



ALTON TOWN COUNCIL

# EHDC LOCAL PLAN REGULATION 18 (2024) RESPONSE

Prepared for Alton Town Council by

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## 1.0 Introduction

- 1.1 This document is being submitted by Alton Town Council in response to the East Hampshire District Council Local Plan 2021- 2040) Regulation 18 consultation (2024).
- 1.2 The new Local Plan 2021-2040 will cover the areas in East Hampshire outside of the South Downs National Park Authority. The SDNP area is covered by the South Downs Local Plan which was adopted on 2 July 2019 and is currently in the initial stages of review.
- 1.3 This response considers the proposed spatial strategy for the emerging plan, the settlement hierarchy and its application and consequences for Alton. It also addresses the proposed site allocations as well as selected other draft policies, informed by the work of Alton Town Council (ATC) including its response to the Climate Emergency and the on-going review of the Alton Neighbourhood Plan (ANP)
- 1.4 This response also reviews the supporting evidence bases to ensure they are robust and support the rationale of the proposed site allocations contained within, to support the requirement for the EHDC Local Plan to be considered to be positively prepared, justified, effective and consistent with national policy as it moves to the next stage in preparation.

## 2.0 Background and Context

### EHDC emerging Local Plan

- 2.1 There have been three previous Regulation 18 consultations for the emerging Local Plan, two held in 2019 and one in early 2023. The first Regulation 18 in 2019 sought, in terms of spatial strategy, to deliver a number of “local” sites together with Northbrook Park at Bentley and Whitehill/Bordon forming the two main “strategic sites”.
- 2.2 The second consultation, also in 2019, focused on 10 potential strategic development sites. This included two sites of direct relevance to Alton, Chawton Park Farm and Neatham Down.
- 2.3 Subsequently, EHDC Full Council on the 23<sup>rd</sup> September 2021 sought Members approval for the preferred site allocations option for the emerging Local Plan in order to proceed to the Regulation 19 consultation. Members were requested to approve one of the sites near Alton (Option 2)

"Chawton Park Farm" as its preferred option. It was, however, determined at that meeting that further work was requested on all sites and thus no preferred option was approved.

- 2.4 On the basis of its inclusion in this current Regulation 18 it is worth noting that in respect of the other site near Alton proposed at that time, Neatham Down ( Option 3), the report to Full Council stated that this location was not recommended:

*"Potential adverse impact on the landscape of the Wey Valley and the setting of Alton have been identified in respect of the site at Neatham Down, whilst there are concerns that the A31 – as a physical and psychological barrier – would hinder the integration of a new community with Alton"*

- 2.5 EHDC subsequently halted the Local Plan process in summer 2022, restarting with a Regulation 18 Issues and Priorities paper in late 2022. This consultation asked for views on high level principles over where to distribute or concentrate new housing. The current Regulation 18 consultation indicates that the preferred spatial strategy is Option 2 - *"Concentrate new development in the largest settlements with more facilities and services"*

- 2.6 The other options were 1) disperse growth over a wider range of settlements, 3) distribute new development by population and 4) concentrate development in a new settlement or in a large urban expansion to one or more existing settlements.

#### **Alton Neighbourhood Plan review.**

- 2.7 There has been a period of considerable growth in Alton over the last ten to fifteen years. The previous EHDC Local Plan (JCS,) set out a requirement for 1,731 homes in Alton through the plan period of 2011 and 2028. When the original Alton Neighbourhood Plan was made in 2016, a minimum of 700 additional homes was required over the 1,031 either already built out, with permission or anticipated as windfall. At that time the Neighbourhood Plan allocated 1,027 against that 700 target, to ensure a good buffer, with further allocations made in the modified Alton Neighbourhood Plan (2021) totalling a further 305 homes (so in total 1,332) This figure was found to be in general conformity with the JCS.

- 2.8 Despite recent developments, the built-up area remains relatively contained in Alton within an area about 3 kilometres long and 2 kilometres wide. The built environment consists of four elements, namely: central older areas; outer residential areas; industrial areas; and Holybourne

village. Alton is set within a distinctive chalk landscape setting, at the source of the River Wey. It sits relatively hidden in a hollow, which is encircled by sloping downland that provides a green skyline. Immediately to the south-west is the northern edge of the South Downs National Park.

- 2.9 The Town Council approved a full review of the Alton Neighbourhood Plan in February 2023. A community led Steering Group (ANPSG) has met every two weeks since, gathering evidence, engaging with the community and subsequently writing the new plan. The draft introduction states:

*“In summary, Alton residents respect the need for growth, but wish to retain the individual characteristics and heritage of the Parish. While further housing will be necessary, key elements to be considered must be maintenance of the town setting, protection of the environment and the development of infrastructure and services”.*

- 2.10 It was agreed by the ANPSG that the town and potentially the town’s environs, would continue to be a focus for some future growth as a principal town in the settlement hierarchy, required by EHDC to take further housing development.

- 2.11 With no early indication of likely housing numbers from EHDC, the ANPSG, assisted by their consultants (ONH), considered scenario planning as part of the review of the neighbourhood plan, looking at the different ways the town could evolve in the longer term, to inform a choice about which development path to take.

- 2.12 Each scenario was framed as distinct and plausible, enabling more complex issues to be mapped and compared, which is particularly useful when exploring the relationship between settlement growth and the capacity and distribution of its current supporting infrastructure.

- 2.13 Its primary driver was answering the question “what will serve Alton well”? So much development over the preceding decade had not delivered the improvements to services, facilities and infrastructure which were required and this method of considering growth focused on addressing this, rather than being driven by an arbitrary number which leads to choosing the least worst options without considering the bigger, longer-term picture.

- 2.14 Once identified, these cumulative scenario options were tested with the community at the September 2023 drop-in sessions. The feedback, indicated that there was community opposition to scenario 3 (c.800) which included development in Holybourne of around 200 plus the development numbers from scenario 1 and 2. There were limited responses to the other options which were, Scenario 1 - c.400 homes (Brownfield sites) Scenario 2 - c.600 homes

(Brownfield plus land to the west of the town) and scenario 4, - c.1700 homes (Brownfield, Land to the west, Holybourne and to the south of the town)

- 2.15 EHDC feedback to the scenario planning was supportive of scenario 1 in principle but felt there was insufficient evidence to support the numbers proposed, had little comment on scenario 2, was supportive of scenario 3 relating to Holybourne but had landscape concerns over the South Alton element of scenario 4.
- 2.16 Subsequently, EHDC indicated to the ANPSG in October 2023 that the emerging Local Plan housing target for Alton would be 1,700, of which 1,000 would come from a strategic “satellite village” site outside of the Neighbourhood Plan boundary at Neatham Down, with a further c.260 from three other sites, Brick Kiln Farm (150), Beech (90) and Travis Perkins (20) of which the latter two fall outside of the Alton boundary.
- 2.17 The ANPSG had concerns over the likely constraints of a satellite village, given it would create a car dependent community, disconnected from the existing town and would need significant infrastructure within the site which would not benefit the wider town.
- 2.18 As such, the ANPSG sought to consider whether the Alton Neighbourhood Plan scenario 4 could, with some adjustment on locations, (likely to exclude Holybourne) provide a solution in order to negate the need for a satellite village workshopping the proposed scenario and commenced engagement with land promoters to discuss the infrastructure requirements needed in order to deliver the sites. This would then be used to prepare justified draft site allocation policies to include for testing with consultees through the statutory Regulation 14 consultation for the Neighbourhood Plan, scheduled for April 2024.
- 2.19 EHDC officers have indicated their concern about the Neighbourhood Plan progressing in this way and seeking to consider the full allocation, recommending that the Neighbourhood Plan only considers sites within its boundary of up to 700 (or a lower number leaving the Local plan site allocates the sites Brick Kiln Lane, Travis Perkins and Beech), or allocates no housing at all with EHDC allocating the full 1,700. They have further advised that the group of sites around South Alton should not be considered by ANPSG as these would be deemed to be a strategic allocation and thus only able to be included within the Local Plan.
- 2.20 EHDCs attention is drawn to the [inspectors report](#) for the South Oxfordshire District Council Core Strategy as it related to the Thame Neighbourhood Plan. The core strategy was modified in order to *“delete the strategic allocation and devolving the task of identifying sites for all of the town’s growth to the Thame Neighbourhood Plan”*.

- 2.21 The response by EHDC to direct the ANP to either promote no housing or a restricted choice of sites could be seen to pose a threat to the “integrity and freedom”<sup>1</sup> of the neighbourhood plan process through restraining the ANP from allocating where it believes best serves the local community.
- 2.22 The ANPSG believes that the neighbourhood plan being asked to allocate up to 700, does not work for Alton alongside a new “village” allocated by EHDC. With the sites available, it is an insufficient housing number to be viable for developers to provide the infrastructure and community facilities required for the town which can only be realised with delivery at scale. Furthermore, Scenario 1 (Brownfield) would be undeliverable in the numbers originally conceived if a satellite village went ahead as this option relied upon redevelopment of some of the parking areas in the town centre with a greater a focus on active travel, which is not possible if creating a car dependent community of up to 1,250 homes on the outskirts of town.
- 2.23 As such the Neighbourhood Plan Steering Group will be meeting with officers of EHDC before the end of February to consider the future of site allocations from the Neighbourhood Plan as with the constraints they have been told to work within, the result would just be more housing for Alton and little or no supporting infrastructure, which would not be supported by the community at referendum.

### 3.0 EHDC Regulation 18 Consultation Local Plan

- 3.1 ATC wishes to raise objection to the draft Local Plan as presented. The explanation for the objection is detailed below but the focus is concentrated on the following areas:
- The incorrect placement of Alton as a stand-alone tier one settlement
  - The resulting distribution of housing numbers across the settlements
  - The overall quantum of housing advocated in the plan
  - The inclusion of a 22% buffer without justification
  - The omission of capacity testing to obtain the numbers on each proposed site
  - The lack of brownfield first approach

#### Spatial Strategy.

- 3.2 EHDCs Planning Policy Manager recently stated<sup>2</sup> “*As planners we should concentrate development in the higher order settlements to encourage that modal shift so new residents can use walking and cycling to access those everyday facilities that they use.*”

<sup>1</sup> <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2021/06/Inspectors-final-report-Core-Strategy.pdf> (Para 55)

<sup>2</sup> EHDC Planning Policy Meeting 10<sup>th</sup> January 2024

- 3.3 This reflects the principle set out in S1.4 that the spatial strategy should be *“To concentrate the greater proportion of development in the larger and more sustainable settlements”*.
- 3.4 From this principle it logically follows that Alton, Whitehill/Bordon, Horndean and Liphook would take the bulk of the required housing development, most effectively achieved through intensification of existing town centre sites, which are the most accessible, making best efforts to use previously developed land before looking to greenfield sites. The NPPF is clear that substantial weight should be given to reuse of previously developed land.<sup>3</sup> This “brownfield first” approach was also supported by Alton residents during the Alton Neighbourhood Plan informal engagements sessions in 2023.
- 3.5 The government recently announced that every council in England will be told that they will need to prioritise brownfield developments and instructed to be less bureaucratic and more flexible in applying policies that halt housebuilding on brownfield land.<sup>4</sup> The EHDC Local Plan does not currently appear to provide evidence that this approach has been taken.
- 3.6 It is further noted in the current EHDC register of local brownfield land the council has not put any sites on Part 2 of the register. Granting permission in principle (PiP) for appropriate sites is a useful tool designed to speed-up smaller housing-led development and de-risk the sites helping to bring forward housing in these areas and should be utilised wherever appropriate.
- 3.7 The preferred spatial strategy must also consider this concentration of development in higher order settlements in terms of what will serve the existing community well to provide infrastructure solutions through housing delivery, which will benefit the existing as well as new communities, providing an integrated, well-connected community, which will continue to thrive through support for local services including long term vibrancy for town centres.
- 3.8 This effectively applies the principles of sequential testing to determine where development should be located, assessing of all of the brownfield and comparable deliverable and developable LAA sites within the town centre, then within the settlement boundaries before considering sites outside SPBs but within the Neighbourhood Plan boundary and only then sites beyond, as by definition the further out from the town centre sites are located, the less sustainable and accessible they are likely to be.

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<sup>3</sup> <https://commonslibrary.parliament.uk/research-briefings/cdp-2023-0035/>

<sup>4</sup> <https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development>

- 3.9 ATC is concerned that whilst concentrate development in the higher order settlements is an appropriate approach, there is little evidence that the current spatial strategy considers brownfield first and therefore the Plan may not be consistent with national policy or justified.

### Settlement Hierarchy & Housing Requirement.

- 3.10 In respect of the distribution of proposed development across the settlement hierarchy, ATC is concerned over the justification given for Alton to take 1,700 homes. It is only the latest revision of the settlement hierarchy which sets Alton apart from the other large settlements in the district, all previous hierarchy methodologies employed set it alongside Whitehill/Bordon and Liphook.
- 3.11 In total the three tier 2 settlements are required to take 1,098 compared with Alton as the single tier 1 taking 1,700. There is no justification for this pattern of distribution across the higher level settlements, which appears to disproportionately attribute development to Alton.
- 3.12 It is also inconsistent with previous approaches taken by EHDC in respect of Bordon/Whitehill in particular. The town is described as having a relatively large range of facilities and services for local residents. *“However, an even greater range of local facilities and services will be delivered through the development of a new town centre as part of regeneration activities.”*(Page 368)
- 3.13 Cryptically, it is stated that EHDCs view on *“the amount of additional new homes that should be delivered at Whitehill & Bordon has changed over time”*, whilst local publicity congratulates the transformation of the town into a [sustainable green, healthy and connected town](#), which has received [over £34m from the LEP](#) to fund infrastructure improvements in addition to the multimillion point [S106](#) legal agreement signed in 2015. Contained in the draft plan is evidence of work undertaken to identify what further infrastructure works would be required with further development, yet there is no evidence of such detailed analysis for Alton.
- 3.14 There is information missing from the evidence base to explain how the proposal set out in the 2019 larger sites consultation for 1,257 additional homes in Bordon has been more than halved. It is stated that compared to other sites the Gibbs Lane/Oakhanger Road site ( LAA/WHI-021) has not performed well within the Accessibility Study. Clearly this depends on which sites it is being compared to, yet its average score is the same as Neatham Down, with its minimum score higher than Neatham Down.
- 3.15 Overall it is therefore unlikely that the plan would currently be found to be sound based on the information presented.



- 3.16 ATC would agree with the approach that the settlement hierarchy methodology takes, emphasising accessibility and living locally, *“Sustainable locations in the district are informed by the settlement hierarchy, which is based on a methodology of reducing carbon emissions from the transport sector, the largest contributing sector to carbon dioxide (CO2) emissions in the district”*
- 3.17 However, the only proposed strategic allocation in the Plan is situated in an inaccessible location. This is therefore is not consistent with the application of the methodology and scores low on the accessibility score contained with the [East Hampshire Accessibility Study](#) with a minimum score of 4. (The maximum accessibility score is 58.6 and the median accessibility score for the district is 4.9)
- 3.18 As a technical note, site LAA/AL- 060 Holybourne does not appear in the accessibility appraisal. It does include LAA/AL-034 which was the larger Holybourne site which is no longer available. The report should therefore be updated to reflect the current position in terms of land availability.
- 3.19 In calculating the required housing number for the district, the updated NPPF states that the standard methodology is an *“advisory starting point”* (para 61). The supporting evidence base provides a clear direction in terms of use of the standard methodology and its application for the LPA. The [East Hampshire Technical Note September 2023](#), concluding that there is no exceptional circumstances to justify using an alternative method to calculate housing need.
- 3.20 This consultation identifies a need for a minimum number of 9,082 dwellings over the plan period (2021- 2040). (8,816 plus 266 unmet need from the SDNPA) As of 31 March 2023 part of this minimum requirement was already made up of 940 net completions and existing planning permissions totally 3,965 new homes, with a windfall allowance of 1,320, leaving a requirement for a further minimum of 2,857 new homes plus appropriate buffer.
- 3.21 ATC would question why a buffer of over 22% has been included, (in addition to meeting the unmet need from the SDNP) and appears excessive at 643 homes, resulting in a housing requirement figure of 3,500. Whilst the background paper notes the longer term potential unmet needs of the wider South Hampshire sub-region, this is not quantified and therefore lacks justification. Any buffer needs to be proportionate to the degree of risk, with a significant buffer indicates a lack of confidence over deliverability of sites chosen within the Plan. A buffer of 10% would reduce the overall requirement by some 358 homes over the plan period.

- 3.22 Capacity testing. The EHDC Policy team have indicated that the figures stated in the LAA should not be relied upon, which calls into question the degree of accuracy in the proposals. By way of evidence, in Alton, the LAA site at Holybourne (LAA/AL-060) is tabled as having a capacity of 101. This is 100% below the figure publicly stated by the site promoters at 223. The proposed allocation at Brick Kiln Lane (LAA/AL-005) is stated at 150 yet the site promoters have confirmed their figure of 225. The sites comprising the land at known locally as “South Alton” (LAA/AL-056 Land North of A31) is stated on the LAA as 650, yet the site promoter responded to the previous Issues and Opportunities Regulation 18, stating up to 1,100 in total and 920 across the corresponding LAA sites. The site at Neatham Down (LAA/BIN-011) is stated as 1,000 but the site promoter is stating 1,250.
- 3.23 Therefore, firstly the desired “buffer” is likely to already exist within the emerging sites as demonstrated in this sample of four LAA sites but secondly, the lack of clarity over capacity testing may be resulting in surplus allocations being made, against the stipulated requirement.

## Transport Study

- 3.24 This background paper does not provide sufficient information to enable consultees to form a view on transport impacts of the proposed site allocations. Whilst it assesses in high level terms, the impact of proposed development, particularly strategic sites, this information should be available at the earliest possible opportunity to help de-risk potential allocations moving forward and demonstrate positive preparation of the emerging plan. Whilst transport assessments are *“an iterative process and become more refined and detailed as the process draws to a conclusion”*<sup>5</sup>, the PPG is also clear that transport assessment should be undertaken throughout including as part of the initial evidence base (issues and opportunities) and part of the options testing as well as in the preparation of the final submission.
- 3.25 The [PPG](#) is clear that the key issues and outcomes should include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole. The evidence presented does not even detail how traffic as a whole will move through the network with the cumulative impacts once the proposed housing number for the district is built out.
- 3.26 HCC LTP4 places emphasis on integrating land-use and transport planning, to enable sustainable travel choices and reduce the need to travel in the first place., with walking and

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<sup>5</sup> [PPG Transport Evidence Bases in Plan Making and Decision taking](#)

cycling prioritised as transport modes that should be the first choice for shorter journeys. However, It is impossible to inform sustainable approaches to transport at a plan making level without knowing the likely transport impacts of existing and proposed development or assessing where alternative allocations or mitigation measures would have.

### Integrated Impact Assessment (incorporating SA/SEA)

- 3.27 *Sustainability appraisal and strategic environmental assessment are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives<sup>6</sup>*
- 3.28 As prescribed, the SA Report must be published for consultation alongside the draft plan that essentially ‘*identifies, describes and evaluates*’ the likely significant effects of implementing ‘the plan, and reasonable alternatives. The report must then be considered alongside consultation responses when finalising the plan.
- 3.29 It is the view of ATC that this IIA does not adequately address the matter of “reasonable alternatives” for two reasons; firstly, the consideration of reasonable alternatives to the preferred spatial strategy option, “*Option 4 scores the least favourably in sustainability terms overall, with a new settlement expansion predicted to result in adverse effects across a number of objectives, including biodiversity, accessibility and emissions reductions, health, landscape, natural and water resources and economic growth.*”, yet the proposed strategic allocation for Alton is effectively an option 4 spatial strategy through the creation of a new settlement. There also appears to have been no assessment of reasonable alternatives within Alton which could cumulatively supply a similar quantum of housing in order to satisfy the housing requirement within the option 2 model.
- 3.30 Secondly, in assessing the reasonable alternatives, Appendix F & G evidence the high level assessments undertaken yet there is no obvious explanation as to how the scoring was considered and the weight given to the various objectives at this screening stage. The indication is that all bar three LAA sites in Alton, detailed in Appendix H, were rejected with no rationale and does not assess these three any further on the basis that they would fall within the Alton Neighbourhood Plan area. In view of one of the recommended options to the ANPSG being to not allocate with the ANP area at all, sites may subsequently be included within the Regulation 19 which had not been assessed at this stage. The evidence for demonstrating consideration of reasonable alternatives is not therefore sufficiently robust.

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<sup>6</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

- 3.31 There should be appropriate evidence supplied in the form of an assessment confirming why the chosen sites are ‘more appropriate’ than other comparable sites, set out in terminology that can be easily understood.

## Proposed Site Allocations

- 3.32 As previously stated, there is concern that there is little evidence on any brownfield first approach, a lack of accuracy over site capacity and sufficient evidence to the rational for discounting sites. *This evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.*<sup>7</sup>
- 3.33 In consideration of the proposed sites which have been selected, ATC provides the following comments:

### ALT1 – Land at Brick Kiln Lane Alton (LAA/AL-005)

- 3.34 This site has been considered by the ANPSG (part of scenario 2) and as such has been subject to engagement with the site promoter and workshopped by the Alton Neighbourhood Plan Steering Group with the following outputs:
- 3.35 The site has as indicative capacity on the LAA of 150; the landowner has proposed a quantum of 225.
- 3.36 Any site allocations policy will need to include a requirement for highways infrastructure improvements in the form of a new 4 or 5 arm roundabout (the 5<sup>th</sup> arm potentially required for the proposed site ALT4 should this be confirmed as an allocation.)
- 3.37 Attention is drawn to the drainage issues currently experienced on the sunken lane (Brick Kiln Lane) from the farmed land to the north and where it currently drains into surrounding land.
- 3.38 There is also flooding in the area located around the proposed site entrance which would need to be mitigated (SUDS or other alleviation proposal)
- 3.39 The site is located at the entrance to the town from the Basingstoke direction and as a key gateway into Alton it is important that the build line is discretely set back from A339 so as not to create a hard development line on the approach to the town.

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<sup>7</sup> <https://www.gov.uk/guidance/plan-making> 038 Reference ID: 61-038-20190315

- 3.40 The site contains a number of TPO trees. To the west and north of the site is woodland identified as part of the network enhancement zone on the ANP Green Infrastructure Map. Built development should provide a buffer zone of a minimum of 50-100m from this woodland. In addition, wherever possible mature trees should be retained on site and where new planting is required, mature trees of scale are planted to break up the built environment.
- 3.41 Development on the site should continue to follow the northern edge of the original Will Hall Farm built form, (around 120m contour line) and wrap around the site rising slightly (but not exceeding the 130m contour line) to maintain the landscape setting.
- 3.42 Pedestrian and cycle routes into town and towards Beech should be improved with the introduction of a safe crossing point to enable walking and cycling to the western end of town to access school/hospital/GP/recreational facilities including the skatepark and Leisure Centre.

#### **ALT2 - Chawton Park Surgery (LAA/AL-037)**

- 3.43 This proposal is supported by ATC and a policy is included within the ANP.
- 3.44 However, given its location at the western end of the town, the surgery will remain largely reliant on access by car, which constrained its scope for expansion as the car park will need to be retained and potentially extended to accommodate additional patients.
- 3.45 With the proposal to allocate 1,700 new homes for Alton there is a question over whether the site is sufficiently able to support the additional c3,500 people, in the knowledge that Wilson Practice is already 2,787 patients oversubscribed (operating currently at 111%) and this is prior to the increase in patient numbers resulting from the current developments which have yet to be completed.

#### **ALT3 – Land Adjacent to Alton Sewerage Treatment Works (LAA/AL-058)**

- 3.46 The Town Council would support the inclusion of this site for an extension to the waste-water treatment use adjoining it, in order to increase capacity in this location.
- 3.47 There is no justification to allocate this site for more generic employment uses, which are not required given the proximity to ALT6 and the likely environmental issues of smell and/or noise for adjoining users.

#### **ALT4- Land at Whitedown Lane (LAA/BEE-010)**

3.48 This site is located outside of Alton in the neighbouring parish of Beech although, given its proximity to the town, would rely upon it for services and facilities. Alongside the proposed development on the other side of the A339 at Brick Kiln Farm (ALT1), development of this site could result in a very clear definition to the built environment on this gateway to the town.

3.49 The site has a number of similar constraints and opportunities as ALT1. A new arm to any roundabout on the A339 would be required for access. In addition there would need to be improvements to the surrounding area for active travel routes into the town along the A339 and the installation of a crossing point to enable safe passage to the centre of town and the facilities at the western end of the town.

#### **ALT5- Land at Travis Perkins (Mounters Lodge Park (LAA/CHA009)**

3.50 ATC raised no objection raised to planning application 59923 (response submitted 25<sup>th</sup> October 2023) for this site. A decision is pending.

#### **ALT6- Land at Wilsom Road (LL/WOR-004)**

3.51 This site was included on the EHDC Housing and Employment Allocations Plan in 2016. An application in 2016 was refused with an appeal lodged and subsequently withdrawn in 2017. Therefore, EHDC need to be satisfied that this site is both developable and deliverable prior to its inclusion in this Local Plan.

#### **ALT7- Land at Lynch Hill (LAA/BIN-008)**

3.52 This site has a complex history. There are two outline consents for the site, (49776/003 and 49776/004), an outstanding reserved matters application for the whole of the site (49776/004) as well as an outstanding reserved matters application for site access for pedestrian, cycle and vehicular access to the site from Waterbrook Road (49776/005)

3.53 Listed under the constraints and opportunities for this site, the question of access is noted, stating that there is a private track which runs through the site, which connects Golden Chair Farm with the Waterbrook Road which will need to be factored into any reserved matters decision affecting access from the site into Waterbrook Road and how the site is laid out.

3.54 It is further noted that it is this privately owned track which would be required to enable pedestrian and cycle access to the proposed site ALT8; without which access to Alton would

be across the A31. It is therefore vital for the delivery of both this site and consideration of ALT8 that there is certainty in the securing of this right of way for public access.

#### ALT8 – Land at Neatham Manor Farm (LAA/BIN-011)

- 3.55 This site is the sole proposed strategic allocation in the emerging Local Plan. As previously noted, in spatial terms it is more aligned with option 4 rather than the preferred option 2 as it creates a new satellite village. The site promoter is advocating delivery of 1,250 homes on the site.
- 3.56 The site scores poorly overall in the [Living Locally Accessibility Study](#), with one of the lowest minimum scores in the district at a minimum of 4 given its inaccessible location. Residents would be dependent upon the private car, undermining the environmental limb of sustainability as set out in the NPPF 2023, the priorities and objectives of EHDC emerging Local Plan and ATCs response to the climate emergency as well as the aim of HCC's Transport Plan (LTP4) in creating a prioritising active travel by foot and bicycle.
- 3.57 As noted in ALT7 above, there is a question over potential constraints over the proposed safe route for walking and cycling over the existing third party owned bridge and the relationship of any proposed route through the Lynch Hill employment site accessing out to Waterbrook Road. Without resolution, the site is unlikely to be considered deliverable.
- 3.58 The EHDC [Interim SA Report \(Strategic Site Options\) February 2021](#), stated, in relation to the previous proposal to allocate a site for up to 600 homes in this area
- “this area is close to the South Downs National Park and is considered to be a highly sensitive landscape with a low capacity for development in the Council's Landscape Capacity Study (2018). An option for employment development was previously considered through the LAA and SA in 2018, prior to the Draft Plan consultation, but ultimately not taken forward for detailed appraisal. Key concerns at the time were in respect of landscape and groundwater flood risk.”*
- 3.59 The EHDC [2018 Strategic Flood Risk Assessment \(SFRA\)](#) identifies the site is substantially affected by areas of groundwater flood risk. As such there is no evidence that reasonable alternatives have not been adequately assessed, not least in terms of sequential testing to identify if there are better options for site allocation.
- 3.60 The [Interim SA \(2021\)](#) states at 8.5.15 that Neatham Down is “peripheral or distant from existing services” its location “considered to be more problematic ....in terms of the level of

*intervention required to improve accessibility and in terms of the number of existing residents who would benefit from facilities delivered on site.”*

3.61 Whatever improved to accessibility could be made, parts of the site would remain at least a 30 - 40 minute walk to the middle of the High Street (2km) and more than a 10 minutes cycle and therefore does not accord with the [Manual for Streets](#) recommendations (800m with an upper limit of under 2km)

3.62 It is clearly not accessible and in EHDCs own words the A31 “*provides a physical and psychological barrier [and] would hinder the integration of a new community with Alton.*”<sup>8</sup>

3.63 There is a real risk of the development becoming, in reality, far removed from the option 2 spatial strategy intention to extend existing larger settlements and will in effect create a new “garden village”. The lack of sustainability of such new settlements is illustrated by the Report “[Garden Villages and Garden Town: Vision and Reality](#)”<sup>9</sup> This summarises their findings which include these settlements being:

Car dependent;

Unlikely to be self-sufficient or self-contained in a meaningful way;

Good/excellent public transport was wanted and a stated aim but rarely achieved as funding in uncertain; and

Cycling was underfunded. (This has been a concern voiced previously by ATC the LCWIP is unable to be delivered due to the cost of implementation with no funding through HCC)

3.64 It is also likely that a viability assessment which would need to factor in the required infrastructure, local services and elements such as the need for subsidised bus services, would result in an inability to deliver the quantum of affordable housing required locally as part of the ANP [Housing Needs Assessment](#)

3.65 In conclusion, ATC would not support the selection of this site for development for the reasons set out above.

### **Support for Alton Town Centre**

3.66 ATC is pleased to see a specific policy DM24(Alton Town Centre Uses). However, the proposed area is currently not identified on the polices map, so it is not possible to comment on the

<sup>8</sup> <https://easthants.moderngov.co.uk/documents/g3773/Public%20reports%20pack%2023rd-Sep-2021%2018.00%20Council.pdf?T=10>

<sup>9</sup> Foundation for Integrated Transport and Transport for New Homes (Subtitled “The Garden Village Dream Vs. The Tarmac Estate”) (2020).



extent of the area. EHDC have been made aware that the ANP is developing a Town Centre Masterplan (commissioned through Locality with AECOM) which also considers the extend of the primary shopping area as well as considers the opportunities for redeveloping parts of the town centre to improve the mix of uses and introducing more residential spaces to intensity use of this most accessible part of the town.

- 3.67 To support the Alton Town Centre policy, development within Alton should be in a way that is fully integrated with the existing community and supports the town centre in order to benefit the existing businesses located there. ATC therefore agrees with the ‘town centre first’<sup>10</sup> approach to retail and other town centre uses within Alton and welcomes draft policy E5 (5.5) “*Any development that would significantly harm the vitality and viability of a defined centre or small local parade (3 or more units) will not be permitted.*”
- 3.68 As such new developments should not be providing local centres which would deter use of the town centre (ATC objected to the proposed café on the Molson Coors Brewery Site redevelopment, as it would fail this sequential test<sup>11</sup> - the proposed café was subsequently withdrawn from the application)
- 3.69 ATC is also keen to ensure the town centre adapts to current trends, which sees high streets being focal points for social interaction and community services with improved public realm spaces. As such the Local Plan, should respond to the need to decrease carbon emissions in the town centre, through policies to improve air quality and canopy cover, restricting HGV vehicles and improving accessibility by active travel modes.

#### Other Policy Areas of Note.

- 3.70 Climate Change. Whilst supportive of the policies, ATC would like to see the Local Plan go further, where it is able, namely, mandating the use of community energy systems such as CHP or district heating in site allocation policies where they relate to development over a particular size and certainly on strategic sites.
- 3.71 In addition, the need for sustainability assessments post occupancy could be relaxed for developments which are certified passivhaus. This would assist the developer and case officer in not having to monitor and report post occupation and would avoid the performance gap issues experienced once properties are occupied.

<sup>10</sup> <https://www.easthants.gov.uk/media/8743/download?inline> page 268

<sup>11</sup> [https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?activeTab=consulteeComments&keyVal=EHANT\\_DCAPR\\_245727&consulteeCommentsPager.page=3](https://planningpublicaccess.easthants.gov.uk/online-applications/applicationDetails.do?activeTab=consulteeComments&keyVal=EHANT_DCAPR_245727&consulteeCommentsPager.page=3)

- 3.72 Settlement Policy Boundary. ATC is supportive of the proposed amendments to the settlement boundary. It is noted that in Alton, Site 12 (Cowdray Park) and Site 13 (Salisbury Close) are being reviewed as potential Local Green Space allocations within the ANP protect them from future development as valued community amenity spaces.
- 3.73 Design policies are overall supported and the ANPSG has worked with AECOM in the creation of design guidance and codes for Alton which will nuance the design policies within the Local Plan to apply specifically within the Alton Area.
- 3.74 It is noted that in relation to Appendix F of the draft Local Plan (Parking Standards) there should be consideration given to mandating wider dimensions for parking bays where electric charging points are included as part of the design. (up to an additional 30cm) to account for wall and floor mountings.

## Summary and conclusions

- 3.75 In summary, ATC is concerned that the draft Local Plan is unable to demonstrate that it meets the tests of soundness.
- 3.76 The plan is not positively prepared, demonstrated through evidence inconsistencies. The identified vision and priorities are not reflected in the selection of the strategic site, which conflicts with the approach of the plan to support enlarging existing higher tier settlements (options 2) yet in reality has sought the creation of a new settlement (option 4).
- 3.77 The selection of the strategic site would be a significant incursion into a valued landscape, without meaningful attachment to the existing town, which would result in funding for infrastructure arising being consumed, in the main, within the site to attempt to mitigate its location constraints. It is therefore inconsistent with the NPPF.
- 3.78 *New communities with poor accessibility encourage private vehicle dependent travel, which undermines initiatives to encourage sustainable transport use in line with net zero objectives and promote healthy lifestyles.*<sup>12</sup> The Local Plan has the opportunity to be outcome focused to enable the aspirations of planning policy priorities to be reflected in the resulting schemes for the delivery of housing. Currently, there is a disconnect between the desired achievements of many of the emerging policies and the likely reality of the adverse impacts of development located where they currently proposed.

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<sup>12</sup> [https://www.rtpi.org.uk/research/2021/december/the-location-of-development/#\\_Toc89101909](https://www.rtpi.org.uk/research/2021/december/the-location-of-development/#_Toc89101909)

- 3.79 The location of a new “village” at Neatham Down also leaves open the possibility for gradual and creeping coalescence with Holybourne at a later date, or a larger development with further encroachment into the open countryside.
- 3.80 There is a lack of credible evidence in respect of site allocation numbers. As the site allocation figures are not to be relied upon, with no capacity testing undertaken, it is difficult to see any evidence to support the need for a large strategic site if the draft plan has over supplied, given the examples used earlier in this submission. In addition, there is no evidence-based justification for a 22% buffer to meet an undefined need elsewhere (excluding the SDNP which has already been accounted for)
- 3.81 The plan is purely numbers driven and currently appears to be attributing numbers to sites to hit a target figure, even though no capacity testing has been undertaken and numbers are evidently far removed from those sought by landowners/promoters.
- 3.82 Further, there is insufficient evidence to support the distribution of development across the settlement hierarchy, which sets Alton apart through the demotion of all other towns and the resulting overall percentage of housing the town is required to allocate as a result.
- 3.83 It is the view of ATC that the Local Plan would not be in conformity with the requirement for a plan to be justified.<sup>13</sup> *“taking into account reasonable alternatives and based on proportionate evidence”* for the following identified reasons:
- 1) A lack of evidence that sufficient endeavors have made to take a brownfield first approach nor seeking to consider Permission in Principle (PiPs) to de-risk smaller brownfield sites.
  - 2) A lack of evidence in the consideration of reasonable alternatives in relation to the IIA and site allocations work, including the omission of any detailed work on Alton sites prior to their rejection.
  - 3) A lack of sufficient evidence in the transport study to support how the overall quantum of development would impact the highways network and no settlement specific mitigation requirements (with the exception of some high level work on requirements for sites at Whitehill/Bordon)
  - 4) No evidence to confirm that any transport impact/capacity work has been undertaken as part of the selection of the sole strategic site; HCC highways should be a proactive planning partner throughout. It is accepted that transport assessments are iterative but should be part of positive planning not reverse engineering.

<sup>13</sup> [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf) Para 35.

- 3.84 In conclusion, whilst many of the policies in the plan are aspirational, they are currently not deliverable, principally due to the way in which the spatial strategy is sought to be implemented. The citing the proposed “new village” strategic allocation in a constrained location, the unjustified quantum of development sought within the Plan and the distribution of the proposed sites across the settlement hierarchy.
- 3.85 It is the view of ATC that as a result, the current draft plan, if taken forward, would fail at examination.

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