

Document for	Alton Town Council
Purpose	A response to ATC following the resolution passed at Full Council on 6 th June 2024.
Date	15 th July 2024
Authors	Representatives Group listed in paragraph 1.2

“Neighbourhood Plans empower communities to get involved in the decision-making process when it comes to housing and infrastructure in their local region”. (source: [ATC website](#))

1. Summary:

- 1.1. On Wednesday 6th June 2024 Alton Town Council (ATC) passed the following resolution:
“Alton Town Council proceed to a Regulation 14 consultation but not before 14th September and that a group of representatives be given until the end of July to come back with any new proposal for site allocations to be included in the Draft Neighbourhood Plan, which would then be put to the Full Council Meeting on 4th September. The alternative sites and accompanying assessment / information should be submitted to the Town Clerk by the end of July.”
- 1.2. This paper outlines a proposal, in response to this resolution, from a Group made up of representatives from The Alton Society, Holybourne Village Association, the Windmill Hill Group, ACAN and others.
- 1.3. The proposal makes the following two recommendations.

Recommendations:

1. Alton Town Council should pause the Alton Neighbourhood Plan process immediately pending further information regarding the Local Plan from EHDC and should not proceed to Regulation 14 consultation in September 2024.
2. Alton Town Council should instruct the Alton Neighbourhood Plan Steering Group to work only within the remit set by the draft Local Plan. This means allocating sites for 130 dwellings in brownfield town centre space and for an additional 245 dwellings (unless these additional 245 dwellings are added to the Neatham Down development within the Local Plan).

2. Context

- 2.1. The Group recognises that having an Alton Neighbourhood Plan (ANP) is important for the future of Alton and that the current draft ANP contains policies which would serve Alton well as the town handles the inevitable planning applications over the period of the Plan. The Group wishes the draft ANP to succeed with EHDC, the Planning Inspector and at public referendum. The Group considers that, in its current form, the draft ANP would not succeed.
- 2.2. In response to the ATC resolution, this Group has reviewed the [draft ANP](#) and has proposed alternative site allocations. (See Section 6 below.)

- 2.3. In the process of reviewing the [draft ANP](#), the Group, has identified fundamental procedural, tactical, and democratic flaws.(See Sections 3,4 + 5 below.)
- 2.4. The new government is making fundamental policy announcements which will almost certainly significantly affect the draft Local Plan process, and thereby the Neighbourhood Plan process.
- 2.5. In the draft ANP ([page 27](#)), Policy HO3 lists the following allocations:
 - HO3(A) Land at Brick Kiln Lane (up to 225 dwellings)
 - HO3(B) South Alton (up to 800 dwellings)
 - HO3(C) Land at Windmill Hill (up to 100 dwellings)
 - HO3(D) Holybourne (up to 223 dwellings)
- 2.6. These allocations exceed the estimate published in the Land Availability Assessment (LAA) for those sites.
- 2.7. Given the inclusion of the sites listed in 2.5 there is no credible explanation why areas in north Alton are not also included in this list.

3. Procedural Issues

- 3.1. In March 2024, EHDC closed its first consultation on its [draft Local Plan](#). EHDC divides its geography into areas, one of which is “wider Alton and surrounding villages”. The EHDC draft Local Plan allocates 1,700 dwellings to this area. 1,000 of these are proposed for the Neatham Down development. Of the remaining 700, EHDC notes that “a significant proportion of the 700 homes that are proposed within Alton... will be identified through the Alton Neighbourhood Plan, which is in the process of being revised.” ([page 332](#)). The draft Local Plan goes on to allocate 264 of those 700 dwellings within (or close to) the ANP boundary – 24 on the Travis Perkins site ([page 350](#)), 90 on Whitedown Lane ([page 347](#)) and 150 on Brick Kiln Lane ([page 340](#)).
- 3.2. It is clear, therefore, that the Local Plan asks ATC to identify sites for the remaining 436 dwellings to be allocated by the ANP within the boundary of ATC. However, the Alton Neighbourhood Plan Steering Group (ANP-SG) has exceeded its remit by allocating 1,348 dwellings - more than 3 times the 436 dwellings required by the draft Local Plan.
- 3.3. The ANP-SG is exceeding its remit by attempting to use the ANP process to negate the Neatham Down development proposed in the draft Local Plan. Paragraph 5.60 of the [draft ANP](#) explicitly states that the ANP-SG explored whether the ANP could be used to “provide a solution in order to negate the need for a satellite village” (i.e. the Neatham Down development). It is the case that opposing the Neatham Down development is the official position taken by ATC in its response to the draft Local Plan. In the September 2023 ANP consultation the majority of those who

commented on the Neatham Down proposal were in favour, which is not reflected in the draft ANP. In any event, as stated above, decisions regarding the Neatham Down development are for the Local Plan to make. The only role for the ANP is to consider the impact of any satellite village developments, and this is not covered in the draft ANP.

- 3.4. [The views of the public during the consultation process](#) have not been accurately reflected in the draft ANP. In some case these opinions have been ignored or watered down. In others the ANP-SG has directly contradicted the public's views e.g. by proposing several large allocations for the Alton area. Due to this misrepresentation of community feedback, the Planning Inspector is likely to reject the current excessive proposal at examination and the ANP is likely to fail at referendum.
- 3.5. Due to points 3.2, 3.3 and 3.4 above, the ANP currently proposed by the ANP-SG may not reach endorsement by EHDC Councillors at the relevant approval meeting required by the planning process.

4. Tactical Issues

- 4.1. EHDC's Local Plan is still in draft and not finalised. We do not know if the many responses from both ATC and by local residents will fundamentally change it.
- 4.2. The new Government has clearly stated its aim to change parts of the planning process which may have a significant impact on the current draft Local Plan.
- 4.3. To commit Alton to allocating 1,300+ dwellings at this moment is unwise and unnecessary because it severely limits room for manoeuvre in a fluid policy environment. Neighbourhood Plans should always be consistent with Local Plans and usually follow the adoption of the Local Plan rather than pre-empting it.
- 4.4. The Group has had discussions with the EHDC Planning Policy Manager who confirms that the current ANP will continue to provide protection for the town until 2026 (subject to any changes by the new Government).
- 4.5. The Group urges ATC to wait until it is clear how the draft Local Plan will proceed.

5. Democratic + Representational Issues

- 5.1. The draft ANP proposal directly contradicts the public's views, as recorded at the official public consultations. The analysis from the September 2023 consultation is clear: – Altonians are concerned about:
 - Damage to the country market town identity of Alton and the separate village identity of Holybourne

- Increase in traffic volumes, leading to congestion and perceived as a real safety risk to children, families and vulnerable residents.
 - Pressure on infrastructure - especially surface drainage, sewage, education, healthcare
 - Loss of nearby immediately accessible and familiar greenfield amenity spaces – viewed as essential for both physical and mental wellbeing.
 - Need for restoration and regeneration of the town centre.
- 5.2. A fundamental principle of neighbourhood planning is to faithfully represent the views of the community, particularly those recorded in formal consultation exercises. Section 4.7 of the draft ANP misrepresents the community feedback of the September 2023 consultation, summarised in [the steering group's own summary](#) of that consultation. Indeed, careful inspection of the feedback is recommended as it illustrates the most common themes have been overlooked completely.
- 5.3. The steering group's duty is to ensure their recommendations are evidenced by a golden thread of community feedback. This draft document fails that test and risks undermining public confidence in the neighbourhood planning process.
- 5.4. As noted above, the proposed allocations and policies are incompatible with the public feedback from the September 2023 consultation. This consultation forms a crucial part of the evidence on which the draft ANP should be based. This failure to reflect public opinion risks the ANP failing at referendum. The failure of the ANP at this late stage would represent a significant waste of public money and committee representatives' time and, more importantly, would leave Alton unprotected by a valid Neighbourhood Plan.

6. What is the Group proposing?

- 6.1. This proposal recognises the need for additional dwellings within the ANP boundary over the next 15 years. It also recognises that some dwellings will be found through small windfall applications outside of this allocation process. The rate of windfall dwellings is 14% across EHDC as reflected in the draft Local Plan.
- 6.2. As described in paragraph 3.1 (above) the draft Local Plan requires the ANP to allocate sites for 436 dwellings.
- 6.3. The current draft ANP Scenario 1 suggests that 130 dwellings can be placed on brownfield sites within the defined town centre. This would reduce the numbers of dwellings to be allocated from 436 to 306. A historical windfall rate of 14% reduces this by 61 to 245 dwellings.
- 6.4. The Group has had discussions with the EHDC Planning Policy Manager, who has indicated that, based on proposals on behalf of the site promoter, the number of dwellings allocated to the Neatham Down development has the potential to be

raised to 1,250. This would be subject to further work as part of the plan-making process but would potentially remove the need to find those dwellings within Alton town.

6.5. If additional dwellings are added to Neatham Down in the Local Plan there would be no further dwellings needed in Alton.

6.6. This breakdown is described in Table 1 (below).

6.7. Therefore, the Group proposes that the ANP should allocate sites for 130 dwellings in the town centre on brownfield. The additional 245 dwellings need to be allocated elsewhere unless an additional 245 dwellings are added to the Neatham Down development. The allocation of the additional 245 dwellings will only become clear once the Local Plan is published. The allocation of 130 dwellings in the town centre, in line with the Town Centre Master Plan, could be transformative for the town and its surrounding villages.

Table 1: Breakdown of the 1,700 dwellings allocated to the wider Alton area in the draft Local Plan:

Allocations	Site	Dwellings
EHDC Local Plan allocations (1,264 dwellings)	Neatham Down	1,000
	Travis Perkins site	24
	Whitedown Lane	90
	Brick Kiln Lane	150
Alton Neighbourhood Plan (436 dwellings)	Brownfield Town Centre	130
	Windfall (14% of 436)	61
	Additional or Neatham Down	245
	TOTAL	1,700

7. Conclusion

In response to the Alton Town Council meeting of 6th June 2024, a collective Group of residents has closely examined the draft ANP. Through its conclusions, explained above, it has developed two recommendations for Alton Town Council:

1. Alton Town Council should pause the Alton Neighbourhood Plan process immediately pending further information regarding the Local Plan from EHDC and should not proceed to Regulation 14 consultation in September 2024.
2. Alton Town Council should instruct the Alton Neighbourhood Plan Steering Group to work only within the remit set by the draft Local Plan. This means allocating sites for 130 dwellings in brownfield town centre space and for an

additional 245 dwellings (unless these additional 245 dwellings are added to the Neatham Down development within the Local Plan).

APPENDIX 1

Membership of the Group:

CLlr Ginny Boxall – District Councillor / resident Windmill Hill area

Jerry Janes – Chair of the Holybourne Village Association / ex EHDC Councillor/ resident Holybourne

Dr Helen Walters – ex-EHDC Councillor + Town Councillor / ex-Director of Public Health, Westminster City Council / resident Holybourne

Vanessa Gist – retired solicitor / resident Holybourne

Richard Carter – Alton Society / resident Alton

Philippa Brearley – ACAN / resident Alton

Jackie Nelson – resident Holybourne