and the housing requirements of the East Hampshire District Local Plan: Second Review (1996 2011). The Council state that they have achieved the baseline housing requirement figure (practically) with 5,427 completions out of a requirement of 5,500 dwellings in 2011. However, the plan period of the Joint Core Strategy was back dated to April 2011 and there has been an identified under-provision over the last 3 years of the plan which required 592 dwellings to be delivered across the district per annum. Although it can be argued that an under provision should be assessed over a longer period of time, we consider that given the current market East Hampshire District Council have not substantially met targets to respond to the housing need. We therefore believe the

council has persistently under delivered and a 20% buffer should be applied to account for this.

As detailed within the Draft Housing Policy HO3 the appropriate buffer to compensate for the prolonged under delivery has not been applied to the basis of the policy. The policy therefore restricts the number of dwellings that can be delivered on each site which is not a true representation of the housing allocation in Alton. A 20% buffer would increase the need for Alton to allocate sites to deliver 840 dwellings, rather than the currently proposed 781. This shortfall could be sustainability delivered on our client's site, Land West of Old Odiham Road.

### *The Delivery of Housing*

The draft Housing Policy further details each site and details the key elements of the proposal in line with a proposed masterplan. However, within these detailed policies the deliverability of the sites is not included and the draft policy relies upon the full allocation being fully delivered. The draft policy assumes that the sites are available and it is achievable and viable to deliver housing to meet the current housing needs.

Paragraph 6 of the NPPF states that to be considered 'deliverable' sites should be available now, offer a suitable location now, and be achievable with a realistic prospect that housing will be delivered within five years and in particular that the site is viable. We do not believe it is realistic that the total allocation of dwellings will be delivered within the 5 year period for the following reasons:

- a) Phasing of development, lead-in times and build rates for these strategic sites;
- b) Assumed supply from the sites without planning permission (these sites have yet to be considered through the local plan process and could be/are subject to local opposition); and
- c) Viability concerns regarding planning obligations and signed S106 agreements.

The delivery of the dwellings appended to the Five Year Housing Supply and which this draft policy is based upon is unrealistic within the five year period and therefore this appeal should attract paragraph 14 of the NPPF 'Presumption in Favour of Sustainable Development' due to the inaccuracies of the deliverability within the five year period.

### *The location of Housing*

The seventh core planning principle of the NPPF states '*allocations of land for development should prefer land of lesser environmental quality*'. Chapter 11 specifically requires great weight to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. It outlines the unacceptability of major development in these designated areas except in exceptional circumstances, and directs development away from these areas.

Unlike the majority of the rest of the district and other sites promoted through the SHLAA process this site is not subject to any specific designations by the Local Plan Proposals Map. The site adjoins Alton but is not within:

- Green Belt;
- Sites of Importance for Nature Conservation;



- Sites of Special Scientific Interest;
- Conservation Area;
- Special Area of Conservation (SAC);
- Special Protection Area (SPA);
- Local Gap;
- Area of Outstanding Natural Beauty.

It should be noted that a scheme located within Alton with similar planning principles (i.e. outside of the policy boundary) but of a larger scale was granted planning permission at committee on 4<sup>th</sup> February 2015 (Application ref. 30021/056 Land at Lord Mayor Treloar Hospital Site and Land East of Selborne Road, Alton). This was at a lesser sustainable location than Land West of Old Odiham but still considered by the council to be sustainable development that would significantly boost Alton's housing supply.

The site at Land West of Old Odiham Road therefore offers the opportunity for development on land that is not designated to be of specific natural/scientific/ecological value, and will ultimately reduce the pressure to develop higher quality natural environments that are subject to the above designations in other parts of the District.

### **Policy DE1: Town Setting and Natural Assets**

Policy DE1 details that all new development in Alton must ensure that it is able to at least maintain wherever possible enhance the appearance and setting of the town.

The policy further details that 'new development must respect key views into and out of the town, in particular from the National Park to the south, through the preservation or preferably the enhancement of the important views afforded by the vistas and gateways leading into and out of Alton. Any new development should demonstrate how it has reacted positively to opportunities to enhance the appearance of key entrances to the town'.

During the application process (LPA ref. 55097/001), CgMs worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This extensive exercise far exceeds the brief Landscape Capacity study undertaken for the SHLAA. In addition, it should be noted that Further inaccuracies within the Landscape Capacity study which forms a basis for the SHLAA site assessment were also identified, in particular the broad brush nature of and subjective view of the landscape impacts of the sites

As part of this exercise an extensive Landscape Visual Impact Assessment was undertaken alongside a Zone of Theoretical Vision, followed by a robust and very accurate photographic assessment of the key views.

Therefore, this detailed evidence clearly demonstrated the impact of the site on the landscape is minimal and is contrary to the broad brush landscape capacity study the neighbourhood plan relies upon. Therefore, this more detailed approach objectively assessing the landscape impact of the site must attract material weight when considering the Site Allocations for housing in Alton and also highlights further inaccuracies within the draft policy DE1 included within the Neighbourhood Plan.

### **The Site at Land West of Old Odiham Road**

The site would assist and provide high quality housing for Alton to meet the current housing demand. The proposal site has the capacity to deliver housing which would respond to the short term delivery of significant housing. Delivery would be within 3 years and therefore would meet the short term housing need which other identified sites in East Hampshire cannot. In addition, the site would have a social and economic role and contribute towards the positive and sustainable growth of Alton. In summary, the site at Land West of Old Odiham Road is a highly sustainable form of development for Alton.

### **Conclusion**

Therefore as you can see there are a number of inaccuracies with the site selection criteria as well as unsound evidence documents which have been used to draft Policy HO3 and DE1 which has led to the exclusion of site Land West of Old Odiham Road. We therefore disagree with the above detailed policies due to the unsound evidence base which they have evolved from. The site at Land West of Old Odiham Road provides a sustainable form of development in accordance with the NPPF which would meet the short term housing need.

Please do not hesitate to contact me or Matthew Roe if you would like to discuss further.

Yours faithfully,



**John Ferguson**  
**Associate Director**

# **APPENDIX A**

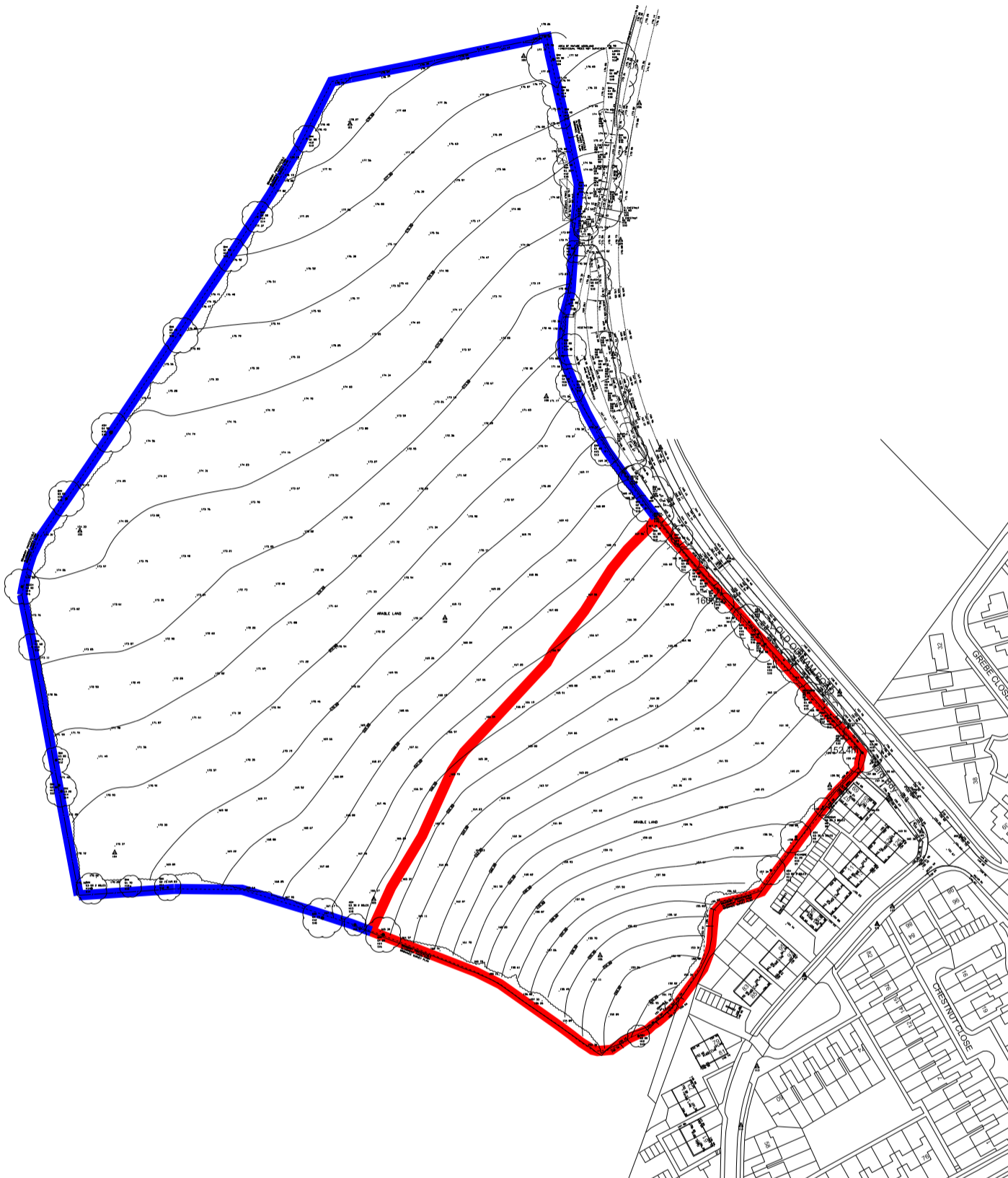
Notes:  
 Do not scale from this drawing.  
 All contractors must visit the site and be responsible for taking and checking Dimensions.  
 All construction information should be taken from figured dimensions only.  
 Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.  
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Key

— Site Application Boundary

— Ownership Boundary



P01 30.05.14 Planning Issue PC JH

Rev	Date	Description	Drawn	Chkd

Drawing Status

**For Planning**

Client

**David Meisels**

**JOHN THOMPSON & PARTNERS**



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 London, EC1V 0DN  
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Project

**Land West of Old Oldham Road,  
 Alton**

Drawing Title

**Site Location Plan**

Scale @ A3 1:2500 Job Ref. 00776

Drawing No. 00776 \_ S11 Revision P01



# **APPENDIX B**

Our Ref: JF/JCG15532

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email address: [REDACTED]

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Offices also at:  
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Dorset, Edinburgh,  
Kettering, Manchester,  
Newark

19 November 2014

Dear Sir,

**NEIGHBOURHOOD PLAN – REQUEST FOR MEETING  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and understand there is a public consultation event on 22<sup>nd</sup> November where draft options will be presented.

I appreciate Alton is facing a challenging prospect with the need to find sites for a minimum of 700 new homes with no obvious or easy choice of where these should go.

To that extent we would very much appreciate a meeting with yourselves to discuss our site.

***Landscape Impact Concerns***

We particularly would like to discuss the concerns you may have regarding the impact of our proposals on Alton's skyline. As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Since our initial meetings and my last letter, CgMs have undertaken significant further assessment of the prominence and visibility of the site within key short, middle and long distance viewpoints. This work has been valuable in identifying available views of importance and helping to demonstrate the significance of the effects which development of the land (within potential key viewpoints) will cause. As you are aware a number of sites were put forward in the SHLAA process including land along the northern aspect of Alton. These sites, including this one, are elevated in the landscape and likely to lead to development that is more prominent and more influential on landscape character and the townscape setting of*

*Alton. The Council's Principal Landscape Officer reviewed these sites and I have mentioned his advice in my previous correspondence.*

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. While I do not think that the exercise can be relied on to have ruled out any and all public viewpoints I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints (which I have not visited to verify) seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land, having regard to the relevant goals of the NPPF and the Council's housing land supply shortfall.*

This initial feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above. We would very much welcome an opportunity to discuss this with you and take you through our landscape impact assessment, as we feel this may help reassure you of the landscape impact concerns of this site. We would also be willing to discuss other ways you consider could help minimise landscape impact.

**SHLAA Sustainability Assessment**

In addition you will see from the SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan, the site is the most sustainable out of the large sites currently in for planning. (There was an error with the initial sustainability assessment that resulted in our site having a red box for access to employment and a yellow box for access to retail. There is retail provision within 800 metres of the site and employment provision within 1200 metres of the site.) We have therefore requested this appraisal is amended to reflect this and it should therefore be corrected to show 0 red, 4 yellow and 16 green boxes.

Site	SHLAA Sustainability Assessment		
	R	Y	G
Cadnam Farm	0	7	13

Borovere Farm and Lord Mayor Treloar	0	9	11
Will Hall Farm	0	7	13
Highmead House	1	5	14
Old Odiham Road*	1	4	15

\*Sustainability assessment being challenged. It should read RED 0, YELLOW 4, GREEN 16

As can be seen the site is therefore in the most sustainable location.

### **Community Support**

We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications is quite telling. This is summarised below and as you will see our application has by far the least local objections of 48.

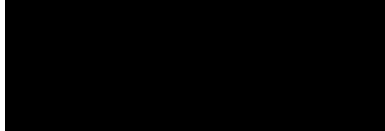
Site	Application Reference	Number of units	No. objections to planning app
Cadnam Farm	55428/001	275	162
Borovere Farm and Lord Mayor Treloar	30021/056	530	111
Will Hall Farm	55222/001	200	350
Highmead House	55250/001	120	134
Old Odiham Road	55097/001	97	48



As mentioned it would be appreciated if we could organise a meeting with yourselves to discuss your concerns with the site, and also if this site and the above could be seriously considered at your upcoming consultation event and further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours sincerely,



**John Ferguson**  
**Associate Director**

# **APPENDIX C**

SENT BY EMAIL TO [REDACTED]



Our Ref: JF/JCG15532

Direct Dial: [REDACTED]

email address: [REDACTED]

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London EC2Y 5DN

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Kettering, Manchester,  
Newark

Alton Town Council  
Town Hall  
Market Square  
Alton  
Hampshire  
GU34 1HD

2<sup>nd</sup> December 2014

Dear Sir,

### **NEIGHBOURHOOD PLAN COMMENTS LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and have reviewed the public consultation material from the 22<sup>nd</sup> November 2014, where draft options were presented to the public.

Our client is very disappointed their site was not included within the draft site options.

We believe there are a number of errors with the site selection process and evidence base which has led to an unsound choice of selected sites. We would very much appreciate the opportunity to discuss these with you and try to address the concerns you have with our client's site within this letter.

I trust these can be taken into account by the Neighbourhood Plan steering group and Town Council when the consultation responses from the 22<sup>nd</sup> November are considered.

### **Site Selection Criteria for Land West of Old Odiham Road**

#### ***SHLAA Sustainability Appraisal***

The SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan has a number of errors that we have raised with EHDC and previously pointed out to you in a letter dated the 19<sup>th</sup> November 2014.

There were a number of errors with the initial sustainability assessment at appendix G of the SHLAA sustainability assessment that resulted in our site having a red box for access to employment (over 1600m away) and a yellow box for access to retail (over 800 metres away). The correct picture is retail provision within 500 metres of the site and employment provision within 1200 metres of the site. These boxes should therefore be changed to green for access to retail and yellow for access to employment.

This therefore equates to 0 red, 4 yellow and 16 green boxes, making it the most sustainable site out of the sites selected in the Neighbourhood Plan. Giving the site a yellow box in Annex C of the ANP Site Selection Methodology is therefore incorrect, as is the evidence base this methodology is based on.

Site	SHLAA Sustainability Assessment		
	R	Y	G
AL005 Cadnam Farm	0	7	13
AI002 Borovere Farm and Lord Mayor Treloar	0	9	11
AL033 Will Hall Farm	0	7	13
Highmead House	1	5	14
AL026 Land of Wilsom Road	0	5	15
AL042 Land adjacent to convent	0	5	15
<b>Old Odiham Road</b>	<b>0</b>	<b>4</b>	<b>16</b>

As can be seen the site is therefore in the most sustainable location out of the SHLAA sites and has the most green boxes and least red and yellow boxes. It is certainly more sustainable than the other Neighbourhood Plan Sites. This should therefore be shown as green in Annex C of the ANP Site Selection Methodology. As you are aware paragraph 072 of the National Planning Practice Guidance requires Neighbourhood Plans to guide development to the most sustainable solutions, and that material produced as part of the Sustainability Appraisal of the Local Plan may be relevant, which is the case here.

### **Community Support**

We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications currently pending determination is of key note, and should be considered in addition to the neighbourhood plan feedback from February 2014.

The feedback from the February consultation into potential sites is potentially flawed, as it was based on the number of dwellings within the SHLAA allocation as opposed to the numbers of dwellings the different applications relate to, and the number of dwellings included in the most recent November neighbourhood plan draft allocations. The views therefore received from the February consultation were based on a very different number of dwellings at these sites than the most recent consultation.

A more accurate and up to date reflection of local views on the proposed housing numbers for the sites is encapsulated in the number of objections registered for each planning application at the key sites, currently in for planning, that should be considered along with the responses from the Neighbourhood Plan feedback from February 2014.

This is summarised in the table below.

<b>Site</b>	<b>No. units consulted on in February 2014</b>	<b>Rank from Neighbourhood Plan Feedback (1- most favourable, 5 least)</b>	<b>Number of units in application</b>	<b>No. objections to planning application</b>
Cadnam Farm	150	2	275	162
Borovere Farm and Lord Mayor Treloar	420	1	530	111
Will Hall Farm	150	5	200	350
Highmead House	100	4	120	134
AL026 Land of Wilsom Road	Not consulted		No app	
AL042 Land adjacent to convent	Not consulted		No app	
<b>Old Odiham Road</b>	<b>60</b>	<b>3</b>	<b>97</b>	<b>48</b>

As can be seen in this table, the application at Old Odiham Road has by far the least number of local objections of 48 for the current application, and a very similar amount of local opposition as Cadnams Farm from the neighbourhood plan feedback. This would place Old Odiham the second most popular site for development according to local opinion. Annex C of the ANP Site Selection Methodology should therefore reflect this and Old Odiham Road should be changed from red to a yellow or green.

### **Landscape Capacity Study: SHLAA Site Assessment**

The East Hants SHLAA Landscape Capacity Study: Sites Assessment provides a very broad brush, subjective view on the landscape impact of sites.

The study's comments on the Old Odiham Road site AL002-4 are the same as AL001-4 Highmead House.

As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land.*

This pre-application feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above, and considers the skyline of Alton can be retained.

Therefore at Annex C of the ANP Site Selection Methodology, for the Landscape Capacity Study: SHLAA Site Assessment, the box ticked red is incorrect and should be yellow, based on the above, which is a more accurate, objective and up to date review of the impact of developing the site on Alton's skyline.

### **Alton Town Design Statement**

Annex C of the ANP Site Selection Methodology puts a red box against the Alton Town Design Statement.

The Alton Town Design Statement seeks to preserve Alton's skyline. The above section and the Landscape Visual Impact Assessment of the application at Land West of Old Odiham Road clearly demonstrates development of the site can preserve Alton's skyline. Therefore against the Alton Town Design Statement at annex c of the ANP Site Selection Methodology the red box should be changed to yellow.

### ***Alton Study***

Annex C of the Alton Neighbourhood Plan Site Selection Methodology currently has a blank box for the Alton Study criteria.

This should be changed to green and 'yes', as the site is included within this study, as Option Two and within Growth Option 2.

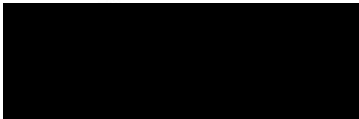
### ***Conclusion***

Therefore as you can see there are a number of inaccuracies with the site selection criteria as well as unsound evidence documents used at Annex C of the Alton Neighbourhood Plan Site Selection Methodology, which has led to the exclusion of site Land West of Old Odiham Road.

We would very much appreciate if we could organise a meeting with yourselves at the earliest opportunity to discuss your concerns with the site, and also how this site and the above can be seriously considered in further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours faithfully,

A solid black rectangular box used to redact the signature of John Ferguson.

**John Ferguson**  
**Associate Director**

# **APPENDIX D**



Our Ref: JF/MR/15332

email address: [REDACTED]

Direct Dial: [REDACTED]

Planning, Regeneration and Economy  
East Hampshire District Council  
Petersfield  
Hampshire  
GU31 4EX



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Dorset, Edinburgh,  
Kettering, Manchester,  
Newark

6<sup>th</sup> February 2015

Dear Sir / Madam,

**LAND WEST OF OLD ODIHAM ROAD, ALTON  
EAST HAMPSHIRE DISTRICT LOCAL PLAN PART 2: HOUSING AND  
EMPLOYMENT ALLOCATIONS (DRAFT SITE ALLOCATIONS PLAN)**

I write on behalf of my client, David Meisels, with regard to the Council's Local Plan Part 2: Housing and Employment Allocations (Draft Site Allocations Plan) which is currently out for public consultation. Our client wishes to make representations to this Draft Site Allocations Plan to promote their site Land West of Old Odiham Road, Alton (site plan attached at **Appendix A**).

This letter sets out the flawed process of the Draft Plan to rely on Neighbourhood Plan Allocations for housing sites in Alton, and should be read in conjunction with the representations made to the Call for Sites, 16<sup>th</sup> June 2014.

**Site Description**

The site comprises a 10 hectare field currently in use as arable farmland. The site is bound by housing to the south at Southview Rise, thick hedging and Old Odiham Road to the east, Averley Wood to the north and public open space to the west.

The site has been previously promoted through the SHLAA process. The site was promoted through the fifth tranche of sites in 2013, and the southern third of the site was included within the SHLAA (ref AL002-4 Land West of Old Odiham Road) as it was considered the landscape impact of this part of the site could potentially be mitigated, as well as a need for new sites to meet the identified housing need in the district.

The site was promoted through the sixth tranche in 2014, and the southern third was included within the SHLAA.

The site is available, suitable and achievable for residential development. Below sets out the suitability of the site and justification for its promotion in the Draft Housing and Employment Locations.

**Objections and Concerns**

Having reviewed the Council's draft Site Allocations Plan, the Alton Neighbourhood Plan and supporting evidence provided in the Sustainability Appraisal by URS, we consider the draft Site Allocations is currently unsound.

We are concerned the site, Land West of Old Odiham Road, has not been allocated for housing in the draft Site Allocations document. I have set out the three reasons of concern below:

- The Neighbourhood Plan, upon which the site Allocations Document is heavily reliant on, is founded on inaccurate evidence and is therefore unsound;
- Housing allocations within the draft Alton Neighbourhood Plan, that the Draft Site Allocations Plan relies on, do not go far enough to deliver sufficient levels of housing for Alton;
- The URS Sustainability Appraisal supports the site for housing but fails to test it as an option, despite recognising the importance of considering all alternatives.

### **Inaccurate Evidence Base**

Section 3.1 of the draft Site Allocations Plan states the site allocation process for housing in Alton will be addressed as part of the emerging Alton Neighbourhood Plan.

We fundamentally disagree with this approach that relies on the Neighbourhood Forum to allocate appropriate sites for housing.

There are a number of inaccuracies in the process that allocated the housing sites within the neighbourhood plan, which are set out below.

### ***SHLAA Sustainability Assessment, 2014***

One key inaccuracy of the evidence base for this plan, is the EHDC SHLAA Sustainability Assessment (2014), that the URS Sustainability Appraisal refers to. The SHLAA Sustainability Appraisal at Appendix G sets out the access to retail facilities and employment access, when assessing the sustainability of the SHLAA sites.

This has been incorrectly calculated. We have previously submitted representations pointing out this error (dated 11<sup>th</sup> November 2014, 19<sup>th</sup> November 2014 and 2<sup>nd</sup> December 2014 these are enclosed at **Appendix B**), which I have summarised below:

#### *Access to retail*

The categorisation given to the 'Access to Retail' of site reference AL047 is currently 'Yellow', the criteria for which is retail being 'between 800m and 1600m'. However, our research has identified that retail floor space is within 800m of the site. A Londis convenience store is within 500 metres of the site. In addition Wooteys Way retail parade is within 800 metres of the site.

This would put the site within the 'Green' category, which is defined as less than 800m.

### *Access to Employment*

The sustainability assessment defines access to employment as red i.e. over 1600m. However the site is within 1.2km of the High Street where there are offices and significant employment. The categorisation should therefore be changed to yellow to reflect this.

We requested that the Sustainability Appraisal be amended to reflect the above corrections on 11<sup>th</sup> November 2014, however the Neighbourhood Plan has been progressed without consideration to updated accurate evidence. We therefore consider the draft Neighbourhood Plan allocations are unsound, and this process should not be relied on to accurately allocate housing sites in Alton.

### **Landscape Capacity Study**

Further inaccuracies within the Landscape Capacity study which forms a basis for the SHLAA site assessment were also identified, in particular the broad brush nature of and subjective view of the landscape impacts of the sites.

CgMs submitted an application for the development of 98 residential dwellings, associated landscaping and transport provisions, at the site west of Old Odiham Road in Alton, (LPA ref. 55097/001) which was refused on 23<sup>rd</sup> December 2014. During the application (LPA ref. 55097/001), we worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This extensive exercise far exceeds the brief Landscape Capacity study undertaken for the SHLAA. As part of this exercise an extensive Landscape Visual Impact Assessment was undertaken alongside a Zone of Theoretical Vision, followed by a robust and very accurate photographic assessment of the key views.

This work was particularly appreciated and accepted by officers from EHDC in the pre-application feedback we had on the scheme, dated 7<sup>th</sup> January 2014. This states:

*'Having reviewed the work carried out to date, with the assistance of the Senior Landscape architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in land around the settlement. In my view this land area is less influential on many key views out of an across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produce. I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land.'*

This pre-application feedback was consistent with the landscape officer's consultation response to the application, who supported the application given the above, and considered the skyline of Alton can be retained.

Therefore, this detailed evidence clearly demonstrates the impact of the site on the landscape is minimal and is contrary to the broad brush landscape capacity study the neighbourhood plan relies upon. Therefore, this more detailed approach objectively assessing the landscape impact of the site must attract material weight when considering the Site Allocations for housing in Alton and also highlights further inaccuracies within the neighbourhood plan.

### ***Consultation Process of Draft Site Options of Neighbourhood Plan***

The consultation process of the neighbourhood plan was also flawed, further drawing attention to the inaccuracies and inconsistencies in the approach to the plan.

The consultation process for the document was flawed as it was based on the number of dwellings within the SHLAA allocation as opposed to the numbers of dwellings the different applications relate to, and the number of dwellings included in the most recent November neighbourhood plan draft allocations.

The views therefore received from the February consultation were based on a very different number of dwellings at these sites than the most recent consultation in November 2014.

Given the above it is clear that little weight should be placed on the allocations within the Alton neighbourhood plan, as it contains significant inaccuracies, flaws in the process and faulty evidence.

### **The Draft Site Allocations Document Places too much Reliance on the Neighbourhood Plan**

The neighbourhood plan should compliment the Local Plan, however it is our opinion that the draft Local Plan: Site Allocations document places too much emphasis on the evidence base and subsequent conclusions of the Alton neighbourhood plan. We consider this does not go far enough in allocating enough housing for Alton.

Paragraph 184 of the NPPF states 'neighbourhood plans should reflect these policies (in the Local Plan) and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the local plan or undermine its policies.'

Core Strategy Policy 10 requires the provision of a minimum of 700 dwellings in Alton. The Sustainability Appraisal for the East Hampshire Core Strategy tested seven housing number scenarios for Alton. Option 6 tested an allocation at Alton for 1,380 dwellings. When appraised for sustainability, Alton came out as a highly sustainable location for housing in terms of employment and economy and transport and accessibility. This therefore demonstrated Alton was capable of sustainably delivering well in excess of 700 new houses, and led to the Inspector changing the wording in the policy to a minimum of 700 new homes. However the draft neighbourhood plan only contains an allocation of 781 which caps the housing provision in Alton. This will restrict the delivery of housing in Alton, and requires all the allocated sites in Alton to be deliverable.

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a gold thread running through both plan-making and decision-making (paragraph 14).

NPPF paragraph 19 states the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth.

Therefore the Draft Site Allocations Plan should be an opportunity to allocate sites well in excess of 781 homes, to ensure it does all it can to support sustainable economic growth and maximise sustainable housing delivery. The Plan must consider the most sustainable locations for development, which URS Sustainability Appraisal considers the site west of Old Odiham Road to be.

The NPPF encourages Neighbourhood Plans to support Local Plans, the evidence for which clearly states that the land west of Old Odiham Road is a viable and sustainably justifiable site for extended housing.

The NPPF confirms this in Para 157, which requires Local Plans to plan positively for the development required in the area. It requires sites to be allocated to promote development and flexible use of land. We therefore consider this draft Local Plan to not fully meet the aspirational requirements of the NPPF.

### **The Evidence Base for the Draft Local Plan is Flawed**

The URS Sustainability Appraisal of the East Hants Site Allocations Plan relies on the SHLAA Site Assessment and Sustainability Appraisal prepared by East Hants.

This Sustainability Appraisal recognises the site ref. AL047 as a housing option within Appendix 4. The Appraisal then sets out potential issues to these housing sites and notes that the Land West of Oldiham Road (ref. AL047) is a suitable and sustainable option for extended housing growth.

Further, Appendix 4 goes on to note that should the site be developed, it would be an *'extension to the housing estate on the west side of Old Odiham Road, which is much less extensive than the estate on the other (eastern) side of the road.'* The Sustainability Appraisal concludes by stating *'as only the lower part of the site is proposed for development, landscape impacts would not be severe.'*

Despite this positive appraisal of the site west of Old Odiham Road, it has not been considered within the Draft Housing and Employment Site Allocations Plan due to the lack of recognition in the Neighbourhood Plan. This is a flawed approach, particularly due to the inaccuracies in the evidence base of the Neighbourhood Plan which we have outlined above. This contradicts paragraph 14 of the NPPF which calls for a presumption in favour of sustainable development.

In addition to this, the site has not been included within the preferred options within Appendix 6 of the appraisal. The Sustainability Appraisal needs to test Option 2 of Alton Study 2013 which includes sites to the north of Alton, in particular Land West of Old Odiham Road. As stated in paragraph 16.1.1 of the appraisal which reads: *'subsequent to the current consultation the Council will consider representations before preparing the formal draft 'Pre-*

*submission' version of the plan. It may also be necessary to undertaken further appraisal of site options (or alternatives, e.g. alternative uses for particular preferred sites) in order to inform preparation of the Pre-Submission Plan.'*

Therefore, the URS Sustainability appraisal should be re-run, to include a testing scenario that the includes sites to the north of Alton, including the site west of Old Odiham Road.

## **Conclusion**

Paragraph 154 of the NPPF requires Local Plans to be aspirational and should set out the opportunities for development. We consider the draft Site Allocations Document to be restrictive rather than aspirational, through lack of assessment of the most sustainable site in Alton for housing, land west of Old Odiham Road and thus excluding it from the proposed options.

The draft Site Allocations document also places too much emphasis on the Alton Neighbourhood Plan which is based on flawed and inaccurate evidence and should not determine the contents of the Local Plan. The Draft Site Allocations as currently drafted does not ensure it is doing all it can to support sustainable economic growth and maximise sustainable housing delivery in Alton.

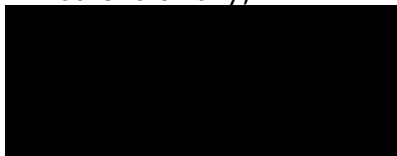
## **Next Steps**

We recommend that the Sustainability Appraisal undertaken by URS explores the option of the site west of Old Odiham Road further. In addition, as per our correspondence in November 2014 we are keen to ensure the Council are aware that the Neighbourhood Plan discounts the site for inaccurate reasons as it is based on a flawed evidence base and is therefore unsound.

In addition we consider the Draft Allocations Plan is an opportunity to allocate additional housing sites in Alton that are sustainable and can help deliver the significant housing need in Alton.

I trust this is acceptable. If you have any further questions do not hesitate to contact myself or Matt Roe and this office. I look forward to your formal confirmation of receipt.

Yours faithfully,



**John Ferguson**  
**Associate Director**

# **APPENDIX A**

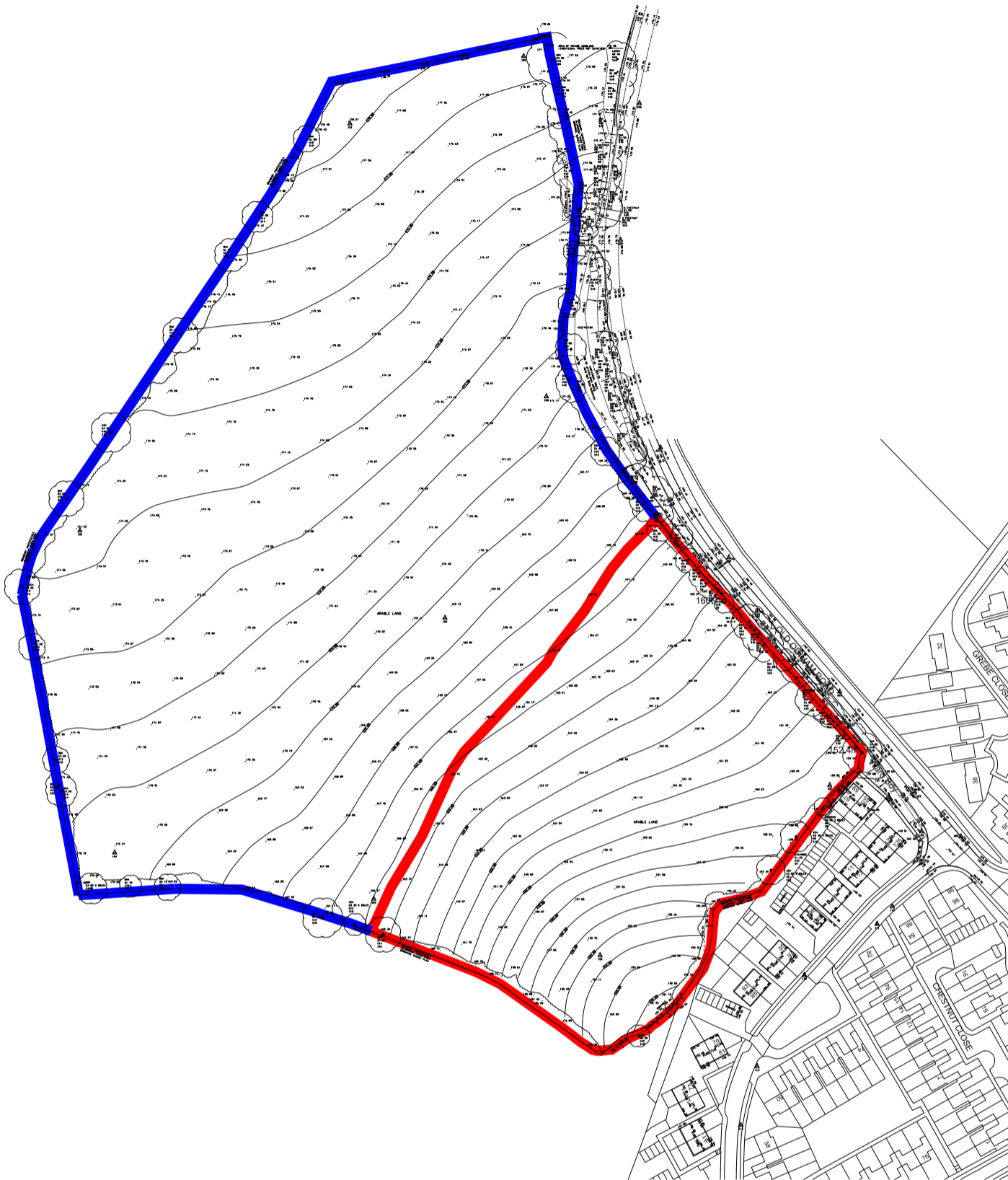
Notes:  
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 Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.  
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Key

— Site Application Boundary

— Ownership Boundary



P01	30.05.14	Planning Issue	PC	JH
Rev	Date	Description	Drawn	Chkd

Drawing Status  
**For Planning**

Client  
**David Meisels**

**JOHN THOMPSON & PARTNERS**



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Project  
**Land West of Old Oldham Road,  
 Alton**

Drawing Title  
**Site Location Plan**

Scale @ A3 1:2500 Job Ref. 00776

Drawing No. 00776 \_ S11 Revision P01

Scale Bar 0 20 40 60m





# **APPENDIX B**

SENT BY EMAIL TO [REDACTED]  
[REDACTED]

Our Ref: JF/JCG15532

Direct Dial: [REDACTED]

email address: [REDACTED]

Alton Town Council  
Town Hall  
Market Square  
Alton  
Hampshire  
GU34 1HD

2<sup>nd</sup> December 2014

Dear Sir,

**NEIGHBOURHOOD PLAN COMMENTS  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and have reviewed the public consultation material from the 22<sup>nd</sup> November 2014, where draft options were presented to the public.

Our client is very disappointed their site was not included within the draft site options.

We believe there are a number of errors with the site selection process and evidence base which has led to an unsound choice of selected sites. We would very much appreciate the opportunity to discuss these with you and try to address the concerns you have with our client's site within this letter.

I trust these can be taken into account by the Neighbourhood Plan steering group and Town Council when the consultation responses from the 22<sup>nd</sup> November are considered.

**Site Selection Criteria for Land West of Old Odiham Road**

***SHLAA Sustainability Appraisal***

The SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan has a number of errors that we have raised with EHDC and previously pointed out to you in a letter dated the 19<sup>th</sup> November 2014.

There were a number of errors with the initial sustainability assessment at appendix G of the SHLAA sustainability assessment that resulted in our site having a red box for access to employment (over 1600m away) and a yellow box for access to retail (over 800 metres away). The correct picture is retail provision within 500 metres of the site and employment provision within 1200 metres of the site. These boxes should therefore be changed to green for access to retail and yellow for access to employment.



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This therefore equates to 0 red, 4 yellow and 16 green boxes, making it the most sustainable site out of the sites selected in the Neighbourhood Plan. Giving the site a yellow box in Annex C of the ANP Site Selection Methodology is therefore incorrect, as is the evidence base this methodology is based on.

Site	SHLAA Sustainability Assessment		
	R	Y	G
AL005 Cadnam Farm	0	7	13
AI002 Borovere Farm and Lord Mayor Treloar	0	9	11
AL033 Will Hall Farm	0	7	13
Highmead House	1	5	14
AL026 Land of Wilsom Road	0	5	15
AL042 Land adjacent to convent	0	5	15
<b>Old Odiham Road</b>	<b>0</b>	<b>4</b>	<b>16</b>

As can be seen the site is therefore in the most sustainable location out of the SHLAA sites and has the most green boxes and least red and yellow boxes. It is certainly more sustainable than the other Neighbourhood Plan Sites. This should therefore be shown as green in Annex C of the ANP Site Selection Methodology. As you are aware paragraph 072 of the National Planning Practice Guidance requires Neighbourhood Plans to guide development to the most sustainable solutions, and that material produced as part of the Sustainability Appraisal of the Local Plan may be relevant, which is the case here.

### **Community Support**

We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications currently pending determination is of key note, and should be considered in addition to the neighbourhood plan feedback from February 2014.

The feedback from the February consultation into potential sites is potentially flawed, as it was based on the number of dwellings within the SHLAA allocation as opposed to the numbers of dwellings the different applications relate to, and the number of dwellings included in the most recent November neighbourhood plan draft allocations. The views therefore received from the February consultation were based on a very different number of dwellings at these sites than the most recent consultation.

A more accurate and up to date reflection of local views on the proposed housing numbers for the sites is encapsulated in the number of objections registered for each planning application at the key sites, currently in for planning, that should be considered along with the responses from the Neighbourhood Plan feedback from February 2014.

This is summarised in the table below.

<b>Site</b>	<b>No. units consulted on in February 2014</b>	<b>Rank from Neighbourhood Plan Feedback (1- most favourable, 5 least)</b>	<b>Number of units in application</b>	<b>No. objections to planning application</b>
Cadnam Farm	150	2	275	162
Borovere Farm and Lord Mayor Treloar	420	1	530	111
Will Hall Farm	150	5	200	350
Highmead House	100	4	120	134
AL026 Land of Wilsom Road	Not consulted		No app	
AL042 Land adjacent to convent	Not consulted		No app	
<b>Old Odiham Road</b>	<b>60</b>	<b>3</b>	<b>97</b>	<b>48</b>

As can be seen in this table, the application at Old Odiham Road has by far the least number of local objections of 48 for the current application, and a very similar amount of local opposition as Cadnams Farm from the neighbourhood plan feedback. This would place Old Odiham the second most popular site for development according to local opinion. Annex C of the ANP Site Selection Methodology should therefore reflect this and Old Odiham Road should be changed from red to a yellow or green.

### **Landscape Capacity Study: SHLAA Site Assessment**

The East Hants SHLAA Landscape Capacity Study: Sites Assessment provides a very broad brush, subjective view on the landscape impact of sites.

The study's comments on the Old Odiham Road site AL002-4 are the same as AL001-4 Highmead House.

As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land.*

This pre-application feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above, and considers the skyline of Alton can be retained.

Therefore at Annex C of the ANP Site Selection Methodology, for the Landscape Capacity Study: SHLAA Site Assessment, the box ticked red is incorrect and should be yellow, based on the above, which is a more accurate, objective and up to date review of the impact of developing the site on Alton's skyline.

### **Alton Town Design Statement**

Annex C of the ANP Site Selection Methodology puts a red box against the Alton Town Design Statement.

The Alton Town Design Statement seeks to preserve Alton's skyline. The above section and the Landscape Visual Impact Assessment of the application at Land West of Old Odiham Road clearly demonstrates development of the site can preserve Alton's skyline. Therefore against the Alton Town Design Statement at annex c of the ANP Site Selection Methodology the red box should be changed to yellow.

### ***Alton Study***

Annex C of the Alton Neighbourhood Plan Site Selection Methodology currently has a blank box for the Alton Study criteria.

This should be changed to green and 'yes', as the site is included within this study, as Option Two and within Growth Option 2.

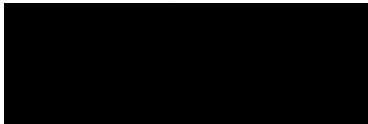
### ***Conclusion***

Therefore as you can see there are a number of inaccuracies with the site selection criteria as well as unsound evidence documents used at Annex C of the Alton Neighbourhood Plan Site Selection Methodology, which has led to the exclusion of site Land West of Old Odiham Road.

We would very much appreciate if we could organise a meeting with yourselves at the earliest opportunity to discuss your concerns with the site, and also how this site and the above can be seriously considered in further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours faithfully,



**John Ferguson**  
**Associate Director**

Our Ref: JF/JCG15532

Direct Dial: [REDACTED]

email address: [REDACTED]

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Kettering, Manchester,  
Newark

19 November 2014

Dear Sir,

**NEIGHBOURHOOD PLAN – REQUEST FOR MEETING  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and understand there is a public consultation event on 22<sup>nd</sup> November where draft options will be presented.

I appreciate Alton is facing a challenging prospect with the need to find sites for a minimum of 700 new homes with no obvious or easy choice of where these should go.

To that extent we would very much appreciate a meeting with yourselves to discuss our site.

***Landscape Impact Concerns***

We particularly would like to discuss the concerns you may have regarding the impact of our proposals on Alton's skyline. As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Since our initial meetings and my last letter, CgMs have undertaken significant further assessment of the prominence and visibility of the site within key short, middle and long distance viewpoints. This work has been valuable in identifying available views of importance and helping to demonstrate the significance of the effects which development of the land (within potential key viewpoints) will cause. As you are aware a number of sites were put forward in the SHLAA process including land along the northern aspect of Alton. These sites, including this one, are elevated in the landscape and likely to lead to development that is more prominent and more influential on landscape character and the townscape setting of*

*Alton. The Council's Principal Landscape Officer reviewed these sites and I have mentioned his advice in my previous correspondence.*

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. While I do not think that the exercise can be relied on to have ruled out any and all public viewpoints I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints (which I have not visited to verify) seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land, having regard to the relevant goals of the NPPF and the Council's housing land supply shortfall.*

This initial feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above. We would very much welcome an opportunity to discuss this with you and take you through our landscape impact assessment, as we feel this may help reassure you of the landscape impact concerns of this site. We would also be willing to discuss other ways you consider could help minimise landscape impact.

**SHLAA Sustainability Assessment**

In addition you will see from the SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan, the site is the most sustainable out of the large sites currently in for planning. (There was an error with the initial sustainability assessment that resulted in our site having a red box for access to employment and a yellow box for access to retail. There is retail provision within 800 metres of the site and employment provision within 1200 metres of the site.) We have therefore requested this appraisal is amended to reflect this and it should therefore be corrected to show 0 red, 4 yellow and 16 green boxes.

Site	SHLAA Sustainability Assessment		
	R	Y	G
Cadnam Farm	0	7	13



Borovere Farm and Lord Mayor Treloar	0	9	11
Will Hall Farm	0	7	13
Highmead House	1	5	14
Old Odiham Road*	1	4	15

\*Sustainability assessment being challenged. It should read RED 0, YELLOW 4, GREEN 16

As can be seen the site is therefore in the most sustainable location.

### **Community Support**

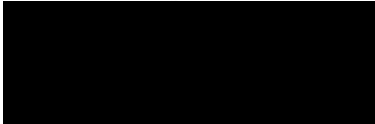
We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications is quite telling. This is summarised below and as you will see our application has by far the least local objections of 48.

Site	Application Reference	Number of units	No. objections to planning app
Cadnam Farm	55428/001	275	162
Borovere Farm and Lord Mayor Treloar	30021/056	530	111
Will Hall Farm	55222/001	200	350
Highmead House	55250/001	120	134
Old Odiham Road	55097/001	97	48

As mentioned it would be appreciated if we could organise a meeting with yourselves to discuss your concerns with the site, and also if this site and the above could be seriously considered at your upcoming consultation event and further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours sincerely,



**John Ferguson**  
**Associate Director**

## Sophie Hinton

---

**From:** John Ferguson  
**Sent:** 11 November 2014 14:26  
**To:** 'Jennifer.howard@easthants.gov.uk'  
**Cc:** Bethan Hawkins  
**Subject:** 11.11.14 JF:JH East Hants Strategic Housing Land Availability Assessment - Site AL047.  
**Attachments:** East Hants Strategic Housing Land Availability Assessment 1.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Jennifer,

I email regarding the recently published East Hants Strategic Housing Land Availability Assessment and in particular the Appendices. I write on behalf of my client and the landowner of a site in Alton AL047 – Land West of Old Odiham Road.

We have concern with the accuracy of the sustainability appraisal of the sites at Appendix G. In particular access to retail facilities and access to employment have been calculated wrongly for the site.

### **Access to retail**

The categorisation given to the 'Access to Retail' of site reference AL047 is currently 'Yellow', the criteria for which is retail being 'between 800m and 1600m'. However, our research has identified that retail floor space is within 800m of the site. A Londis convenience store is within 500 metres of the site. In addition Wooteys Way retail parade is within 800 metres of the site.

This would put the site within the 'Green' category, which is defined as less than 800m.

### **Access to Employment**

The sustainability assessment defines access to employment as red i.e. over 1600m. However the site is within 1.2km of the High Street where there are offices and significant employment. The categorisation should therefore be changed to yellow to reflect this.

I trust the sustainability appraisal can be changed to reflect the above, and previous inaccuracies.

I attach maps and detail of distances to the facilities.

Please confirm receipt of this email and advise if you would like to discuss further.

Kind Regards

**John Ferguson BSc (Hons), PG Dip TP, MRTPI**  
**Associate Director**

**Direct Dial:** [REDACTED]

**Mobile:** [REDACTED]

**Email Address:** [REDACTED]

## **CgMs Consulting**

*Planning, Archaeology & Historic Buildings Consultants*  
7<sup>th</sup> Floor, 140 London Wall, London EC2Y 5DN

**Tel: 020 7583 6767**

**Fax: 020 7583 2231**

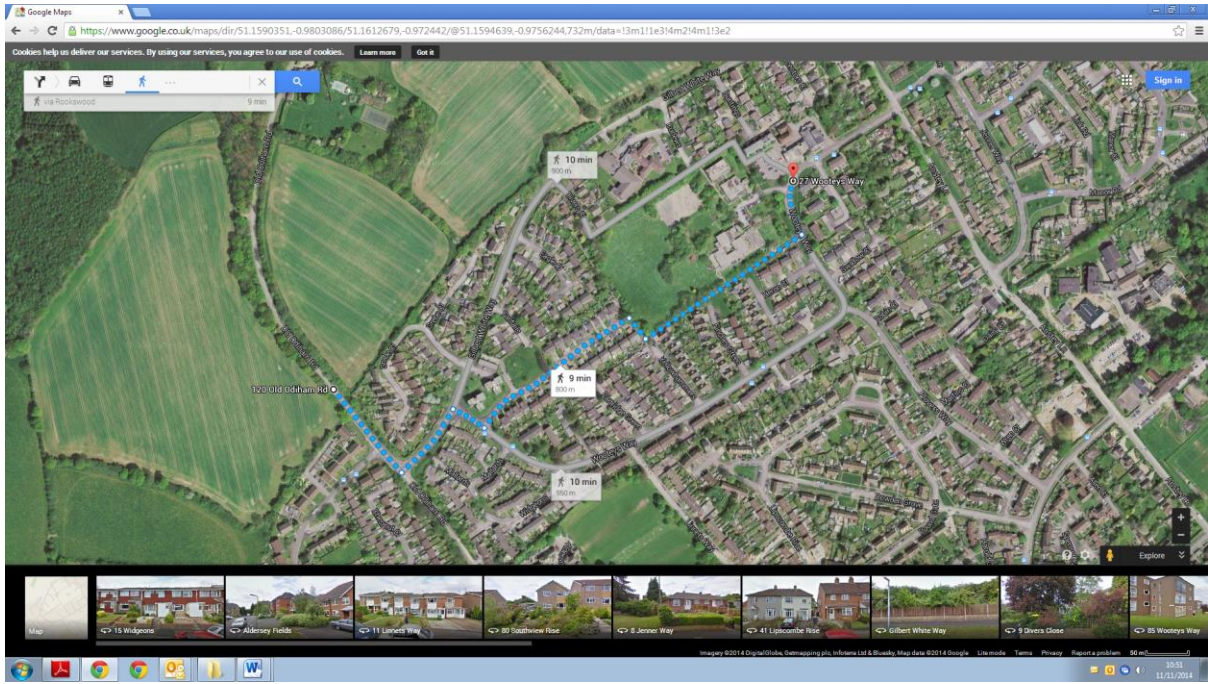
[www.cgms.co.uk](http://www.cgms.co.uk)

# East Hants Strategic Housing Land Availability Assessment

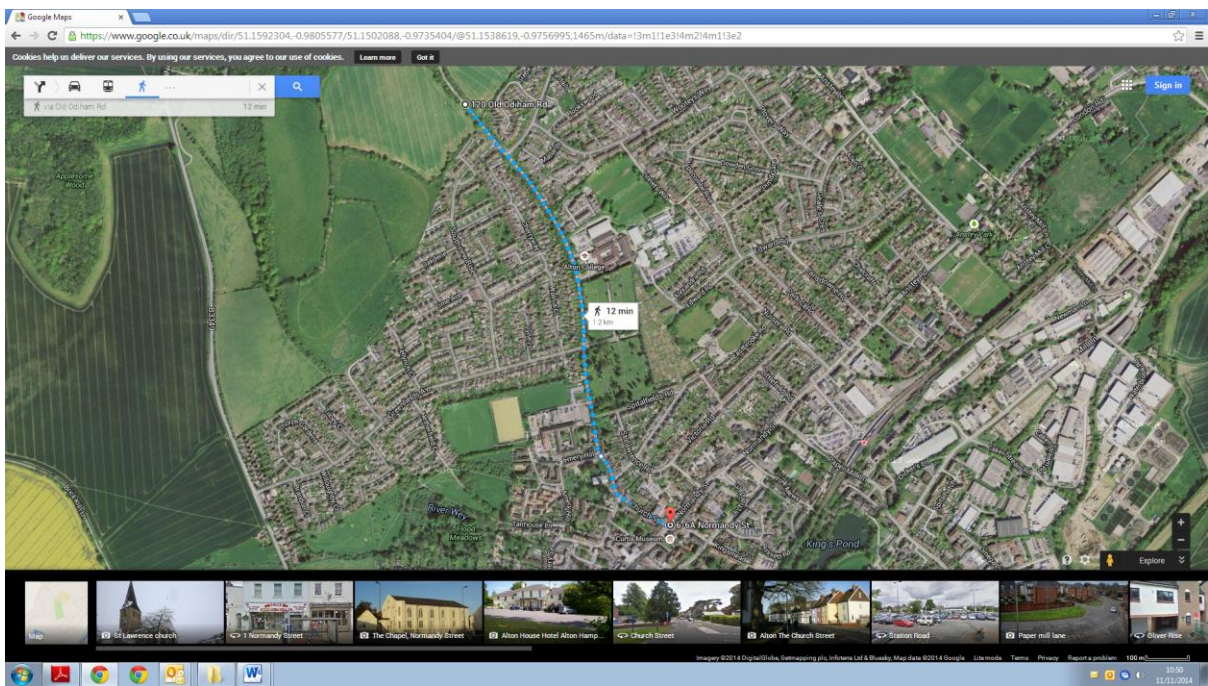
## AL047 – Land West of Old Odiham Road

### *Access to retail*





## Access to employment



Cgms

**Cgms**  
[www.cgms.co.uk](http://www.cgms.co.uk)

# **APPENDIX E**



SENT BY EMAIL: [REDACTED]  
[REDACTED]  
[REDACTED]

Our Ref: JF/JCG15532  
Direct Dial: [REDACTED] 2  
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Alton Town Council  
Town Hall  
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Offices also at:  
Birmingham, Cheltenham,  
Dorset, Edinburgh,  
Kettering, Manchester,  
Newark

30<sup>th</sup> March 2015

Dear Sir,

**PRE-SUBMISSION CONSULTATION DRAFT NEIGHBOURHOOD PLAN  
FEBRUARY 2015  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site (Site Location Plan at **Appendix A**). We have been following the neighbourhood planning process and have reviewed the public consultation material from the 22<sup>nd</sup> November 2014 and the Pre-submission Consultation Draft Alton Neighbourhood Plan published in February 2015. In addition we have met with you on the 23<sup>rd</sup> January 2015 (meeting request at **Appendix B**).

CgMs submitted an application for the development of 98 residential dwellings, associated landscaping and transport provisions, at the Land west of Old Odiham Road in Alton, (LPA ref. 55097/001) which was refused on 23rd December 2014.

Our client is very disappointed their site was not included within the draft site options and the Housing Policy (HO3) which allocates new housing in Alton to specific sites.

We believe there are a number of errors with the site selection process and evidence base, which we have previously pointed out but this has not been taken into consideration, which has led to an unsound choice of selected sites which has now been presented in the draft housing policy.

I trust these can be taken into account by the Neighbourhood Plan Steering Group and Town Council when the responses from this consultation are considered.

**Background to Representations**

On 2nd December 2014 (attached at **Appendix C**), CgMs made representations to Alton Town Council on the draft policy site options. Specifically representations were made on the site selection criteria, community support and landscape impacts. The representations detailed key discrepancies with the site and policy options. Specifically errors with the evidence base and initial sustainability assessment were identified, including appendix G which misrepresented our client's site in relation to the SHLAA Sustainability Assessment. It was therefore highlighted that the



proposal site presented one of the most sustainable locations out of the SHLAA sites in Alton.

On 6<sup>th</sup> February 2015 (attached at **Appendix D**) CgMs reviewed the Council's draft Site Allocations Plan and the supporting evidence provided in the Sustainability Appraisal by URS. In addition to the above consultation, CgMs have highlighted that the following documents are unsound for the following reasons:

- Housing allocations within the draft Alton Neighbourhood Plan, that the Draft Site Allocations Plan relies on, do not go far enough to deliver sufficient levels of housing for Alton;
- The URS Sustainability Appraisal supports the site for housing but fails to test it as an option, despite recognising the importance of considering all alternatives.

CgMs have concluded from the consultations to date that the draft Site Allocations document also places too much emphasis on the Alton Neighbourhood Plan which is based on flawed and inaccurate evidence and should not determine the contents of the Local Plan. The Draft Site Allocations as drafted does not ensure it is doing all it can to support sustainable economic growth and maximise sustainable housing delivery in Alton.

### **Inaccurate Evidence Base of the Neighbourhood Plan**

There are a number of inaccuracies in the process that allocated the housing sites within the neighbourhood plan, which are set out in the below paragraphs.

### **Policy HO3: New Housing Site Allocations**

Draft Policy HO3 identifies six specific sites for housing to deliver the total allocation of 781 new dwellings over the plan period to 2028. Paragraph 47 of the NPPF identifies that Councils should ensure that their local plans meet the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area.

#### *The Housing Allocation*

This policy and the policy table relies on the delivery of every permitted scheme. In addition it has been detailed in recent appeal decisions the need to increase the 5% buffer to 20% to take account of the record of persistent under delivery of housing (Cheshire East Decision Appeal Decision Ref.APP/R0660/A/14/2216767). The NPPF guidance requires a longer term view to be taken in addressing this issue.

East Hampshire District Council have applied a 5% buffer to their Five Year Housing Land Supply. The document details that the council have exceeded the target set in relation to the revoked South East Plan (SEP) and the housing requirements of the East Hampshire District Local Plan: Second Review (1996 2011). The Council state that they have achieved the baseline housing requirement figure (practically) with 5,427 completions out of a requirement of 5,500 dwellings in 2011. However, the plan period of the Joint Core Strategy was back dated to April 2011 and there has been an identified under-provision over the last 3 years of the plan which required 592 dwellings to be delivered across the district per annum. Although it can be argued that an under provision should be assessed over a longer period of time, we consider that given the current market East Hampshire District Council have not substantially met targets to respond to the housing need. We therefore believe the

council has persistently under delivered and a 20% buffer should be applied to account for this.

As detailed within the Draft Housing Policy HO3 the appropriate buffer to compensate for the prolonged under delivery has not been applied to the basis of the policy. The policy therefore restricts the number of dwellings that can be delivered on each site which is not a true representation of the housing allocation in Alton. A 20% buffer would increase the need for Alton to allocate sites to deliver 840 dwellings, rather than the currently proposed 781. This shortfall could be sustainability delivered on our client's site, Land West of Old Odiham Road.

### *The Delivery of Housing*

The draft Housing Policy further details each site and details the key elements of the proposal in line with a proposed masterplan. However, within these detailed policies the deliverability of the sites is not included and the draft policy relies upon the full allocation being fully delivered. The draft policy assumes that the sites are available and it is achievable and viable to deliver housing to meet the current housing needs.

Paragraph 6 of the NPPF states that to be considered 'deliverable' sites should be available now, offer a suitable location now, and be achievable with a realistic prospect that housing will be delivered within five years and in particular that the site is viable. We do not believe it is realistic that the total allocation of dwellings will be delivered within the 5 year period for the following reasons:

- a) Phasing of development, lead-in times and build rates for these strategic sites;
- b) Assumed supply from the sites without planning permission (these sites have yet to be considered through the local plan process and could be/are subject to local opposition); and
- c) Viability concerns regarding planning obligations and signed S106 agreements.

The delivery of the dwellings appended to the Five Year Housing Supply and which this draft policy is based upon is unrealistic within the five year period and therefore this appeal should attract paragraph 14 of the NPPF 'Presumption in Favour of Sustainable Development' due to the inaccuracies of the deliverability within the five year period.

### *The location of Housing*

The seventh core planning principle of the NPPF states '*allocations of land for development should prefer land of lesser environmental quality*'. Chapter 11 specifically requires great weight to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. It outlines the unacceptability of major development in these designated areas except in exceptional circumstances, and directs development away from these areas.

Unlike the majority of the rest of the district and other sites promoted through the SHLAA process this site is not subject to any specific designations by the Local Plan Proposals Map. The site adjoins Alton but is not within:

- Green Belt;
- Sites of Importance for Nature Conservation;

- Sites of Special Scientific Interest;
- Conservation Area;
- Special Area of Conservation (SAC);
- Special Protection Area (SPA);
- Local Gap;
- Area of Outstanding Natural Beauty.

It should be noted that a scheme located within Alton with similar planning principles (i.e. outside of the policy boundary) but of a larger scale was granted planning permission at committee on 4<sup>th</sup> February 2015 (Application ref. 30021/056 Land at Lord Mayor Treloar Hospital Site and Land East of Selborne Road, Alton). This was at a lesser sustainable location than Land West of Old Odiham but still considered by the council to be sustainable development that would significantly boost Alton's housing supply.

The site at Land West of Old Odiham Road therefore offers the opportunity for development on land that is not designated to be of specific natural/scientific/ecological value, and will ultimately reduce the pressure to develop higher quality natural environments that are subject to the above designations in other parts of the District.

### **Policy DE1: Town Setting and Natural Assets**

Policy DE1 details that all new development in Alton must ensure that it is able to at least maintain wherever possible enhance the appearance and setting of the town.

The policy further details that 'new development must respect key views into and out of the town, in particular from the National Park to the south, through the preservation or preferably the enhancement of the important views afforded by the vistas and gateways leading into and out of Alton. Any new development should demonstrate how it has reacted positively to opportunities to enhance the appearance of key entrances to the town'.

During the application process (LPA ref. 55097/001), CgMs worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This extensive exercise far exceeds the brief Landscape Capacity study undertaken for the SHLAA. In addition, it should be noted that Further inaccuracies within the Landscape Capacity study which forms a basis for the SHLAA site assessment were also identified, in particular the broad brush nature of and subjective view of the landscape impacts of the sites

As part of this exercise an extensive Landscape Visual Impact Assessment was undertaken alongside a Zone of Theoretical Vision, followed by a robust and very accurate photographic assessment of the key views.

Therefore, this detailed evidence clearly demonstrated the impact of the site on the landscape is minimal and is contrary to the broad brush landscape capacity study the neighbourhood plan relies upon. Therefore, this more detailed approach objectively assessing the landscape impact of the site must attract material weight when considering the Site Allocations for housing in Alton and also highlights further inaccuracies within the draft policy DE1 included within the Neighbourhood Plan.

### **The Site at Land West of Old Odiham Road**

The site would assist and provide high quality housing for Alton to meet the current housing demand. The proposal site has the capacity to deliver housing which would respond to the short term delivery of significant housing. Delivery would be within 3 years and therefore would meet the short term housing need which other identified sites in East Hampshire cannot. In addition, the site would have a social and economic role and contribute towards the positive and sustainable growth of Alton. In summary, the site at Land West of Old Odiham Road is a highly sustainable form of development for Alton.

### **Conclusion**

Therefore as you can see there are a number of inaccuracies with the site selection criteria as well as unsound evidence documents which have been used to draft Policy HO3 and DE1 which has led to the exclusion of site Land West of Old Odiham Road. We therefore disagree with the above detailed policies due to the unsound evidence base which they have evolved from. The site at Land West of Old Odiham Road provides a sustainable form of development in accordance with the NPPF which would meet the short term housing need.

Please do not hesitate to contact me or Matthew Roe if you would like to discuss further.

Yours faithfully,



**John Ferguson**  
**Associate Director**

# **APPENDIX A**

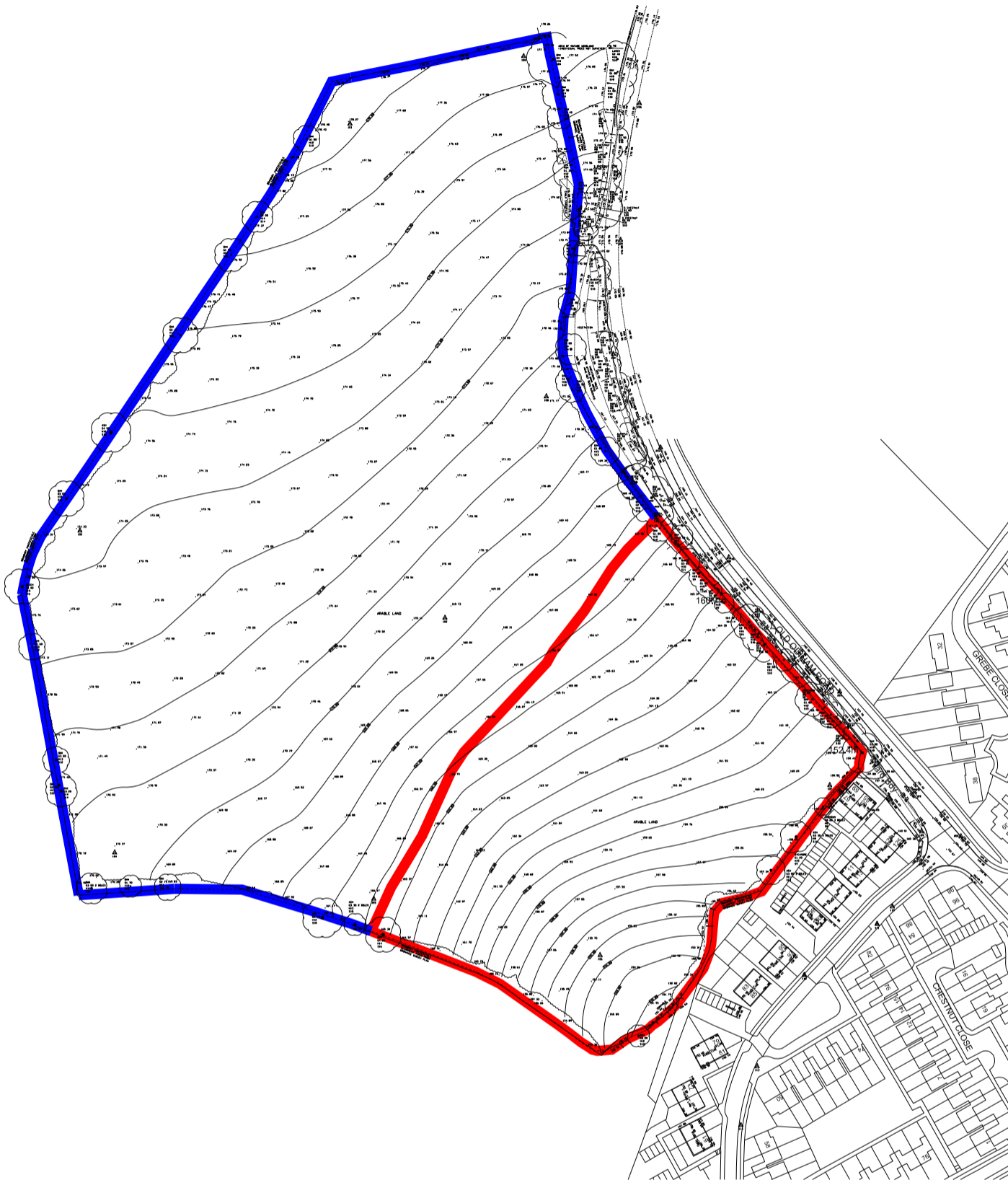
Notes:  
 Do not scale from this drawing.  
 All contractors must visit the site and be responsible for taking and checking Dimensions.  
 All construction information should be taken from figured dimensions only.  
 Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.  
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Key

— Site Application Boundary

— Ownership Boundary



P01 30.05.14 Planning Issue PC JH

Rev	Date	Description	Drawn	Chkd

Drawing Status

**For Planning**

Client

**David Meisels**

**JOHN THOMPSON & PARTNERS**



23-25 Great Sutton Street  
 London, EC1V 0DN  
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Project

**Land West of Old Oldham Road,  
 Alton**

Drawing Title

**Site Location Plan**

Scale @ A3 1:2500 Job Ref. 00776

Drawing No. 00776 \_ S11 Revision P01



# **APPENDIX B**

Our Ref: JF/JCG15532

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email address: [REDACTED]

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Market Square  
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Dorset, Edinburgh,  
Kettering, Manchester,  
Newark

19 November 2014

Dear Sir,

**NEIGHBOURHOOD PLAN – REQUEST FOR MEETING  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and understand there is a public consultation event on 22<sup>nd</sup> November where draft options will be presented.

I appreciate Alton is facing a challenging prospect with the need to find sites for a minimum of 700 new homes with no obvious or easy choice of where these should go.

To that extent we would very much appreciate a meeting with yourselves to discuss our site.

***Landscape Impact Concerns***

We particularly would like to discuss the concerns you may have regarding the impact of our proposals on Alton's skyline. As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Since our initial meetings and my last letter, CgMs have undertaken significant further assessment of the prominence and visibility of the site within key short, middle and long distance viewpoints. This work has been valuable in identifying available views of importance and helping to demonstrate the significance of the effects which development of the land (within potential key viewpoints) will cause. As you are aware a number of sites were put forward in the SHLAA process including land along the northern aspect of Alton. These sites, including this one, are elevated in the landscape and likely to lead to development that is more prominent and more influential on landscape character and the townscape setting of*



*Alton. The Council's Principal Landscape Officer reviewed these sites and I have mentioned his advice in my previous correspondence.*

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. While I do not think that the exercise can be relied on to have ruled out any and all public viewpoints I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints (which I have not visited to verify) seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land, having regard to the relevant goals of the NPPF and the Council's housing land supply shortfall.*

This initial feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above. We would very much welcome an opportunity to discuss this with you and take you through our landscape impact assessment, as we feel this may help reassure you of the landscape impact concerns of this site. We would also be willing to discuss other ways you consider could help minimise landscape impact.

**SHLAA Sustainability Assessment**

In addition you will see from the SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan, the site is the most sustainable out of the large sites currently in for planning. (There was an error with the initial sustainability assessment that resulted in our site having a red box for access to employment and a yellow box for access to retail. There is retail provision within 800 metres of the site and employment provision within 1200 metres of the site.) We have therefore requested this appraisal is amended to reflect this and it should therefore be corrected to show 0 red, 4 yellow and 16 green boxes.

Site	SHLAA Sustainability Assessment		
	R	Y	G
Cadnam Farm	0	7	13

Borovere Farm and Lord Mayor Treloar	0	9	11
Will Hall Farm	0	7	13
Highmead House	1	5	14
Old Odiham Road*	1	4	15

\*Sustainability assessment being challenged. It should read RED 0, YELLOW 4, GREEN 16

As can be seen the site is therefore in the most sustainable location.

### **Community Support**

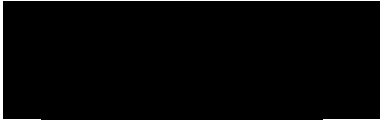
We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications is quite telling. This is summarised below and as you will see our application has by far the least local objections of 48.

Site	Application Reference	Number of units	No. objections to planning app
Cadnam Farm	55428/001	275	162
Borovere Farm and Lord Mayor Treloar	30021/056	530	111
Will Hall Farm	55222/001	200	350
Highmead House	55250/001	120	134
Old Odiham Road	55097/001	97	48

As mentioned it would be appreciated if we could organise a meeting with yourselves to discuss your concerns with the site, and also if this site and the above could be seriously considered at your upcoming consultation event and further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours sincerely,



**John Ferguson**  
**Associate Director**

# **APPENDIX C**

SENT BY EMAIL TO [REDACTED]  
[REDACTED]

Our Ref: JF/JCG15532

Direct Dial: [REDACTED]

email address: [REDACTED]

Alton Town Council  
Town Hall  
Market Square  
Alton  
Hampshire  
GU34 1HD

2<sup>nd</sup> December 2014

Dear Sir,

### **NEIGHBOURHOOD PLAN COMMENTS LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and have reviewed the public consultation material from the 22<sup>nd</sup> November 2014, where draft options were presented to the public.

Our client is very disappointed their site was not included within the draft site options.

We believe there are a number of errors with the site selection process and evidence base which has led to an unsound choice of selected sites. We would very much appreciate the opportunity to discuss these with you and try to address the concerns you have with our client's site within this letter.

I trust these can be taken into account by the Neighbourhood Plan steering group and Town Council when the consultation responses from the 22<sup>nd</sup> November are considered.

### **Site Selection Criteria for Land West of Old Odiham Road**

#### ***SHLAA Sustainability Appraisal***

The SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan has a number of errors that we have raised with EHDC and previously pointed out to you in a letter dated the 19<sup>th</sup> November 2014.

There were a number of errors with the initial sustainability assessment at appendix G of the SHLAA sustainability assessment that resulted in our site having a red box for access to employment (over 1600m away) and a yellow box for access to retail (over 800 metres away). The correct picture is retail provision within 500 metres of the site and employment provision within 1200 metres of the site. These boxes should therefore be changed to green for access to retail and yellow for access to employment.



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Kettering, Manchester,  
Newark

This therefore equates to 0 red, 4 yellow and 16 green boxes, making it the most sustainable site out of the sites selected in the Neighbourhood Plan. Giving the site a yellow box in Annex C of the ANP Site Selection Methodology is therefore incorrect, as is the evidence base this methodology is based on.

Site	SHLAA Sustainability Assessment		
	R	Y	G
AL005 Cadnam Farm	0	7	13
AI002 Borovere Farm and Lord Mayor Treloar	0	9	11
AL033 Will Hall Farm	0	7	13
Highmead House	1	5	14
AL026 Land of Wilsom Road	0	5	15
AL042 Land adjacent to convent	0	5	15
<b>Old Odiham Road</b>	<b>0</b>	<b>4</b>	<b>16</b>

As can be seen the site is therefore in the most sustainable location out of the SHLAA sites and has the most green boxes and least red and yellow boxes. It is certainly more sustainable than the other Neighbourhood Plan Sites. This should therefore be shown as green in Annex C of the ANP Site Selection Methodology. As you are aware paragraph 072 of the National Planning Practice Guidance requires Neighbourhood Plans to guide development to the most sustainable solutions, and that material produced as part of the Sustainability Appraisal of the Local Plan may be relevant, which is the case here.

### **Community Support**

We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications currently pending determination is of key note, and should be considered in addition to the neighbourhood plan feedback from February 2014.

The feedback from the February consultation into potential sites is potentially flawed, as it was based on the number of dwellings within the SHLAA allocation as opposed to the numbers of dwellings the different applications relate to, and the number of dwellings included in the most recent November neighbourhood plan draft allocations. The views therefore received from the February consultation were based on a very different number of dwellings at these sites than the most recent consultation.

A more accurate and up to date reflection of local views on the proposed housing numbers for the sites is encapsulated in the number of objections registered for each planning application at the key sites, currently in for planning, that should be considered along with the responses from the Neighbourhood Plan feedback from February 2014.

This is summarised in the table below.

<b>Site</b>	<b>No. units consulted on in February 2014</b>	<b>Rank from Neighbourhood Plan Feedback (1- most favourable, 5 least)</b>	<b>Number of units in application</b>	<b>No. objections to planning application</b>
Cadnam Farm	150	2	275	162
Borovere Farm and Lord Mayor Treloar	420	1	530	111
Will Hall Farm	150	5	200	350
Highmead House	100	4	120	134
AL026 Land of Wilsom Road	Not consulted		No app	
AL042 Land adjacent to convent	Not consulted		No app	
<b>Old Odiham Road</b>	<b>60</b>	<b>3</b>	<b>97</b>	<b>48</b>

As can be seen in this table, the application at Old Odiham Road has by far the least number of local objections of 48 for the current application, and a very similar amount of local opposition as Cadnams Farm from the neighbourhood plan feedback. This would place Old Odiham the second most popular site for development according to local opinion. Annex C of the ANP Site Selection Methodology should therefore reflect this and Old Odiham Road should be changed from red to a yellow or green.

### **Landscape Capacity Study: SHLAA Site Assessment**

The East Hants SHLAA Landscape Capacity Study: Sites Assessment provides a very broad brush, subjective view on the landscape impact of sites.

The study's comments on the Old Odiham Road site AL002-4 are the same as AL001-4 Highmead House.

As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land.*

This pre-application feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above, and considers the skyline of Alton can be retained.

Therefore at Annex C of the ANP Site Selection Methodology, for the Landscape Capacity Study: SHLAA Site Assessment, the box ticked red is incorrect and should be yellow, based on the above, which is a more accurate, objective and up to date review of the impact of developing the site on Alton's skyline.

### **Alton Town Design Statement**

Annex C of the ANP Site Selection Methodology puts a red box against the Alton Town Design Statement.

The Alton Town Design Statement seeks to preserve Alton's skyline. The above section and the Landscape Visual Impact Assessment of the application at Land West of Old Odiham Road clearly demonstrates development of the site can preserve Alton's skyline. Therefore against the Alton Town Design Statement at annex c of the ANP Site Selection Methodology the red box should be changed to yellow.



### ***Alton Study***

Annex C of the Alton Neighbourhood Plan Site Selection Methodology currently has a blank box for the Alton Study criteria.

This should be changed to green and 'yes', as the site is included within this study, as Option Two and within Growth Option 2.

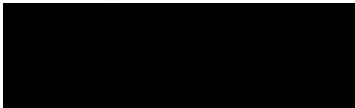
### ***Conclusion***

Therefore as you can see there are a number of inaccuracies with the site selection criteria as well as unsound evidence documents used at Annex C of the Alton Neighbourhood Plan Site Selection Methodology, which has led to the exclusion of site Land West of Old Odiham Road.

We would very much appreciate if we could organise a meeting with yourselves at the earliest opportunity to discuss your concerns with the site, and also how this site and the above can be seriously considered in further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours faithfully,



**John Ferguson**  
**Associate Director**

# **APPENDIX D**

Our Ref: JF/MR/15332

email address: [REDACTED]

Direct Dial: [REDACTED]

Planning, Regeneration and Economy  
East Hampshire District Council  
Petersfield  
Hampshire  
GU31 4EX



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London EC2Y 5DN

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[www.cgms.co.uk](http://www.cgms.co.uk)

Offices also at:  
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Newark

6<sup>th</sup> February 2015

Dear Sir / Madam,

**LAND WEST OF OLD ODIHAM ROAD, ALTON  
EAST HAMPSHIRE DISTRICT LOCAL PLAN PART 2: HOUSING AND  
EMPLOYMENT ALLOCATIONS (DRAFT SITE ALLOCATIONS PLAN)**

I write on behalf of my client, David Meisels, with regard to the Council's Local Plan Part 2: Housing and Employment Allocations (Draft Site Allocations Plan) which is currently out for public consultation. Our client wishes to make representations to this Draft Site Allocations Plan to promote their site Land West of Old Odiham Road, Alton (site plan attached at **Appendix A**).

This letter sets out the flawed process of the Draft Plan to rely on Neighbourhood Plan Allocations for housing sites in Alton, and should be read in conjunction with the representations made to the Call for Sites, 16<sup>th</sup> June 2014.

**Site Description**

The site comprises a 10 hectare field currently in use as arable farmland. The site is bound by housing to the south at Southview Rise, thick hedging and Old Odiham Road to the east, Averley Wood to the north and public open space to the west.

The site has been previously promoted through the SHLAA process. The site was promoted through the fifth tranche of sites in 2013, and the southern third of the site was included within the SHLAA (ref AL002-4 Land West of Old Odiham Road) as it was considered the landscape impact of this part of the site could potentially be mitigated, as well as a need for new sites to meet the identified housing need in the district.

The site was promoted through the sixth tranche in 2014, and the southern third was included within the SHLAA.

The site is available, suitable and achievable for residential development. Below sets out the suitability of the site and justification for its promotion in the Draft Housing and Employment Locations.

**Objections and Concerns**

Having reviewed the Council's draft Site Allocations Plan, the Alton Neighbourhood Plan and supporting evidence provided in the Sustainability Appraisal by URS, we consider the draft Site Allocations is currently unsound.

We are concerned the site, Land West of Old Odiham Road, has not been allocated for housing in the draft Site Allocations document. I have set out the three reasons of concern below:

- The Neighbourhood Plan, upon which the site Allocations Document is heavily reliant on, is founded on inaccurate evidence and is therefore unsound;
- Housing allocations within the draft Alton Neighbourhood Plan, that the Draft Site Allocations Plan relies on, do not go far enough to deliver sufficient levels of housing for Alton;
- The URS Sustainability Appraisal supports the site for housing but fails to test it as an option, despite recognising the importance of considering all alternatives.

### **Inaccurate Evidence Base**

Section 3.1 of the draft Site Allocations Plan states the site allocation process for housing in Alton will be addressed as part of the emerging Alton Neighbourhood Plan.

We fundamentally disagree with this approach that relies on the Neighbourhood Forum to allocate appropriate sites for housing.

There are a number of inaccuracies in the process that allocated the housing sites within the neighbourhood plan, which are set out below.

### ***SHLAA Sustainability Assessment, 2014***

One key inaccuracy of the evidence base for this plan, is the EHDC SHLAA Sustainability Assessment (2014), that the URS Sustainability Appraisal refers to. The SHLAA Sustainability Appraisal at Appendix G sets out the access to retail facilities and employment access, when assessing the sustainability of the SHLAA sites.

This has been incorrectly calculated. We have previously submitted representations pointing out this error (dated 11<sup>th</sup> November 2014, 19<sup>th</sup> November 2014 and 2<sup>nd</sup> December 2014 these are enclosed at **Appendix B**), which I have summarised below:

#### *Access to retail*

The categorisation given to the 'Access to Retail' of site reference AL047 is currently 'Yellow', the criteria for which is retail being 'between 800m and 1600m'. However, our research has identified that retail floor space is within 800m of the site. A Londis convenience store is within 500 metres of the site. In addition Wooteys Way retail parade is within 800 metres of the site.

This would put the site within the 'Green' category, which is defined as less than 800m.

### *Access to Employment*

The sustainability assessment defines access to employment as red i.e. over 1600m. However the site is within 1.2km of the High Street where there are offices and significant employment. The categorisation should therefore be changed to yellow to reflect this.

We requested that the Sustainability Appraisal be amended to reflect the above corrections on 11<sup>th</sup> November 2014, however the Neighbourhood Plan has been progressed without consideration to updated accurate evidence. We therefore consider the draft Neighbourhood Plan allocations are unsound, and this process should not be relied on to accurately allocate housing sites in Alton.

### **Landscape Capacity Study**

Further inaccuracies within the Landscape Capacity study which forms a basis for the SHLAA site assessment were also identified, in particular the broad brush nature of and subjective view of the landscape impacts of the sites.

CgMs submitted an application for the development of 98 residential dwellings, associated landscaping and transport provisions, at the site west of Old Odiham Road in Alton, (LPA ref. 55097/001) which was refused on 23<sup>rd</sup> December 2014. During the application (LPA ref. 55097/001), we worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This extensive exercise far exceeds the brief Landscape Capacity study undertaken for the SHLAA. As part of this exercise an extensive Landscape Visual Impact Assessment was undertaken alongside a Zone of Theoretical Vision, followed by a robust and very accurate photographic assessment of the key views.

This work was particularly appreciated and accepted by officers from EHDC in the pre-application feedback we had on the scheme, dated 7<sup>th</sup> January 2014. This states:

*'Having reviewed the work carried out to date, with the assistance of the Senior Landscape architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in land around the settlement. In my view this land area is less influential on many key views out of an across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produce. I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land.'*

This pre-application feedback was consistent with the landscape officer's consultation response to the application, who supported the application given the above, and considered the skyline of Alton can be retained.

Therefore, this detailed evidence clearly demonstrates the impact of the site on the landscape is minimal and is contrary to the broad brush landscape capacity study the neighbourhood plan relies upon. Therefore, this more detailed approach objectively assessing the landscape impact of the site must attract material weight when considering the Site Allocations for housing in Alton and also highlights further inaccuracies within the neighbourhood plan.

### ***Consultation Process of Draft Site Options of Neighbourhood Plan***

The consultation process of the neighbourhood plan was also flawed, further drawing attention to the inaccuracies and inconsistencies in the approach to the plan.

The consultation process for the document was flawed as it was based on the number of dwellings within the SHLAA allocation as opposed to the numbers of dwellings the different applications relate to, and the number of dwellings included in the most recent November neighbourhood plan draft allocations.

The views therefore received from the February consultation were based on a very different number of dwellings at these sites than the most recent consultation in November 2014.

Given the above it is clear that little weight should be placed on the allocations within the Alton neighbourhood plan, as it contains significant inaccuracies, flaws in the process and faulty evidence.

### **The Draft Site Allocations Document Places too much Reliance on the Neighbourhood Plan**

The neighbourhood plan should compliment the Local Plan, however it is our opinion that the draft Local Plan: Site Allocations document places too much emphasis on the evidence base and subsequent conclusions of the Alton neighbourhood plan. We consider this does not go far enough in allocating enough housing for Alton.

Paragraph 184 of the NPPF states 'neighbourhood plans should reflect these policies (in the Local Plan) and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the local plan or undermine its policies.'

Core Strategy Policy 10 requires the provision of a minimum of 700 dwellings in Alton. The Sustainability Appraisal for the East Hampshire Core Strategy tested seven housing number scenarios for Alton. Option 6 tested an allocation at Alton for 1,380 dwellings. When appraised for sustainability, Alton came out as a highly sustainable location for housing in terms of employment and economy and transport and accessibility. This therefore demonstrated Alton was capable of sustainably delivering well in excess of 700 new houses, and led to the Inspector changing the wording in the policy to a minimum of 700 new homes. However the draft neighbourhood plan only contains an allocation of 781 which caps the housing provision in Alton. This will restrict the delivery of housing in Alton, and requires all the allocated sites in Alton to be deliverable.

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a gold thread running through both plan-making and decision-making (paragraph 14).

NPPF paragraph 19 states the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth.

Therefore the Draft Site Allocations Plan should be an opportunity to allocate sites well in excess of 781 homes, to ensure it does all it can to support sustainable economic growth and maximise sustainable housing delivery. The Plan must consider the most sustainable locations for development, which URS Sustainability Appraisal considers the site west of Old Odiham Road to be.

The NPPF encourages Neighbourhood Plans to support Local Plans, the evidence for which clearly states that the land west of Old Odiham Road is a viable and sustainably justifiable site for extended housing.

The NPPF confirms this in Para 157, which requires Local Plans to plan positively for the development required in the area. It requires sites to be allocated to promote development and flexible use of land. We therefore consider this draft Local Plan to not fully meet the aspirational requirements of the NPPF.

### **The Evidence Base for the Draft Local Plan is Flawed**

The URS Sustainability Appraisal of the East Hants Site Allocations Plan relies on the SHLAA Site Assessment and Sustainability Appraisal prepared by East Hants.

This Sustainability Appraisal recognises the site ref. AL047 as a housing option within Appendix 4. The Appraisal then sets out potential issues to these housing sites and notes that the Land West of Oldiham Road (ref. AL047) is a suitable and sustainable option for extended housing growth.

Further, Appendix 4 goes on to note that should the site be developed, it would be an *'extension to the housing estate on the west side of Old Odiham Road, which is much less extensive than the estate on the other (eastern) side of the road.'* The Sustainability Appraisal concludes by stating *'as only the lower part of the site is proposed for development, landscape impacts would not be severe.'*

Despite this positive appraisal of the site west of Old Odiham Road, it has not been considered within the Draft Housing and Employment Site Allocations Plan due to the lack of recognition in the Neighbourhood Plan. This is a flawed approach, particularly due to the inaccuracies in the evidence base of the Neighbourhood Plan which we have outlined above. This contradicts paragraph 14 of the NPPF which calls for a presumption in favour of sustainable development.

In addition to this, the site has not been included within the preferred options within Appendix 6 of the appraisal. The Sustainability Appraisal needs to test Option 2 of Alton Study 2013 which includes sites to the north of Alton, in particular Land West of Old Odiham Road. As stated in paragraph 16.1.1 of the appraisal which reads: *'subsequent to the current consultation the Council will consider representations before preparing the formal draft 'Pre-*

*submission' version of the plan. It may also be necessary to undertaken further appraisal of site options (or alternatives, e.g. alternative uses for particular preferred sites) in order to inform preparation of the Pre-Submission Plan.'*

Therefore, the URS Sustainability appraisal should be re-run, to include a testing scenario that the includes sites to the north of Alton, including the site west of Old Odiham Road.

## **Conclusion**

Paragraph 154 of the NPPF requires Local Plans to be aspirational and should set out the opportunities for development. We consider the draft Site Allocations Document to be restrictive rather than aspirational, through lack of assessment of the most sustainable site in Alton for housing, land west of Old Odiham Road and thus excluding it from the proposed options.

The draft Site Allocations document also places too much emphasis on the Alton Neighbourhood Plan which is based on flawed and inaccurate evidence and should not determine the contents of the Local Plan. The Draft Site Allocations as currently drafted does not ensure it is doing all it can to support sustainable economic growth and maximise sustainable housing delivery in Alton.

## **Next Steps**

We recommend that the Sustainability Appraisal undertaken by URS explores the option of the site west of Old Odiham Road further. In addition, as per our correspondence in November 2014 we are keen to ensure the Council are aware that the Neighbourhood Plan discounts the site for inaccurate reasons as it is based on a flawed evidence base and is therefore unsound.

In addition we consider the Draft Allocations Plan is an opportunity to allocate additional housing sites in Alton that are sustainable and can help deliver the significant housing need in Alton.

I trust this is acceptable. If you have any further questions do not hesitate to contact myself or Matt Roe and this office. I look forward to your formal confirmation of receipt.

Yours faithfully,



**John Ferguson**  
**Associate Director**



# **APPENDIX A**

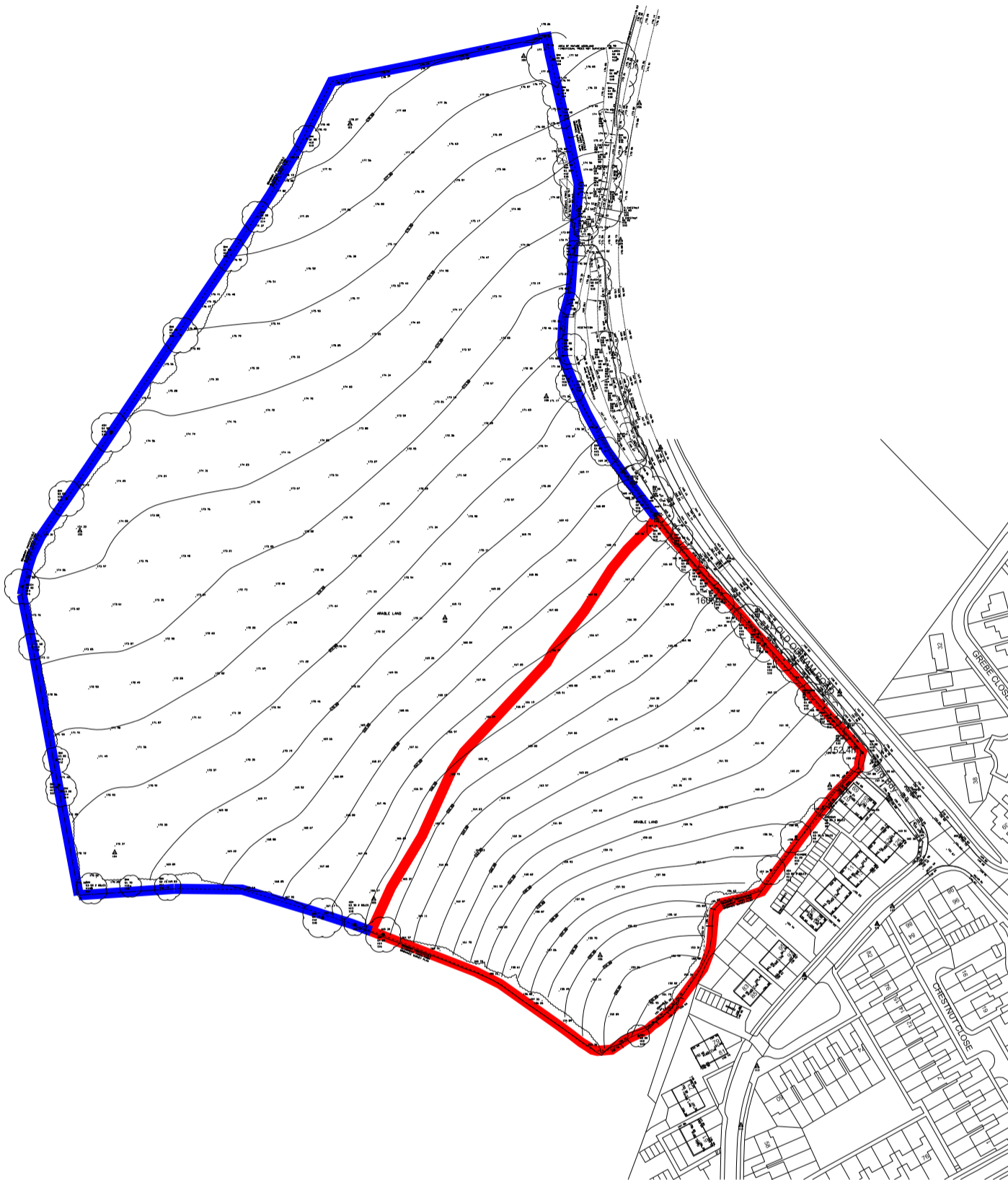
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Key

— Site Application Boundary

— Ownership Boundary



P01 30.05.14 Planning Issue PC JH

Rev	Date	Description	Drawn	Chkd

Drawing Status

**For Planning**

Client

**David Meisels**

**JOHN THOMPSON & PARTNERS**

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Project

**Land West of Old Oldham Road,  
 Alton**

Drawing Title

**Site Location Plan**

Scale @ A3 1:2500 Job Ref. 00776

Drawing No. 00776 \_ S11 Revision P01



# **APPENDIX B**

SENT BY EMAIL TO [REDACTED]



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Newark

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Town Hall  
Market Square  
Alton  
Hampshire  
GU34 1HD

2<sup>nd</sup> December 2014

Dear Sir,

**NEIGHBOURHOOD PLAN COMMENTS  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and have reviewed the public consultation material from the 22<sup>nd</sup> November 2014, where draft options were presented to the public.

Our client is very disappointed their site was not included within the draft site options.

We believe there are a number of errors with the site selection process and evidence base which has led to an unsound choice of selected sites. We would very much appreciate the opportunity to discuss these with you and try to address the concerns you have with our client's site within this letter.

I trust these can be taken into account by the Neighbourhood Plan steering group and Town Council when the consultation responses from the 22<sup>nd</sup> November are considered.

**Site Selection Criteria for Land West of Old Odiham Road**

***SHLAA Sustainability Appraisal***

The SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan has a number of errors that we have raised with EHDC and previously pointed out to you in a letter dated the 19<sup>th</sup> November 2014.

There were a number of errors with the initial sustainability assessment at appendix G of the SHLAA sustainability assessment that resulted in our site having a red box for access to employment (over 1600m away) and a yellow box for access to retail (over 800 metres away). The correct picture is retail provision within 500 metres of the site and employment provision within 1200 metres of the site. These boxes should therefore be changed to green for access to retail and yellow for access to employment.

This therefore equates to 0 red, 4 yellow and 16 green boxes, making it the most sustainable site out of the sites selected in the Neighbourhood Plan. Giving the site a yellow box in Annex C of the ANP Site Selection Methodology is therefore incorrect, as is the evidence base this methodology is based on.

Site	SHLAA Sustainability Assessment		
	R	Y	G
AL005 Cadnam Farm	0	7	13
AI002 Borovere Farm and Lord Mayor Treloar	0	9	11
AL033 Will Hall Farm	0	7	13
Highmead House	1	5	14
AL026 Land of Wilsom Road	0	5	15
AL042 Land adjacent to convent	0	5	15
<b>Old Odiham Road</b>	<b>0</b>	<b>4</b>	<b>16</b>

As can be seen the site is therefore in the most sustainable location out of the SHLAA sites and has the most green boxes and least red and yellow boxes. It is certainly more sustainable than the other Neighbourhood Plan Sites. This should therefore be shown as green in Annex C of the ANP Site Selection Methodology. As you are aware paragraph 072 of the National Planning Practice Guidance requires Neighbourhood Plans to guide development to the most sustainable solutions, and that material produced as part of the Sustainability Appraisal of the Local Plan may be relevant, which is the case here.

### **Community Support**

We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications currently pending determination is of key note, and should be considered in addition to the neighbourhood plan feedback from February 2014.

The feedback from the February consultation into potential sites is potentially flawed, as it was based on the number of dwellings within the SHLAA allocation as opposed to the numbers of dwellings the different applications relate to, and the number of dwellings included in the most recent November neighbourhood plan draft allocations. The views therefore received from the February consultation were based on a very different number of dwellings at these sites than the most recent consultation.

A more accurate and up to date reflection of local views on the proposed housing numbers for the sites is encapsulated in the number of objections registered for each planning application at the key sites, currently in for planning, that should be considered along with the responses from the Neighbourhood Plan feedback from February 2014.

This is summarised in the table below.

<b>Site</b>	<b>No. units consulted on in February 2014</b>	<b>Rank from Neighbourhood Plan Feedback (1- most favourable, 5 least)</b>	<b>Number of units in application</b>	<b>No. objections to planning application</b>
Cadnam Farm	150	2	275	162
Borovere Farm and Lord Mayor Treloar	420	1	530	111
Will Hall Farm	150	5	200	350
Highmead House	100	4	120	134
AL026 Land of Wilsom Road	Not consulted		No app	
AL042 Land adjacent to convent	Not consulted		No app	
<b>Old Odiham Road</b>	<b>60</b>	<b>3</b>	<b>97</b>	<b>48</b>

As can be seen in this table, the application at Old Odiham Road has by far the least number of local objections of 48 for the current application, and a very similar amount of local opposition as Cadnams Farm from the neighbourhood plan feedback. This would place Old Odiham the second most popular site for development according to local opinion. Annex C of the ANP Site Selection Methodology should therefore reflect this and Old Odiham Road should be changed from red to a yellow or green.

### **Landscape Capacity Study: SHLAA Site Assessment**

The East Hants SHLAA Landscape Capacity Study: Sites Assessment provides a very broad brush, subjective view on the landscape impact of sites.

The study's comments on the Old Odiham Road site AL002-4 are the same as AL001-4 Highmead House.

As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land.*

This pre-application feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above, and considers the skyline of Alton can be retained.

Therefore at Annex C of the ANP Site Selection Methodology, for the Landscape Capacity Study: SHLAA Site Assessment, the box ticked red is incorrect and should be yellow, based on the above, which is a more accurate, objective and up to date review of the impact of developing the site on Alton's skyline.

### **Alton Town Design Statement**

Annex C of the ANP Site Selection Methodology puts a red box against the Alton Town Design Statement.

The Alton Town Design Statement seeks to preserve Alton's skyline. The above section and the Landscape Visual Impact Assessment of the application at Land West of Old Odiham Road clearly demonstrates development of the site can preserve Alton's skyline. Therefore against the Alton Town Design Statement at annex c of the ANP Site Selection Methodology the red box should be changed to yellow.

### ***Alton Study***

Annex C of the Alton Neighbourhood Plan Site Selection Methodology currently has a blank box for the Alton Study criteria.

This should be changed to green and 'yes', as the site is included within this study, as Option Two and within Growth Option 2.

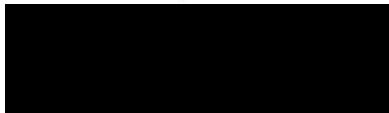
### ***Conclusion***

Therefore as you can see there are a number of inaccuracies with the site selection criteria as well as unsound evidence documents used at Annex C of the Alton Neighbourhood Plan Site Selection Methodology, which has led to the exclusion of site Land West of Old Odiham Road.

We would very much appreciate if we could organise a meeting with yourselves at the earliest opportunity to discuss your concerns with the site, and also how this site and the above can be seriously considered in further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours faithfully,



**John Ferguson**  
**Associate Director**



Our Ref: JF/JCG15532  
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Kettering, Manchester,  
Newark

19 November 2014

Dear Sir,

**NEIGHBOURHOOD PLAN – REQUEST FOR MEETING  
LAND WEST OF OLD ODIHAM ROAD, ALTON**

I write on behalf of David Meisels, the landowner of the above site. We have been following the neighbourhood planning process and understand there is a public consultation event on 22<sup>nd</sup> November where draft options will be presented.

I appreciate Alton is facing a challenging prospect with the need to find sites for a minimum of 700 new homes with no obvious or easy choice of where these should go.

To that extent we would very much appreciate a meeting with yourselves to discuss our site.

***Landscape Impact Concerns***

We particularly would like to discuss the concerns you may have regarding the impact of our proposals on Alton's skyline. As you will see for our application we have worked extensively with EHDC's planning and landscape officers to objectively and robustly assess the views to the site, and its impact on Alton's skyline, through undertaking a Zone of Theoretical Visibility Framework followed by a robust and very accurate photographic assessment of the key views. This work has been particularly appreciated by the officers at EHDC, and accepted in pre-application feedback we had on the scheme dated 7<sup>th</sup> January 2014. This states:

*Since our initial meetings and my last letter, CgMs have undertaken significant further assessment of the prominence and visibility of the site within key short, middle and long distance viewpoints. This work has been valuable in identifying available views of importance and helping to demonstrate the significance of the effects which development of the land (within potential key viewpoints) will cause. As you are aware a number of sites were put forward in the SHLAA process including land along the northern aspect of Alton. These sites, including this one, are elevated in the landscape and likely to lead to development that is more prominent and more influential on landscape character and the townscape setting of*

*Alton. The Council's Principal Landscape Officer reviewed these sites and I have mentioned his advice in my previous correspondence.*

*Having reviewed the work carried out to date, with the assistance of the Senior Landscape Architect I note that the three main land areas included within the SHLAA vary in how visible, and therefore influential, they are within views in and around the settlement. In my view this land area is less influential on many key views out of and across the town, than one would initially suspect and than the adjoining land stretching out across on the eastern side of Old Odiham Road for example.*

*This is supported by the scoping and review exercise carried out between ourselves and your landscape consultant, and the ZTV produced. While I do not think that the exercise can be relied on to have ruled out any and all public viewpoints I believe the work undertaken has been reasonably comprehensive. Based on the submitted information, it demonstrates that the significance of harm to the landscape setting of the settlement, and to landscape character itself, is likely to be lower than feared on this individual site. This is because many of the scoped viewpoints (which I have not visited to verify) seem to offer less prominence to the land area. On this basis I do not believe that potential impacts' significance is likely to rule out development on this land, having regard to the relevant goals of the NPPF and the Council's housing land supply shortfall.*

This initial feedback is consistent with the landscape officer's consultation response to the application, who supports the application given the above. We would very much welcome an opportunity to discuss this with you and take you through our landscape impact assessment, as we feel this may help reassure you of the landscape impact concerns of this site. We would also be willing to discuss other ways you consider could help minimise landscape impact.

**SHLAA Sustainability Assessment**

In addition you will see from the SHLAA sustainability assessment, that forms part of the evidence base for the Neighbourhood Plan, the site is the most sustainable out of the large sites currently in for planning. (There was an error with the initial sustainability assessment that resulted in our site having a red box for access to employment and a yellow box for access to retail. There is retail provision within 800 metres of the site and employment provision within 1200 metres of the site.) We have therefore requested this appraisal is amended to reflect this and it should therefore be corrected to show 0 red, 4 yellow and 16 green boxes.

Site	SHLAA Sustainability Assessment		
	R	Y	G
Cadnam Farm	0	7	13

Borovere Farm and Lord Mayor Treloar	0	9	11
Will Hall Farm	0	7	13
Highmead House	1	5	14
Old Odiham Road*	1	4	15

\*Sustainability assessment being challenged. It should read RED 0, YELLOW 4, GREEN 16

As can be seen the site is therefore in the most sustainable location.

### **Community Support**

We appreciate there is local opposition to development at each site. However the number of objections to the individual planning applications is quite telling. This is summarised below and as you will see our application has by far the least local objections of 48.

Site	Application Reference	Number of units	No. objections to planning app
Cadnam Farm	55428/001	275	162
Borovere Farm and Lord Mayor Treloar	30021/056	530	111
Will Hall Farm	55222/001	200	350
Highmead House	55250/001	120	134
Old Odiham Road	55097/001	97	48

As mentioned it would be appreciated if we could organise a meeting with yourselves to discuss your concerns with the site, and also if this site and the above could be seriously considered at your upcoming consultation event and further consultations into the most sustainable sites in Alton for development.

Please do not hesitate to contact me or Matt Roe if you would like to discuss further.

Yours sincerely,



**John Ferguson**  
**Associate Director**

## Sophie Hinton

---

**From:** John Ferguson  
**Sent:** 11 November 2014 14:26  
**To:** 'Jennifer.howard@easthants.gov.uk'  
**Cc:** Bethan Hawkins  
**Subject:** 11.11.14 JF:JH East Hants Strategic Housing Land Availability Assessment - Site AL047.  
**Attachments:** East Hants Strategic Housing Land Availability Assessment 1.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Jennifer,

I email regarding the recently published East Hants Strategic Housing Land Availability Assessment and in particular the Appendices. I write on behalf of my client and the landowner of a site in Alton AL047 – Land West of Old Odiham Road.

We have concern with the accuracy of the sustainability appraisal of the sites at Appendix G. In particular access to retail facilities and access to employment have been calculated wrongly for the site.

### **Access to retail**

The categorisation given to the 'Access to Retail' of site reference AL047 is currently 'Yellow', the criteria for which is retail being 'between 800m and 1600m'. However, our research has identified that retail floor space is within 800m of the site. A Londis convenience store is within 500 metres of the site. In addition Wooteys Way retail parade is within 800 metres of the site.

This would put the site within the 'Green' category, which is defined as less than 800m.

### **Access to Employment**

The sustainability assessment defines access to employment as red i.e. over 1600m. However the site is within 1.2km of the High Street where there are offices and significant employment. The categorisation should therefore be changed to yellow to reflect this.

I trust the sustainability appraisal can be changed to reflect the above, and previous inaccuracies.

I attach maps and detail of distances to the facilities.

Please confirm receipt of this email and advise if you would like to discuss further.

Kind Regards

**John Ferguson BSc (Hons), PG Dip TP, MRTPI**

**Associate Director**

**Direct Dial:** [REDACTED]

**Mobile:** [REDACTED]

**Email Address:** [REDACTED]

## **CgMs Consulting**

*Planning, Archaeology & Historic Buildings Consultants*

7<sup>th</sup> Floor, 140 London Wall, London EC2Y 5DN

**Tel: 020 7583 6767**

**Fax: 020 7583 2231**

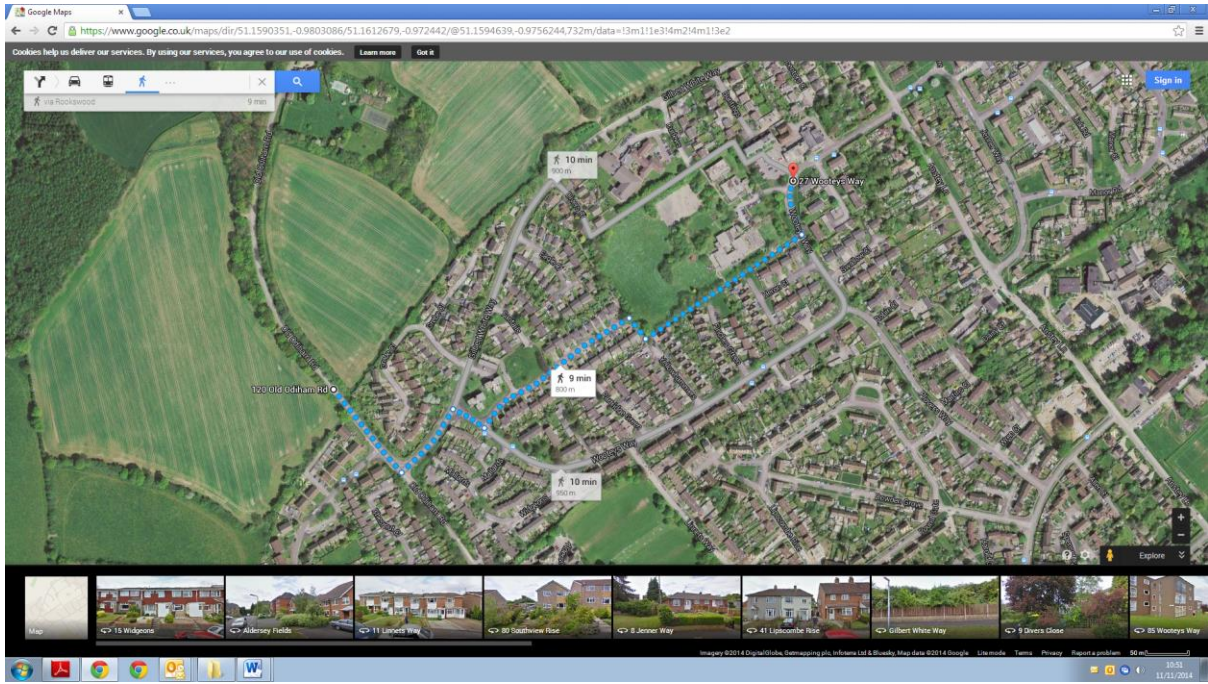
[www.cgms.co.uk](http://www.cgms.co.uk)

# East Hants Strategic Housing Land Availability Assessment

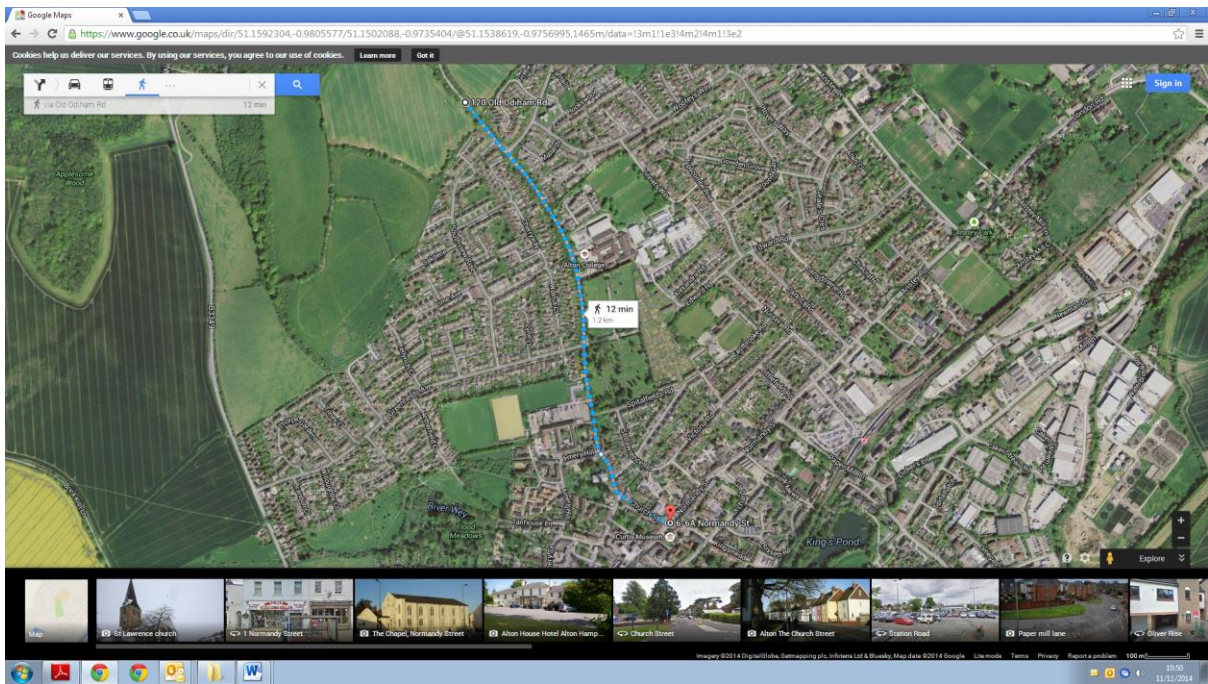
## AL047 – Land West of Old Odiham Road

### *Access to retail*





## Access to employment



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**Cgms**  
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**Jenny Woodgate**

---

**From:** Simon Jenkins  
**Sent:** 24 August 2015 09:28  
**To:** Jenny Woodgate  
**Subject:** FW: Alton Neighbourhood Plan - comments of Hampshire County Council  
**Attachments:** HCC Response - Alton Neighbourhood Plan - August 2015  
\_(HF000009982419).doc



Could you add please?

**Simon Jenkins**  
Executive Manager - Planning Policy, Heritage and Compliance

Direct Tel: 01730 234211

Email: [simon.jenkins@easthants.gov.uk](mailto:simon.jenkins@easthants.gov.uk)



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**From:** Samantha Brown [<mailto:> ]  
**Sent:** 24 August 2015 09:03  
**To:** Simon Jenkins  
**Cc:** 'Mike Heelis'  
**Subject:** FW: Alton Neighbourhood Plan - comments of Hampshire County Council

Hello Simon,

Please find attached comments received from HCC, although these should have been forwarded to EHDC.

Kind regards,  
Pat

**Samantha Brown**  
Admin Officer

Alton Town Council  
email: [REDACTED]  
website: [www.alton.gov.uk](http://www.alton.gov.uk)  
Town Hall, Market Square, Alton, Hampshire, GU34 1HD  
Tel: [REDACTED]

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**From:** Errington, Pete [mailto: [REDACTED]]  
**Sent:** 21 August 2015 12:09  
**To:** [REDACTED] < [REDACTED]>  
**Cc:** Planning Consultations < [REDACTED]> k>; Errington, Pete < [REDACTED]>  
**Subject:** Alton Neighbourhood Plan - comments of Hampshire County Council

Dear Sir / Madam,

Please find attached the comments of Hampshire County Council on the Alton Neighbourhood Plan. Hopefully all is self-explanatory but if you have any questions or require any further information about any of the comments made please do not hesitate to contact me.

Yours faithfully,

-----  
**Pete Errington**  
Planning Policy Manager  
Economy, Transport & the Environment Department  
Hampshire County Council  
Elizabeth II Court West - 1st Floor  
The Castle  
Winchester. SO23 8UD

Tel: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED]  
[www.hants.gov.uk/county-planning](http://www.hants.gov.uk/county-planning)

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**Alton draft Neighbourhood Plan Consultation  
Hampshire County Council Response – August 2015**

Paragraph / Policy Number	Object/ Support / Comment	Reasons (Including Proposed Changes / Amendments)
Policy HO3(e) Land at Will Hall Farm	Object	<p>As the Minerals and Waste Planning Authority, Hampshire County Council would like to reiterate that the site of 'Land at Will Hall Farm' is part of the Mineral Consultation Area due to the underlying safeguarded mineral resources in this area. This mineral resource (sharp sand and gravel) is protected under Policy 15: Safeguarding – mineral resources of the Hampshire Minerals and Waste Plan (2013). It would be helpful if this MCA designation was referenced in a bullet point in Policy HO3(e) of the Neighbourhood Plan.</p> <p>Hampshire County Council advises that early consideration is given to addressing the impacts of developments on potentially viable mineral resources in this area. Early discussions and consultation between developers and Hampshire County Council can ensure that developments are appropriately planned to comply with policies within the Minerals and Waste Plan (2013).</p> <p>Please see below the response previously submitted to the draft Alton Neighbourhood Plan which provides further details.</p> <p><i>Hampshire County Council recognises that the neighbourhood plan falls within the administrative area of East Hampshire District and the following response has been prepared on the basis of the implementation of the adopted Hampshire Minerals and Waste Plan (2013) which was prepared by Hampshire County Council in partnership with East Hampshire District Council.</i></p> <p><i>Although neighbourhood plans cannot include policies that deal with minerals and waste development, it may be the case that areas covered by a plan contain safeguarded minerals resources or existing safeguarded or planned minerals or waste sites. It is therefore important, when preparing a neighbourhood plan, that these issues are taken into consideration.</i></p> <p><i>Mineral resources as well as safeguarded minerals and waste sites are set out in a Mineral Consultation Area (MCA) which is issued by the County Council and sits alongside the adopted Hampshire Minerals &amp; Waste Plan. The MCA helps to ensure that non minerals or waste development does not needlessly sterilise viable mineral resources and that development does not negatively impact the operation of existing minerals or waste sites. More information on this is</i></p>

		<p>available on the HCC website: <a href="http://www3.hants.gov.uk/mineralsandwaste/planning-policyhome/mwsafeguarding.htm">www3.hants.gov.uk/mineralsandwaste/planning-policyhome/mwsafeguarding.htm</a>. It is important that any neighbourhood plan taken forward to adoption does not conflict with the adopted HMWP's policy objectives.</p> <p><i>HO39e) Land at Will Hall Farm</i>  The 12.88 Ha site allocated for residential use with a net developable area of 6.06 Ha overlies an area of mineral resource (sharp sand and gravel). Development of this site has potential to conflict with Policy 15: Safeguarding – mineral resources, of the Hampshire Minerals and Waste Plan – 2013. Hampshire County Council as the Minerals and Waste Planning Authority wishes to take this early opportunity to advise the Town Council that consideration must be given to addressing the impacts of potential development proposals on areas of potential viable mineral resources if development proposals come forward.</p> <p><i>It is recommended, in the event of a developer taking a development proposal forward which overlays safeguarded minerals resource, that a Minerals Assessment Report is produced for the Mineral Planning Authority. It would be most beneficial to the developer if this was submitted to the County Council prior to submission of any application to allow for early discussions to take place. The report should broadly address key issues including:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Site setting – Location, access, site description, geology and constraints;</li> <li><input type="checkbox"/> Planning status in respect of minerals safeguarding</li> <li><input type="checkbox"/> Policy context (both national and local), Mineral safeguarding Area;</li> <li><input type="checkbox"/> Constraints upon prior extraction – <i>inter alia</i> previous mineral working, hydrology of area, utilities and market issues (viability and/or quantity of resource present).</li> </ul>
<p><b>CH5 Local green space and open space</b></p> <p><b>ED1: School expansion</b></p>	<p>Object</p>	<p>The County Council as the Local Education Authority (LEA) is concerned that the wording of Policy CH5 does not allow sufficient flexibility to allow the County Council to secure future improvements to education facilities during the plan period. This ability is a requirement of the NPPF, paragraph 72 of which states that the 'government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.'</p> <p>Where central government funding is not available, the only way that education improvements can be funded is through developer contributions and through the disposal of surplus land within school sites. The County Council is only able to promote the disposal of surplus school facilities for alternative development where it can be demonstrated, under Section 77 of the School Standards and Framework Act (1998), that the land is surplus to the requirements of both the subject school and</p>

		<p>other LEA schools within the local area, and that the proceeds from the sale of the surplus land are re-invested by the LEA into educational sport and/or recreational facilities. Section 77 is therefore a process that would be consistent with the intentions of Policy CH5. The text above referring to section 77 should be referenced as one of the 'exceptional circumstances' in an additional bullet point in the latter part of Policy CH5 in order to be compliant with paragraph 72 of the NPPF.</p> <p>In terms of Policy ED 1 it would be helpful if a similar reference to the requirements of Section 77 was included in the explanatory text to this policy. It would also be helpful if a reference was included to engagement with Hampshire County Council, as Local Education Authority, in EDAP1 in addition to the reference to the District Council.</p>
Basic Conditions Statement version 1.1	Object	<p>The Basic Conditions Statement version 1.1 includes a section named 'NPPF sustainability objective and synopsis' (page 40). This section does not adequately address the issue of energy efficiency and energy generation, as set out in the NPPF paragraphs 95, 96 &amp; 97. To address these areas appropriate objectives should be added as set out below:</p> <ul style="list-style-type: none"> <li>• <u>To ensure that developments take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.</u></li> <li>• <u>To ensure that developments implement measures to reduce greenhouse gas emissions.</u></li> <li>• <u>To ensure that development proposals including renewable, decentralised or low carbon energy generation will be permitted, unless it is proven unviable to do so.</u></li> </ul> <p>These matters should have been considered as part of the plan preparation process and it should have been demonstrated how this consideration informed the preparation of policy in the Neighbourhood Plan. Because the matter was not addressed in the Basic Conditions Statement it does not appear to have fed through to Policy in the Neighbourhood Plan. It would be helpful if the matters referred to above were referenced in the Design section (and policies) of the Plan. At the very least the plan should include a reference to the relevant energy efficiency / sustainable building policies of the Joint Core Strategy and/or the NPPF. The matter of energy efficiency and sustainable building design appears completely absent from the Plan which is unfortunate.</p>

Hannah Collier

---

**From:** Matthew Ellis <[REDACTED]>  
**Sent:** 19 August 2015 09:35  
**To:** EHDC – Neighbourhood Plans Shared  
**Subject:** NOTIFICATION OF PUBLICITY OF THE ALTON NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir/Madam,

Thank you for consulting Waverley Borough Council on the Alton Neighbourhood Development Plan.

Having reviewed the document, the Council has decided not to make any representations.

Yours faithfully

Matthew Ellis  
Principal Planning Officer (Policy)  
Planning Services  
Waverley Borough Council  
Direct Line: [REDACTED]

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