



*Celebrating our Heritage – Protecting our Environment – Shaping the Future*

Application for 35 houses, and new sports facilities at Alton School - Ref: 21560/021

The Alton Society's Comments.

Whilst we would otherwise welcome the 'windfall' provision of 17 houses over and above the number provided for in the Alton Neighbourhood Plan, the impact of the scheme as a whole – especially in environmental terms – is in our view too great to justify. Our main concerns are detailed below.

1. Access, road safety and traffic congestion

Whilst the planned provision of sports facilities for shared community use is a commendable objective, there are serious access / traffic issues arising from what is a doubling of the proposed number of dwellings from that provided for in Policy HO3(e) of the ANP where 'approximately 18 dwellings' are specified.

The overall context: the huge growth in traffic movements in Anstey Lane arising from major recent developments – primarily Cadnams Farm, but also Barley Fields and Anstey Gardens to the southeast, means this comes at a time when the road network is least able to cope with the further increase in traffic. The local residents' group has provided vivid examples of the hazards that already exist for local residents, schoolchildren and users of the Anstey Park sports facilities, not to mention the significant peak-time congestion at the Anstey Road junction.

We would particularly take issue with the planned dual two-way access points, to replace the one way access and egress arrangements that currently exist. The proposed arrangement can only add to the acute congestion that already exists along Anstey Lane, the difficulty in manoeuvring into the flow of traffic, and impeded sight lines.

We believe that on these grounds alone the proposals fail to constitute 'sustainable' development as required by the NPPF's presumption in favour. The risks to air quality seem to have been dismissed - we note for example the response to concerns raised in January's questionnaire: "The site is not within an area of concern for air quality and as such air quality mitigation measures are not required". Given the number of children using this stretch of Anstey Lane to get to and from school this degree of complacency is unacceptable. For a school to be the architect of increasing air pollution within its environs to the degree envisaged is extraordinary.

## 2. Design and Layout

Our concerns here are less to do with overall density, but more the poor quality of design and site planning. The scheme is totally road and highway dominated, with a predominance of frontage parking, and the entire public realm smothered with roadways and parking. There are also conflicts with frontages and backs of dwellings – the Anstey Mews scheme has the frontages along the road and then the ‘mews’ faces the backs of the frontage houses, with the entire area between taken up with parking and roadway.

The predominance of three storey buildings is totally unsympathetic to the scale of the location; they are massive in comparison with the surrounding area. The houses are deceptively presented as two storey with rooms in the roof with dormers, but one only has to look at the eaves’ heights and the scale of the elevations and roofs, to see how large and dominant these houses are. The Meadow Vale three storey apartments are particularly unattractive and overbearing. Again, it is a cramped, bulky and car dominated scheme.

Has any thought been given (for example) to providing parking on the ground floor of the dwellings themselves, or incorporating the parking below a deck that forms outside space on the roof of the parking deck?

We fear it is now too late, but this is an excellent example of a scheme that would have benefited from submission to a Design Review Panel for a robust independent review. [See also item 5, below].

## 3. Loss of biodiversity and wildlife habitat

Notwithstanding the plans for new tree planting, the damage to the natural environment (loss of woodland and orchard) is a major concern.

We need do no more than quote the County Ecologist in her report dated 15<sup>th</sup> May:

*“The loss of woodland and the small orchard in particular are highly unfortunate, and I note that the Arboricultural Officer has raised concerns over the extent of tree loss...”. (In fact the arboricultural officer’s conclusion amounted to a ‘strong objection’ to the scheme’). “...The loss of woodland and orchard habitats does not accord with Policy CP21 of the East Hampshire District Local Plan: Joint Core Strategy and the proposals do not appear to have been designed to avoid the most significant ecological impacts. The presence of hazel dormouse in the local area has been confirmed through surveys carried out in 2013 at Cadnam Farm, Anstey Lane, c.0.5km north of the application site (and linked by hedgerow habitat to the application site). More recent surveys have recorded dormice in 2016 at Lynch Hill on the southern side of Alton, c.0.9km southeast of the application site....” Also cited are a distinct possibility of “roosting bats” ..... and reports of “rare species such as the lesser spotted woodpecker”.*

The report goes on to highlight major deficiencies in the applicant’s evidence, and demands much more detail of the potential damage to flora and fauna “in order for *the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable*”.

#### 4. Housing mix and affordability

Whilst we are pleased to note the improvement in housing mix since pre-app stage, we don't believe this goes far enough in addressing the acute need that exists locally for 1 and 2 bedroom units.

Much more concerning though is what we see as a serious shortfall in the provision of affordable homes, against the JCC policy (23% versus 40%). The justifications for this in the viability report include the extraordinary assertion that Anstey Mews "*would benefit the community by the payment of council tax*" and that the community will benefit from "*increased spending by new residents into the local economy*", as if this somehow makes this application exceptional. Payment of CIL is also listed as a factor, whereas this obligation exists regardless of affordable homes provision. Neither is "*facilitating of the school's expansion*" a credible viability factor, given that the very purpose of the 35 new homes is to fund the school's expansion. Lastly, the sharing of the new sports facilities with the local community will surely be made financially viable by an appropriate charging regime?

In summary, the viability claims seem to be based on a whole series of spurious and irrelevant statements, and we would strongly urge planners to stand firm on the standard obligation to provide 40% affordable homes, regardless of whether 18 or 35 homes are ultimately built.

#### 5. Sustainability

Finally, we are disappointed not to see a bolder approach to sustainable, low carbon design. Falling back on the minimum requirement to achieve a 10% CO2 saving over current Building Regs is simply not good enough. Whilst we acknowledge the proposed absence of gas boilers, and welcome the provision of electric charging points, these do not themselves represent a serious attempt to achieve a carbon-neutral outcome based on renewable sources, such as solar. The roofing of the proposed all-weather sports hall would surely be a candidate for solar panels?

Of all institutions, for an educational establishment to set such a poor example flies in the face of the climate emergency now facing us. This is a missed opportunity.

In conclusion, we believe the benefits of the additional housing (Anstey Mews) and the associated sports facilities are far outweighed by the cost in social and environmental terms, and the application in its current form should therefore be refused.

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Rod Eckles  
Built Environment Group  
27<sup>th</sup> May 2019