

REPRESENTATIONS TO EAST HAMPSHIRE DISTRICT COUNCIL DRAFT CORE STRATEGY CONSULTATION

BORDON AREA ACTION GROUP

18 JANUARY 2010

Introduction

This submission is made by Bordon Area Action Group, BAAG. The group was formed in February 2009. It now has about 500 members. Many more people in Whitehill-Bordon and surrounding settlements support our principles.

We are local people who think the Council's promotion and Government's acceptance of an eco-town here in which the existing population would double is wrong. It is neither sustainable nor deliverable and is likely to fail. As promoter, the Council dismisses informed local responses and conceals the real impact- a lot more houses, a lot more traffic, a lot of damage to the natural environment and surrounding settlements, no proven gains in terms of addressing climate change or new "facilities". We think the price of any new facilities is far too high. Most people place preservation of the area's countryside as a top priority. 5,500 houses will damage the natural ecology and biodiversity and take greenfield land to support a substantial proportion of those houses and to make up the shortfall in required open space.

Our principles are as follows:

We support

- Sensible redevelopment of redundant brownfield land
- Conservation of the historic natural and built environment
- Maintenance of the ecology and biodiversity of the area
- A rural town way of life
- A revitalised town centre
- Zero carbon building standards
- Better public transport to reduce car dependency
- A better social, economic and housing tenure balance
- Meeting any demand for more local jobs
- A fair say in our future

We oppose

- Development of existing valued or productive greenfield land.
- Development which would lead to substantial increases in carbon dioxide production.

- Harm to the historic natural and built environment
- Threats to the ecology and biodiversity of the area
- Increased urbanisation of the town
- Token buses instead of a rail or tram link
- Road widening and increased traffic on existing roads
- Development which would result in substantial increases in traffic flow through surrounding communities, segregating those communities and reducing air quality.
- Development which would intensify traffic flows along rural lanes.
- Widening the social and economic imbalance of the town
- False choices and false promises posed by the Council
- Central and local government intervention and “management” of the community.

We dispute

- The Council’s claim that a better town requires doubling the population
- The Council’s claim that uncontrolled development would arise if their plan is rejected.
- That zero carbon development can only be delivered through eco-towns
- That more affordable homes can only be delivered through eco-towns
- That the Council has a mandate to double the size of the town.

General objection

We submitted responses in objection to the draft masterplan on 24 December 2009. This submission should be read together with that document. The Council’s proposed masterplan and promotion of an eco-town with 5,500 new homes and associated development is unsustainable. It does not have the support of the local community. The Council’s submissions to central government, claiming “widespread community support” are unfounded. The community has never been asked whether it would support that level of expansion, doubling the size of the town. The proposed quantum has been decided and promoted, first through the Regional Spatial Strategy, then through the eco-town bid process, in the absence of a credible evidence base and with no public consultation.

In the absence of any formal consultation in which the quantum of proposed development could be meaningfully addressed, BAAG conducted its own survey. An overwhelming majority of responding local residents and business people oppose the proposed quantum of development and its impacts.

The DCLG assessment of the Council’s eco-town bid indicated failure to meet all key criteria, as originally set out in the draft PPS, notably that it would not be a freestanding settlement, close to and well linked with a higher order settlement, would threaten the natural environment or wildlife and would be

zero carbon. The Council's claim of community support went unquestioned notwithstanding our submission to the contrary. This appears to have been given sufficient weight to prompt relaxation of some PPS criteria, thereby upgrading Bordon's score. Nevertheless, there still appears to be insufficient justification for having designated Bordon as an eco-town candidate.

Assuming that the identified MoD land in Bordon does become available, we suggest the eco-town proposal in its current form is unsustainable and has a high probability of failure on account of:

- a. inability to achieve even the reduced PPS 1 standards across the whole town;
- b. inability of the town and surrounding area to absorb the scale, or amount of proposed development without harm to interests of acknowledged importance, including ecology, pollution, resources, congestion, quality of life and landscape character;
- c. commercial unattractiveness of zero carbon new build costs in relation to land values without massive public subsidy;
- d. inability to attract large scale new employment opportunities in advance of housing or at all.
- e. Inability to address the existing socio-economic imbalance in the town
- f. Inability to satisfy the requirements of national policy, specifically in the forms of PPG13 and PPS7, the very directives designed to limit carbon production by preventing development which would increase the need to travel.
- g. Wastefulness of existing resources, including green spaces, food production, retail and education premises.

The following responses therefore are founded on fundamental objection to a suite of policies which would if adopted give the Council complete authority to further promote and implement its own damaging, risky, unproven interests and ideas as both deal maker and decision maker in planning applications.

This submission addresses the dialogue in the draft Core Strategy which is intended to provide the justification for the proposals for W-B and the draft Core Strategy policies themselves.

The abbreviation W-B is used for Whitehill-Bordon, dCS for Preferred Policies draft Core Strategy.

The submitted comments are in "normal" font whilst the extracts from the dCS are set out in *italics*.

Context.

The populations of Petersfield and Alton are 14,000 and 17,000 respectively. W-B's population is around 15,000. The former have expanded progressively over hundreds of years and have established themselves in the hierarchy of settlements in Hampshire.

W-B has no historic and geographic reasons for its location. It did not grow around a staging post on the London to Portsmouth route or at the confluence of rivers; it has no listed buildings, few historic buildings, and little architectural heritage. It is not an historic market town which has grown to service a wide catchment area. Nevertheless, it is a rural town with a military history of more than 150 years, which is valued as such, as well as for its direct access to large areas of important open space and wildlife habitats.

W-B is likely to remain a less appealing place to live, work, shop and play than the market towns cited above. Future development should therefore aim to reinforce and improve its containment. It should concentrate on meeting existing local needs, including compensating for any loss of population and employment resulting from any relocation of the military establishment, rather than arbitrarily doubling its population. Many would regard the town's size as too large already, given the paucity of its asset base and locational disadvantages. The least appropriate course of action would be to significantly increase its size and population, with the likelihood of intensifying its dormitory status and exacerbating the impact of the daily migration of residents to the employment and retail "honeypots" of London, Guildford, Winchester and the south coast cities, acknowledged by the council's advisers as huge attractors of the district's residents.

No amount of intervention by the planning system will enable W-B to become a "centre" and compete with the likes of neighbouring historic towns. The success of "new towns" is variable, despite being commonly been located on good public transport and other access corridors, which W-B lacks. Even if labeling W-B as an eco-town marginally depresses internal traffic activity, it will make no difference at all to the increased intensity of external movements. The need to travel will not be reduced as paragraph 3.36 of the dCS claims. This need will result in increased reliance on the private car. As Lord Turner's report to Parliament advises, the increase in carbon dioxide emissions will far exceed any savings which improved house construction will achieve.

W-B is a place which needs jobs, from which its prosperity should be allowed to stabilise and improve. The community should be allowed to grow only as much as local jobs are created or retained. The policy guidance set out in PPS7 and PPG13 were written with communities like W-B in mind, where their unsustainable locations direct planning authorities to assess whether even development of "previously developed" land would be acceptable, let alone the vast areas of heathland, woodland and other greenfield sites included in the W-B proposal.

General responses to Preferred Policies for Whitehill-Bordon

6.1 This paragraph fails to distinguish between built and unbuilt land, i.e. between greenfield and brownfield land. It seeks to imply that all MOD land should be considered available for development, but the majority of it is greenfield land in the form of heathland, woodland and playing fields. The

text provides no justification for developing the very greenfield land which could meet all of the requirement in the heart of Bordon, in close proximity to the brownfield sites which should be considered as priorities for any regeneration strategy. Development of all or most greenfield land as proposed in the draft masterplan is therefore wrongly conceived because compensating for its loss necessitates attaching a large, remote area of farmland outside the town, in the neighbouring parish.

6.3 The “additional land” referred to is a working farm. It should be considered wholly unacceptable in the context of any policy set claiming “eco” credentials to extinguish the local food production which takes place in favour of “dog walking” and other recreation use, within a wider environment rich in open space and biodiversity. The “exciting opportunity” referred to is in this context neither sustainable nor innovative nor ground breaking. It cannot in itself make any contribution to the development of new technologies, or put W-B “on the map” in any but a negative manner. It cannot put in place facilities of any description that are dependent on market forces. The language employed throughout this section amounts to little more than a wish list.

6.5 Whitehill Town Council and Whitehill Town Partnership cannot be described as “partners” with authority or influence in any meaningful sense. The locally elected representatives of W/B have been removed from the Executive Committee. Councillors from outside the town have been put in their place.

6.8 This contravenes the EU Habitats Directive precautionary principle by expanding the town to create an excessively large urban settlement within a rural environment, but surrounded by land with European protection. There is no evidence to support the Council’s contention that harmful effects can be mitigated, no provision for monitoring those effect and no remedial measures if “mitigation” does not work.

6.12 This statement should not be confined only to SPAs north of the town. SPA’s are particularly vulnerable to impacts associated with housing development, but the likelihood of other uses of land immediately adjacent to the SPA’s is just as dangerous – the dropped cigarette, the game of football etc. There is no proof that it is possible to avoid impacts on the sites of ecological importance, and no proof that mitigation could work. Surely before any site was considered for a town of this size a proper detailed HRA should have been carried out. Those that have now been carried out show no evidence that this could be achieved, it is all just supposition. In addition to existing air quality issues around the A325 within the town, there are existing high levels of NOx near the roads such as the A325 through Woolmer Forest SPA and the Oakhanger to Kingsley Road through Shortheath Common. They already greatly exceed the safe limit.

6.14 BAAG agrees with this statement, but suggests an addition to policy CP18 as follows:

The separation between other outlying hamlets and towns also needs to be included in the above list to maintain the important landscape setting of the existing gaps between the following towns and villages:

Whitehill-Bordon and Standford

Whitehill-Bordon and Oakhanger

Whitehill-Bordon and Blackmoor

Whitehill-Bordon and Kingsley

Whitehill-Bordon and Hollywater

None of these villages are currently part of Bordon.

7.8 and 7.12 BAAG agrees with the content of these two paragraphs. But the proposed masterplan fails to demonstrate compliance with these objectives. Replacing a working agricultural landscape within an ancient and historic Domesday settlement with recreational development to provide a SANG is not 'retaining and enhancing' the character of either Standford Grange Farm or the historic settlement of Standford.

WH1

Inclusion as an SDA in The South East Plan with a target housing allocation of 5,500 was only approved on account of the Local Authority's pleading. No proven capacity studies or consultations were undertaken beforehand. There is no evidence base for this quantum of housing allocation.

No eco town boundary has been defined. A justifiable, specific boundary should be defined beforehand. The statement "...to identify a boundary..." is in conflict with "...has been identified..." It would be premature to adopt any policies, especially those related to development control decisions which would affect an area that has not yet been properly defined, let alone justified in detail.

Similarly, no masterplan is adopted. BAAG contends that the current draft masterplan is unsustainable, harmful to the town and surrounding area. It certainly fails to embrace a number of important requirements set out in the guidance given by CABI "Creating Successful Masterplans". We have made detailed representations on the masterplan. We contend that it should be scrapped in its present form.

Any preferred policy which pre-empts planning application decisions on the basis of whether the application complies with an unsustainable masterplan is therefore mistaken and should be omitted. Any preferred policy approach should avoid vague or ambiguous phrases such as "exemplar", "sustainable living" or "innovative and ground breaking" which do not serve to advance or

clarify how development decisions are to be made. Overall, we consider this policy to be ill-founded, and amounting to a licence for the local authority to take decisions in pursuit of its self-promoted politically inspired, unproven ideas.

The proposed circle radius of 2km includes land within the Headley Parish and tracts of countryside.

The above contradicts para 3.28, which states that: *“New development will protect and where possible enhance biodiversity by considering the impact of any change on both the designated sites and the many other sites which are of local value for wildlife. For example, the hedgerows, road verges, river valleys and farmland which act as wildlife corridors. These habitats, as well as gardens and open spaces in built-up areas, are recognised as essential parts of the overall wildlife diversity of the district.”*

Standford Grange Farm contributes to the overall wildlife diversity of the local area. The existing green spaces within Bordon, which are proposed to be built over in the draft masterplan, should be retained as such.

The policy contravenes the aspirations set out in para 3.29, which states that: *“... Developers will be expected to ... enhance links between existing habitats, including the enhancement of wildlife corridors and the restoration of key lost habitats such as heathland and water meadows.”* It conflicts with the masterplan proposals and EHDC’s own Biodiversity Action Plan, approved by the EHDC cabinet on 18th March 2009, states that: *““The Slab and Hogmoor Inclosure offer great potential for heathland restoration following cessation of military and forestry land uses. These sites remain vulnerable to the direct and indirect pressures of housebuilding in the area.”*

The Council’s masterplan includes building over parts of Hogmoor Inclosure and immediately adjacent to it. Policies should instead be directed at increasing the extent and quality of these valuable declining habitats.

Hogmoor Inclosure is designated by Hampshire County Council as a Site of Importance for Nature Conservation. It has already reduced dramatically in size since the MoD have been operational in W-B. EHDC should omit any proposals which would further compromise the acknowledged importance of this area.

WH2

To expand the community by 100% together with their cars, pets etc. in such a sensitive area is not possible without damage to the European sites. The heathland does contain several important protected birds. There is no strategy to deal with the possible decline of species. The Green Town Vision did not envisage doubling the population of the town. In an area such as W/B it is not possible to show a net gain in local biodiversity. It could only have a negative effect.

The HRA's produced by UE Associates and Scott Wilson both dated November 2010 do not show there will be no adverse effect on the integrity of European sites. The Council admits that *"where there is an adverse effect, proposals must show that appropriate mitigation or compensation measures can be put in place to minimise the effect on species and habitats of principle importance"*

The Habitats Directive does not say you can do this. It says the precautionary principle must always be applied, therefore if there is any doubt that the development may cause harm it must not go ahead.

"Housing sites will not be built within 400 metres of a Protected Area"

We have seen in information from Natural England that they have suggested there should be at least 600 metres barrier between housing sites and the Protected areas. How has this been ignored?

WH3

"The Councils preferred approach is based on the following principles:

The Core Strategy will allocate land for green space. This will amount to 40% of the new area that is to be developed (110 hectares.) At least half of this (20%) should be available to the public. The area required must be agreed by Natural England and informed by the Habitats Regulations Assessment.

The green space should consist of a network of well managed high quality green open spaces which are linked to the wider countryside."

Objection

If the 40% of the net land to be developed is 110 hectares, and at least half of this (20%) should be available to the public, that only leaves 55 hectares of public space. As SANGS need to be allocated at the rate of 8 hectares per thousand people, even with your low estimate of 2.7 people per household, that still needs 112 hectares of SANGS.

THIS SEEMS TO LEAVE A SHORTFALL OF 57 hectares. WHERE IS THE EXTRA LAND GOING TO COME FROM?

. "There should be a range of types of green space – the network will comprise new parks and formal gardens, amenity green space in and around housing, sports grounds, playing fields, open spaces, semi-natural areas including woods and heaths, green ways including rivers, cycleways and rights of ways, allotments, green streets.

Objection

This does not meet the SANGS criteria. Their purpose is to keep people away from the more sensitive European sites. They must be places where

dogs can be off the lead, and which attract walkers away from the sensitive sites.

. *“Community allotments or commercial gardens will allow the production of local food, green spaces will enhance the spatial qualities of the area, will improve biodiversity and be multi functional – accessible for play and recreation, walking or cycling and support wildlife and flood management.”*

Objection

We do not believe this would have any significant impact on local sustainability, in particular food mileage carbon emission.. The meaning of “commercial gardens” is not defined. We note that no more allotment space is allocated for W-B than the rest of East Hants, i.e. 0.2 of a hectare per thousand people. No viable commercial production could be expected to occupy such even the whole of that allocation. This “token” allocation is massively outweighed by the plan’s proposed extinguishing of a 90 ha working farm in the neighbouring parish for redevelopment as a SANG and recreation area.

. *“Wildlife Corridors will make the town more permeable for wildlife. Some areas will be restricted in terms of access. These sites, will have a biodiversity function first and collectively will provide a network linking the protected areas to the north and south.”*

Objection

Most of these shown on the Masterplan are far too narrow. If the wildlife corridor shown on the Croft (top of Hogmoor Inclosure) is an example the chance of wildlife using it is improbable. As this would be the back of gardens, in no time at all there would be garden waste, fires etc. and at the top it comes to a busy road.

. *“The Green Loop at W/B will be a major element of the SANG strategy. These areas will have a recreation function first and offer residents the chance to enjoy green landscapes right in the heart of the town providing opportunities for cycling, walking, dog walking, jogging. It focuses recreation away from the SPAs. It links the internal green loop with external footpath network.”*

Objection

The statement implies that dogs will chase cyclists, who will then run over the joggers. This is a recipe for chaos.

. *“Hogmoor Inclosure, Bordon Inclosure, Eveley Wood and farmland at Stanford form part of it and will form country parks and natural areas for people to enjoy. A network of rights of way, footpaths and streets will link into the green loop”*

Objection

Stanford Grange farm is not in W-B. This should be kept in agriculture. It is too far from housing (at least 1.6 km from the town centre) to attract people to

use it as a SANG. It is further away from the centre of the new town than the SPA. It is also important for biodiversity in its own right. It contains breeding Woodlarks and is an area for foraging Nightjars. Eveley Wood is a fairly narrow strip of land, heavily wooded and extremely boggy most of the time. It should not be considered as suitable for any kind of parkland.

Responses to the draft Core Strategy as a whole

1.7 The Core Strategy will take a broad look at the future of places in East Hampshire and will consider where changes should be made. It will not contain detailed comments such as where specific development sites should be located, as these will be identified in later documents once the Core Strategy has been approved by the Government.

1.23 The proposals set out in this document will be reconsidered following the consultation. A Core Strategy document will then be prepared and published for consultation. This document will then be submitted to the government for public examination and an assessment by an independent inspector.

“We anticipate applications will be submitted almost immediately after consultation ends on the 24th December, with demonstration sites set up next year.” (Press release by East Hampshire District Council (EHDC) to Planning Magazine 13 November 2009.)

BAAG objection. CSOH1

We understand that on the introduction of the Local Development Framework (LDF) process, the Core Strategy’s role did not include the definition of development locations. A subsequent Area Action Plan process was designed to cover this ground.

However changes have been recommended by central government to make the process less confusing for the general public, to reduce the number of occasions when they were asked to submit representations and to accelerate matters generally.

East Hampshire’s LDF has already been through an Issues and Options stage and a more recent Masterplan consultation on the W-B proposals. This “Preferred Policies” stage is in our view an unnecessary contrivance and can only serve to confuse and exhaust public interest.

1.23 advises that there will be yet another Core Strategy consultation. This will be followed by an Examination when the Inspector might choose to raise questions to which responses from the Council and general public will be sought.

The Council’s Deputy Chief Executive’s comments to the professional press in November 2009, that the first planning applications in line with the *draft* masterplan were anticipated early in 2010, create further confusion and

mistrust. Any such applications “immediately after” the preferred policies consultation stage and in advance of the next Core Strategy consultation exercise and examination, would be premature and prejudicial to the proper planning of the town. East Hampshire District Council is clearly sabotaging and pre-empting the very process it purports to pursue.

BAAG considers that the draft Core Strategy fails to accord with government guidance. It does not show precisely where development changes are proposed and the relevant specific policies to be adopted. Moreover, there is no comprehensive evidence base to support any of the draft policies.

This draft East Hampshire Core Strategy (dCS) is not consistent in the manner that it deals with different communities. It simply aims, but fails to identify the precise boundary of the proposed development at Whitehill-Bordon (W-B), in producing a master plan with a parallel consultation period, yet does not do the same for other communities.

In our view, this phase of the Core Strategy is premature, confusing and unhelpful. The threatened planning application strategy is very confrontational and disregards the majority view of the local public.

This dCS does not follow government guidance and serves to confuse the public who, in respect of the W-B proposal, have already been disadvantaged through a series of manipulative and misleading consultation exercises where, for example they have been advised that this is their “last opportunity” to comment.

BAAG considers that the council is trying to steer the W-B proposal past genuine, informed public scrutiny in an attempt to achieve a threshold of adoption/acceptance in the Core Strategy in advance of the general election in order to secure government funding which under a different administration may be withdrawn. We deplore the tactic.

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1.15 East Hampshire must provide 5,200 new homes between 2006 and 2026. Some of these have already been built or have been allocated in the existing Local Plan..... In addition, about 5,500 homes will be built as a part of the Whitehill/Bordon Opportunity.

4.80 The Council’s preferred policy is to provide sufficient development up to 2026 to meet both strategic requirements and local needs. The South East Plan requires 5,200 additional homes to be provided for future needs in the district between 2006 and 2026. In addition a new strategic development area at Whitehill/Bordon will include provision for about 5,500 homes.

BAAG Objection. CSOH1

There is no commitment within the South East Plan (SEP) to allow the council to state that “5,500 homes will be built at W-B”. The South East Plan and the Secretary of State (SoS) conditioned this allocation on the favourable

outcome of a number of elements of further research, none of which have been satisfactorily concluded. The council's Core Strategy Objective CSOH1 acknowledges this.

The Council's aspirational submission to the SEP panel lacked comprehensive evidence to support the W-B proposal. The material submitted was inadequate to support the development proposed.

Hampshire County Council:

*".....concerns about whether significant development at this location would be sustainable. ...the County Council is not fully convinced that **substantial housing development would lead to additional jobs, shopping and entertainment facilities**...Unless the latter are secured, the outcome would be an increased population which has to gain access to employment and higher order facilities by traveling to other towns, inevitably mainly by car."*

The Panel:

*"The housing provision figure is based on ongoing work including a water cycle study and Habitats Regulation Assessment and **should be regarded as an indicative figure. There is a need to appropriately assess this development and adequate mitigation is also required.**"*

Accordingly BAAG is of the view that the SEP panel's recommendations cannot be regarded as material considerations in considering the acceptability of the W-B proposal.

Not surprisingly the Government's eco-town announcement, introducing even greater challenges to the requirements of development at W-B, was made in the absence of a wider range of evidence, primarily associated with transport matters.

Since that time there have been two planning inquiries at other locations when very comprehensive research and evidence was made available to the government Inspectors. The fragility of successfully delivering sustainable development in rural areas was highlighted by the inspectors considering the proposed Dunsfold EcoVillage and development at the former Transport Research Laboratory near Crowthorne. Both were found to represent fundamentally unsustainable development locations with adverse traffic and carbon emission conditions. The Inspectors' recommendations to reject the appeals were confirmed by the SoS.

We object to statements within the dCS which are highly suggestive that building 5,500 new homes at W-B is a foregone conclusion, thereby reducing the incentive to submit representations. The numbers and indeed the principle are dependent upon the outcome of research which is far from complete at the end of 2009.

Policies which rely on incomplete and inadequate evidence to support the W-B proposition must be regarded as premature and unsound. If, despite the consequential high risk of failure, the dCS proceeds on that basis, implementation of all policies should be conditional on continuous, independent evaluation of the impacts against all requirements and/or criteria in or applicable to the proposals.

To assist the public's understanding, policies and explanatory texts should make it clear that the quantum for W-B is "ring fenced" to W-B only and that even a reduction to **zero** dwellings there, due to the constraints of the wider area and concerns about the extreme levels of carbon emissions resulting, would impose no additional pressure on other communities in East Hampshire District. The wider public are then clear that there is no inevitability or pressure to accept 5,500 homes.

This is the SEP panel's approach, designed to avoid the consequences of reduced numbers at W-B imposing additional pressure on surrounding communities. It is however at odds with the recommendations of a previous local plan Inspector who reported that "*land here could take the pressure off greenfield reserve sites*" elsewhere in the district.

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2. A profile of East Hampshire

The local economy

- *the district has about 55,000 residents who work.*
- *the number of jobs in the district is around 43,000.*
- *in 2001, about 13,000 people commuted into, and about 25,000 residents commuted out of East Hampshire to work (daily presumably)*

2.13 A key weakness of the local economy is the imbalance between jobs available (mainly lower skilled) for a more highly qualified and professional workforce. Average earnings from jobs in East Hampshire are low compared with Hampshire, the south east and England nationally and this inevitably leads to high in and out commuting. The reality is that because of good road and rail links residents can easily work in London, for example. About 40 percent of the resident workforce work outside the district while many jobs available in the district are filled by workers from outside East Hampshire.

2.14 The economy is dominated by the A3 corridor with workers, shoppers and people pursuing recreational activities looking either south towards Portsmouth and the coast or north towards Basingstoke, Guildford, the Blackwater Valley and London.

Transport and Environment.

Protecting the wider environment

The local picture

- *Air quality in the district is generally high, but pockets of poorer quality exist, such as high levels of nitrogen dioxide at the A3 (Bramshott/Grayshott and Horndean) and the A325 (Bordon)*

2.34 Reducing the causes of climate change is the other key aspect. This focuses on reducing the amount of carbon dioxide and methane released into the atmosphere through improved energy efficiency and waste reduction.

- *Car ownership in the district averages about 1.5 cars per dwelling, which is significantly above the national average, and 88 percent of households own one or more cars.*

Car Ownership

Characteristic % Households 2001

	<i>East Hampshire</i>	<i>Hampshire</i>	<i>UK</i>
<i>Average</i>			
<i>Two or more</i>	<i>48.8</i>	<i>42.3</i>	
<i>28.8</i>			
<i>One</i>	<i>38.9</i>	<i>42.0</i>	
<i>43.8</i>			
<i>None</i>	<i>12.3</i>	<i>15.7</i>	
<i>27.4</i>			

Sources: Nat Lichfield retail and Leisure Study for EHDC 2001 Census of Population

- *In 2001 70 percent of the district's working population travelled to work by car (2001 Census).*
- *Only six percent of people travelled to work by public transport, nine percent walked and two percent cycled.*

2.35 Of particular concern is the volume and speed of traffic using rural roads.

2.36 Petersfield, Liphook, Liss and Rowlands Castle have stations on the Portsmouth to London Waterloo railway line. The line from Alton also goes to London Waterloo. The numbers of passengers has increased rapidly, in line with national trends. In contrast to buses, the numbers using rail services have increased considerably with congestion growing on the rail network. Now, over 1 million passenger journeys are made out of Petersfield.

2.37 Bus passenger journeys in Hampshire have steadily declined from over 28 million journeys in 2001 to 26.5 million in 2006. Most of this decline occurs in rural areas.

2.38 Public transport in many rural areas of East Hampshire is poor or non-existent and providing local services, where the demand is not sufficient to support them without subsidies, is a continuing concern. Lack of safe routes can mean that walking or cycling are not reasonable options.

BAAG Objection. CSOE9, CSOT1, CSOT3, CSOT4, CSOWB6, CSOWB10, CSOWB12.

This evidence indicates the scale of the challenge in seeking to locate any development at W-B, let alone an eco-town initiative. Essentially;

- Higher paid salaries in attractive locations beyond EHDC boundaries. Lower housing costs at W-B. Result, high levels of long distance commuting, predominantly by car.
- A3 attractive corridor, accessed by over-trafficked rural roads with high speeds, congestion and air quality issues passing through other local communities.
- Significant rail use but more on the main Portsmouth-Waterloo line and even then only 3.3% at Alton for journeys to work.
- Bus use decreasing.
- Reducing causes of climate change is key to the Core Strategy, transport is the largest single contributor (24%).

The Council's proposals have little regard for the issues set out above. The work by WSP reinforces the belief that the provision of local bus services and cycle routes within W-B, the provision of restricted parking and the creation of lots of well paid jobs, will see an end to commuting and are cure to the "off-site" shortcomings.

The Council's much publicised hopes for fast bus links to surrounding communities and a new rail service, are conspicuously not included as policy proposals in this consultation. The Council should confirm whether they have been dropped.

We consider, as did the inspectors at the Dunsfold eco-village and TRL Crowthorne appeals, that the requirements of PPG13 and an appreciation of the overall carbon footprint of the development are essential considerations in assessing the acceptability of a major development proposal in a rural area with a history of high commuting levels.

Lord Turner's report to government highlights the importance of Spatial Planning in driving down carbon emissions to reach the government's various targets of 20% and 80% reductions over the next 40 years. The Council appears to think that the solution lies in building energy efficient housing, but those achievements are now a requirement of any new housing anywhere in the UK. The key difference between W-B and elsewhere in the UK is that it

would be difficult to find a less sustainable location in transport terms than W-B.

The Council fails to incorporate policies which address the bigger picture in carbon and transport terms, fails to identify the most sustainable option for the regeneration of W-B and direct policies accordingly and fails to have an adequate evidence base on which to build those policies.

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3. Spatial vision and objectives

Built and natural environment

Core Strategy objectives

Environment

CSOE1 BAAG agrees with the intent, but the best use of land in Bordon includes retaining and protecting the existing valuable green spaces to serve proposed new housing adjacent to them. PPG3 is clear that the best use of even brownfield land does not mean automatic allocation for built development.

CSOE2 BAAG objects to the harmful impact of the proposed 'Country Park' at Standford Grange Farm on the character of Standford whose rural working farm is an essential local food producing component which should be regarded as wholly complementary to the primary purpose of an "eco-town." Engineered features such as car parking, sports pitches, pavilions, floodlighting paths, dog areas, etc are alien to this character and harmful to the acknowledged important biodiversity. Standford Grange Farm is a rural landscape and forms part of the relatively dark landscape setting to the village of Standford. Any consequential highway "improvement" such as access arrangements should similarly be unacceptable.

CSOE3 BAAG considers this essential. However, the impact of the proposed expansion contravenes this policy. Furthermore, the opportunities identified in the EHDC Biodiversity Action Plan in association with restoring and extending existing heathland should be further advanced within the Core Strategy.

CSOE4 *To conserve and improve the district's attractive built and historic environment, including heritage sites, conservation areas, listed buildings and important open areas;*

BAAG agrees with the intent but objects to the conflict with the masterplan. Important open spaces within W-B will be lost. Heritage sites and

conservation areas in surrounding settlements including Standford, Passfield, and Oakhanger will be harmed. BAAG considers the existing green spaces and sports pitches within Bordon to be important both physically and visually. This policy should be amended to include *important or locally valued public or private open spaces*.

Healthy Living

CSOHL3 CSOHL5 CSOHL6 BAAG supports these objectives. However, the proposed location of the 'Country Park' in the proposed Bordon-Whitehill Ecotown masterplan is well over the recognised Fields in Trust (FiT) 2008 guidance for outdoor recreation for both rural and urban locations. Locating a country park some 1.6km away from the proposed new housing areas, fails to encourage people to use these proposed recreational facilities. The existing distribution of these spaces in the heart of Bordon is far more sustainable in being in close proximity to the brownfield residential and other sites which should be given highest priority in line with PPS3.

Whitehill/Bordon

CSOWB

CSOWB8 BAAG agrees with the objective. However, the character of the proposed ecotown will be that of an alien high density urban settlement which fails to draw upon good features of the past or present to help make Bordon truly distinctive.

CSOWB9 BAAG considers that the use of Standford Grange Farm to provide the recreational requirements for the town will change the landscape setting from a productive, rural, undulating landscape to that of a sub-urban environment with engineered features likely to include car parking, flat sports pitches, pavilion buildings and potentially lighting to ensure that the park meets 'Secure by Design' requirements. The development of this land, separated from the town by a dense woodland belt, won't change the landscape setting of Bordon. It will however, change the landscape setting and character of the village of Standford. For the proposed Ecotown to be truly "exemplary", the farm should be retained and used to supply the Ecotown with its own food and bio-mass, while preserving its biodiversity.

CSOWB10 *To avoid effects on the integrity of the European designated sites nearby and enhance biodiversity.*

CSOWB12 *To ensure development takes place within the environmental capacity of the town.*

BAAG agrees. However, on the available evidence or its absence, the Council's actual proposals will fail these tests. The acknowledged need for "mitigation" of the harmful impacts of these proposals is an admission of

failure. The policies are too general to be effective. They should be rewritten as follows:

CSOWB10 To ensure that the total quantum of planned development has been proven to avoid all harmful impact on nearby European designated sites before any development is commenced.

CSOWB12 To ensure that the total quantum of development has been proven to avoid harm to the existing natural environment, including ensuring reduction in carbon emissions in compliance with eco-town objectives. A further policy should be included to deliver the objectives of EHDC's Biodiversity Action Plan. i.e. to restore the areas of heathland following the departure of the MoD.

3.5*The eco-town status for Whitehill/Bordon will bring the longstanding Green Town Vision to fruition meeting the needs of residents, businesses and visitors.*

BAAG objection. Statement of Community Consultation.

The Green Town Vision formulated worthy development guidelines and originated in 2004 in response to the possibility that the Army might leave Bordon.

1 December 2005. Green Town Vision launch at a public meeting. 100 people responded, of whom *"90% want better facilities for the town and are keen for the surrounding countryside to be protected."* - *"around 75% supported the principles of the Green Vision"*. So 75 people voted for it. The population of Whitehill Bordon is around 14000.

November 2006. the Whitehill Bordon Opportunity Steering Group, led by EHDC, called for up to 5500 dwellings to be included in the Regional Spatial Strategy . Residents were not consulted.

July 2007. EHDC submitted its eco-town bid to Government. The bid document linked the proposal firmly to the Green Town Vision, asserting several times that this received *"the full support of the local community"* and that the *"community welcomes development and growth"*.) Despite this claim, residents had not been consulted. Neither had Whitehill Town Council.

October 2007. An EHDC, district wide survey, established that 77% of 1116 respondents from the whole District agreed *"that the army leaving would be a real opportunity to develop the kind of town that serves the community and protects the environment"*. Only 168 respondents were from Bordon Whitehill.

Spring 2008. EHDC Core Strategy questionnaire provided the only opportunity to choose housing numbers - 2000, 4000, 5500 or 8000 homes. The 5500 homes figure was defeated by 72 to 36, but was nevertheless

adopted by EHDC. *The only positive vote* was for 2000 homes, supported by 66 people, with 50 against.

24 July 2008. Forest Community Centre, EHDC eco-town public meeting. 200 residents attended. Bordon Herald reported, “Widespread disquiet over the local authority-led bid.”

6 October 2008. Petition to Parliament with 1350 signatures, calling for no more than 2000 houses to be built at Whitehill Bordon. A large vote, ignored by EHDC.

4 April 2009. EHDC’s First public masterplan consultation in the Forest Community Centre. Questionnaire results only published in October 2009. No questions about the scale of the development.

April 2009 BAAG delivered 2500 questionnaires locally. Of some 400 returned, 90% voted “No” to both the question *‘Do you agree with the plan to double the size of Whitehill Bordon by building 5500 more homes ?* and *‘In your view, do the Council’s plans reflect what local people want ?*

17 April 2009. BAAG held a public meeting in Forest Centre. With some 300 present, 99% voted to *“reject EHDC’s plan to double the number of homes and people in Bordon”*.

16 July 2009. In a Radio 5 Live interview Ferris Cowper stated that *“when we had a MORI independent survey done 77% of the town supported our Green Vision.”* This is entirely incorrect. This was not a MORI poll, not a town poll and not about the Green Town Vision. (See October 2007 above.)

The Green Town Vision is a long way from today’s proposals. To parade the current Core Strategy proposals as *“realising the Green Town Vision and thereby meeting the needs of residents”* is misleading to say the least.

X-X-X-X-X-X-X

3.6 Whitehill/Bordon will have a bold town centre with a major retailer at its heart and other large units to attract more quality retailers.

BAAG Objection. CSOWB1

The term “bold town centre” is meaningless. The Council cannot in any case deliver it or a major or any quality retailers, which it acknowledges is dependent on market forces. The Council’s consultants’ reports do not support that prediction. As with employment provision they express limited confidence in any major retail operations, “quality” or otherwise, being attracted to the town. BAAG considers this policy to be unfounded. The Council’s expert advisors express no enthusiasm for a market for the early delivery of facilities, but recognise that to improve containment is essential. BAAG considers this policy should be omitted in favour of a more sustainable

one of incremental reinforcement of the existing High Street in parallel with any new housing or employment development.

X-X-X-X-X-X-X

3.7 The housing needs of everyone will be met thanks to a wide mix of properties including a broad range of larger, detached homes and an appropriate proportion of affordable housing.

BAAG Objection.CSOH4

The eco-town requirement at W-B is for 40% affordable housing, not an “appropriate proportion”. One of the justifications for eco-town initiatives is that they are seen as major vehicles for the provision of affordable housing. The recent Forest of Dene decision has demonstrated that where a key allocation is unable to provide the requisite proportion of affordable housing, it is preferable not to permit development to proceed. The Masterplan area proposed for “larger detached homes” is in fact wooded open space, not brownfield land, therefore objectionable for reasons stated throughout this submission. Moreover, even the Council’s stated affordable target of 35% is in conflict with the stated objective of the original Green Town Vision to redress the present socio-economic imbalance which has already produced an abnormally high proportion of social and affordable housing. The over-optimistic wording of this policy relies for its delivery on forces and events beyond the ability of the Council to control. This policy should be rewritten accordingly.

X-X-X-X-X-X-X

3.8 The aim is to curb commuting away from the town so that means new and improved schools, sixth form and higher education facilities and investment in high quality sustainable employment. This will enable local businesses to find the skills they need locally.

BAAG Objection. CSOT4, CSOT1, CSOWB1, CSOWB6, CSOWB10, CSOWB 9, CSOWB12, CSOEM1, CSOE9.

The “aim” needs to address the means by which commuting to as well away from W-B, will be curbed. However the planning system cannot control out-commuting nor restrict any provision of new jobs to local residents. The Council would need to adopt a policy contrary to UK and EU law and human rights which restricts the free movement of labour to bring this about. It must be self-evident that any decision by any employer to locate in Bordon equates with a decision *not* to locate someplace else. Job hungry populations in nearby settlements must be expected to compete with locals for the new jobs. New jobs will inevitably attract more incoming traffic, bringing employees from beyond Bordon’s or EHDC’s boundaries.

There is little correlation between the numbers of jobs and the provision of social infrastructure and homes in a community and travel characteristics. Gosport is a prime example of a relatively balanced community in terms of jobs and housing but has very high commuting levels, Crawley has more jobs than economically active residents, yet out-commuting levels there are also high.

Parents also exercise their right to choose the schools they send their their children to. Their choices are influenced primarily by the known quality of a school, not its location. Without hard evidence and a secure means of delivery, the “aim” of 3.8 has no substance.

X-X-X-X-X-X-X

3.9 Investment in public transport and improved cycle/pedestrian links will improve access to services and facilities within the town and to the wider area, including to local railway stations and regional centres.

BAAG objection. CSOT1, CSOT3, CSOT4, CSOWB6.

BAAG’s representations on transport issues are set out throughout this document. However;

- EHDC’s consultants confirm that this is an area of failing public transport.
- There is no vision or strategy with commensurate policies, to make any external bus links attractive and effective in attracting new customers.
- There is no viability analysis of the internal public transport proposals or of the links to external destinations, all the more regrettable following the recent withdrawal of the existing commercial service, now only partial and subsidised at public expense.
- There are no concrete proposals for ensuring that buses can get past queuing traffic (or that traffic can get past stopping buses) to give some certainty about journey times and frequencies of service, the raw ingredients of a successful service.
- There is no understanding of let alone provision for accommodating those buses at their destinations.
- The words appear to be limited to components of the master plan, not addressing policies external to the town and certainly not the “delivery” issues beyond EHDC’s boundaries.
- There is no evidence that the policy ambitions are “deliverable, achievable and viable”, requirements of PPS 3 we think.
- There is no policy relating to the delivery of the Rail link to W-B. This despite numerous announcements by EHDC that “there is a strong prospect of having the new station” and “you will soon be able to whiz to London from W-B by train.” BAAG considers the consultation process has attempted to seduce consultees into the prospect of

accepting major growth with a suite of attractive investment measures, few of which are now the subject of policy commitments.

X-X-X-X-X-X-X

3.20 A generally wider geographical spread of employment sites and a wider base of employment types will increase the availability and choice of modern business premises, allowing new smaller businesses to set up providing opportunities for better paid jobs for local residents. There will also be improved infrastructure and local services for businesses and their employees. This should strengthen the economies of more communities, meaning more opportunities for local businesses to thrive with better employment prospects for local people. As a result fewer residents will need to work outside the district.

BAAG objection. CSOWB6, CSOEM1, CSOE9.

In the case of W-B this statement is not based upon the findings of the research carried out for the council. It is essentially an aspiration for which the expert advice has little confidence of delivery. It does not represent a basis for sound planning policy.

BAAG's objections to the employment report are set out later in this submission. The employment study makes no reference to a potential for small industries to provide better paid jobs in W-B, there is no evidence that substantial investment in infrastructure and services would strengthen local economies. There is no evidence that fewer residents will work outside the district.

X-X-X-X-X-X-X

3.25 The gaps which separate towns and villages and contribute to their character and identity will be protected.

3.27 The landscape character assessment will be used to protect the important characteristics for each landscape type in the district. Development will not harm the landscape, conserving the unspoilt and locally distinctive character of the countryside.

3.28 New development will protect and where possible enhance biodiversity by considering the impact of any change on both the designated sites and the many other sites which are of local value for wildlife. For example, the hedgerows, road verges, river valleys and farmland which act as wildlife corridors. These habitats, as well as gardens and open spaces in built-up areas, are recognised as essential parts of the overall wildlife diversity of the district.

BAAG objection. CSOE1, CSOE2.

EHDC's preferred Gap policy, advised by WSP's 2008 paper "East Hampshire Development Locations", states that the retention of the Lindford Bordon Gap is very important. Paragraph 3.25 of the Core Strategy repeats that commitment. However the proposals for W-B envisage the gap, currently a farm, being lost to recreational facilities requiring car parking and sports pitches, changing rooms and lighting.

We have not encountered any meaningful policy relating to landscape issues. There appear to be no Visual Impact or Landscape Character analyses which might direct development away from sensitive locations. The SA/SEA Landscape chapter sets out legitimate topics for consideration in paragraphs 14.3.1 and 14.6. They are not followed through however.

Whilst BAAG supports the strategy to protect and enhance all sources of biodiversity in locally designated areas as well as internationally protected areas, we would point out that the overriding legal requirement to comply with the Habitats Regulations is to establish that the proposed development would result in **NO** harm to the integrity of an SPA. It is not a matter of "considering" the impact of change, it is a matter of preventing any adverse impact.

We are surprised therefore to see new routes shown on the master plan into many areas of ecological value. Hogmoor Inclosure is one example.

More detailed objections to the proposed Core Strategy Policies are set out elsewhere in BAAG's submissions.

X-X-X-X-X-X

3.30 New areas for informal recreation will be provided as alternatives to the heathland which is part of the internationally designated, Special Protection Area (SPA) in the north eastern area of the district. The rare species of bird on this particularly important heathland will be protected from the recreational pressure from residents of the new housing in the Whitehill/Bordon, Liphook, Liss, Headley and Grayshott areas.

BAAG Objection. CSOE3, CSOWB12, CSOWB9.

The protection of the heathland will also need to be extended to the activities of employees and educational establishments in these areas. In other words protection is needed against all increased human activity introduced into these areas.

X-X-X-X-X-X

3.36 Development which is likely to result in a lot of new journeys will be located near existing centres. This will reduce the need to travel and increase the scope for shared and multi-purpose trips.

3.36 New development 'travel plans' will encourage the use of public transport services and provide facilities for pedestrians and cyclists.

3.37 The level of parking provided with new housing will vary to reflect expected car ownership, accessibility to facilities and availability of public transport.

CP35 PREFERRED TRANSPORT POLICY

1. Encourage the fullest possible use of sustainable modes of transport including cycling, walking and public and community transport wherever possible to reduce dependence on the private car and the negative impacts of vehicular emissions on the climate. This will be done through working with partners to:

- Ensure development is located and designed to reduce the need to travel. Development that is likely to result in a lot of new journeys will be located near existing centres and supportive infrastructure;
- Ensure development reduces travel demand and car trips through transport assessments and travel plans;
- Protect rural/green lanes so that they remain convenient and safe for those who have to use them.

Core Strategy objectives	CHOT1 To reduce the need to travel through the careful planning of development/location of services
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BAAG objection. CSOT1, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

BAAG's submissions above cover much of our objection to policy CP35 and the paragraphs above.

The logic of putting major trip generating development near to existing centres is supported. However in the case of W-B, the town is not a centre of sufficient substance to be capable of providing any degree of containment. There are some elements of social infrastructure which the council, with public finance, could provide but their provision would not make any significant difference to the population's ability or willingness to live, work, educate and play within the confines of the town. The private sector's willingness to invest in W-B is certainly not confirmed in the Council's reports from experts in their fields. The "offer" elsewhere is overwhelmingly superior with centres rich in heritage, quality of life, architecture, street environments, job opportunities, retail and leisure space, all relatively easily accessed. Existing residents travel to those locations, the prospects for making W-B a competitive "centre" thereby entirely changing their travel habits and improving the town's

containment, are very slim indeed. This development will simply extrapolate current travel characteristics and prove to be a very big generator of traffic and carbon, contrary to the policy ambition and massively failing to meet related eco-town targets.

At W-B Travel Plans will need to go to a much higher level than current HA models require. We need real policy detail here if carbon production through travel is to be controlled. Targets need to be set, monitoring carried out in perpetuity, and hard measures implemented if targets are in danger of being exceeded. There need to be mechanisms whereby development of any sort is stopped until corrective measures are implemented. Those measures need to be identified and costed such that finance can be set aside to enable them to be implemented. The sensitivity of the location demands measures which many will describe as social engineering. The problem is intensified in that existing residents are unlikely to accept the need for *their* behaviour to change, especially through any kind of restriction, enforcement or compulsion, whilst behaviour in every other settlement remains unaffected.

Providing restricted car parking has not in our experience produced any reductions in car use. The CABE reports on completed developments across the UK reported one consistent complaint, not enough dedicated car parking space. At the same time residents were not aware of the public transport offer and streets were clogged with on street parking, often on footpaths.

Restricting parking provision where there are overriding reasons to rely on the car, is not an appropriate policy. Locating development where using the car is not as attractive or necessary to travel short distances to well established urban centres rich in choice of facilities, would allow restricted car parking policies to work. W-B is not one of those places.

BAAG supports the proposal to protect rural lanes. However W-B is centred on a network of rural lanes and adverse impact is inevitable unless both targeted policies and physical measures are in place to prevent this happening.

The Council fully accepts that the A3 is the primary movement corridor and will become more so on completion of the Hindhead tunnels. Their studies do not however address which routes would become most attractive to W-B traffic. The congested centre of Liphook village, through which A3 destined traffic can chose to pass to/from the north, will be avoided in favour of the minor lanes through Lindford, Headley, Grayshott, Bramshott and others. A policy to protect minor lanes therefore needs to be drafted, detailing deliverable proposals rather than providing visionary wording.

X-X-X-X-X-X-X

P1 PREFERRED SPATIAL STRATEGY POLICY

The Council's preferred approach to the spatial strategy is to provide development in the most accessible and sustainable locations to maintain the vitality and viability of existing communities. The Council will:

- *Locate development predominantly in or near settlements with a good range of services and facilities, and access to alternative modes of transport to the car;*
- *Provide housing, including affordable housing, of a scale appropriate to the settlement;*
- *Provide appropriate economic development of a scale appropriate to the settlement;*
- *Provide and retain public open space and green infrastructure;*
- *Locate development so as to minimise risk of damage to areas of high nature conservation and/or landscape value;*
- *Locate development so as to protect and enhance the character and quality of the local area;*
- *Locate development so as to minimise the amount of development and people at risk from flooding;*
- *Support rural transport initiatives that improve accessibility;*
- *Support the retention of local services and facilities.*

The Preferred Policy is to include a settlement hierarchy based upon the accessibility of settlements and availability of a broad range of facilities. The majority of development will be focused in the most sustainable towns and larger villages where it retains and enhances their character.

BAAG Objection CSOT1, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

We consider that policy CP1 is not in conformity with PPG13 or PPS7, rather it contradicts their guidances not to locate major generators of traffic in rural locations, thereby generating the need to travel.

X-X-X-X-X-X

Settlement hierarchy

4.3 Sustainability is a key theme of the Council's sustainable community strategy as well as national and regional planning policy guidance.

Development needs to be distributed in a sustainable way and an effective tool for measuring this is via a settlement hierarchy.

Market towns

4.5 Whitehill/Bordon (pop. 13,922) is currently a largely self-contained military town with a range of services although these are generally spread throughout the town.

BAAG objection. CSOT1, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

The council's research advises that East Hampshire and W-B exhibit high levels of out commuting over considerable distances to a wide range of facilities. The overwhelming proportion of journeys are undertaken by car. Under these circumstances it is difficult to accept statements that "W-B is a largely self contained town". It clearly is heavily reliant on external jobs, shops and leisure facilities.

In BAAG's view the town is far from being a sustainable community, a conclusion which should have led the council not to allocate further development there..

X-X-X-X-X-X

Where will new development go?

4.46 A transport assessment has been undertaken by consultants for the Core Strategy to help assess the most suitable locations for new development. Potential sites for new housing are considered against such criteria as congestion, accessibility and sustainability.

The WSPTransport Assessment.
East Hampshire Development Location November 2008

WSP has been commissioned to assist in the investigation of the transport related impacts of delivering the Local Development Framework housing target for East Hampshire District Council.

1.2.3 This study concentrates on potential locations for housing development. A separate employment study has been undertaken by East Hampshire District Council. It has concluded that there will be not be an increase in employment floorspace over the LDF period.

1.2.4 The South East RSS sets out an approximate target of 5,200 residential units for East Hampshire over the period of 2006-2026. There are also an additional 5,500 allocated for Whitehill/Bordon, providing a total of up to 10,700.

1.2.6 Finally, this study only looks at the situation within East Hampshire District, and not the traffic impact of developments in neighbouring authorities.

BAAG Objection. CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

The council's policy for W-B is to create over 5,500 or 7,000 new jobs. The WSP study assumes no increase in employment floorspace. The exercise is unsound and should be disregarded.

Para 4.46 of the dCS refers to the WSP work reporting on sustainability issues. BAAG couldn't see any output which quantifies the carbon consequences of transport generated by the W-B development, surely the primary consideration.

BAAG notes that no research has been carried out as to the impact of development beyond the EHDC boundary.

Para 4.46 states that the purpose of the WSP work was to assess the most suitable locations for development. 1.2.4 states that the locations are predetermined at the start of the study. The research is invalid.

X-X-X-X-X-X-X

5.1.2 Having completed this interrogation a trip rate was calculated for generated trips as 0.41 trips per household in the AM Peak Hour and this was used for all clusters.

5.1.3this study assesses only the impact of generated trips from the potential housing allocation within the AM peak, and does not account for potential trip attractions either in the AM or PM peak.

BAAG objection. CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

Without substantial disincentives, prohibitions, controls and penalties on car users, there is no evidence that car based trip rates from new development would not be broadly similar to existing trip rates from W-B. Why select other examples from TRICS in locations with potentially different environments? It would be useful to understand what current MOD operations generate as this level is the base comparator for the redevelopment of genuine brownfield land in isolated locations such as W-B.

It is only legitimate to speculate what might happen if you model car based traffic generation as each "trip subduing" investment comes on line. You can't use a consistent trip rate for the whole development unless all the investment is in place on day 1. The retail and employment studies show these are late arrivals, though in reality they are unlikely to ever happen. The public transport initiatives might subdue some internal trips, but where is the evidence of effectiveness? How will external trips be subdued? If rail is a proposal the study should state that this as an assumed investment, if bus, explain how services will bypass queueing traffic and again the effectiveness before supposing that car based trip generation can be driven down to levels of 0.13

trips per dwelling, less than half the trip rates from development in Winchester city.

The WSP work has a number of missing appendices, trip distribution in particular. This is particularly concerning because the trip distribution here is based on 2001 journey to work census data. There is a danger that the impact of the Hindhead tunnel has not been recognised in changing travel patterns. The proposed closure of the A325 in W-B is not modelled. Furthermore other work by WSP has distributed traffic in accordance with trip ends. Thus Liphook is only burdened with 5% of trips originating in W-B because only 5% of trips terminate there. In reality a lot of traffic gains access to the A3 by driving through Liphook, not stopping there. The trip distribution matrix could well be fundamentally flawed here, as it was in another WSP analysis, the W-B Eco-Town Transport Assessment May 2009.

East Hampshire Council has made great play of the advantages to W-B that the Hindhead Tunnel will bring to its accessibility. Why then do some of the traffic studies direct the majority of traffic along the A325 to Farnham when that route doesn't lead to the Hindhead tunnel? The journey times through Lindford, Passfield and Liphook or Lindford Headley and Grayshott, or via the lanes through Bramshott to the A3 and the tunnel will be very attractive. The proposed closure of the A325 is not modelled, but will change the distribution of traffic from its historic base. Why is this not modelled in the transport work? Why does the study limit itself to the strategic network only, W-B is at the heart of a rural lane network? Council policy is to protect rural lanes, how can that policy apply in the absence of any advice on the traffic impacts of development on those lanes?

X-X-X-X-X

7.4.4 The map shown in Figure 7.1 identifies the location of known Congestion Hotspots in East Hampshire.

BAAG Objection. CSOE7, CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

Liphook centre, a Conservation Area, and Grayshott are identified as Congestion Hotspots, both on access routes to the A3. Policy CP14 relates to enhancing village centres to provide a focus for communities and to provide essential services and facilities. The council's retail report advises that the quality of both locations is threatened by existing levels of traffic flows. The W-B proposal will lead to further deterioration, contrary to policy CP14.

X-X-X-X-X

6.3.9 Within this assessment two scenarios have been appraised in relation to the Whitehill/Bordon cluster (Cluster 7). The first of these assumes that the Bordon/Whitehill development is granted Eco-Town status. This will mean that the development itself will aim to achieve a mode share for car of 25% and the

existing Whitehill/Bordon settlement will aim to achieve a mode share for car of 40%. It has been assumed that 50% of trips through the existing Whitehill/Bordon settlement are local trips, rather than through trips. This therefore equates to a reduced trip rate of 0.13 being used within the Eco town scenario assessment.

6.3.10 The second scenario assumes that the Bordon/Whitehill development is not granted Eco-Town status and thus the development impacts are assessed as generating traffic at the standard trip rate of 0.41, as discussed previously in Section 5.1.

BAAG Objection CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

The implied assumption that magic “eco-dust” sprinkled over the W-B project will reduce car based trip generation to less than 50% that of Badger Farm Winchester is clearly indefensible. WSP rejected the figures from that development as “misrepresentative” because of the proximity of the “town” centre.

Winchester is a city. The eco-town initiative envisaged new stand alone communities being built within a short distance of such centres. At Badger Farm, the potential is clear, Winchester has masses of heritage, hundreds of retail outlets, many primary and secondary schools, tens of thousands of jobs, a direct main line railway station to London and the south coast cities. It provides a lifestyle far different and far more sustainable than W-B could ever achieve. Yet EHDC has chosen to use a car based traffic generation figure of less than half that of Badger Farm. This is blatantly ridiculous and will produce forecasts of traffic impact which are wholly misrepresentative. This is not a sound evidence base!

As the HA picks up, the study is flawed in that the am peak outgoing only effects are assessed. It would appear that no employment or retail activities are modelled.

Is table 6.3 referring to B2131 or 2171, are we talking about south of Liphook, not north, in which case any traffic leaving and joining the A3 at Liphook has been missed. What is the impact on Liphook?

The table does state that on the A3 passing Liphook the W-B proposal would add 627vph in the am peak. Bearing in mind the gross underestimates assumed, this is a frightening increase.

On the A325 north of W-B the table advises that there would be an additional load of 1618 vph in am peak in non eco and 509 in eco mode, again no employment traffic. In fact the northbound overloads would be 188% and 115% respectively but the magic dust of the eco-town actually reduces traffic flows below the levels which would result with no W-B development at all (126%). The eco-town fairy godmother could solve the country’s problems by

building 5,500 house developments at every congestion point across the UK!
The study is flawed.

X-X-X-X-X

6.3.12 The Whitehill/Bordon development will have an impact on the A325 Broxhead Common link (NB). As an eco town it is estimated that an additional 248 trips will impact on this link in the AM Peak. As a non-eco town this impact increases to 785 trips, almost leading to a doubling of the roads current traffic loading (186%). It should be noted however that the base scenario for 2026 indicates that this link will be over capacity by 25.5% by 2026 even without additional LDF residential development traffic impact.

BAAG Objection. CSOE1, CSOE3, CSOE9.

This area is sensitive to air quality, the prime source being traffic. This report seems to be suggesting that the area would be gridlocked anyway, so the impact of the W-B proposal is less relevant. The task here should be to examine ways of reducing the risk of deteriorating air quality. If WSP's brief was as described by the council in para. 4.46, WSP would have concluded that to limit the impact on air quality, the scale of development at W-B should be minimised, not maximised by building a dormitory town on brown and large areas of green field land.

X-X-X-X-X

7.4.9 Road improvement schemes were initially identified through the Solent Transport Strategy and then checked with Hampshire County Council to identify currently programmed schemes, longer term schemes, as well as schemes deemed desirable in the future, but with no known start or completion date. Through this process the following road improvement schemes, and their current status were identified from the Hampshire Council's LTP as being relevant to the East Hampshire District LDF process:

- _ Alton (The Butts junction and other improvements) 2008/09–2010/11*
- The scheme will aim to reduce congestion on Whitedown Lane that is caused by queuing traffic underneath the rail bridge and improve the safety of the junction for pedestrians and cyclists.*
- _ The A325 Route Strategy (Greatham to Holtpond)*

BAAG objection. CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

We raise these purely to illustrate the potential for the “old school” traffic engineer to bring forward highway schemes to address the inevitable pressures which major development at W-B will bring to the network. Here are “business as usual” traffic schemes designed to increase road capacity to reduce congestion and inevitably make travel by car more attractive, thereby

increasing carbon production. It is one of the consequences of permitting development in unsustainable locations.

X-X-X-X-X

8.2.5 Alton is served by bus route 23/24, a town bus service that runs between the town centre and sports centre. Another service running through this cluster is route X64, operating between Winchester and Alton rail station and route 28 between Basingstoke and Alton. Both routes provide an hourly service through this cluster.

8.2.16 Cluster 4 (Liphook) is a large village in East Hampshire, with a population of 8,291.

8.2.18 The cluster is served by Liphook railway station, which is on the South West Trains line from London Waterloo to Portsmouth with a regular service to various destinations within Hampshire.

8.2.19 Current bus service provision within Liphook is limited to route 250 – Liphook local service which operates hourly within the settlement. The only other service running through this cluster is the South West Trains Rail Link loop service between Liphook rail station, Whitehill, Bordon and Liphook centre.

BAAG Objection. CSOT3, CSOT4, CSOWB5, CSOWB9, CSOWB10, CSOWB12.

This illustrates the paucity of commercially viable bus services in adjoining towns. The W-B to Liphook Rail Link bus service was withdrawn recently and has needed public subsidy to retain a service. BAAG doubts the viabilities of the many services proposed within W-B. If they do not operate in perpetuity, this element of the car use reduction strategy will be lost. Will public funding be needed, are the services viable, what “Travel Plan” initiatives will guarantee their operation in perpetuity?

X-X-X-X-X-X-X-X

HA Correspondence 20th March 2009.

7. From our perspective, an Evaluation of Transport Impacts (ETI) on the SRN is necessary to demonstrate that the proposed LDF developments are deliverable in transport terms (individually and cumulatively) and the LDF is set on a robust and credible evidence base. The evidence base should consider both the local and wider area transport issues to help ensure that the Core Strategy takes account of relevant cross boundary issues and is coherent with neighbouring authorities. Without a robust and credible evidence base, there is a risk that the Core Strategy will not be ‘justified’, as outlined in PPS12 paragraphs 4.44–4.47.

11. As noted above, your Core Strategy evidence base will need to consider both the local and wider area transport issues to help ensure that it takes account of relevant cross boundary issues and is coherent with neighbouring authorities. It will be essential that the impact of development in neighbouring boroughs is factored into estimates of future traffic conditions on the SRN as part of the next stage of the evidence base.

6.1 Route Choice

18. Paragraph 6.1.3 state that journey time data relating to the A3 Hindhead scheme has been provided to East Hampshire District Council. It is noted that Atkins Consultancy provided the council with traffic flow data relating to the Hindhead scheme in May 2008, however it is not clear whether this data included journey times. Furthermore it is not clear whether the model that this data was taken from included development identified in the LDFs of nearby councils. Therefore it may not be appropriate for such data to be used in East Hampshire's LDF assessment. Further details of the data referred to in paragraph 6.1.3 should be provided to the Highways Agency.

4.47 The study has forecast the potential impact of new development on the strategic highway network. At Whitehill/Bordon the study identifies impacts on the A325. This has been the subject of a separate study. Elsewhere the proposed levels of development will have negligible effect on road capacity.

BAAG objection CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

As the Highways Agency confirms, the study is wholly inadequate. Its findings entirely misrepresent the likely outcome of the W-B development.

X-X-X-X-X

4.50 At Whitehill/Bordon the planned new development is seen as providing the opportunity to enhance the town's role as a large local service centre. The additional facilities and services together with highway and public transport improvements are seen as contributing towards a more sustainable settlement.

BAAG objection. CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

The report and the master planning consultation make no reference to highway improvements.

X-X-X-X-X

Economic Development – Preferred Spatial Policy

4.129 However, if large scale development takes place at Whitehill/Bordon, the study forecast that additional office floorspace (around 10,000sq.m high quality office space) was required to meet this growth. It concluded that logically much of this would be ideally located in the Whitehill/Bordon growth area, where Council policy is to make a sustainable community.

BAAG objection. CSOEM1, CSOWB1, CSOWB6

The study did not conclude that W-B would be an ideal location. It actually favoured Petersfield.

10,000 sq m of office space, for which the report advises that there is no demand at W-B, would in any event according to the consultants advice, create 476 jobs. The council's consultation exercises broadcast variously that 5,500 to over 7,000 new jobs would be created. The council's policy is fundamentally flawed. The greater likelihood is the creation of an overexpanded, unsustainable, high density urban dormitory ghetto.

X-X-X-X-X

5. Place Shaping policies.

5.223 PPS7 sets out guidance on the approach to development in rural areas.

5.224 The PPS also identifies a number of key principles which should be applied to achieve sustainable development:

- Most developments which are likely to generate large numbers of trips should be located in or next to towns or other service centres which are accessible by public transport, walking and cycling.*
- Priority should be given to the re-use of previously developed land, except where these brownfield sites perform poorly in terms of sustainability considerations e.g. remoteness from settlements and services (para 1(v));*

5.238 PPG13 predates PPS7 but set out similar themes with respect to reducing the need to travel by car:

- The availability of previously developed land is not in itself a sufficient reason for developing in rural areas (para 41);*
- Need to be realistic about the availability of alternatives to the car. Should not reject proposals where small-scale business development or expansion would give rise to only modest additional daily vehicle movements, and the impact on minor roads would not be significant (para 43).*

5.239 PPS7 confirms that new development outside the designated urban areas should be strictly controlled. The Government's overall aim is to protect the countryside for the sake of its intrinsic character and beauty, the diversity of the landscapes, heritage and wildlife and the wealth of its natural resources and so it can be enjoyed by all.

BAAG objection. CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

BAAG considers that the regeneration of W-B should respect the policy guidance given in PPS7 and PPG13. W-B is in a rural area. Both Planning Policy documents are concerned to discourage development in such areas which would be unsustainable in that great reliance would be placed on the private car. This is the case at W-B already and would be the case with any future development here.

The Council's development proposals accept the whole of the MoD's landholding in Bordon, much of which is woodland or greenfield land. Both Planning Policy documents recommend against the development of brownfield land where the resultant development would perform poorly in sustainability terms. PPG3 confirms that the availability of brownfield land is not in itself justification for development. They clearly would not support the development of greenfield land in these circumstances.

In its considerations of "sustainability" the Council has chosen to ignore transport sustainability, concentrating instead on building fabric and renewable energy potential. It is important to note that both PPG13 and PPS7 regard sustainability as transport issues. So did Lord Turner in his report to government. In promoting development at W-B, the Council needs to assess the bigger picture in sustainability and carbon terms, including the transport implications.

X-X-X-X-X

6. Policies for the Strategy and Future Role of Whitehill/Bordon

6.1 The Ministry of Defence will be relocating its forces from Bordon Garrison to St Athan in Wales in phases after 2013, leaving around 570 acres (about 230 hectares) of land empty in the town. The availability of the MoD land is subject to contract award and to affordability.

BAAG Objection CSOE1, CSOE3, CSOWB9, CSOWB12.

This represents the entirety of the MoD's Bordon landholding, much of it virgin greenfield land and wooded. It is misleading to refer to it as becoming "empty" after the MoD's departure and imply that it is made up of disused buildings and yards. It was never all "full" in the first place. The split between brownfield and greenfield land should be specified so that consultees can appreciate the true extent of previously used land available for redevelopment.

X-X-X-X-X

6.3 However, this large amount of MOD land and additional land owned by public bodies brings the total amount of land available to around 340ha. This therefore provides an exciting opportunity to carry out a masterplan for the future regeneration of Whitehill/Bordon.

BAAG Objection CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12, CSOWB9, CSOE1, CSOE4.

These "public bodies" are not identified. The major part of the "additional land" is in fact a farm operated on land acquired by Hampshire County Council half a century ago when a "new town" of some 40,000 people was

being considered as part of the Government's national strategy. This again suggests that the whole of the landholding is available for development. There is no recognition that there may be external constraints as well as the green and brownfield considerations to influence the master plan. This statement considers every element should be subjected to a master planning exercise. PPS7 and PPG13 would suggest otherwise, even discouraging the redevelopment of brownfield land if that would produce unsustainable development.

X-X-X-X-X

The town can respond to the challenge of climate change, the need for more homes, and the need for more sustainable living in an innovative and ground-breaking way. It can make an important contribution to the development of new technologies and practices and put Whitehill Bordon on the map as an example of a modern sustainable community in the 21st century.

BAAG Objection. CSOE9.

The colossal disadvantage of the adverse location of W-B, resulting in the generation of far greater quantities of carbon dioxide from transport activity than could ever be saved by energy efficient building, would guarantee this development to be entirely unsustainable and severely damaging to the world's environment.

X-X-X-X-X-X

Most importantly it gives us the chance to work with local people to meet their needs and to put in place the facilities that are lacking today.

BAAG Objection. Statement of Community Consultation.

Whitehill and Bordon Town Council responded to the EHDC Survey and advised that the needs of W-B are quite limited, certainly not necessitating the doubling of the town's population to deliver. Many of the facilities which the council is suggesting, are market led. They are not within the council's gift to "put in place".

X-X-X-X-X-X-X-X

6.4 The Government recognises that there is an exciting opportunity at Whitehill Bordon to meet strategic housing needs and this is reflected in the South East Plan which contains a specific policy for the town. The decision to make it one of the UK's first eco – towns will attract funding and investment and give the town a new sense of purpose. It is also a gateway to the newly formed South Downs National Park.

BAAG Objection CSOH1.

The strategic needs of the SEP are met by the housing numbers assigned to the District in other locations, 5,200 dwellings in total. The housing numbers at W-B are not intended to meet the Strategic requirement, they are ring fenced to that location. Their construction remains subject to the outcome of further studies, not yet completed. Allocation of any number of dwellings at W-B, down to zero has no impact on the housing requirement elsewhere in the District. The SoS decision was to make W-B a *potential* eco-town. It does not automatically attract funding. Any limited funding for specified purposes must be bid for and approved. "...give the town a new sense of purpose." Is simply meaningless in terms of reasoned argument, self promotional and contrary to the expressed views of local people, the vast majority of whom are opposed to the Council's proposed over-expansion. This paragraph should be omitted or rewritten accordingly.

X-X-X-X-X

6.5 In anticipation of the Defence Training Review (DTR) a great deal of technical work and public consultation has been carried out over the past four years.

6.6 The Place-Shaping policies and proposals for Whitehill/Bordon need to be included in the Core Strategy of the Local Development Framework (LDF). The development options are guided by the Green Vision for the town. This was worked up by the Opportunity Group, endorsed through local consultation and adopted by the District Council in April 2006. East Hampshire District Council made the decision to bid for eco-town status because the aims of the initiative fit closely with the aims of the Green Town Vision for Whitehill Bordon.

BAAG Objection Statement of Community Consultation.

Our objection to 3.0 above sets out the history of the council's misrepresentation of the Green Vision debate.

X-X-X-X-X

Eco-town status

6.9 Government has published 'Planning Policy Statement: eco-towns' as a supplement to PPS1. This identifies Whitehill/Bordon as a potential location for an eco-town.The South East Plan already identifies Whitehill Bordon as a Strategic Development Area. The Core Strategy sets out policies for the development of a strategic development area and an eco-town. It is the Government's view that eco-towns should be exemplar projects that encourage and enable residents to live within managed environmental limits and in communities that are resilient to climate change. The policies for Whitehill/Bordon are being developed to reflect its status as an eco-town.

BAAG Objection CSOH1, CSOE1, CSOE2, CSOE3, CSOE9, CSOT1, CSOT4, CSOWB6, CSOWB9, CSOWB10, CSOWB12.

We note that this is a **potential** eco-town location. We suggest that in order to demonstrate the deliverability of the project, the council needs to assemble the evidence base required by PPS3 to show;

- Its availability, will the MoD vacate and does the Crichel Down ruling apply?
- Its suitability by assessing the impact of constraints and its ability to meet the eco-town criteria described by the council in Planning November 2009 as a “carbon busting community”.
- Its achievability by proving the ability to create 5,500 jobs if this is the appropriate number, to meet the needs of the community, the social infrastructure and traffic and carbon reductions promised, all self financed from planning gain and without cost to the council tax payers of East Hampshire District.

X-X-X-X-X

WH1 PREFERRED POLICY APPROACH FOR WHITEHILL BORDON

The preferred approach for Whitehill Bordon is to allocate it as a Strategic Development Area and eco-town, and to identify a boundary within which the eco-town policies would apply. The approach then sets out a range of policies to deliver the community’s vision for the area.

The overall aim is to create an eco-town that responds to the challenge of climate change, meets the need for more homes, jobs and facilities, and acts as an exemplar of sustainable living in an innovative and ground-breaking way. Proposals should make an important contribution to the development of new technologies and practices and put Whitehill/Bordon on the map as an example of a modern sustainable community in the 21st century.

BAAG Objection CSOH1, CSOE1, CSOE2, CSOE3, CSOE9, CSOT1, CSOT4, CSOWB6, CSOWB9, CSOWB10, CSOWB12.

All development is required to meet the challenge of climate change. This policy wording does not provide any definition as to how the eco-town at W-B would be any different.

The achievement of the eco-town is not defined. If this is to be an “exemplar” it needs to define more precisely the targets which it is designed to fulfill. At its most basic, those are to make Whitehill-Bordon a town which will have a zero carbon impact on the planet.

The greatest damage which this proposal will impose on eco-systems will be beyond the boundary of the development, not within it. The policies which are to be applied need to “bite” on both sides of the boundary and be “measurable” on both sides, and should include carbon emissions targets.

X-X-X-X-X-X

Planning Applications that comply with the Masterplan will be granted consent.

BAAG Objection. CSOWB8, but there isn't enough policy control in the areas of community building and built form.

The Council has confirmed that the masterplan is not to scale and is indicative only. It contains several acknowledged howlers, including a requirement for the demolition of the Catholic church.

The Plan is clearly poorly thought through. How is the council going to decide what "complies" and what doesn't against this basis? EHDC is at risk of a series of lost planning appeals because there is no clear or adequate definition of the proposals or the requirements for development.

This basis is hopelessly inadequate to create a successful new community. There needs to be an appreciation of topography and ground conditions, an understanding of community linkages and how a sense of place can be delivered. Materials, façade treatments and heights, window design, roofscapes, an appreciation of the Hampshire vernacular and many other issues. A Supplementary Design Document or Design Statement is needed. To propose a policy which states that:

"Planning Applications that comply with the Masterplan will be granted consent"

is a recipe for an "anywhere town" of indifferent design, built at lowest cost. It confirms the Council's inexperience in handling the design of major developments of this nature and does not bode well for the future. The Council appears unable to point to single exemplar within its area of the kind of development it envisages in each of its housing density zones, let alone other uses. The masterplan's promotional illustrations of happy cycling children and architect designed housing are simply plucked from images of development elsewhere.

X-X-X-X-X-X

Where the proposals materially alter or would have a negative impact on the integrity of the Master-plan should be refused consent.

BAAG Objection. CSOWB8, but there isn't enough policy control in the areas of community building and built form.

What is a material difference from a not to scale sketch? A negative impact to one party not another. Too subjective, with little chance of the planning authority controlling the final product. Design and development briefs are required to get delivered on the ground what the authority wants to see built.

These sloppy policy formats are a developer's dream and will allow builders to escape the costs of creating character, using appropriate materials and

creating a sense of place....all the things which the Government itself, CABA and other bodies advise make a successful community and not simply a good return on investment for developers. The council will lose appeals with this approach.

X-X-X-X-X

Development must be carried out in a comprehensive manner and will be required to deliver the necessary infrastructure, including a full range of facilities and services to meet the needs of the expanded community. The town will provide a gateway to the adjoining South Downs National Park.

BAAG Objection. CSOWB8, but there isn't enough policy control in the areas of community building and built form. CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

Too vague, "necessary" for what? "Full range," meaning what? What has the Gateway got to do with it, where does it set out how that feature is delivered, how does the design brief advise developers what exactly is required to deliver this? What are the "needs of the expanding community?" Just more quantity ignoring quality?

X-X-X-X-X

The preferred boundary for the proposed eco-town has been identified as a circle of radius 2km focused upon the new town centre and proposed transport hub. Taking into consideration the location of local and town centre shops, schools and facilities identified in the EDAW / AECOM masterplan, this should ensure that the PPS1 requirement of a maximum walking distance from homes to schools be 800m for children under aged 11. In addition, that for older children and adults there should be access to a local centre within 1km and the town centre within 2km.

BAAG Objection. CSOWB8, but there isn't enough policy control in the areas of community building and built form. CSOT1, CSOT3, CSOT4, CSOE9, CSOE3, CSOWB6, CSOWB10, CSOWB12.

It doesn't follow that a 2km radius will deliver an 800m walking distance. The directness, safety of movement and presence of natural surveillance are as important as distance and these distances need to be actual walking, not as the crow flies. These are all master plan drivers. We cannot see this approach in the masterplan. Drawing a 2km radius displays no thought or reasoned argument at all. It cuts through property and parish boundaries, sensitive sites, landscapes and more. Any policy should only be applicable within a properly considered and justified boundary.

X-X-X-X-X

A number of green tongues bisect the town including the Wey and Deadwater valleys and the Hogmoor Inclosure – currently a tank training area. Proposals should safeguard Hogmoor land by introducing sensitive perimeter development which would overlook and thus provide passive control for the land.

6.13 All these sites are within the ownership of the District Council, the County Council or the MoD and the aim is to safeguard them all from inappropriate development.

BAAG Objection. CSOE1, CSOE2, CSOE3, CSOE4, CSOWB8,10,12.

The masterplan shows development within the boundaries of the Hogmoor Inclosure, acknowledged by EHDC, together with intensified public access. What is the perimeter fence intended to achieve, a sensitive solution will not prevent access, one designed to prevent access will not be sensitive. These are the problems created by introducing increased human activity close to areas of ecological value. This is not “safeguarding areas of acknowledged ecological interest”. Including the term “inappropriate development” effectively licenses the Council to approve anything it considers “appropriate,” thereby rendering any policy constraint or aim meaningless. The paragraph and relevant policies should be rewritten so as to either define “inappropriate” or safeguard the areas identified from all development.

X-X-X-X-X

.6.14 The Core Strategy is proposing under Policy CP18 to retain the existing local gaps between Whitehill Bordon and Lindford and between Lindford and Headley. These gaps will ensure the separate identity of the settlements.

BAAG Objection. CSOE1, CSOE2, CSOE4, CSOWB9, 12.

See BAAG’s objection elsewhere. The council’s research confirms that this is an important gap which should be protected. The proposed playing fields represent development, so the gap is not protected or safeguarded from inappropriate development.

X-X-X-X-X

Reducing Carbon Emissions and Water Consumption

6.16 Global warming and climate change will affect us all and could lead to extreme weather conditions with hotter summers and wetter winters and more flooding. By its designation as an eco-town, Whitehill Bordon now has the chance to lead the way.

6.17 The Council’s preferred policy approach is to maximise the opportunity presented by development to make a significant contribution towards reducing carbon emissions and water consumption, such as through the provision of district heating systems or on-site renewable energy generation.

BAAG Objection. CSOE9, CSOT1,4, CSOWB10,12, CSOEM1.

The council is entirely wrong in promoting this development as a means of making a significant contribution towards reducing carbon emissions. Other well qualified parties and the outcome of appeals elsewhere have advised that it will do quite the reverse, substantially increasing carbon emissions, the very opposite of the Government's stated intention for eco-towns.

The carbon dioxide production from buildings constructed to meet code level 6 standards, currently at 8% of the UK's total, will certainly be less than if they were not built to that standard. However the latter is not an option. The same requirements will be imposed on development built anywhere in the UK in the very near future, 2010 for code level 3, 2013 for code level 4 and 2016 for code level 6. This development will at best be emerging in 2016 because it is largely reliant on the withdrawal of the MoD. Accordingly this aspect of carbon reduction does not uniquely justify the W-B proposal, nor does it enable carbon reductions to be achieved within the development fabric which would not be achieved at any other location.

It is the carbon increases stemming from transport which will do most of the damage. Lord Turner's progress report to Parliament Committee on Climate Change advises;

"Planning and transport policy focusing new development within existing cities and large towns couldresult in significant emissions reductions (from the "trend" of recent history, BAAG. That "trend" includes the likes of W-B) We estimate that such a land use framework could deliver an emissions reduction of at least 2MtCO2 in 2020..... This can be compared to the additional 0.7 MtCO2 saving Government estimates the Zero Carbon Homes initiative would deliver in 2020. This suggests that transport emissions should be given at least as much consideration as residential emissions in the design of new development."

That conclusion accords with the statistical evidence contained in the Government's eco-town guidance, that carbon emissions from housing in the UK contributes around 8% of the total, whilst emissions from transport contribute around 24%.

The Council has noted that "the completion of the Hindhead tunnel will offer the opportunity for regeneration at Whitehill-Bordon", whilst their advisers have reported the significance of that transport investment in attracting businesses to the District. The largest development proposal in the District is at W-B.

The reports for the council by their leisure, retail and employment advisers have confirmed that the "draw" from the established urban centres such as

Guildford, Winchester, Chichester and the south coast cities, already attracts residents and employees out of W-B and that those trends will continue, irrespective of the development proposals at W-B.

In their W-B Eco-town Transport Assessment for EHDC, omitted as background research in the Core Strategy consultation, WSP in working to “support the eco-town” as opposed to assess its feasibility, concludes that even in the extreme circumstance that all new residents and employees in the town, together with all the existing residents and employees travel in accordance with the “eco-town ethos” of using their cars for only 25% of journeys, there would still be an increase in external car based trips of 46% in the peak hours. That wholly unlikely and optimistic outcome, in combination with the travel distances from W-B (Guildford 19 miles, Winchester 24 miles, Portsmouth 28 miles, Chichester 33 miles.) predicts a very dark picture for carbon emissions.

The benefits of “rapid” buses are questionable. There is nothing “rapid” about travelling to Liphook or any other railway station at present during peak hours. The council accepts that the A325 is already at capacity leading to congestion during the day. Other routes are rural in nature and already over trafficked. The Council accepts that the development will generate additional traffic movements. How then could buses travel in an “express” fashion on the network of adjoining rural lanes? Why would people use them in any significant numbers in these circumstances? Carriageway widening, even if it could be restricted to advantage the bus, could not be achieved through all the constrictions of the adjoining networks. Widening directly contravenes eco-town criteria. It would in any event urbanise the rural networks, repeating some of the worst practices of traffic engineers across the UK. Many of the verges to these carriageways are, as noted in the WS Atkins’ report to the South East Panel, of ecological value and are accordingly protected by European legislation.

There may be some potential to change resident’s and employees travel modes for trips made within the town, but these commonly represent only 15% or all car based trip distances travelled, the majority being external trips. In any event the Council does not quantify the likely outcome, despite this being the primary transport investment associated with the development.

To achieve short journey times, buses will need route advantage, perhaps segregation from other traffic. We see no such routes on the master plan, nor are they possible in practice. To be attractive to existing residents, bus corridors need to be “retrofitted” within the existing built fabric, one means of making the whole town into one community, sharing transport investment. We see no such routes on the master plan.

Because the journeys within the town will be short, we are not convinced that people will be willing to walk and wait, even if real time information is “piped” into each home. We note that the WSP report refers to the success of “street based trams” in Augustenborg. Apart from having no relevance to W-B, that system was withdrawn in 2003, having proven unviable.

Great confidence is expressed in the potential to provide of a new railway station for the town, though “Station” doesn’t appear on the master plan. No evidence is available to confirm or otherwise the feasibility or viability of providing a rail link. Neither have we found any ecological evidence to suggest that the old line could be reinstated. The Association of Train Operators advises that its capital cost could be in the region £50m, excluding land. We would suggest that patronage is likely to be similar to that at Alton where around 3.3% of journeys associated with work use the train. At that level we would have thought that there would be little chance of recouping the capital costs involved.

Contrary to the council’s claim that this development could make a significant contribution to reducing carbon emissions, our conclusion is that the only significant contribution would be to increase carbon emissions and to intensify the onset of global warming and climate change.

X-X-X-X-X-X

WH5 PREFERRED POLICY APPROACH FOR REDUCING CARBON EMISSIONS AND WATER CONSUMPTION

The following factors must be taken into account in development proposals:

- *All new buildings will be zero carbon. However the aim is to achieve carbon neutrality for the whole town by 2050 – not just homes but also commercial and public sector buildings. This means that the carbon footprint of the new larger town will not exceed the carbon footprint of the existing town.*
- *Planning applications should be accompanied by a water cycle strategy that provides a plan for the necessary water infrastructure and water quality improvements, and sets out measures for managing surface water, ground water and local watercourses to prevent surface water flooding from those sources.*
- *An outline water cycle study has shown that there are a number of feasible ways of providing enough water for the whole town. This may include bringing the MOD water supply into public use or using the water already planned for the town expansion by the water authorities.*
- *Achieving water neutrality – i.e. achieving development without increasing overall water use across a wider area.*

BAAG Objection. CSOE9, CSOT1,4, CSOWB10,12, CSOEM1.

From the issues discussed above, we consider that this policy is inadequate to address the carbon reductions which should be secured in pursuing very large scale development of this nature. Transport emissions need to be included in the calculation, and policies imposed to achieve the same objective, of not exceeding the carbon footprint of the existing town.

A means of monitoring in perpetuity is required, with means of stopping development if existing levels are exceeded.

X-X-X-X-X-X

WH6 PREFERRED POLICY APPROACH FOR SUSTAINABLE CONSTRUCTION

The following factors must be taken into account in development proposals:

- *Homes should show high levels of energy efficiency in the fabric of the building. Proposals will be included to retro-fit all existing dwellings to Passiv Haus standards where possible.*

BAAG Objection. CSOE9

“Possible” in what terms? If the eco-town is allowed to proceed because here is the only means of successfully retrofitting existing housing, then the required standard need to be defined and delivered, or the development should not proceed. “Where possible” is a get out clause that should be inadmissible in principle, particularly in an “exemplar” context.

X-X-X-X-X

Homes

6.20 Whitehill/Bordon has a young population with a high proportion of children.

BAAG Objection. CSOWB4

The core strategy refers to existing schools having falling rolls, even with the MoD still in occupation. We do not understand why a new secondary school is required, and why that seems to be an urgent requirement.

X-X-X-X-X

About 20% of householders rent their homes. House prices are lower than average in the District and there are many affordable homes. This attracts low income earners and first time buyers and has created an imbalance in the social and economic mix in the existing population. Some of the key principles of development are:

- *There is a vital link between providing homes and new facilities. The more the town and its population grows, so more jobs, services and facilities will be attracted to the town.*

BAAG Objection. CSOWB1, 2, 6, CSOT1, 4, CSOE9, CSOH1.

The fact that house prices are low is an influential factor in carrying out a development viability assessment. It is not possible to “force” the market by building larger houses in the hope that high prices will be forthcoming which will in turn fund the astonishingly high infrastructure costs required in W-B. W-B is not a desirable address. Whilst Swindon is an excellent town in which to live, with full employment, low crime and brilliant accessibility, it remains a location with the lowest house prices across the whole of the south west. Because it is Swindon.

There is no “vital link” between providing homes and the arrival of new facilities. Whilst it does follow that some elements of social infrastructure will arise with new households, it is only those elements which are the business of government and local authority policy and funding, where the likelihood of their provision is “real”. These are schools, recreation, waste facilities and to a lesser degree (because neither the government nor the planning system can force them to happen) health and leisure facilities. The provision of jobs, services and other “facilities” such as retail activity is the business of the private sector unless the council wishes to intervene and subsidise their operations in the same manner as the existing bus service to Liphook.

An employer wishing to invest many millions of pounds into setting up a new business will only do so if he perceives the outcome in operational and financial terms, to be profitable. He/She needs to understand that he can service his market from the location, that the industries with which he does business are in close proximity and that the transport networks are adequate to meet his needs. Skill bases and salary levels are also considerations but his preference would be to have a reasonably wide catchment area from which he can draw his workforce.

He/she will not be attracted to a location which demands constraint in parking provision or limitations on the area of land upon which the operation is based. Those are the implications for an eco-town and, because there is choice, would serve to deter employers from investment in W-B.

The numbers of new houses in the area are of little significance to him. He has no guarantee that even 1 resident from them would choose to work for his business. There are areas of the UK with vast swathes of housing and no employment activity because the other requirements for a successful business operation are simply not there. There is no simple linkage between the emergence of new housing and the creation of new jobs.

Accordingly it does not follow that “more jobs will be attracted to the town”. Indeed the council’s employment advisers prefer Petersfield for the provision of office space, partly because W-B has a poor track record of office space take up. Even then a figure of 10,000 sq m is suggested, after 2016 with little enthusiasm. That equates to 476 jobs in contrast with the several thousand “promised” by the council.

“Facilities” doesn’t provide either townspeople or anyone else with any clarity of the intended meaning. If this implies elements of retail activity, then the likelihood of these facilities being “attracted” to the town as the population grows is fraught with even less certainty than with job provision. Retailers rely on a number of characteristics to make investment decisions.

1. Catchment area. The council’s retail study shows a catchment area for W-B which is both assumed and incorrect, see BAAG’s representations on the retail study, page 82 of this submission. The clue is that the study shows the W-B catchment area to have the largest population within the District, much larger than Petersfield or Alton. From observation of activity in the town centre that is wrong, our experience of living in the area confirms that the residents of Grayshott, Liphook, Bramshott and Milland do not shop in W-B.
2. Spending power. The retail research confirms that W-B experiences the lowest spend per head. Yet, by assuming an oversized catchment area and applying the high population within that area, the study concludes that W-B has the highest overall spend across the District.
3. Competing draws. The retail advice points out that the “draws” of the major conurbations within easy driving distance of W-B, are strong and that residents will continue to travel to them, irrespective of the offer at W-B.
4. Trading disadvantage. The eco-town is intended to improve containment in order to subdue carbon emissions, not to attract custom from a wide catchment area. Whatever mechanism is selected to achieve this, it will serve to constrain the enthusiasm of retail operators.

It does not follow that “*The more the town and its population grows, so more jobs, services and facilities will be attracted to the town.*”

X-X-X-X-X

- *A broader range of larger, detached homes could redress the imbalance in the population.*

BAAG Objection. CSOWB1, 2, 6, CSOT1, 4, CSOE9, CSOH1.

This is a speculative and irresponsible statement. Is the council really proposing to adopt a policy to grow the town by around 5000 homes on the basis that “*a broader range of larger detached housing **COULD** redress the imbalance?*”

The Core Strategy needs solid research to demonstrate that it **WOULD**. The council should not “hope for the best” and risk disaster. Doesn’t the proposal need to be based on greater clarity that house sales rates and values will secure the right social and financial outcomes to service the needs of W-B’s ambitious proposals before the Core Strategy progresses any further?

Isn't this in any event social engineering, designed to contrive the social structure of a community for revenue purposes? How is that likely to assist in building an inclusive community, integrating new with existing?

X-X-X-X-X

- *The supply of labour provided through people moving to new housing should match the type of employment that is provided in the town to avoid additional commuting.*

BAAG Objection. CSOT1,4, CSOWB2,4,6,10,12, CSOE9, CSOH4.

Is the council stating that it will only select new residents who match the type of employment to be provided? Is this another form of social engineering? Are potential purchasers to be interviewed to assess their suitability to live in W-B?

Common sense suggests that people making the decision to buy a house will already have a job, because that's what most people need to raise a mortgage. That job will be the best one they can get and is likely to be in one of the major conurbations. The number working in W-B will be small.

The travel characteristics of this area are well rehearsed in the transport, retail and employment research carried out for the council and confirm that there are very low levels of containment, with almost as many people commuting in as commute out every day. We cannot accept that the residents and employees of the new community at W-B will behave any differently.

The council's suggestion that by somehow creating jobs which match peoples needs will "avoid additional commuting" is an attractive proposition for an eco-town but has no guarantees and is incapable of being delivered. This element of the core strategy must be unsound.

X-X-X-X-X-X

WH8 PREFERRED POLICY APPROACH FOR HOMES

The South East Plan sets out a housing target for Whitehill Bordon for 5,500 homes. It states that the final figure will be determined following further studies. Work on the Masterplan has assessed the physical capacity of each site to accommodate new homes. It also takes account of the Habitats Regulations Assessment (HRA), and further transport studies.

The preferred strategy is to consult on a figure of 4,700 dwellings phased over a 20 year period.

BAAG Objection. Community Consultation conformity, CSOE1,2,3,4, CSOE9, CSOEM1,CSOT1,4, CSOWB6,9,10,12.

The master plan is currently out for consultation, the council appears to consider that the views of third parties will not influence the capacity of the development. This is an example of the uninformed nature of the consultation exercises which the council has administered to date.

Elsewhere in this document it is accepted that the transport studies are still unavailable, making it difficult to understand how policy WH8 has already taken the advice into account.

X-X-X-X-X-X

4,700 dwellings would provide opportunities to bring about a new town centre that would be viable. Should further land become available in the town this figure may rise but an upper limit or cap should be 5,300 dwellings. Any development over that upper limit may start to undermine the mitigation strategy to protect the SPAs.

BAAG Objection. CSOWB1,5,6,9,10,12, CSOE1,2,3,4,CSOE9.

The retail report for the council does not provide any evidence that this scale of development would make a new town centre viable. It suggests a floorspace for the housing numbers proposed, but does not say that less floorspace would not prove equally appropriate for fewer dwellings.

The council is trying to invent a justification for doubling the size of the town. This is not one of them.

Neither is there evidence that the SPAs would be protected at 4,700 additional houses but at risk at over 5,300 dwellings.

X-X-X-X-X-X

Type of housing: The tenure mix is affordable 35% and private 65%.

BAAG Objection. CSOH4

It is a requirement of eco-towns that 40% of housing is affordable, not 35%. We do not understand how this figure has been arrived at or agreed by the Government. One primary requirement of the government's eco-town initiative is the provision of affordable housing at 40%. The recent Forest of Dene decision confirms the Government's thinking, if the allocation is the primary vehicle for affordable housing delivery, if that allocation is unable to provide that tenure, it is preferable for permission to be refused rather than to reduce the target.

X-X-X-X-X-X

Jobs.

6.21 In Whitehill Bordon there are limited jobs locally, especially in the office and service industries; this means that 65% of residents commute out of town by car to work, mainly to Surrey and the inner South East. There are more jobs in the Industrial sectors. When the MoD leave GVA it is estimated that there will be a loss of 2452 jobs, representing an economic impact of £28M per year to the local economy. (GVA Grimley Final Baseline Report - September 2008). Further work has been carried out by SQW (Whitehill Bordon Economic Potentials Study 2009). Some of the main principles are:

- More local employment opportunities are needed to reduce out-commuting.
- There is a need to encourage investment in high quality sustainable employment, and innovation/technology goods and services to a national/global market.
- Any withdrawal of MoD will occur over a short period of time whilst major redevelopment will be longer term requiring careful management of land assets to enable economic growth and regeneration over the plan period. There is a need for careful programming and phasing of land release to minimise impacts on the local economy and population.
- It is necessary to start planning now for a new economy to ensure the right skills and business spaces are available before the Garrison departs.
- There is scope for a major employer of global repute to locate in the town.
- There should be a mix of businesses so that the town is not reliant on one sector or company.
- The Town is identified as a Strategic Development Area in the South East Plan. It lies between the sub regional growth areas of the Blackwater Valley and South Hampshire (PUSH). Policies need to integrate with, and complement, the policies for those areas.
- Business growth requires a supporting infrastructure of an excellent local education system, high capacity digital technologies, diverse housing, convenient access to regional transport networks, business advice/support services and good value commercial premises

BAAG Objection. CSOWB1,6,9,10,12, CSOE1,2,3,4,CSOE9.

We support the aspiration. However the employment study by Roger Tym and Lambert Smith Hampton for the council does not express any confidence that this intensity of employment creation could be achieved at W-B within any timeframe. The summary of the outcome of the SQW and GVA reports does not suggest that any further understanding of the means of attracting jobs to the town has been identified.

Creating new jobs is a vital component of the council's doubling of the town's population. Without absolute confirmation in their creation, totaling between 5,500 and 7,000 in this core strategy document, the development should not

proceed. Policies should make it clear that job creation in direct proportion to proposed housing development must precede that development.

X-X-X-X-X

WH9 PREFERRED POLICY APPROACH FOR JOBS

Together we anticipate that this will lead to in the region of 5,500 jobs.

This is intended to redress the balance resulting from the loss of MOD jobs and to provide the creation of a minimum of one new job for each new home. Careful monitoring, particularly in relation to the loss of employment land for other uses, will be essential. More local jobs are needed to reduce out-commuting. Each new job should be easily reached by walking, cycling and/or public transport. Many people will choose to work from home.

BAAG Objection CSOWB1,6,9,10,12, CSOE1,2,3,4,CSOE9.

We have rehearsed elsewhere the gulf between the aspirations set out in policy WH9 and the consultant's advice to the council. Roger Tym suggests 10,000 sq m of office space which would create 476 jobs whilst Nathaniel Lichfield proposes 12,600 sq m of comparison floorspace and 2,500 sq m of convenience space (para 17.43 Nat Lichfield report) creating 378 jobs, 852 in total.

The council is proposing an 80,000 sq m business park, 30,000 sq m of retail and leisure and 13,000 sq m of office space, 3,932 jobs in all. (Policy WH10 and August 2008 consultation)

About 28 hectares of land is shown on the masterplan for employment purposes, sufficient for the land uses set out in the previous paragraph.

There would be other jobs created as rangers to police the SPAs and SANGS, maintenance of POS, education, health and social services.

However policy WH9 is inconsistent with previous higher figures which the Council have said would be required, and flawed in seeking to provide only 5,500 jobs. It is accepted by the council that 2,400 jobs would be lost if the MoD leave W-B. The ambition is also to create 1 new job for every new dwelling, 5,500 being referred to at various points in the plan, 4,700 in others. Furthermore, in order to improve the town's containment, more jobs are required for existing residents currently commuting out of the town.

BAAG would suggest perhaps 10,000 jobs should be planned for. We therefore consider that the area of land allocated to support employment should be increased to 71 hectares, to give the town a reasonable chance of addressing the deficiencies of the past and meeting the needs of the future.

However it is clear that W-B is not a location that attracts employers. As the bulk of new jobs is required to provide employment for new residents, it would

be more logical to simply not provide as many new houses. The real need to create new jobs is two fold, 2,400 to replace those lost by the withdrawal of the MoD, and a further 2,500 or so, to offer local jobs to those currently commuting out of the town to work, requiring a total of 35 hectares of land. That might improve containment and reduce environmental damage.

That approach has been taken elsewhere. The inspector overseeing North Somerset Council's Local Plan Inquiry in 2005 advised that no further land should be allocated at Nailsea and Backwell for housing because of his concerns that to do so would reinforce its role as a dormitory to Bristol, 12 minutes journey time by train. The inspector advised that greater levels of employment were a more appropriate requirement to provide improved containment in the community.

X-X-X-X-X-X

The Council's preferred approach is for a dispersed distribution of employment development.

BAAG Objection. CSOE9, CSOEM1, CSOWB1,5,6.

There are many advantages in locating employment activities in reasonable proximity to each other.

1. Facilitating symbiosis between different employment activity will strengthen the offer.
2. There may be potential to set up administration facilities to service a number of smaller start up businesses.
3. Employment operations within say 800metres of the town centre will improve the viability of the centre and improve vitality. Banking, leisure and other activities will be encouraged to set up as a result of the greater footfall. Healthier food than can be offered by the hot pie van will be available.
4. Isolated remote facilities will be less attractive to operators and financial institutions funding employment activity.
5. The propensity to cycle, walk and use buses to travel to or during working hours will be that much greater if employees are centrally located. The same movement facilities provided for residents will be available to employees. Bus occupancy will be improved, as would viability.

Accordingly we object to the council's preferred approach to the dispersed provision of employment provision.

X-X-X-X-X

Shopping and Leisure Facilities

6.22 The town has reasonable convenience shops e.g. food, drinks, newspapers but poor comparison shops e.g. clothing, household goods, for a town of its size.

Residents travel elsewhere to do their comparison shopping and have expressed a desire for a new town centre with additional shops. The town lacks a stand-alone leisure centre, family pubs, restaurants and hotels. Some of the main principles are

- There is an opportunity to make the town a more sustainable community with a wider range of shops and leisure facilities. This depends on the scale of housing development.*
- The perceived profile of the town needs to be raised to attract quality retailers.*
- The potential for creating a new town centre needs to be carefully examined.*
- A diverse town centre with a mix of retail, culture, entertainment, leisure, housing and related business uses which are easily accessible by local people and visitors.*
- A town capable of attracting customers from the surrounding villages.*

BAAG Objection CSOT1, 4, CSOWB1

This is the Core Strategy. The proposals within it should be based on the sound researched evidence. Yet the council insists that 5,500 dwellings represents the necessary “critical mass” with no supporting evidence, on the basis that *“the potential for a new town centre needs to be examined”*.

- The strategy to double the size of the town is based upon the council’s untested premise that that will attract masses of retail investment.
- The retail research does nothing more than pro-rata the floor space provision per head of new population using a very large and unrealistic catchment area. It assumes custom is drawn from a wider area, within which there must be a real threat to future retail activity.
- No recognition of the draw to established centres is made and
- there is no recognition of the relatively low spending power per head of population at W-B.
- There is no retail impact study to assess how adjoining communities would fair against the competition at W-B.
- The adviser’s recommendation to provide 15,100 sq m of retail floorspace (para. 17.43, 12,600 plus 2,500) is disregarded in favour of a 30,000 sq m proposal in the council’s policy WH10.

X-X-X-X-X-X

WH10 PREFERRED POLICY APPROACH FOR SHOPPING AND LEISURE FACILITIES

The scale of development in the town centre will be more than that at existing centres of Petersfield and Alton. The core strategy will need to reflect Whitehill/Bordon's changed role and function in the retail hierarchy.

Proposals will include:

- *30,000 square metres of retail floorspace – this will include a mix of uses including those which contribute to the evening economy (pubs, cafes, restaurants etc)*
- *Leisure and recreational facilities, community and civic/cultural uses*
- *Around 13,000 sq. metres of office and commercial development, and an hotel*
- *Car Parking – this will be flexible. Once alternative modes of transport to the car are established, car parking areas may not need to be so large and other uses be accommodated.*

BAAG Objection CSOT1, 4, CSOWB1

See the previous objection by BAAG.

X-X-X-X-X-X-X

Education 6.26 The withdrawal of the armed forces will also impact on already falling school rolls. For example Bordon Junior and Infants School report that 30% to 40% of their entire school roll represents garrison children and Mill Chase Secondary School – the only secondary school within the area is already running at only 70% capacity. (Figures provided by HCC 2008)

6.27 Thus the strategy to include up to 7,000 new jobs is crucial to the vision of a sustainable settlement where you can live, work and play within the same town.

BAAG Objection CSOWB4

5,500 new jobs in policy WH9, 7,000 here. The Council appears to have no consistent idea of how many jobs should be provided. There is no evidence to confirm that the provision of jobs would be taken up locally or that they are the key to W-B's future self containment. Not clear that there is any correlation with education.

X-X-X-X-X-X-X

6.28 In general, Whitehill/Bordon residents are less qualified compared to residents elsewhere in the District. This is partly due to the lack of further education and training facilities. A lower ratio of residents is employed in managerial or professional occupations. There is no sixth form or further education provision in the town and public transport to colleges elsewhere is poor. There is an identified shortage of pre-school places.

- Land will be required for new schools for the additional population and it may be necessary to extend existing facilities.

BAAG Objection. CSOWB4

There is evidence that the MoD's departure would reduce school roles by 30 to 40%. The school's already have spare places. Why does the taxpayer have to fund new schools in this situation?

X-X-X-X-X-X-X-X

- Improvements in the quality of education and access to 16 to 19 education provision which enables young people to follow both sixth form and vocational skills to meet the needs of new businesses.
- Good educational facilities are essential to attract a wider socio-economic mix to the town and to attract new businesses.

BAAG Objection. CSOWB4

These are not reasons why W-B needs to accept 5,500 new homes. It is the Government's role, through the Education Act, to use public funding to improve educational infrastructure where it is justified.

X-X-X-X-X-X-X-X

WH11 PREFERRED POLICY APPROACH FOR HEALTHY LIVING AND EDUCATION

Two options for a new secondary school are under consideration:

Option A - a site on Budds Lane is central to the new community, on MoD land, is and is more compact. Leisure uses would be relocated east of Hollywater Road on HCC land.

Option B - uses HCC Land. Larger site with some built development east of Hollywater with a leisure hub split between Mill Chase and BuddsLane.

Budds Lane or Mill Chase focus for active leisure hub. Leisure hub could include:-

New sports hall

New 6 lane pool

Around 100 gym stations

Full size public synthetic turf pitch

4 tennis and 4 squash courts

Sports pitches

Improvements at BOSC

Shared school pitches and community halls

Large town centre multipurpose space

Whitehill Club –leisure or tourism focus

Commercial Leisure opportunities at town centre edge and Viking Park

BAAG Objection. CSOEM1, CSOT1, 4.

See BAAG's response to 6.26 to 6.28 above.

School roles are low even whilst the MOD are still in occupation. Why then is there a need for new primary and secondary schools? There is no educational needs report to understand why these are required.

As stated previously, these location options are remote and inaccessible. Schools should be centrally located, near to the new station and bus depot, where combined trips without reliance on the car to shops, leisure facilities and jobs can be made, thereby injecting life into the centre.

The leisure report advised that across the whole of East Hampshire there may be demand for a small cinema, bingo club and health and fitness centre, not the extensive list of requirements set out above. Furthermore, the "shopping list is carefully prefaced with the words "could include," which makes any such promises easy to sidestep later. Policies should make it clear what facilities are: a- truly needed and, b- to be committed.

X-X-X-X-X-X-X

Transport

6.29 *The town is set midway between the A3 and the M3 .*

BAAG Objection. CSOT1,4, CSOE9.

It is 19 miles through Alton to the M3 and 4 miles through Liphook to the A3, not midway. This doesn't give much confidence that the transport report will be in any way sound!

X-X-X-X-X-X-X

6.31 *Access via the A3 is currently undergoing improvement by the construction of the Hindhead Tunnel which will increase pressure for development in the area.*

BAAG Objection CSOE9, CSOE1,2,3,CSOT1,3,4, CSOWB5,10,12.

The council accepts that the Hindhead tunnel will change travel habits across the wider area and implies that W-B will be effected. We agree.

However it has centred its transport studies exclusively on the A325 corridor to Farnham which avoids the A3 Hindhead tunnel.

The shortest distances from W-B to the A3 northbound are via Liphook as will be the shortest journey times following the closure of the A325 in central W-B.

Accordingly it will be the villages of Passfield, Lindford, Liphook, Bramshott, Headley and Grayshott which will see the greatest increases in traffic flow. Clearly the council does not want to recognise this, hence the absence of any traffic studies along these corridors. Acceptance of reality would not assist the council's case for eco-town cash for W-B.

The Hindhead tunnel will also encourage a modal shift towards the car because journey times to wider destinations with well paid jobs, high quality leisure facilities and large scale retail offers will be reduced. That counts against all the aspirations the council has to get people to cycle, walk and use public transport and stay within the confines of W-B. That is why none of the traffic studies recognise the existence of the Hindhead tunnel, because to do so would erode the chances of getting eco-town cash handouts from central government.

X-X-X-X-X-X-X

6.32 *The town suffers from poor public transport services. However the strategy should be to provide a public transport solution for access within and to-and-from the new town.*

6.33 High car ownership and poor public transport in the area leads to a lot of car use for everyday trips to school and work. The scale of development proposed needs to reflect the ability of the A325 and local roads to cope with the additional demand and scope for improvements. Other issues relating to the A325 include its poor accident record and its separation of the town.

- *The impact of any future development on the wider highway network will need to be considered in the longer term.*

BAAG Objection. CSOE9, CSOE1,2,3, CSOT1,3,4, CSOWB5,10,12.

Not “*in the longer term*” but as the first step in assessing whether this scale of development can be countenanced in this isolated rural location. The council does not recognise that this development will have profound impacts over a wide area, just as the Oxford strategy of “building beyond the Green Belt” at Witney, Bicester and Banbury has, all well reported in the 1996 PPG13 guidance. That advised planning authorities that such a strategy resulted in very high levels of car based commuting as opposed to Botley which didn’t partly because of its close proximity to Oxford. The W-B proposal shows every propensity to repeat the mistakes of Witney, Bicester and Banbury.

X-X-X-X-X-X-X

- *Options for development need to be assessed against their ability to provide a network of new roads to the west of the town to alleviate the physical barrier caused by the A325.*

BAAG Objection. CSOE9, CSOE1,2,3, 4,CSOT1,3,4, CSOWB5,10,12.

The W-B proposal will create physical barriers through a number of surrounding villages including Liphook. The council is not prepared to examine the scale of the problem.

X-X-X-X-X-X-X

- *The impact of traffic and reliance on the car for local journeys could be reduced by improving walking and cycling facilities.*
- *Improved public transport is required within the town, to local railway stations and other regional centres.*
- *As the scale of development and number of shops, jobs and leisure opportunities increase in the town, the more scope there is to reduce car trips and provide better public transport.*

BAAG Objection. CSOE9, CSOE1,2,3, 4,CSOT1,3,4, CSOWB5,10,12.

There is no evidence to demonstrate this at this scale of urbanisation, indeed there is every possibility that the additional development uses would increase

the number of car trips. This is not central Winchester or Guildford where the council's claim might be substantiated.

X-X-X-X-X-X-X

WH12 PREFERRED POLICY APPROACH FOR TRANSPORT

Policies are awaiting the outcome of various transport studies.

BAAG Objection. CSOE9, CSOE1,2,3, 4,CSOT1,3,4, CSOWB5,10,12.
Statement of Community Consultation.

This is the Core Strategy stage of the LDF. The Core Strategy can only be found "sound" if it respects and builds on a sound evidence base. This statement accepts that that evidence base does not yet exist. Accordingly the council should be formulating its proposals for the development without the benefit of that advice or involving the public in a Preferred Policies Core Strategy consultation exercise.

X-X-X-X-X-X

The preferred policies will provide the opportunity for a new transport hub. This hub will be the focal point for trips in the town, for links with the villages and links to regional networks. The main aims of the strategy are to establish sustainable patterns of movement to and within the town and to minimise the use of the private car by providing appropriate and realistic alternatives.

BAAG Objection. CSOE9, CSOE1,2,3, 4,CSOT1,3,4, CSOWB5,10,12.

Where is the research which confirms that the investment in public transport is a realistic alternative and that it will achieve the stated objectives? This is the Core Strategy stage of the LDF. The Core Strategy can only be "sound" if it respects and builds on a sound evidence base. That evidence base does not exist yet. The council should complete its research and review its policy proposals in the light of that evidence.

X-X-X-X-X-X-X

Travel in the town should support people's desire for mobility whilst achieving the goal of low carbon living. Proposals must show how the carbon impact of transport will be monitored.

The Council's preferred approach is to include a series of policies designed to encourage residents to walk, cycle or to use public transport or other sustainable options and to significantly reduce trips made by car.

This will help to reduce the overall carbon footprint of the town and the amount of traffic generated by the town's growth. Much will depend on the level of positive behavioural change of the residents.

BAAG Objection. CSOE9, CSOE1,2,3, 4,CSOT1,3,4, SOWB5,10,12

There should be a policy requirement which sets maximum acceptable levels of carbon production, together with measures which will be introduced when trends are suggesting that such levels are likely to be exceeded. These are designed to bring a halt to further development construction whilst “solutions” and remedies are found and constructed.

X-X-X-X-X-X

The design of the town should enable at least 50% of trips originating in Whitehill Bordon to be made by non-car means.

BAAG Objection. CSOE9, CSOE1,2,3, 4,CSOT1,3,4, CSOWB5,10,12

The work by WSP for the council has targetted a figure of 25%. We are unsure whether this is consistent with the 50% figure or the eco-town requirement set by government or whether other transport targets should also be the subject of policy.

X-X-X-X-X-X-X

Policies will include the following:

- *the designation of priority areas for pedestrians and cyclists – including the new town centre - and certain residential areas. Residents would not need to own a car to get about. These areas will be identified on the Proposals Map.*
- *car clubs and car sharing schemes – new businesses must include such measures in their travel plans that must be submitted with planning applications.*
- *measures to restrict parking in residential areas; in some areas existing parking standards will be reduced by 50%. Parking must be integrated with the development*
- *promoting the best quality public transport system that is easy to use, cheap, convenient, frequent, pleasant, comfortable, stylish, fast and reliable. This will include:*
 1. *an express long distance strategic bus service to the east linking with the larger towns and railway stations at Liphook and Haslemere, and to west to Alton. A north south route would link with Liss and Petersfield and Alton and Farnham. These services will have infrequent stops, be within the town, and other Proposals should extend the travel plan beyond the immediate boundaries of the town*

2. *measures to mitigate the traffic impacts of the proposed development to ensure that the strategic and local road networks can accommodate it.*

The Masterplan shows a network of connected streets ranging from main streets to minor streets to prevent traffic solely using the A325. The focus will be on a new through street together with a network of streets which will need to be carefully designed to redistribute the traffic away from the A325 and to cater for the type and level of traffic anticipated to use them. A main street will be busier and will take more commercial traffic. All streets will be designed to be comfortable and attractive places for people to walk, live, play and shop. The existing A325 will have public transport and pedestrian/cycle focus, with some parts bus only.

3. *Safeguard land from development that lies along the route of the former Bordon to Bentley railway line. A disused complex of railway lines runs northwards towards Bentley, potentially linking Whitehill Bordon to the Alton - Waterloo line.*

4. *Piloting the use of electric and hybrid cars. Low carbon vehicle options should demonstrate that there will be sufficient energy available to meet the higher demands on electricity and that the additional number of private cars will not cause extra congestion*

5. *Promoting forms of transport that use less fuel and cause less congestion e.g. motor cycles*

BAAG Objection. CSOE9, CSOE1,2,3, 4,CSOT1,3,4, CSOWB5,10,12

This is more akin to a Vision Statement than Core Strategy policy.

- We have seen no evidence that restricting car parking provision has resulted in reduced reliance on the use of the private car. CABE's report on completed PPG3 developments across the UK found parking cluttered footpaths and carriageways. Residents were consistently dissatisfied and at the same time unaware of bus service provision. There are concerns that that restricted carriageway widths will frustrate emergency vehicle and bus access.
- A car club will not be viable at W-B.
- A "best" quality bus service does not sufficiently define the requirement for an appeal setting.
- There is no prospect of any bus service being "express" through the narrow and congestion rural lanes around W-B or along the A325. The inspectors at the Dunsfold eco-village and TRL Inquiries both questioned the effectiveness of this approach. There are no policies to address how buses will be advantaged over cars or how the necessary arrangements at the destination points will be delivered. This is a throw away and ill-considered proposal on the backcloth of failed bus services in the area.
- There is no indication as to where the high levels of existing traffic will be displaced following the closure of the A325. There is a real risk that traffic will divert to inappropriate residential and rural lanes around W-B.

- The master plan does not show the railway to be safeguarded into the centre of the town. This was a consultation requirement and would represent sound planning.

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Commercial Viability

6.34 The property market and the commercial viability is crucial to any new development proposals.

- *Regeneration of the town will be market driven and a strong market for new housing will need to lead the town's expansion.*
- *Improvements in public transport are essential so that it becomes viable to run new services, walking and cycling links to the new facilities are essential.*
- *A consolidated, conspicuous and viable town centre is needed, offering a strong anchor store and other large units to attract a wider range of retailers.*
- *Phasing of housing and commercial and retail floorspace needs to be carefully co-ordinated.*
- *Initial phases of all new development will need to be of high quality in order to set a precedent for future development.*
- *On-going, co-ordinated and pro-active marketing of site availability will be key to raising the profile and attractiveness of the town to the market and the development opportunities it affords.*

BAAG Objection. CSOWB1, 4,5,6.

This is written as a vision statement, not a Core Strategy policy driver or justifier. Without soundly based evidence, linked to testing and monitoring development proposals the policies as drafted are therefore premature and unsupportable.

The council tax payers of East Hampshire need assurances and policies which will guarantee that no aspect of W-B's development will call upon the public purse. The council's proposals are intended to be self financing, council tax payers do not want to have to fund or subsidise any component of the W-B project, including public transport measures.

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Infrastructure

6.35 Housing development at Whitehill/Bordon in the past has not been accompanied by the necessary infrastructure. Future development must be phased to ensure that infrastructure and services are in place before the start of the next phase.

BAAG Objection. CSOE9, CSOE1,2,3, 4,CSOT1,3,4, CSOWB5,10,12

1. To attract new residents to change their lifestyles, the instruments of change need to be in place on their arrival. So the local shops, schools, leisure facilities, jobs and comprehensive public transport systems need to be there on day one. If not they will establish more conventional life styles which they will not abandon at a later stage.
2. The same applies to new employers and employees.

X-X-X-X-X-X

WH13 PREFERRED POLICY APPROACH FOR A DELIVERY MECHANISM

BAAG Objection. CSOE9, CSOE1,2,3, 4,CSOT1,3,4, CSOWB5,10,12

See the points made above.

X-X-X-X-X-X-X

BAAG Objection. CSOE1, CSOH1, CSOH2, 4.

Missing Policies.

Mineral Extraction of Sand Reserves safeguarded in the Hampshire Minerals and Waste plan.

Archaeology issues.

Contaminated Land, need for investigation and influences on master plan.

Travellers and Gypsies.

X-X-X-X-X-X

Local Development Framework: Scoping Report

East Hampshire Core Strategy Preferred Policies

Sustainability Appraisal Report. November 2009 Scott Wilson

1.2.1 SEA is required by European and by English law.The aim of the SEA Directive is “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development”.

2.2.2 East Hampshire's Core Strategy sets out the following vision for the District:

By 2026, East Hampshire will be a better place where people live in safe, attractive and prosperous towns and villages. They will have good access to a range of housing, jobs, leisure and community facilities, and enjoy a high quality built, historic and natural environment. They will live and work in a way that respects resources and protects and enhances the District's natural environment.

BAAG Objection. CSOT1, 3, 4, CSOWB 10,12, CSOE9, CSOE1,2,3,4.

The Core Strategy does not extend its research beyond the boundaries of the District. PPS guidance requires working with neighbouring authorities. It is only by so doing that the impact on the environment can be assessed. The best means of protecting the environment might not be in line with the consultant's brief here operating within the restriction of "making East Hampshire a better place.....whilst respecting the District's environment."

The task here is to respect the wider environment within the UK and Europe. Copenhagen wasn't about imposing restrictions to carbon emissions at an international level only to see planning authorities ignore the impacts of their actions on the adjoining Districts and to simply pursue the best way of attracting government funding within their own patch.

The Secretary of State owns the land here. If he/she does not ensure the delivery of the minimum carbon solution for W-B, the government will be clearly signalling its refusal to respect the International Agenda for its own profit motives.

This SA/SEA does not report on the bigger picture or less carbon intensive options which may be available to see the regeneration of the town. It should do so.

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Appendix 2 of the Sustainability Appraisal

<i>Appendix 2 – Screening of Alternatives to Appraise</i>	
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<p><i>How do we make sure that the mix of new housing meets housing demand (market housing)?</i></p>	<p><i>The mix of new market housing to meet demand is not considered to be a true sustainability issue as any mix will contribute towards meeting market demand and the mix of housing types and sizes for market housing will be determined by the market itself. It is therefore inappropriate to appraise these options.</i></p>
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BAAG Objection. CSOEM1, CSOH4, CSOWB2.

This acknowledges that the market needs to be respected, EHDC can't change the market by simply building bigger houses where there is little historic demand. The market is not for bigger housing in W-B, at least not in any volume.

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Appendix 3 – Preferred Policies Appraisal Matrices

Spatial Strategy

Locating development in existing settlements in response to local need and informed by accessibility is anticipated to have beneficial effects in terms of transport, climate change and service provision. Locating a portion of development within small local service centres and rural villages is likely to contribute to a thriving rural economy and may be beneficial to improving accessibility to all facilities and services, particularly in rural areas, with the provision of rural transport initiatives to improve accessibility.

The provision of housing through new allocations is small with the majority of provision being made through existing completions, commitments, Local Plan reserve sites, provision on SHLAA sites within SPBs and any windfall sites.

The most significant location of new housing will be at Whitehill/Bordon. The provision of new housing and new affordable housing is considered to have a significant beneficial effect on SA Objectives 2 and 13.

The scale of development at Whitehill/Bordon and its location means that it has the potential to have adverse effects on nature conservation. It is possible that there will be adverse effects on nature conservation interests from the proposed development as a result of indirect impacts on biodiversity as a result of recreational impacts. Mitigation measures will almost certainly be required and these will manage the magnitude of the effect. The SPA status of nature conservation sites surrounding the town will mean that development will not go ahead unless Natural England are satisfied that there are no adverse effects on these sites. However there may be adverse effects on nature conservation areas which do not have SPA status and the same level of protection.

Overall the preferred approach is likely to uphold the current employment and economic situation rather than making significant changes either beneficial or adverse. A modest provision is made for new employment land in existing settlements. Development at Whitehill/Bordon will however provide a significant allocation of employment land and a wider provision of jobs in different sectors.

BAAG Objection. SA objectives below.

The W-B proposal may have a beneficial effect on SA Objectives 2 and 13 listed in this table, but it has very damaging effects on SA Objectives 11, 15, 17, 18, 19, 20, 22, 23, 24 and 27. Where is the sustainability balance in this dialogue? There isn't any.

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Housing – Preferred Spatial Policy

In Central and South Hampshire no significant new housing allocations have been made as the strategic requirement can be met through existing completions, commitments, use of Local Plan reserve sites and SHLAA sites within SPBs and provision from windfall sites. There will be a modest amount of new provision in Central Hampshire in Grayshott to meet local need and to maintain its provision as a local service centre. 50 new dwellings will be provided over the plan period. In South Hampshire there will be a modest provision of 200 additional housings on new allocations in Horndean. The housing preferred spatial policy is consistent with the spatial strategy with the majority of new housing allocations to be provided by the redevelopment of Whitehill/Bordon with smaller amounts in established settlements. The anticipated effects are consistent with those for the spatial strategy.

BAAG Objection. SA objectives below.

The W-B proposal has very damaging effects on SA Objectives 11, 15, 17, 18, 19, 20, 22, 23, 24 and 27. Where is the sustainability balance in this dialogue? There isn't any.

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Economic Development – Preferred Spatial Policy

Overall the Preferred Policy is likely to uphold the current situation rather than making any significant changes either beneficial or adverse. Small amounts of employment land will be provided for in accordance with identified need.

BAAG Objection. SA objectives below

In that the W-B proposal is having to create jobs to “match” the new households proposed, in addition to the numbers of jobs thought to be lost by the departure of the MoD, the proposal brings about unnecessarily damaging effects on SA Objectives 11, 15, 17, 18, 19, 20, 22, 23, 24 and 27. There can be absolutely no guarantee that the jobs created would be taken up at all, or that they would be taken up by local residents. The best way forward in sustainability terms is to progress at the smallest scale of employment provision required to address the loss of MOD employment and to improve containment of the existing community, not to risk the environmental damage which would occur with the council’s current proposals designed to attract maximum grant from central government rather than the most sustainable outcome. Where is the sustainability balance in this dialogue?

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Housing provision in the settlement will be made through existing commitments and any provision through windfall sites is likely to be small. The approach to employment land mirrors that in the preferred spatial policy to economic development and similar effects are anticipated at a local level. The provision of additional retail floorspace will provide a small number of addition jobs in retail in the town.

BAAG Objection. There is no policy proposed to protect neighbouring communities.

The provision of competing retail facilities at W-B may undermine the viability of attracting new investment in Alton and Petersfield and Liphook, vital in the case of the latter for regeneration. Where is the impact appraisal?

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*Policies for Whitehill/Bordon
Strategic Development Area / Eco-town*

The redevelopment of Whitehill/Bordon has been designated as an Eco-town and as such development here must be in accordance with the requirements set out in national policy by PPS: Eco-towns – A Supplement to PPS 1. The PPS sets out a range of minimum standards. Where the requirements in the Preferred Policy are the same as the requirements in the PPS no effects are anticipated. Beneficial effects are anticipated where the Preferred Policy strengthens the requirements of the PPS and introduces requirements which are specific to the location. Significant effects on SA Objective 11 and 15 are anticipated through the Preferred Policy on Transport, which goes over and above the standards that are required in the PPS.

The relocation of the army from the area will result in a considerable loss of local jobs. The Preferred Policy will address this through the provision of new employment development. In accordance with the Eco-Town initiative one-new job will be provided for every new home. The Preferred Policy includes the provision of employment accommodation for offices and high tech

industries. There is a shortage of these types of jobs in East Hampshire and a significant beneficial effect is anticipated against SA Objective 5. The possible redevelopment of Bordon Camp for residential use is established in the local plan under policies MOD1 and MOD2 although the scale of residential provision outlined in the Core Strategy is greater. The effects on air quality are uncertain. The Preferred Policy is likely to have a beneficial effect on reducing car journeys and sustainability transport however it is not clear at this stage if these measures will address those areas of poor air quality around the A325.

BAAG Objection. CSOE9

At the very least, the W-B proposal does not accord with the basic requirement that eco-towns should create development which will reduce the carbon footprint of that development below that which might result from conventional development. Because of its remoteness from major conurbations, the inability to provide sustainable transport links beyond the town, the strength of the retail, leisure and employment offers elsewhere, the W-B proposal fails completely against the PPS1 criteria.

That is the nub of the problem. Why, at a time when the government is battling to reduce carbon emissions internationally and whilst it has targets to slash carbon emissions in the UK by 80% by 2050, is this council promoting a carbon generating development strategy at W-B?

The answer is the carrot of government finance, not good planning, hence why the Chief Executive of the council submitted the 5,500 dwelling bid as an eco-town.

The council claims that its preferred policy on transport exceeds the standards required in the PPS. This before the transport study has seen the light of day!!!!

They claim that they can create the sorts of jobs missing in the existing community, but they have patently failed to do this in for example Liphook, which is blessed with all the communication advantages which W-B has not got. So what weight can be given to aspirational policy statements, none?

Those policies can portray the immaculate delivery of a community all selecting to be educated, employed, live and recreate in the town, yet in reality those achievements have never been delivered at any location in the East Hampshire, the UK or Europe to date. Certainly the lifestyles of existing residents at Liphook, Petersfield and Alton, all places with all the transport advantages and more than W-B will ever accrue, are very different. Why then should the existing and new residents and employees of the town behave differently. They won't, W-B will not become a medieval walled town where residents will not seek better jobs, shops and educational opportunities elsewhere. This will become a dormitory town in a sensitive ecological, landscape and village environment, to the disadvantage of all three, together

with an unnecessarily high carbon output. The policy wording is aspirational, the delivery will be very different.

These policies refer to

“the provision of employment accommodation for offices and high tech industries”.

The reality is that the planning authority can only allocate land, not provide the employment accommodation and see it occupied.

The stated shortage of offices and high tech industries is not a failure of the planning process, it is a lack of market demand at W-B. This is confirmed by Roger Tym’s advice which the council has chosen to ignore. The SA/SEA need to comment on the likely outcomes not the misplaced theory.

“The Preferred Policy is likely to have a beneficial effect on reducing car journeys.....” The council haven’t got a shred of evidence to support this statement. All the national experience and policy guidance concludes that the opposite would be true, even questioning the wisdom of redeveloping brownfield land in rural areas such as W-B’s.

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*East Hampshire District Core Strategy:
Preferred Policies
Background Paper on Gaps between Settlements
BORDON/LINDFORD GAP*

The Bordon/Lindford Local Gap in the Second Review Local Plan separates two relatively densely populated settlements and includes the attractive, generally open countryside on either side of the River Wey. The gap between the two settlements varies between 100 and 800 metres, the narrowest area being between Hamilton Close, Bordon and Liphook Road, Lindford. A SHLAA site has been put forward in this area. Views are obtained from the edge of the built-up areas of the neighbouring settlement. Public footpaths cross the gap at Washford Lane and from the western end of Canes Lane, Lindford to the B3002. It is very important that the two settlements maintain their separate identities.

Future growth of the Whitehill/Bordon area through the Whitehill/Bordon Opportunity will place pressure on this open area for new development and for recreation. It is important that the gap is maintained to ensure the separate identities of the two settlements.

BAAG Objection. CSOE1,4.

EHDC’s preferred Gap policy, advised by WSP’s 2008 paper “East Hampshire Development Locations”, states that the retention of the Lindford Bordon Gap is very important. Paragraph 3.25 of the Core Strategy repeats that commitment.

However the proposals for W-B envisage the gap, currently a farm, being lost to recreational facilities. The existing farm is threatened with sports pitches, changing facilities, car parks, flood lights, footpaths, lighting, waste bins, dog poo bins, signage and a host of community facilities.

The preferred policy must retain the gap in its present condition and use.

X-X-X-X-X-X-X-X

*East Hampshire District Council
ASSESSMENT OF EMPLOYMENT NEEDS AND
FLOORSPACE REQUIREMENTS
Final Report
Re-issued May 2008*

*National Guidance
PPS1: Delivering Sustainable Development*

2.3 Paragraph 27 of PPS1 sets out the general approach to delivering sustainable development, which planning authorities should adopt when preparing their development plans. The relevant considerations for this study require planning authorities to:

*ii) Allocate sites on the basis of their accessibility and sustainable transport needs, and the provision of essential infrastructure, amongst other issues.
1v) Focus developments that attract a large number of people, including offices, within existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development.*

2.4 Paragraph 2.15 of PPS12 clarifies the role of the development plan, and states that “the identification of sites should be founded on a robust and credible assessment of the suitability, availability and accessibility of land for particular uses or mix of uses”.

BAAG Objection. CSOE1,2,3,4, CSOH1, CSOEM1, CSOH1, CSOT1,3,4, CSOWB1,2,4,5,6,9,10,12.

The advice to the council on all these points concludes that W-B has none of these characteristics, it is not an existing centre of the scale and character to support large scale development intended to be sustainable.

The council’s response to this accusation has been to deny reality. They believe that the development will fund sufficient investment to change the habits of the whole community.

- New schools to improve educational standards.
- New college to do the same.
- Retraining the existing population to create the workforce to attract B1 employment.
- New residents will be interviewed to assess their suitability to take up local jobs before they are allowed to move in.

- Office space and business park use, well in excess of the scales advised by their consultants.
- Leisure facilities of a scale for which there is no market.
- Retail facilities of a scale for which there is no market.
- New railway lines and comprehensive bus services where a primary service was recently terminated because of viability problems.
- Measures to slash car use by existing residents who will walk and cycle to the shops.
- Traffic levels across the wider area of East Hampshire will reduce dramatically, relieving all existing congestion, improving air quality and furthermore, no one will use this released capacity to drive anywhere.
- Residents will work locally and local employers will move into the town where parking will be restricted and create jobs which pay equally as well as jobs in the surrounding major conurbations.
- People from other communities will not be allowed to work at W-B.
- Residents will shop locally and not visit the cultural centres in easy reach of W-B.
- Residents will educate their children in local schools only.
- Existing housing stock will be retrofitted to improve energy efficiencies.

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ASSESSMENT OF EMPLOYMENT NEEDS AND FLOORSPACE REQUIREMENTS

Final Report

Deprivation

3.38 Table 3.10 shows the rank of each local authority area based on the average Index of Deprivation (IoD04), with 1 being the most deprived and 354 the least.

Table 3.10 Index of Multiple Deprivations 2000, Rank, out of 354 Local Authorities

	Rank of Av.of Ward	Scores Employment Scale
<i>Income Scale</i>		
Mid Sussex 284	349	294
Horsham 286	347	303
Waverley 289	340	304

East Hampshire 280	310	288
Wealden 219	305	235
Cherwell 225	293	241
Aylesbury Vale 189	292	201
Chichester 232	271	276

3.40 Figure 3.7 shows that all of the benchmark districts are relatively non deprived. East Hampshire is in the top least deprived districts 20% for 2 of the 3 indicators

3.41 There is a concentration of relative deprivation in the north-east of the district, particularly in the rural area north of Headley. Levels of deprivation within the District can be seen from Figure 3.8, which models the results of the super output areas against the regional average.

BAAG Objection. CSOE1,2,3,4, CSOH1, CSOEM1, CSOH1, CSOT1,3,4, CSOWB1,2,4,5,6,9,10,12.

The council places great weight upon the need to expand W-B because this will somehow address the high levels of deprivation of its residents.

In reality that deprivation does not appear to be at W-B but in the rural areas north of Headley. East Hampshire in the area of W-B is in the top least deprived districts.

BAAG notes that the Town and Parish Surveys revealed the following for W-B and Bramshott and Liphook (B-L) parishes.

Facilities recorded as absent and needed.

- W-B. Mobile Library, Sports and Leisure Centre.
- B-L. Mobile Library, Sports and Leisure Centre, Youth Centre, Health Centre, Swimming Pool, Public Conveniences and NHS Dentist.

This confirms that W-B's Parish Council considers its social infrastructure needs to be rather less than other parishes.

BAAG is of the view that the council's policies to expand W-B into the largest community in East Hampshire DC on these grounds, is in error. There is no evidence that the expansion would address the issue and the disadvantages of expansion are extreme in terms of carbon emissions, traffic, environmental and the problems imposed on adjoining communities and districts.

ASSESSMENT OF EMPLOYMENT NEEDS AND
FLOORSPACE REQUIREMENTS
Final Report

The Labour Market, Earnings

3.51 Figure 3.12 shows gross weekly earnings for a three year period from 2003 to 2006. Every district's resident earnings are higher than the workplace earnings. This means that those with higher salaries are working outside the district.

3.52 East Hampshire is the district where the difference between workplace and resident's weekly earnings is the highest. Residents' weekly earnings are relatively high in East Hampshire. They are higher than in all districts considered in the study, except Waverley. However in contrast, workplace weekly earnings are lower than in most of the other districts, except Chichester and Wealden.

3.53 East Hampshire residents' wealth relies heavily on out-commuting and access to jobs outside the districts.

Travel to Work

3.54 Figure 3.13 shows that East Hampshire is one of the districts where out-commuting is the highest: The difference between the number of people who 'live in the area and work in the area' and of people who 'live in the area and work outside the area' is low.

3.55 Another way of illustrating this is to show resident and workplace self-containment rates. East Hampshire is at the lower end of the resident self-containment and in the middle of the workplace self-containment ratios. However in both cases it is broadly comparable with benchmark authorities.

	Resident Self Containment	Workplace Self-
Containment		
East Hampshire	54.5%	69.3%
Aylesbury Vale	61.2%	76.3%
Cherwell	64.7%	69.4%
Chichester	68.5%	64.5%
Horsham	58.6%	71.0%
Mid Sussex	54.4%	65.0%
Waverley	50.6%	59.8%
Wealden	54.7%	74.4%

3.56 A refined analysis of travel to work patterns shows where East Hampshire residents are commuting to (Table 3.12 and Figure 3.14) and

where East Hampshire workers are commuting from (Table 3.13 and Figure 3.15).

Table 3.12 Commuting from East Hants

Residents in	Commuting to	Number	Percentage
East Hampshire	East Hampshire	29,926	54.6%
East Hampshire	Waverley	3,899	7.1%
East Hampshire	Portsmouth	2,736	5.0%
East Hampshire	Havant	2,352	4.3%
East Hampshire	Guildford	1,650	3.0%
East Hampshire	Winchester	1,436	2.6%
East Hampshire	Rushmoor	1,431	2.6%
East Hampshire	Chichester	1,415	2.6%
East Hampshire	Basingstoke and Deane	1,400	2.6%
East Hampshire	Hart	930	1.7%
East Hampshire	Westminster	636	1.2%
East Hampshire	City of London	477	0.9%
East Hampshire	Surrey Heath	474	0.9%
East Hampshire	Other Greater London	1,769	3.2%
East Hampshire	All other destinations	4,283	7.8%
East Hampshire	All destinations	54,814	

Table 3.14: Residents' Average Journey to Work, 2001
Distance travelled km, England 9.6, South East 11.2.

Figure 3.16 Distance travelled to work, East Hampshire

12%	Home
19%	<2kms
8%	2-5kms
13%	5-10km
18%	10km - 20km
9%	20km - 30km
15%	> 30km

3.60. Figure 3.16 shows that 15% of East Hampshire workers commute distances longer than 30 kilometres.

3.66 The main weakness of East Hampshire is related to the quality of jobs available in East Hampshire. Workers earnings are well below residents earnings. To access better paid jobs, people are prepared to travel long distances.

3.67 Therefore East Hampshire economy has a low self containment and residents' wealth is boosted by employment availability in the surrounding districts.

3.68 However it is not obvious that this can or even should be easily turned around. The regional policy focus discussed in the previous chapter highlighted that the major growth hubs would be outside the district.

3.69 We would therefore not see the role of East Hants as fundamentally changing, but rather the challenge is to incrementally improve its offer. As such the approach is to review and strengthen activities across a range of economic development functions.

3.70 In terms of B-space employment, the proportion of employment in B-space offices occupying activities is relatively low. This proportion of B-space office employment has been growing faster than industrial and warehousing B-space activities, this proportion remains low.

BAAG objection. CSOE1,2,3,CSOE9, CSOH1, CSOT1, 3,4, CSOWB1,2,5,6,9,10,12.

This is very clear evidence of a number of characteristics of East Hampshire District which are probably at their extremes in the W-B area. These characteristics are fundamental to the scale and nature of future development there.

1. People travel elsewhere to better paid jobs.
2. 55% of residents travel over 3 miles to work.
3. The average journey distance from figure 3.16 is likely to be 15kms, substantially in excess of the figures for England (9.6 kms) and SE (11.2kms)
4. East Hampshire has low self containment.
5. It is not obvious how or whether these characteristics could be changed.
4. Changes cannot be made fundamentally, but rather incrementally.
5. The proportion of office space has grown but remains low.

BAAG concludes that W-B is not a sustainable location, at odds with the council's conclusions in their Settlement Hierarchy papers. It is not a location where the habits of residents and employees could easily be changed. It is not a location where even an experienced planning authority could hope to create a low carbon eco-town.

The changes planned here should be minimal, and designed to improve containment by providing more employment to improve the balance between economically active residents and job opportunities and to provide social infrastructure, with as little new housing as possible.

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The Property Market Regional Perspective

4.2 Lambert Smith Hampton's own experience of the employment land property market over the past 2-3 years is that the number of industrial property enquiries and the number of transactions actually resulting has diminished, particularly for the size range over 10,000 sq ft. This is evident even in the more active locations of Hampshire such as the Portsmouth and Southampton conurbations and the Blackwater Valley.

4.3 Against this trend is the continuing demand for smaller/medium sized owner occupier units (below 10,000 sq ft) and a number of speculative freehold schemes have been developed across Southern England, where occupiers perceive adequate occupier demand However, to date no such occupier has been prepared to undertake such a scheme in East Hampshire.

4.4 Inward investment activity/relocation has been very patchy and what little activity has occurred has focused on larger labour pools or buildings with good motorway access along the M3 and the M27 Corridor.

East Hampshire Market Overview

4.8 The property market is perceived to be less dynamic than the adjoining sub regions such as the Western Corridor and Blackwater Valley. East Hampshire clearly lacks a critical mass, being a much smaller market area, so this perception hides the different role that the area plays. The market is primarily based around Petersfield and Alton, with other centres being Bordon, Horndean and Liphook and is mainly industrial in character. This clear preference for Alton and Petersfield as business locations is confirmed by the results of the business survey, which are discussed later.

BAAG objection. CSOE1,2,3,CSOE9, CSOH1, CSOT1, 3,4, CSOWB1,2,5,6,9,10,12.

This is a 2005-6 study, reflecting the experiences of more dynamic financial times across a wider area than W-B or EH District. Whilst the recession will not last for ever, the recovery will be slow in situations where things were sluggish in the good times and where there has never been enthusiasm from the market, such as W-B.

The proposals to create 7,000 jobs in W-B are aspirational to say the least. Failure to realise these jobs in parallel with housing delivery, will produce substantially adverse environmental impacts from an unsatisfactory dormitory town.

Office Market

4.13 Take-up in the office sector averaged around 31,000 sq ft in the past seven years. The majority of take-up is focused on second-hand and older buildings.

4.15 Demand is relatively poor and it is unlikely that major take-up will take place in the medium term. The area competes with the other major centres in the region, which are more likely to attract occupiers. These include Southampton, Basingstoke and Guildford.

Industrial Market

4.17 The industrial market in East Hampshire is focused principally on Alton and the Whitehill/Bordon area.

4.18 Alton is rural in many aspects and stranded between the M3 and the A3 Corridors, but the Whitehill/Bordon area is likely to become the major industrial focus in East Hampshire going forward. The latter is set for major redevelopment as a result of the opportunity created by the release of 200 acres of MoD land and the opening of the A3 Hindhead Tunnel, both expected in 2011. In anticipation of this the council has been working on a masterplan for the area. The aim is to create a town benefiting from increase in population and improvements in transport and facilities, which in turn provide opportunities for businesses and become more attractive to inward investors.

4.19 The A3 Hindhead Tunnel is a step towards achieving this goal. The project will open up new investment opportunities for the business community in East Hampshire. It will complete the dual carriageway link between London and Portsmouth, removing a major source of congestion.

BAAG objection. CSOE1,2,3,CSOE9, CSOH1, CSOT1, 3,4, CSOWB1,2,5,6,9,10,12.

1. Roger Tym and Lambert Smith Hampton are the experts, their view is that industrial development is the market for W-B, not office.
2. There is unlikely to be any major take up in the medium term.
3. They advise that if W-B grows, it will provide opportunities for businesses. There is no reasoning behind that statement and it suggests that the hope is that once the housing is there, the businesses will follow. That is not acceptable in terms of increasing the containment of the town nor in terms of taking the risk that any employment will follow. BAAG's policy suggestion would be that any housing growth is made conditional and phased upon both the creation and take up of new jobs in the town and their take up by local residents with "internal" trip origins.
4. The Hindhead Tunnel is seen as the major catalyst to new employment at W-B. But that is contrary to the eco-town ethic and threatens a dormitory town whose residents and employees benefit from reduced journey times on the Trunk Road network through Hindhead tunnel. EHDC want to see local employment investment, they are broadcasting a vision of a town with a high degree of self containment and few vehicle movements. Tym, Lambert Smith

Hampton and EHDC are a long way apart, only one is in the real world.

5. Tym's advice does not seem to recognise any constraints to be imposed on employers in W-B. Eco-towns involve restrictions on car use, notably on parking. How else will car use be subdued to meet WSP's aspirations? Tym's enthusiasm for employment creation at W-B might be even further subdued if this aspect of development were to be respected.
6. Industrial development will be the overwhelming activity, those uses will have to be tolerated, despite the sensitivities of the location. But conventional wisdom says that you should minimise the damage by restricting the development footprint as much as possible, here to the brownfield, previously used footprint of the land only, thereby operating within the traffic thresholds of those previous land uses. It would be irresponsible and purely bad planning if EHDC were to risk anything of greater scale.

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Demand

4.20 Industrial take-up has averaged around 55,000 sq ft over the past seven years. Alton has accounted for approximately 45% of take-up in the past seven years, whilst Whitehill/Bordon and Petersfield have each taken a 22% share.

4.22 Approximately 27% of total space on the market (83,781 sq ft) is in Horndean. A further 81,549 sq ft is available in Alton and 57,153 sq ft in the Whitehill/Bordon area.

4.23 Our analysis of the local employment market and the proportion of manufacturing and distribution jobs currently in work, support our contention that the area has been unable to attract significant inward investment and therefore there is little pressure on the industrial land or building stock.

4.24 The Districts manufacturing base has been shrinking, in line with the national picture, and industrial floorspace take-up has been in decline since the 1990s. The market appears to have sufficient supply of industrial space given current take-up levels, although the majority of space available to occupiers is second-hand. Based on average take-up levels, the market appears to have approximately 5.5 year's supply.

4.25 There are two main industrial estates in Alton, the older Mill Lane Estate (1960s and 1970s) and the more recent Omega Park (late 1980s). There is no evidence of speculative development currently in Alton and new buildings which have been developed took place two years ago, are on Waterbrook Park and were purpose built on design and build to three local companies.

4.26 *The recent development along the Waterbrook Industrial Park off Mill Lane has been solely on pre-let or pre-sale commitments from occupiers and originally had outline planning permission for 8,000 sq m of B1, B2 and B8 accommodation on a total site area of 15 acres. However, since planning was approved in June 1997 only 4,000 sq m has been developed.*

4.27 *The Waterbrook Industrial Park has therefore, absorbed indigenous demand from occupiers moving locally from outdated buildings. Apart from refurbishment work to existing buildings there is no evidence of speculative property investment at the present time.*

4.28 *Overall, the local industrial market is relatively static, whereby if a company moves within the area, their existing building is likely to remain vacant. Not surprisingly, the high volume of second-hand accommodation on the market means that developers cannot generally justify taking the risk to provide more speculative accommodation. It is likely that developer interest in the first instance will be focused on serviced and available sites elsewhere in the region*

5.33 *The area has two allocations, neither of which have been taken up. The Liphook site has an attractive village centre location and is easily accessible by road and rail but is not suited to access by HGV. It is considered most suitable for B1 type uses. The site has a long planning history and has been the subject of a number of appeals. In the 2005 appeal decision, the Inspector acknowledged that there is no apparent demand for a stand alone office development and that a mixed use scheme would be needed in order to create a viable scheme. The site remains undeveloped, suggesting a viable mix or quantum of development has yet to be achieved.*

BAAG objection. CSOE1,2,3,CSOE9, CSOH1, CSOT1, 3,4, CSOWB1,2,5,6,9,10,12.

This advice confirms the sluggish nature of the market even before the economic recession and the market's lack of enthusiasm for delivering new employment opportunities.

There is already 7 years supply in W-B. That suggests that the demand is simply not there. The scope for creating 7,000 more jobs to serve the new population must be slim.

The Liphook experience is sobering. Here is a community with all the transport advantages that W-B has not, Trunk Road alongside, railway station, access to the site is good enough to serve the Sainsbury store alongside, we cannot accept that the allocated employment land is not in demand because of that "deficiency" as assessed by the authors. If Liphook is failing to attract jobs, what hope has W-B? Very much less in BAAG's view.

X-X-X-X-X-X-X

Future Employment and the Demand for Space.

6.8 To inform our understanding of future B-space needs we rely on recent Experian employment forecasts for East Hampshire

BAAG objection. CSOE1,2,3,CSOE9, CSOH1, CSOT1, 3,4, CSOWB1,2,5,6,9,10,12.

This approach relies on a loose relationship between household growth and job creation. In Liphook's case we have had residential growth and negative employment provision. In the case of W-B we have long standing surplus employment space, an existing population of 14,000 with 65% external commuting to jobs elsewhere. Across EHDC recent years has seen household growth, yet the Roger Tym report advises that in 2005/2007 employment enquiries were diminishing and take up patchy. There is surplus employment land, consented and allocated land not taken up.

Yet this report advises that the Experian model, operating on increased populations, would have predicted demand for more jobs, not stagnation even prior to the economic turndown.

BAAG therefore regards the forecasting of job need using this approach with great caution, particularly as the transport constraints of an eco-town operation need to be considered in assessing the likely take up of employment creation at W-B.

Any correlation is likely to be in the industries which service households directly, so car and house maintenance, gardening, retail activity, schools, estate agents, social services.... , smaller scale operations.

We don't accept that housing will attract medium and large employment activity however. These operations will be attracted by factors other than "people", such as labour skills, labour costs, the status of the area, cost of setting up, parking and public transport offer, congestion and ease of access, proximities of supply chains and potential for symbiosis with sister technologies, the availability of sites elsewhere.

6.9

Scenario 1: Base line scenario based on Experian forecasts

Scenario 2: High Scenario. It takes into account the schedule of activities in the Whitehill Bordon area. Under this scenario, 5,500 additional dwellings should be provided which represent about 14,000 additional people.

6.9 We have assumed that the containment rate would remain at the same level as the current one (54.6%). We have applied the current working age population ratio (58%) and the current economic activity rate (80%).

BAAG objection. CSOE1,2,3,CSOE9, CSOH1, CSOT1, 3,4, CSOWB1,2,5,6,9,10,12.

We think these assumptions do not in any way reflect the requirements of an eco-town with high levels of self containment. It is simply “business as usual” perpetuating the dormitory town, with implications for carbon production and exactly the outcome which the council has been advising residents would not occur. This approach is a poor basis for allowing the huge gamble that W-B represents, to proceed. The risk of failure in environmental, traffic, carbon and community terms is many times greater than the chances of success.

The new population will be buying houses and the majority are likely to already have a job already in order to buy the house. That job will be external to the town in the overwhelming majority of cases. The existing population is far more mature, many will have bought properties in the town many years ago and might be able to get by on low salaries. The new population, in buying into the town is likely to be more mobile and may have completely different work and travel characteristics.

6.9 To translate these employment forecasts into demand for space, we use the standard employment densities based on a 1997 study by Roger Tym & Partners for SERPLAN15:

- Offices: 21 square metres per worker;*
- Manufacturing and Warehousing: 32 square metres per worker.*

Base Scenario

6.40 Figure 6.2 shows that, over the plan period, the Experian model Base Case identifies a surplus supply of industrial/warehousing space, which is the result of a significant loss in industrial/warehousing jobs, coupled by a net increase in industrial/warehouse space. The gap is equivalent to 51,000 sq m. This suggests that after allowing for space to meet frictional land supply (the natural churn) there is scope for releasing some industrial/warehousing space for other uses.

6.41 Office space is broadly in balance.

High Scenario

6.43 The market balance for the High Scenario shows an oversupply of industrial/warehousing space of 26,000 sqm.

Offices

6.48 Overall office allocations show an oversupply of planned space to 2026, even in the High scenario. However if we look at the estimated likely viable supply, the position is markedly different, being broadly in balance in the Base Case and an undersupply of over 9,000 sq m in the High Scenario. We would therefore conclude that if East Hants is to meet the demand for space

in the years to 2026, it can afford to release those sites that we consider unviable for other uses. However additional office employment sites will need to be identified to ensure that there is adequate office floorspace to meet demand in the Whitehill/Bordon area arising from the High Scenario.

BAAG Objection. CSOE1,2,3,CSOE9, CSOH1, CSOT1, 3,4, CSOWB1,2,5,6,9,10,12.

This assessment relies on “wiping out” existing employment space elsewhere, on sites not identified but neatly totalling 20,000 sq m. Their viabilities are supposedly threatened for access and demand reasons.

Not sure that the wording is appropriate. Surely the consequences of this conclusion are that those sites considered by the report to be unviable for industrial/warehousing should be first in line to support small scale office employment. This report identifies 6,500sq m in this category. In that manner you retain employment opportunities across a range of communities across East Hampshire. The viabilities of office use are likely to be better than those of industrial/warehouse use, notably because access will be less demanding. Liphook for example is quoted as having industrial sites which are unpopular because they have access difficulties. These are therefore prime targets for office use, close to a railway station.

To advise that existing communities should suffer lost employment as this conclusion suggests, in favour of W-B, the very location where office activity is minimal, is bad planning. Even to give existing industrial site owners the opportunity to close their operations down in favour of other uses, is a dangerous step. Other “employment” uses, yes, other uses, no.

The report advises that W-B is not a location to support office space and goes on to suggest that Petersfield is a far stronger market. The lessons of the past are that you can't force the market and indeed why would you when the risk of successful occupation is low and the consequences of failure to occupy are high. Even the consequences of successful occupation are damaging, because containment will be low, commuting high.

The report recommends 10,000 sq m of office floorspace as an option for W-B, how many jobs is that? Page 65 says 21 sq m per job, so 476 jobs. Where are the other 6,524?

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7 CONCLUSIONS

7.6 There appear to be no major problems with the East Hampshire economy in need of urgent attention. Also we do not see its fundamental economic role changing over the plan period. Therefore the focus should be on do what it does better and on remaining competitive in the face of global economic trends.

Future Employment and Demand for Space

7.28 With regard to new employment land, there is an identified requirement for additional office space in order to meet the higher growth scenario associated with the Whitehill- Bordon opportunity area. Since this is the location for the increased population, it is entirely logical that much of this new space should be provided within the new growth area. However it is recognized that the planned completion of the tunnel on the A3 at Hindhead will also improve the marketability of Petersfield and Liphook, which in addition to improved road access, already have good train services. Petersfield in particular would be an attractive alternative location to Whitehill-Bordon for new office related development.

7.43 Whilst there may be a long-term objective to increase the self-containment rate we would argue that this is both difficult and not necessarily efficient. In any event this objective will not be achieved by merely allocating more sites. A more substantial programme of developing the area as a business location would first be required before additional new investment is likely to be attracted.

Should the LDF locate the vast bulk of new office type employment land in Whitehill – Bordon in line with the population growth there or locate in areas likely to prove popular to the market, especially Petersfield

7.50 There are good reasons to focus on Whitehill Bordon for long term development purposes. The proposed new housing will provide real investment and stimulate economic potential. But lessons from elsewhere would suggest that the employment land requirements of the site need to be built in from the outset if this opportunity is not to be lost. We would also highlight the importance for this site of jobs across a range of sectors many of which we not occupy B space but will serve both resident consumer needs and provide viable employment opportunities.

8.3 We recommend that the council designates a site/s for a high quality business park that can provide an additional 10,000 sq m of office floorspace. Ideally this should be located within the Whitehill-Bordon area so as to match the proposed population growth planned there but an option is that an alternative office location would be Petersfield.

BAAG Objection. CSOE1,2,3,CSOE9, CSOH1, CSOT1, 3,4, CSOWB1,2,5,6,9,10,12.

The report expresses a degree of realism in recognising the fragility of the W-B location in comparison with for example, Petersfield. The underscored wording above is particularly helpful.

1. It certainly does not anticipate early take up of employment land, a problem for the council's new better contained less car reliant society.
2. It questions the wisdom of locating new development in W-B and suggests that there is likely to be greater success in take up if Petersfield were the favoured location. W-B's population might grow but new jobs might not be there, but in Petersfield.
3. The report does not suggest that new jobs might be taken up by new residents of W-B, indeed the travel characteristics of existing residents and the forecast impact of the Hindhead Tunnel confirms higher levels of accessibility by car to distant locations, thereby contributing to reduced containment of communities such as W-B.
4. These conclusions do not reflect the eco-town constraints on the operation of employment sites.
5. The report pulls from the air a suggested allocation for 10,000 sq m of business park at W-B. That must be aspirational bearing in mind the track record of this form of employment in the town. The master plan consulted upon does not show such an animal.
6. The report forecasts that the business park would create 476 jobs.
7. We appreciate that a number of jobs may be created in leisure industries, social services, and in retailing, but the council is proposing 7000 new jobs. There is a huge gap between the council's consultation messages and the expert's advice. The council's evidence base for the eco-town package is shot to pieces.
8. Lastly if the council's strategy persists for W-B, a policy of 6 monthly monitoring is required, such that job creation and take up dictates house occupations. As the Roger Tym report advises, jobs need to be taken up first, housing occupations later. The requirement should be more intense as the council's vision is for a high degree of self containment. Jobs therefore need to be taken up by local residents, rather like affordable housing policy, before further housing can be occupied. Furthermore, the council's vision is that the eco-town will result in traffic flows reducing over time. Another monitoring and control mechanism should therefore be the measurement of traffic activity, such that unless the reductions claimed come to fruition, housing occupations should stop, very much along the lines of Travel Plans imposed by the DfT on all significant development activities. To avoid the environmental damage which would otherwise occur, the council's vision for this development needs to be delivered. These are the tools to achieve that vision.

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Nathaniel Lichfield and Partners

Planning Design Economics

EAST HAMPSHIRE DISTRICT COUNCIL TOWN CENTRES, RETAIL AND LEISURE STUDY April 2007

Convenience Retailing (Food and Grocery)

5. *If major residential development is implemented in Whitehill/Bordon then there could be scope for a new food superstore within the enlarged settlement during the period 2016 to 2021.*

Comparison Retailing (Non-Food Durable Goods)

6. *An assessment of available expenditure and existing shopping patterns suggests that a significant amount of comparison goods expenditure in the study area is spent at shopping centres outside the District, and residents have a significant choice of shopping destinations e.g. Basingstoke, Farnham, Guildford, Portsmouth, Southampton and Winchester. Alton and Petersfield town centres are the main comparison shopping destinations in the District.*

10. *If major residential development is implemented in Whitehill/Bordon then there could be scope for a significant amount of comparison floorspace (16,700 sq m gross) during the period 2016 to 2021.*

11. *In qualitative terms, Alton and Petersfield town centres have a reasonable range of comparison shops including some national multiples and independent specialists, but these centres are ranked below Basingstoke, Winchester, Guildford, Southampton and Portsmouth.*

Commercial Leisure and Entertainment Facilities

13. *The provision of leisure, entertainment and cultural facilities within the District is limited, but this reflects the relatively small catchment population of the main towns in the District. Residents in the District also have good access to facilities in neighbouring towns. The main sectors that could offer some potential for new leisure facilities include a small cinema and bingo club, and health & fitness facilities*

16. *If major residential development is implemented in Whitehill/Bordon then there may be scope to provide an enhanced centre within the enlarged settlement.*

Alton Town Centre's Weaknesses

- *There is a poor range of leisure and entertainment facilities and the evening economy could be improved.*
- *The centre does not offer the same quality and range of facilities available in Basingstoke, Guildford and Farnham, especially clothing and footwear retailers.*

Petersfield's Weaknesses

- *There is a poor range of leisure and entertainment facilities. The centre's evening economy is based primary on restaurant/bars and pubs.*
- *The centre does not offer the same range and choice of facilities available in Chichester, Portsmouth and Guildford, especially clothing and footwear retailers.*

Whitehill/Bordon's Weaknesses

- *There are no leisure and entertainment facilities in the centre.*
- *The centre does not offer the same quality and range of facilities available in Liphook and some of the larger local centres, especially national and high quality comparison retailers.*

Alton and Petersfield are the two main shopping centres within the East Hampshire District. These market town centres are influenced by major shopping destinations surrounding the District, including Southampton, Basingstoke, Portsmouth, Chichester, Guildford and Winchester. Southampton, Basingstoke and Portsmouth are Primary Regional Centres as defined in the Draft South East Plan.

4.19 The household shopper survey results demonstrate that residents tend to visit a diverse selection of shopping centres and leisure destinations. A high proportion of residents in the study area regularly shop in Guildford, Chichester, Portsmouth, Basingstoke and Waterlooville. These shopping patterns are likely to continue in the future.

4.21. there are high levels of mobility within the District allowing residents to travel outside the District for shopping and leisure uses, these patterns are likely to continue in the future.

5.2 The zones were chosen based on postcode boundaries which best fit the likely primary catchment areas of the main centres in the District.

17. Alton and Petersfield town centres should be maintained and enhanced as Town Centres. They should serve the northern and southern halves of the District respectively, and should embrace a wide range of activities. The town centres should function as the main comparison shopping destinations in the District, and also the main destination for leisure, entertainment and cultural activities that serve the District's residents.

17.4 Long term forecasts (beyond 2016) may be more susceptible to change, due to unforeseen circumstances. Projected surplus expenditure beyond 2016 is attributable to projected growth in spending per capita, extrapolated from short to medium term growth projections. If the growth in expenditure is lower than that forecast then the scope for additional space will reduce.

10.0 FOREST CENTRE, WHITEHILL/BORDON DISTRICT CENTRE

10.2 Within the district centre boundary an area of land in the north west corner of the centre has been allocated for additional retail development within the Adopted Second Review Local Plan. This allocation will be safeguarded from any form of permanent development (Policy S1) in order that is available for retail development during the plan period to 2011.

Summary and Conclusions

15.19 The floorspace figures above exclude the possible major residential development at Whitehill/Bordon. If this development is implemented and major retail development is provided in Whitehill/Bordon then the floorspace projections for Alton and Petersfield and other centres in the District will reduce slightly, because a higher proportion of expenditure will be retained in Whitehill/Bordon, i.e. there will be an impact on other centres.

Comparison Development

17.13 If 3,000 dwellings are developed at Whitehill Bordon there could be scope for about 16,700 sq m gross of comparison floorspace by 2021 (Table 13.5).

17.43 Within Whitehill/Bordon there may be scope for about 500 sq m gross of comparison retail floorspace by 2016, assuming no major residential development in this area.

However, if major residential development is implemented in Whitehill/Bordon by 2016 (3,000 dwellings) then there could be scope for a large food store (approximately 2,500 sq m net) and about 12,600 sq m gross of comparison floorspace

BAAG objection. CSOE1,2,3,CSOE9, CSOH1, CSOT1, 3,4, CSOWB1,2,5,6,9,10,12.

In convenience, comparison goods and leisure terms, the District is adequately served to 2016. Only beyond 2016 and in the event of major development occurring there, does there arise the possibility that additional floorspace may be required at W-B, assuming growth in spending.

In terms of convenience, comparison and leisure facilities, the report only suggests that there “could” be scope for additional provision. No great confidence in the research therefore.

The “draw” of external retail destinations is substantial, residents from the major communities in East Hampshire travel out of the district to centres whose scale of offer far exceeds anything capable of being provided within the district.

This forecast made at early 2007 when market conditions were very different and growth in spending had occurred. The report accepts that its findings are based on continued growth, those are not the circumstances now. Timing and confidence may have slipped.

Alton and Petersfield town centres are recommended as the main shopping centres, despite the W-B strategy to grow to double their populations.

These forecasts had no regard to the town’s status as an eco-town. There is much reference to the need for adequate car parking provision to serve the needs of retail activity, a prerequisite of operators and investors. The catchment area “assumed” in this study has the largest population of all those identified, such that despite W-B retail expenditure per head being the lowest across the district, the total spend available from the large population within that catchment area places W-B at the top of the list. This has distorted the conclusions, but reinforces the need for high levels of parking, exactly the provision which an eco-town cannot have, because it would run counter to the “low car dependency” ethos of eco-towns. In reality therefore the footfall for any retail provision at W-B would be small, serving very local needs only. Investors would be less enthusiastic about following through.

The catchment area assumed for W-B includes Grayshott, Bramshott, Liphook and places south of the A3 such as Milland. BAAG is clear that residents from these locations do not use W-B in significant numbers. In our view the area should be smaller, reducing population and potential patronage and levels of spending at any W-B facilities.

The spending power of W-B residents is confirmed to be the lowest in East Hampshire District. Retailers have responded appropriately by providing low cost goods. Existing stores are not trading at capacity.

The comparison floorspace recommended for W-B is fifteen times the existing provision. BAAG suspects a combination of the wrong catchment area, the wrong spending power, no allowance for leakage to external destinations and no recognition of the restrictive car policy of an eco town.

Alton, Petersfield and W-B are similarly disadvantaged in leisure and entertainment terms, all three are subservient to the offers at external locations. There is no indication to the effect that W-B is particularly undersupplied at present.

Land at the Forest Centre is safeguarded for additional shopping provision.

BAAG suggests that completion of the retail offer at the existing centre would be more in the spirit of regeneration than the degenerative impact of the council's proposals to abandon the centre as shown in the master plan consultation. The council's proposals are at odds with policy S1 of the plan in abandoning the Forest Centre, an entirely unacceptable strategy in view of the considerable investment recently made at the centre by the council and by retail operators.

END

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