

# **Alton Neighbourhood Plan Basic Conditions Statement**

Version 1.1 dated 28 June 2015

# Basic Conditions Statement for the Alton Neighbourhood Development Plan

## 1. Overview

This Basic Conditions Statement has been prepared in support of the Alton Neighbourhood Development Plan (the Plan) and intends to demonstrate that the Plan has been prepared observing:

- All legal aspects of neighbourhood plan making;
- All relevant national and local level planning policies relevant to Alton;
- An appropriate level of guidance, both statutory and non-statutory, on all aspects of plan making; and
- Best practice in transparent and inclusive consultation and engagement.

Principally, this statement demonstrates the way in which the Plan conforms to the basic conditions as identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (TCPA 1990) and is legal in every other respect.

The structure of this statement will be as follows:

- Background to the Plan: providing a broad overview of the reasons for the Plan and the processes included in its production;
- Statement of Legal Conformity: confirming that the plan proposal package comprises the appropriate level of information to be considered compliant with the Regulation 15 of the Neighbourhood Planning (General) Regulation 2012 (as amended) and that the Plan has been prepared in conformity with the further provisions of the TCPA 1990; and
- Assessment against the basic conditions: demonstrating that compliance with the basic conditions has been at the heart of the Plan's production.

## **2. Background to the Plan**

The proposed Alton Neighbourhood Development Plan has been produced in response to the strategic requirements for Alton set out in the East Hampshire District Local Plan: Joint Core Strategy (JCS), adopted May and June 2014, and the town's desire to ensure that any new development is delivered in a sustainable manner. It takes a positive approach to the delivery of new homes, jobs, services and facilities and has successfully engaged the people of the town to ensure that they are at the centre of helping shape its delivery.

It has been researched and written by Alton Town Council with the benefit of close support from officers of East Hampshire District Council (EHDC) and a team of specialist consultants, who have assisted in the fields of evidence gathering and analysis, legal and policy conformity, plan writing and consultation / engagement. The majority of work towards the Plan has been undertaken by the Alton Neighbourhood Plan Steering Group (ANPSG) that over the course of its production has included a total of 11 constituted members comprising a mix of residents and town and district councillors. The majority of steering group meetings have been attended by one or more of the team of officers and consultants supporting the Plan, who themselves have liaised closely to ensure the ANPSG have received consistent technical advice over the course of the Plan's production.

The decisions made within the Plan have been informed by significant community consultation, stakeholder engagement and discussions with local landowners or promoters. The process has been transparent and inclusive and has been matched stride-for-stride by regular updates on the Plan's well-resourced sub-pages of Alton Town Council's own website. The full programme of consultation and engagement is set out and explained in detail in the accompanying Consultation Statement.

The Plan is also supported by a thorough and rigorous evidence base, which comprises a mixture of previously published information that underpins the JCS, new original evidence that has been produced solely to inform any more locally specific policies in the Plan and a mixture of national studies and statistics. The production of the Plan was also seen by the Town Council as representing the natural progression from the Alton 2020 Town Plan, published in 2005, and the Town Design Statement, published in 2008, both of which benefitted from significant levels of local consultation, with the latter now adopted as a Supplementary Planning Document (SPD) by EHDC. The Town Council therefore has a demonstrable history of producing clear and well-constructed policy and guidance, experience that has left them well placed to pursue a neighbourhood development plan.

The basis of the Plan's production has been a clear and succinct vision and an accompanying set of objectives that have ensured the direction of the Plan's policies has remained consistent and their outcomes focussed. Whilst the objectives have been amended slightly over the course of the Plan's production, to ensure they remain relevant and up-to-date when assessed against emerging policy or the weight of consultation, the vision has remained constant. Indeed, it represents a continuation of the 'Alton 2020 vision' that served as the basis for the previous Town Plan. The Plan's vision and objectives are set out in Section 2 and Section 5 of the main document respectively.

### **3. Statement of Legal Conformity**

Aside from the Plan's conformity with the basic conditions tests, it is important that its production has observed all of the relevant requirements included in the suite of primary and secondary legislation guiding the production of neighbourhood development plans (NDPs). The table below sets out a clear statement of the Plan's conformity with the relevant sections and schedules of the TCPA 1990, the Planning and Compulsory Purchase Act (PCPA) 2004 and the Neighbourhood Planning (General) Regulation 2012 (as amended). The following checklist has been informed by the Planning Advisory Service guidance issued to inform Local Planning Authorities of the legal requirements of NDPs.

<b>Act, section, schedule or regulation</b>	<b>Test</b>	<b>Comment</b>	<b>Legally compliant?</b>
TCPA 1990 Schedule 4B para 5	Is the proposal in question a repeat proposal? Has the local planning authority refused a previous similar proposal under para 12 or Section 61E or has it failed at referendum?	No on both fronts. This is the first NDP prepared by Alton Town Council.	Yes
TCPA 1990 Schedule 4B para 6(2)(a) and Section 61F	Is the body who submitted the Plan a qualifying body for the purpose of neighbourhood plan making?	Yes. As clarified under Section 61F, a town council can act as a qualifying body for neighbourhood planning purposes. The plan has been prepared and submitted by Alton Town Council.	Yes
TCPA 1990 Schedule 4B para 6(2)(b) and Section 61F	Does the plan proposal comply with the other relevant provisions made under Section 61F relating to neighbourhood area designation?	Yes. The town's civil parish area (minus a small strip of land inside the South Downs National Park) was designated as the neighbourhood area by EHDC following a 6 week period of consultation on 8 <sup>th</sup> May 2014. A map of the neighbourhood area can be found at Appendix A of this statement.	Yes

Act, section, schedule or regulation	Test	Comment	Legally compliant?
<p>TCPA 1990 Schedule 4B para 1, para 6(2) (c) and NP (General) Regs 2012 Regulation 15</p>	<p>Have the qualifying body submitted the following in a satisfactory form to EHDC:</p> <ol style="list-style-type: none"> <li>1. A map or statement identifying the area to which the plan relates;</li> <li>2. A consultation statement (which contains details of those consulted, how they were consulted, summarises the main issues and concerns raised and how these have been considered, and where relevant how they are addressed in the proposed NDP;</li> <li>3. The proposed NDP;</li> <li>4. A statement explaining how the NDP meets the basic conditions; and</li> <li>5. Either an environmental statement or a statement confirming why no SEA is required in support of the NDP.</li> </ol>	<p>Yes. All of the documents (including this Basic Conditions Statement) have been submitted as a single package to EHDC. Additionally, links to the key evidence documents prepared in support of the Plan will be made available to officers for publicity.</p>	<p>Yes</p>

Act, section, schedule or regulation	Test	Comment	Legally compliant?
TCPA 1990 Schedule 4B para 4, para 6(2) (d) and NP (General) Regs 2012 Regulations 14 and 15(2)(a)	Has the qualifying body complied with the requirements regarding the scope of pre-submission consultation?	Yes. The Plan was made available for consultation for a period of 6 weeks between 16 <sup>th</sup> February 2015 and 30 <sup>th</sup> March 2015, inviting representations from all groups detailed under Regulation 14 of the NP (General) Regs 2012. This was done through advertising the Plan within the Town Council area as described in the accompanying Consultation Statement. A copy of the Plan was also sent to EHDC and to relevant statutory bodies for comment, with their feedback discussed as part of a series of ANPSG meetings.	Yes
TCPA 1990 Schedule 4B para 6(3), Section 61J (and also PCPA 2004 Section 38B(1) (b))	Does the Plan seek to grant or support planning permission for any development categorised as 'excluded development' under Section 61K of the TCPA 1990?	No.	Yes
PCPA 2004 Section 38A(2)	Does the Plan meet the definition of 'neighbourhood development plan' in that does it set out policies in relation to the development and use of land in the neighbourhood area?	Yes.	Yes
PCPA 2004 Section 38B(1)(a)	Does the 'neighbourhood development plan' specify the time period for which it is to have effect?	Yes. The period is stated as 2011 to 2028, mirroring that of the adopted EHDC JCS.	Yes

Act, section, schedule or regulation	Test	Comment	Legally compliant?
PCPA 2004 Section 38B(1)(c)	Does the 'neighbourhood development plan' relate to more than one neighbourhood area?	No.	Yes

The table above demonstrates that the Plan has accurately observed the required procedures and exclusions and is legal in every respect.



## **4. Assessment against the Basic Conditions**

The principal objective of this statement is to demonstrate the way in which the Plan complies with the basic conditions tests.

The basic conditions applicable to both Neighbourhood Development Plans and Neighbourhood Development Orders are identified at Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (TCPA 1990). The basic conditions specifically relevant to Neighbourhood Development Plans, as clarified by paragraph 065 of the National Planning Practice Guidance (NPPG), are as follows:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the plan.
- The making of the plan contributes to the achievement of sustainable development.
- The making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- The making of the plan does not breach, and is otherwise compatible with, EU obligations.
- Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the plan. For clarity, further conditions have been prescribed relating to the assessment of a Plan's impact on European Habitats.

This section will assess the direction and the 29 policies of the Plan against the clear tests set out above. It is recognised that there is no prescribed approach dictating how this assessment should take place. It has therefore been decided to undertake the assessment against both national and local strategic policy, together, on a neighbourhood plan policy by policy basis. The rationale is that provided the policies of the Plan avoid conflicting with any aspect of the NPPF or the JCS, and otherwise supports their intent, they will inherently ensure their continued delivery. In addition a short supporting section is then provided that demonstrates how the process employed in the delivery of the Plan has observed the guidance included within the NPPG. The consideration of whether the making of the Plan contributes to the achievement of sustainable development and is compatible with EU obligations (including those relating to the protection of Habitats) is similarly done against the Plan as a whole.

### **Assessment against national policy and guidance and strategic local policy**

To ensure compliance with both of these basic conditions throughout the course of its production the Plan has been produced with constant sight of the following:

- The policies of the East Hampshire District Local Plan: Joint Core Strategy;

- The National Planning Policy Framework as a whole; and
- The National Planning Practice Guidance suite.

From the outset officers of EHDC advised that the relevant strategic policies against which the Plan should demonstrate general conformity would include all of the ‘general’ policies of the JCS (i.e. those that are not specific to Whitehill and Bordon). Their consideration during the course of the Plan’s preparation has been helped immeasurably by the continual assistance and support of officers representing all departments of EHDC, with particularly strong guidance from both policy and development management officers.

Cross referencing of both the NPPF and JCS has been interwoven into the Plan. The Plan document has been specifically formatted to attach conformity references identifying the relevant policies of the NPPF and JCS to both the objectives and, most importantly, the policies of the Plan. In which case, this section of the Basic Conditions Statement can be read in parallel with the policy section of the Plan itself. The analysis set out below explains the direction of each policy and explicitly sets out how they have taken the JCS and NPPF into account. It also sets out the key documents of the evidence base which were considered when producing the policy and finalising its wording.

<b>Policy</b>	<b>DE1: Town setting and natural assets</b>
Relevant NPPF paragraphs / sections	58, 64, 100, 113, 115
NPPF conformity	Policy DE1 relates to the setting of the town as a whole and the way in which it interacts with the natural environment. It has been developed with sight of the strengths and sensitivities of the setting of Alton. It draws on existing published evidence to identify the aspects of the town’s character that should be conserved. It seeks to manage the delivery of development in and around areas prone to flood risk and provides great weight to preserving the setting and appearance of the South Downs National Park to the south.
Relevant JCS policies	CP20, CP25

JCS conformity	Policy DE1 seeks to directly complement Policy CP20 by providing local detail on the aspects of Alton's surrounding landscape that would benefit from the greatest level of protection. In particular, it seeks to guide the way the urban edge of the town harmonises with the landscape through the requirement that new development helps at least preserve the integrity of the most important vistas and gateways into the town.
Evidence base	Alton Town Design Statement The Alton Study Hampshire Integrated Character Assessment Community Questionnaire

Policy	<b>DE2: Building design and town character</b>
Relevant NPPF paragraphs / sections	58, 60, 61, 63-65
NPPF conformity	Policy DE2 seeks to complement DE1 through the provision of a framework for the design of new development within the town. It builds heavily on the existing Town Design Statement to ensure a Plan that requires good design appropriately in line with Section 7 of the NPPF.
Relevant JCS policies	CP20, CP29, CP30
JCS conformity	Policy DE2 principally seeks to respond to Policy CP29 of the JCS by setting out a framework that helps guide strong design in the context of Alton. In particular, it engages criteria (h) of this policy that allows neighbourhood plans to set out locally specific policies guiding quality design.
Evidence base	Alton Town Design Statement

Policy	<b>HO1: Housing mix on new development sites</b>
Relevant NPPF paragraphs / sections	50
NPPF conformity	Without being prescriptive, Policy HO1 seeks to provide a mechanism that will allow a rolling review of local housing requirements and how future development proposals can help meet them. This is directly in line with the NPPF requirement for the delivery of a wide choice of quality homes.
Relevant JCS policies	CP10, CP11
JCS conformity	Policy HO1 seeks to facilitate the delivery of the homes required by Policy CP10 and then primarily mirror Policy CP11 of the JCS to ensure that the dwellings delivered in the town meet the needs of both Alton and the District.
Evidence base	EHDC SHMA Community Questionnaire

Policy	<b>HO2: Storage facilities for household waste</b>
Relevant NPPF paragraphs / sections	58
NPPF conformity	Complementing the design policies of the Plan, Policy HO2 seeks to ensure that the waste storage facilities for new residential development result in a managed and uncluttered scheme of design. In particular this policy seeks to respond to Paragraph 58 of the NPPF that requires new development to be visually attractive in all respects and to function well and add to the overall quality of an area.
Relevant JCS policies	CP29
JCS conformity	Policy HO2 seeks to add locally specific detail as requested by Policy CP29 to overcome an issue identified during the course of consultation, notably the cluttering of streetscapes caused by poorly managed and stored waste bins.
Evidence base	Local evidence illustrating the issue

Policy	<b>HO3: New housing site allocations</b>
Relevant NPPF paragraphs / sections	47, 50
NPPF conformity	Policy HO3 sets out the strategy for the provision of the majority of housing in Alton over the Plan period by way of site specific allocations. In total the Policy seeks to allocate land for around 781 homes on a range of sites all of which are deliverable within the next 5 years onwards. The sites have been tested for availability, suitability and developability within the evidence base of the Plan and are demonstrated to be appropriate in the context of both national and local policy on a site by site basis. The empirical evidence base supporting the site selection process and the resultant allocations is extensive and comprises a combination of both EHDC published material and the output of a range of assessments made at local level, including the interaction of the process with public consultation.
Relevant JCS policies	CP10

JCS conformity

Policy HO3 responds directly to the JCS' obligation for neighbourhood plans to allocate sufficient land to deliver the housing requirement for their area. Specifically, the JCS requires 'a minimum of 700 dwellings' to be delivered by way of allocation in Alton over the Plan period. In addition, the JCS also requires 'a minimum of 150 dwellings at other villages outside of the national park'. The villages referred to in this criterion of the policy include Holybourne, a pretty and characterful village that lies within the Plan area. In response to this policy the Plan considered the needs of Alton and Holybourne as a whole - an approach endorsed by EHDC officers as an appropriate 'use of local discretion' in their Regulation 14 response.

All of the sites submitted as part of EHDC's own SHLAA process (both in Alton and in Holybourne) were assessed against clear criteria at both a district (primarily through the SHLAA) and local (through the complementary site assessment work undertaken by the Town Council) level to identify suitability and the ability to meet the strategic requirements of the JCS. They have also been brought forward following consistent consultation with landowners / site promoters both as part of the Local Plan and Neighbourhood Plan process. Factoring in a number of considerations, including the weight of public consultation, it was decided that the most appropriate and most sustainable way to deliver the total allocation for the Plan area, including a contribution towards the needs for Holybourne, would be on four larger and two smaller development sites in and around the main settlement of Alton.

Accordingly, provision has been made for a quantum of housing by way of allocation that exceeds the JCS defined requirement for the Plan area to recognise the requirement of both settlements. Read as part of the policy suite as a whole, the purpose of Policy HO3 is then not to preclude development coming forward on currently unidentified sites, either in Alton or Holybourne, but to ensure that any future growth is sensitive to the Plan area and managed by the clear set of policies in both the JCS and the Plan relating to appropriate future windfall development. The result is that the Plan remains in general conformity with the strategic policies of the development plan, suitably exceeding the requirement identified by Policy CP10 of the JCS, whilst delivering a range of sites that will provide the homes to meet the ongoing needs of the Plan area as a whole.

Evidence base	Dwelling Site Selection Methodology and Supporting Narrative Template for Information about the Proposed Allocation Sites at Alton Alton Housing (SHLAA) Site Assessment Document Alton Neighbourhood Plan Policy Sustainability Assessment EHDC SHLAA, accepted findings EHDC Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan Community Questionnaire
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Policy	<b>HO3(a): Land at Borovere Farm</b>
Relevant NPPF paragraphs / sections	30, 32, 34, 47, 50, 58, 103, 113, 115

<p>NPPF conformity</p>	<p>Policy HO3(a) identifies land at Borovere Farm as an appropriate location for around 100 homes. This was done after the consideration of a number of site specific matters including: the topography of the site and the development’s potential to impact on views out of the national park (paragraphs 113 and 115); the highway restrictions that exist locally due to the constrained nature of the Butts Bridge junction (paragraph 30, 32 and 34); drainage and flood management measures appropriate to the site (paragraph 103); and the weight of public consultation relating to the site.</p> <p>The main contention that has existed throughout the Plan process has concerned the potential allocation of the upper field. With respect to development on the top section of the Borovere site two issues are relevant. One would be its visual impact from within the town. The other would be its visual impact from countryside to the south and especially the South Downs National Park.</p> <p>Views from the town of Alton out towards countryside are very important to its residents. The <i>Community Questionnaire</i> run in 2014 for this Neighbourhood Development Plan, found that almost three quarters of the 894 respondents were concerned about the impact new housing might have upon the skyline around the town. This reinforced consultation findings from earlier work on the Alton Town Design Statement, which again highlighted the unique setting of Alton hidden within a hollow in the chalk Downs landscape and the fact that skylines on the surrounding hills have remained undeveloped. In an opinion survey run in 2006 for that document 88% of respondents agreed that the unbuilt skyline was a highly valued asset. It has therefore been a key principle of the housing site selection process, that development should not be allowed to encroach too far up the hillsides and should not breach the skylines. This principle has been applied consistently when considering all sites for development potential and their developable area. It has in fact resulted in the complete rejection of some sites, largely on these grounds.</p> <p>Three further documents offer further evidence to decisions about the developable area at Borovere and equally other SHLAA sites.</p> <p>The Alton Study (2013), produced for EHDC by consultants Urban Initiatives, noted that “the essence of Alton resides in the fact that the town is hidden from the landscape whilst being an integral part of it” and that “development has been constrained from breaking the green skyline formed by the</p>
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Relevant JCS policies	CP10, CP20, CP25, CP31
JCS conformity	Principally Policy HO3(a) seeks to allocate a deliverable development site in Alton that will contribute towards the housing requirements set out in Policy CP10. When developing the policy seeking to deliver the allocation the wider suite of policies of the JCS were referred to, principally CP20, CP25 and CP31.
Evidence base	Dwelling Site Selection Methodology and Supporting Narrative Template for Information about the Proposed Allocation Sites at Alton Alton Housing (SHLAA) Site Assessment Document Alton Neighbourhood Plan Policy Sustainability Assessment EHDC SHLAA, accepted findings EHDC Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan

Policy	<b>HO3(b): Land at Lord Mayor Treloar (Phase 2)</b>
Relevant NPPF paragraphs / sections	30, 32, 34, 47, 50, 58, 70, 103, 113, 115, 117

NPPF conformity	<p>Policy HO3(b) identifies land at Lord Mayor Treloar hospital as an appropriate location for around 183 homes (273 in total including the delivery of the adjacent retained allocation from the East Hampshire Local Plan Policy H1, considered to have a revised capacity of around 90 homes by the land promoter). This was done after the consideration of a number of site specific matters including: the topography of the site and the development's potential to impact on views out of the national park (paragraphs 113 and 115); the highway restrictions that exist locally due to the constrained nature of the road network on the western side of the town (paragraphs 30, 32 and 34); drainage and flood management measures appropriate to the site (paragraph 103); the existence of tree preservation orders (TPOs) and sites of importance for nature conservation (SINCs) on or adjacent to the site (paragraphs 113 and 117); and the weight of public consultation relating to the site.</p> <p>The main issues on site have been dealt with by a detailed allocation that seeks to ensure that the zoning of houses avoids the areas most sensitive to development on site (principally the SINCs and TPOs) and delivers the bulk of development on the lower slopes to ensure that views into and out of the South Downs National Park are not compromised. Provision has been included in the policy for the development to deliver adequate highway upgrades to accommodate additional traffic movements to and from the site. In addition the on-site recreational needs of residents have been considered through the requirement for 8ha of open space in accordance with paragraph 70 of the NPPF (primarily on the land to be set aside to limit landscape impact).</p> <p>In terms of development management matters the policy requires adequate flood and drainage management systems to be included on site prior to the first occupation of any dwellings.</p>
Relevant JCS policies	CP10, CP18, CP20, CP21, CP25, CP31
JCS conformity	Principally Policy HO3(b) seeks to allocate a deliverable development site in Alton that will contribute towards the housing requirements set out in Policy CP10. When developing the policy seeking to deliver the allocation the wider suite of policies of the JCS were referred to, principally CP18, CP20, CP21, CP25 and CP31.

Evidence base	<p>Dwelling Site Selection Methodology and Supporting Narrative Template for Information about the Proposed Allocation Sites at Alton</p> <p>Alton Housing (SHLAA) Site Assessment Document</p> <p>Alton Neighbourhood Plan Policy Sustainability Assessment</p> <p>EHDC SHLAA, accepted findings</p> <p>EHDC Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan</p>
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Policy	<b>HO3(c): Land at Cadnam, Upper Anstey Lane</b>
Relevant NPPF paragraphs / sections	30, 32, 34, 47, 50, 58, 103, 113, 115
NPPF conformity	<p>Policy HO3(c) identifies land at Cadnam as an appropriate location for around 275 homes. This was done after the consideration of a number of site specific matters including: the topography of the site and the development’s potential to impact on views out of the national park (paragraphs 113 and 115); the highway restrictions that exist locally due to the constrained nature of the road network on the northern side of the town (paragraphs 30, 32 and 34); drainage and flood management measures appropriate to the site (paragraph 103); the existence of tree preservation orders (TPOs) on or adjacent to the site; and the weight of public consultation relating to the site.</p> <p>The main issues on site have been dealt with by a detailed allocation that seeks to ensure that the zoning of the houses avoids the areas most sensitive to development on site (principally the TPOs) and delivers the bulk of development on the lower and middle slopes, with the upper slopes to be planted with enhanced landscaping, to ensure that views into and out of the South Downs National Park are not compromised. Provision has been included in the policy for the development to deliver adequate highways upgrades to accommodate additional traffic movements to and from the site.</p> <p>In terms of development management matters the policy requires adequate flood and drainage management systems to be included on site prior to the first occupation of any dwellings.</p>
Relevant JCS policies	CP10, CP20, CP25, CP31

JCS conformity	Principally Policy HO3(c) seeks to allocate a deliverable development site in Alton that will contribute towards the housing requirements set out in Policy CP10. When developing the policy seeking to deliver the allocation the wider suite of policies of the JCS were referred to, principally CP20, CP25 and CP31.
Evidence base	Dwelling Site Selection Methodology and Supporting Narrative Template for Information about the Proposed Allocation Sites at Alton Alton Housing (SHLAA) Site Assessment Document Alton Neighbourhood Plan Policy Sustainability Assessment EHDC SHLAA, accepted findings EHDC Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan

Policy	<b>HO3(d): Land of Wilsom Road (between numbers 60 and 86)</b>
Relevant NPPF paragraphs / sections	30, 34, 47, 50, 58, 103, 113, 120, 121
NPPF conformity	<p>Policy HO3(d) identifies land at Wilsom Road as an appropriate location for around 25 homes. This was done after the consideration of a number of site specific matters including: the topography of the site and the development's potential to impact on views out of the national park (paragraphs 113 and 115); the need for sufficient access (paragraph 30 and 34); drainage measures appropriate to the site; ground conditions, including potential instability or contamination (paragraphs 120 and 121); and the weight of public consultation relating to the site.</p> <p>As a response to these issues the policy requires any proposal to respect the setting of the site, towards the northern fringes of the national park, and be supported by adequate reports covering ground conditions and detailing an adequate scheme of remediation covering contamination prior to work commencing on site.</p>
Relevant JCS policies	CP10, CP20, CP27, CP31

JCS conformity	Principally Policy HO3(d) seeks to allocate a deliverable development site in Alton that will contribute towards the housing requirements set out in Policy CP10. When developing the policy seeking to deliver the allocation the wider suite of policies of the JCS were referred to, principally CP20, CP27 and CP31.
Evidence base	Dwelling Site Selection Methodology and Supporting Narrative Template for Information about the Proposed Allocation Sites at Alton Alton Housing (SHLAA) Site Assessment Document Alton Neighbourhood Plan Policy Sustainability Assessment EHDC SHLAA, accepted findings EHDC Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan

Policy	<b>HO3(e): Land at Will Hall Farm</b>
Relevant NPPF paragraphs / sections	30, 32, 34, 43, 47, 50, 58, 73, 75, 99, 103, 113, 120, 128, 132

NPPF conformity	<p>Policy HO3(e) identifies land at Will Hall Farm as an appropriate location for around 180 homes. This was done after the consideration of a number of site specific matters including: the topography of the site and the development’s potentially prominent location on the northern fringe of the town (paragraph 58); the need for sufficient access (paragraph 30 and 34); the presence of power lines running across the site (paragraph 43); issues relating to flooding on the southern portion of the site (paragraphs 99 and 103) and the necessity to retain it as landscaped public open space (paragraphs 73 and 75); the sites potential value with regards to nature conservation (paragraph 113), including any impact on the hydrology and water purity of the River Wey (paragraph 120); drainage measures appropriate to the site; the presence of a listed building adjacent to the site (paragraphs 128 and 132); and the weight of public consultation relating to the site.</p> <p>As a response to these issues a number of mitigation measures are required to ensure any development on site is acceptable and inherently sustainable in all respects. The southern portion of the site prone to flooding and comprising the course of the River Wey should remain undeveloped. This area is denoted by the indicative site map accompanying the policy. More widely any proposal will need to include sufficient drainage and flood management measures. Improved access for all types of transport are encouraged including the enhanced provision of cycle and walking routes into, out of and across the site. Importance is given to the setting of the Grade II listed building adjacent to the site and the local TPOs. In addition the semi-rural nature of the site is to be maintained through a significant scheme of planting and landscaping.</p>
Relevant JCS policies	CP10, CP18, CP20, CP21, CP25, CP26, CP27, CP28, CP31
JCS conformity	Principally Policy HO3(e) seeks to allocate a deliverable development site in Alton that will contribute towards the housing requirements set out in Policy CP10. When developing the policy seeking to deliver the allocation the wider suite of policies of the JCS were referred to, principally CP18, CP20, CP21, CP25, CP26, CP27, CP28 and CP31.

Evidence base	<p>Dwelling Site Selection Methodology and Supporting Narrative Template for Information about the Proposed Allocation Sites at Alton</p> <p>Alton Housing (SHLAA) Site Assessment Document</p> <p>Alton Neighbourhood Plan Policy Sustainability Assessment</p> <p>EHDC SHLAA, accepted findings</p> <p>EHDC Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan</p>
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Policy	<b>HO3(f): Land adjacent to Alton Convent School, Anstey Lane</b>
Relevant NPPF paragraphs / sections	30, 34, 47, 50, 58, 118
NPPF conformity	<p>Policy HO3(f) identifies land at Alton Convent School as an appropriate location for around 18 homes. This was done after the consideration of a number of site specific matters including: the need to establish sufficient access (paragraph 30 and 34); the presence of mature tree on site (paragraph 118); and the weight of public consultation relating to the site.</p> <p>As a response to these issues the policy requires any proposal to investigate a potential scheme of access from Manor Road to the north. Where this is not possible the default access will be through a new link created within the school grounds. In addition, the policy requires the loss of mature trees to be kept to a minimum.</p>
Relevant JCS policies	CP10, CP31
JCS conformity	Principally Policy HO3(f) seeks to allocate a deliverable development site in Alton that will contribute towards the housing requirements set out in Policy CP10. When developing the policy seeking to deliver the allocation the wider suite of policies of the JCS were referred to, principally CP31.

Evidence base	<p>Dwelling Site Selection Methodology and Supporting Narrative Template for Information about the Proposed Allocation Sites at Alton</p> <p>Alton Housing (SHLAA) Site Assessment Document</p> <p>Alton Neighbourhood Plan Policy Sustainability Assessment</p> <p>EHDC SHLAA, accepted findings</p> <p>EHDC Sustainability Appraisal (SA) of the East Hampshire Site Allocations Plan</p>
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Policy	<b>TR1: Transport infrastructure</b>
Relevant NPPF paragraphs / sections	32
NPPF conformity	In line with paragraph 32 of the NPPF, Policy TR1 provides a mechanism to ensure that new traffic generating development is adequately accommodated by the local road network, either in its current form or upgraded where required.
Relevant JCS policies	CP31
JCS conformity	Policy TR1 relates specifically to criteria (c), (d), (g), (j) and (k) of Policy CP31. It seeks to strengthen the direction of this policy and provide a related approach to the delivery of new transport infrastructure that is specifically appropriate to Alton, drawing on the initial recommendations of the Alton Transport Study.
Evidence base	<p>Draft Alton Transport Study</p> <p>Hampshire Local Transport Plan 2011-2031</p> <p>Alton Transport Evidence Base</p> <p>Community Questionnaire</p>

Policy	<b>TR2: Adoptable roads</b>
Relevant NPPF paragraphs / sections	31, 35



NPPF conformity	Whilst there is no direct reference to highway standards in the NPPF, the general thrust of paragraph 31 and 35, relating to partnership working and the provision of a suitable highway network are applicable. Policy TR2 supports the general approach to the provision of a sustainable and efficient road network by ensuring that any road required either now or in the future to carry a potentially significant level of traffic is designed and delivered to an adoptable and maintainable standard.
Relevant JCS policies	CP31
JCS conformity	Policy TR2 relates closest to criterion (c) of Policy CP31 in that it seeks to ensure adequate highway design and promote an efficient and suitable highways network to meet the needs of Alton.
Evidence base	Hampshire Local Transport Plan 2011-2031 Alton Transport Evidence Base

Policy	<b>TR3: Pedestrian networks</b>
Relevant NPPF paragraphs / sections	30, 32, 35
NPPF conformity	Policy TR3 seeks to promote the provision of safe pedestrian linkages into and out of development sites to enhance the ability to travel around Alton in a sustainable manner helping reduce carbon emissions.
Relevant JCS policies	CP31
JCS conformity	Policy TR3 relates to criteria (b) and (c) of Policy CP31 in that it seeks to promote the provision of safe pedestrian networks in the town.
Evidence base	Hampshire Local Transport Plan 2011-2031 Alton Transport Evidence Base

Policy	<b>TR4: Cycle routes</b>
Relevant NPPF paragraphs / sections	30, 32, 35

NPPF conformity	Policy TR4 seeks to promote both the provision of safe pedestrian linkages into and out of development sites but also the use of bicycles as a viable alternative to the private car. To this end Policy TR4 provides significant support to the NPPF's requirement to encourage a modal shift and reduce carbon emissions.
Relevant JCS policies	CP31
JCS conformity	Policy TR4 relates to criteria (b) and (c) of Policy CP31 in that it seeks to promote the provision of safe cycle networks in the town and encourage the use of bicycle for shorter journeys throughout the town.
Evidence base	Hampshire Local Transport Plan 2011-2031 Alton Transport Evidence Base Alton Traffic Abstract

Policy	<b>TR5: Cycle storage and parking</b>
Relevant NPPF paragraphs / sections	30, 32, 35, 39
NPPF conformity	Policy TR5 seeks to further promote the use of bicycles as a viable alternative to the private car through enhanced requirements for cycle parking in the town. Allied with improved linkages it is hoped that such a requirement would further encourage a modal shift and reduce carbon emissions.
Relevant JCS policies	CP31
JCS conformity	Policy TR5 relates to criteria (b), (c) and (f) of Policy CP31 in that it seeks to promote adequate cycle parking to encourage greater usage of the cycle network. It should be noted in relation to this policy that it should be read in conjunction with East Hampshire's own adopted cycle parking standards.
Evidence base	Hampshire Local Transport Plan 2011-2031 East Hampshire Parking Standards Alton Transport Evidence Base Alton Traffic Abstract

Policy	<b>TR6: Bus service provision</b>
Relevant NPPF paragraphs / sections	30, 32
NPPF conformity	Policy TR6 seeks to take an innovative approach to the provision of public transport throughout Alton, both now and into the future. Policy TR6 seeks to provide significant support towards achieving a modal shift away from the private car and creating enhancements to the public transport network that serve every community within the town. Principally the policy works on the premise that any new development that may give rise to significant extra journeys is either located in an accessible location or is made accessible through the provisions of the policy. It is understood that viability will be a consideration when considering the cost of designing schemes to be compatible with public transport infrastructure upgrades. However, the start point of this policy is that any development which is inherently inaccessible or cannot deliver the improvements needed to make it accessible should not be considered favourably.
Relevant JCS policies	CP31
JCS conformity	Policy TR6 seeks to lend significant support to criterion (a) of Policy CP31 in that it will ensure that all future residents have access to a quality and frequent public transport service.
Evidence base	Hampshire Local Transport Plan 2011-2031 Alton Transport Evidence Base Alton Traffic Abstract

Policy	<b>TR7: Parking provision and standards</b>
Relevant NPPF paragraphs / sections	39

NPPF conformity	Policy TR7 responds to the provisions of paragraph 39 of the NPPF that allow local parking standards to be set, provided they have regard to issues such as accessibility levels of the development, the development type, availability of public transport, local car ownership levels and the need to reduce emissions. In response to this a comprehensive analysis of traffic conditions in Alton is set out in the evidence base. The need for reinforced locally specific parking standards and a broader policy to manage the delivery of parking in Alton is required due to numerous issues locally relating to car ownership, congestion and the effects on highway safety on many streets caused by inappropriately parked cars. Policy TR7 takes an all-encompassing approach that seeks to achieve the delivery of the right amounts of parking in the right locations to accommodate the needs of the town. As with the cycling standards, the start point is East Hampshire's own currently adopted standards.
Relevant JCS policies	CP29, CP31
JCS conformity	Policy TR7 relates to criterion (f) of Policy CP31 in terms of the requirement for adequate parking standards but also to criterion (k) of CP29 that seeks to ensure that it is provided in a way that respects good design. To this end the wording of policy TR7 seeks to merge both of these interests into a comprehensive set of criteria that seek to ensure that new parking is sufficient and appropriately designed to meet the needs of residents and businesses alike.
Evidence base	Hampshire Local Transport Plan 2011-2031 East Hampshire Parking Standards Alton Town Design Statement Alton Transport Evidence Base Alton Traffic Abstract

Policy	<b>CH1: Community centre</b>
Relevant NPPF paragraphs / sections	70
NPPF conformity	Policy CH1 conforms with paragraph 70 of the NPPF in that it seeks to provide an aspirational policy securing the delivery of a new and needed community facility in the town.
Relevant JCS policies	CP8, CP16

JCS conformity	Policy CH1 conforms with the JCS in that it presents support for a new community facility in the town in a location that is accessible to the residents of the town.
Evidence base	Alton 2020 Vision Alton Health, Community and Recreation Evidence Base

Policy	<b>CH2: Sports centre</b>
Relevant NPPF paragraphs / sections	70, 74
NPPF conformity	Policy CH2 provides a flexible approach to the replacement and enhancement of the existing sports centre facility in the town. It recognises the requirements of paragraph 70 of the NPPF entirely in that it presents a flexible and pragmatic approach to the provision of a fit-for-purpose facility that is fully integrated with other types of development. It also sets out a policy that seeks to ensure that there is no loss of what is a vital community facility in line with paragraph 74 of the Framework. It also recognises the role that other types of development can play in facilitating the delivery of an enhanced sports centre for the town, engaging various other sections of the NPPF dealing with wider development such as new homes or commercial facilities.
Relevant JCS policies	CP8, CP17
JCS conformity	As with Policy CH1, Policy CH2 presents a positive approach to the delivery of new community facilities in Alton. It seeks to provide a strategy that ensures at least the retention of the sports centre whilst positively recognising wider opportunities to provide an enhanced facility for the town.
Evidence base	East Hampshire Infrastructure Delivery Plan East Hampshire Leisure Built Facilities Strategy and Action Plan Alton Health, Community and Recreation Evidence Base

Policy	<b>CH3: Health facilities</b>
Relevant NPPF paragraphs / sections	70

NPPF conformity	Policy CH3 supports the retention and improvement of new community facilities required by paragraph 70 of the NPPF.
Relevant JCS policies	CP8
JCS conformity	Policy CH3 seeks to facilitate and encourage the delivery of enhanced health care provision in the town, identified as a priority within the Infrastructure Delivery Plan that supports the JCS.
Evidence base	Alton Health, Community and Recreation Evidence Base East Hampshire Infrastructure Delivery Plan

<b>Policy</b>	<b>CH4: Community hospital</b>
Relevant NPPF paragraphs / sections	70
NPPF conformity	Similar to Policy CH3, Policy CH4 supports the retention and improvement of new community facilities required by paragraph 70 of the NPPF.
Relevant JCS policies	CP8
JCS conformity	Policy CH4 primarily seeks to protect the existing hospital use but also seeks to facilitate and encourage the delivery of enhanced health care provision in the town, identified as a priority within the Infrastructure Delivery Plan that supports the JCS.
Evidence base	Alton Health, Community and Recreation Evidence Base East Hampshire Infrastructure Delivery Plan

<b>Policy</b>	<b>CH5: Local green space and open space</b>
Relevant NPPF paragraphs / sections	74, 76-78

NPPF conformity	Policy CH5 seeks to tackle the retention of open space in the town in two separate ways. Firstly, it seeks to respond to paragraph 74 of the NPPF in that it provides a general presumption in favour of the retention of existing open space in the town with a community function. In some instances areas of open space have been identified in the town that are eligible for protection as Local Green Space, as described by paragraphs 76-78 of the NPPF. All of the areas of open space identified in the bullet list included as part of Policy CH5 have been assessed against the criteria provided by paragraph 77 of the NPPF and all are demonstrated as being special to the community within the Health, Community and Recreation evidence base supporting the Plan. Additionally, a synopsis of the eligibility of each space to be retained as Local Green Space is set out in the table preceding the policy itself. All areas to be designated have been identified through a positive process led by the outputs of consultation.
Relevant JCS policies	CP17, CP18
JCS conformity	Policy CH5 is principally led by the ability afforded to neighbourhood plans provided by the NPPF. It does, however, also accord with Policies CP17 and CP18 of the JCS that seek to protect and manage the supply of community open space in the town.
Evidence base	Facilities audit: Land and Other Properties Managed by the Council Alton Health, Community and Recreation Evidence Base Community Questionnaire

Policy	<b>CH6: Playing fields</b>
Relevant NPPF paragraphs / sections	73
NPPF conformity	Policy CH6 supports the requirements of paragraph 73 of the NPPF in that it seeks to secure additional playing field space to support the town's growing population. In particular the need for junior football pitches has been identified during the course of consultation and within the evidence base supporting the Plan. Accordingly, the requirement for this type of play space has been included in the wording of the policy.
Relevant JCS policies	CP18

JCS conformity	Policy CH6 supports the JCS' requirement to provide open space and play space, in line with the EHDC Infrastructure Delivery Plan. In addition it seeks to encourage developers to look at ways of exceeding the standard policy requirements wherever possible.
Evidence base	East Hampshire Open Space, Sport and Recreation Study 2008 East Hampshire Infrastructure Delivery Plan Alton Health, Community and Recreation Evidence Base

Policy	<b>CH7: Allotments</b>
Relevant NPPF paragraphs / sections	70, 73
NPPF conformity	Policy CH7 seeks to complement Policy CH5 of the Plan through the retention, and where possible provision, of allotments for the benefit of the town. This seeks to ensure a continued supply of open space and outdoor space in line with the requirements of the NPPF.
Relevant JCS policies	CP17
JCS conformity	Policy CH7 supports the presumption included in the JCS that open space of this type should be protected. It also support the identified need for allotments included in EHDC's Infrastructure Delivery Plan.
Evidence base	East Hampshire Infrastructure Delivery Plan Alton Health, Community and Recreation Evidence Base

Policy	<b>ED1: Schools expansion</b>
Relevant NPPF paragraphs / sections	69, 70, 74
NPPF conformity	Policy ED1 seeks to recognise the pressing need for new schools facilities in Alton, especially as the town grows, responding to paragraph 69 and 70 of the NPPF.
Relevant JCS policies	CP32



JCS conformity	Policy ED1 seeks to reinforce the ‘critical’ requirement for the expansion of the Wootey Schools and the Butts Primary School as identified in the Infrastructure Delivery Plan and supported through Policy CP32 of the JCS.
Evidence base	East Hampshire Infrastructure Delivery Plan Alton Education Evidence Base

Policy	<b>ES1: Access to allocated employment land</b>
Relevant NPPF paragraphs / sections	19, 58
NPPF conformity	Policy ES1 seeks to ensure that new development is delivered in such a way that it respects its neighbouring uses. Additionally, it seeks to ensure that the delivery of future employment uses in Alton is not hindered through their potential location next to incompatible land uses. This accords with the NPPF’s presumption towards the promotion of sustainable economic growth and the sensitive design and siting of new development.
Relevant JCS policies	CP3, CP4
JCS conformity	It is important to note that the JCS requires 7ha of employment land in Alton to meet the town’s economic needs over the Plan period. It is acknowledged that, following a review of potential employment land, the most likely location for this growth falls (partly or wholly) outside the Plan area. The Alton Neighbourhood Development Plan has therefore not sought to bring sites forward to meet this need. What Policy ES1 does do is ensures that the future provision of employment land through the Part 2 Local Plan that may lie adjacent to the Neighbourhood Plan area is not hindered through lack of joined-up thinking. It therefore provides a presumption against any development taking place inside the Plan area that would hinder the delivery of employment uses around its periphery.
Evidence base	East Hampshire Employment Land Review Alton Economic Sustainability and Viability Evidence Base

Policy	<b>ES2: Reuse of commercial brownfield land</b>
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Relevant NPPF paragraphs / sections	19, 22, 23, 111
NPPF conformity	Policy ES2 recognises that the NPPF discourages the long term protection of employment sites where there is no reasonable site being used for that purpose. Additionally, it recognises that the redevelopment or diversification of existing sites can support community development. In addition Policy ES2 seeks to ensure that a balanced approach is taken toward ensuring the vitality of the town and that the delivery of an appropriate mix of uses can be successfully managed through the planning system.
Relevant JCS policies	CP4
JCS conformity	Policy ES2 is slightly more flexible than Policy CP4 of the JCS whilst remaining in general conformity with its overall intentions. It allows for the consideration of alternative uses in the town, in the event that it can be demonstrated the redevelopment of employment sites with alternative uses can enhance the area's vitality and employment potential.
Evidence base	East Hampshire Employment Land Review Alton Economic Sustainability and Viability Evidence Base

Policy	<b>ES3: Regeneration of the brewery site</b>
Relevant NPPF paragraphs / sections	22, 26, 37, 38, 40, 50, 58, 61, 100, 129

NPPF conformity	Whereas Policy ES2 provides general support for the redevelopment of existing employment land where beneficial, Policy ES3 recognises the enhanced potential of the brewery site and provides a more detailed framework for its redevelopment. It is anticipated that the site will be redeveloped shortly and, as such, Policy ES3 seeks to support its regeneration through building in a level of flexibility that will allow a range of uses to come forward that will still ensure the employment potential of the site is retained. Whilst the current landowners have indicated that they would be keen to pursue a redevelopment that is predominantly, if not wholly, residential in nature it is not considered that this would be appropriate on the site due to the net loss of jobs in the town that this would represent. Policy ES2 does, however, recognise the flexibility required by paragraph 22 of the NPPF and allows for the suitable renewal of the land including a mix of enabling uses to cross-subsidise any associated remediation or highways works.
Relevant JCS policies	CP4
JCS conformity	Once again, Policy ES3 is slightly more flexible than Policy CP4 of the JCS whilst remaining in general conformity with its overall intentions. It allows for the consideration of alternative uses on site that will secure its productive reuse in future.
Evidence base	East Hampshire Employment Land Review Alton Economic Sustainability and Viability Evidence Base

In addition to national policy the production of the Plan has had regard to national guidance; principally that contained within the NPPG. Whilst the NPPG does not carry the same statutory weight, in terms of required conformity, it does offer a clear synopsis of recognised best practice and additional explanation of how the statutory requirements of the process should be observed. In particular (though not exclusively), the production of the Plan has been informed by paragraphs 040 to 046 of the guidance and 047 to 051 when observing the correct procedures around consultation.

### **Assessing whether the plan contributes to the achievement of sustainable development**

The preceding section has robustly demonstrated that the Plan is in conformity with both the NPPF and the adopted JCS in every respect. The policies of the former have the achievement of sustainable development at their core, with the policies of the latter having been supported by a comprehensive Sustainability

Appraisal that was tested and found sound, alongside the JCS, at its examination. To this end the Alton Neighbourhood Development Plan has been developed with close attention to two sets of policies that inherently set the framework for sustainable development. What the Plan has done is built upon this firm base and provided a suite of policies that both define and help achieve appropriate and sustainable development in the context of Alton.

Whilst it was determined that no statutory Strategic Environmental Assessment (SEA) was required in support of the Plan, the process was still supported by an extensive and comprehensive sustainability appraisal process. This approach has ensured that both the objectives and the policies of the Plan have been iteratively tested during the course of their production and refinement and that the final document is demonstrably sustainable in every respect. The final ‘Alton Neighbourhood Plan Policy Sustainability Assessment’ comprises part of the evidence base of the Plan.

Due to the presence of the detailed Sustainability Assessment in support of the Plan, the table below takes a higher level approach to the demonstration of how the Plan achieves sustainable development. It identifies the core dimensions of delivering sustainability as defined by paragraph 7 of the NPPF, provides a summary of how Alton’s Plan has sought to define the key sustainability issues in the town under each heading through the development of their objectives and then shows how the policy suite contributes towards overcoming these issues.

<b>NPPF sustainability objective and synopsis</b>
<p><u>Economic sustainability</u></p> <p>The Plan should contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.</p>
<b>Related Plan objectives</b>
<p>2a: To encourage and influence improvements in the town’s infrastructure - particularly to manage traffic - in order to meet current needs and those arising from development.</p> <p>4a: To support the provision of sufficient nursery, school and college places in Alton to meet the growing demand, in accessible locations.</p> <p>5a: To protect and enhance the role of Alton town centre as a retail, tourism and hospitality hub which is vibrant and adaptable to future needs.</p> <p>5b: To develop and enhance the business economy of Alton and Holybourne, to ensure that the town is economically viable.</p>
<b>Relevant Plan policies</b>

TR1: Transport infrastructure  
ES1: Access to allocated employment land  
ES2: Reuse of commercial brownfield land  
ES3: Regeneration of the brewery site

**Commentary**

The Plan has responded positively to the requirements of the NPPF through the provision of policies that introduce suitable flexibility to existing commercial sites, to allow the local economy to diversify and adapt to emerging requirements. Further to this, Policy ES1 has been included to look past the direct influence of the Plan and ensure that the wider aims of the JCS concerning the provision of employment land for Alton are met in the most sustainable fashion.

It is hoped that introducing greater flexibility to the local economy will ensure jobs and services required to sustain local residents will be provided in a timely and long-term fashion. In addition, it has been recognised as important to the people of Alton that policies should help nurture the skills required to perform the employment roles available. In which case, it is necessary that a good range of educational facilities are provided in the town to accommodate the requirements of a growing and aspirational population.

Whilst the beneficial reuse of existing commercial land is promoted in the Plan, it must be stressed that the combined suite of ES policies seeks to ensure that this does not come about to the detriment of the local (natural or built) environment.

**NPPF sustainability objective and synopsis**

Social sustainability

The Plan should support a strong, vibrant and healthy community, by: providing the supply of housing required to meet the needs of present and future generations; by creating a high quality built environment; promoting accessible local services which reflect the community's needs; and by supporting its health, social and cultural well-being.

**Related Plan objectives**

1b: To ensure that the new housing contributes to the needs of the town in terms of mix and design of dwellings.

1c: To influence the location, scale and pace of housing development over the plan period (to 2028).

1d: To ensure that, in the context of the sustainability requirements of the NPPF, the necessary infrastructural improvements will be implemented in a manner appropriate to the location, scale and pace of the proposed development.

2a: To encourage and influence improvements in the town's infrastructure - particularly to manage traffic - in order to meet current needs and those arising from development.

2b: To encourage walking and cycling.

2c: To encourage the provision of public transport services, both within the town and beyond.

2d: To achieve appropriate levels of parking both on and off street.

3a: To support the development of a new / refurbished Community Centre and a new Sports and Leisure Centre in the town.

3b: To support the provision of adequate health services for a growing population.

3c: To support the retention of existing public open spaces and the provision of new ones capable of offering sport / recreational opportunities in line with population growth.

4a: To support the provision of sufficient nursery, school and college places in Alton to meet the growing demand, in accessible locations.

5a: To protect and enhance the role of Alton town centre as a retail, tourism and hospitality hub which is vibrant and adaptable to future needs.

**Relevant Plan policies**

DE2: Building design and town character  
 HO1: Housing mix on new development sites  
 HO2: Storage facilities for household waste  
 HO3: New housing allocation sites  
 HO3a: Land at Borovere Farm  
 HO3b: Land at Lord Mayor Treloar (phase 2)  
 HO3c: Land at Cadnam, Upper Anstey Lane  
 HO3d: Land off Wilsom Road (between numbers 60 and 86)  
 HO3e: Land at Will Hall Farm  
 HO3f: Land adjacent to Alton Convent School, Anstey Land  
 TR2: Adoptable roads  
 TR3: Pedestrian networks  
 TR4: Cycle routes  
 TR5: Cycle storage and parking  
 TR6: Bus service provision  
 TR7: Parking provision and standards  
 CH1: Community Centre  
 CH2: Sports Centre  
 CH3: Health facilities  
 CH4: Community hospital  
 CH5: Local green space and open space  
 CH6: Playing fields  
 CH7: Allotments  
 ED1: Schools expansion  
 ES1: Access to allocated employment land

### **Commentary**

Unsurprisingly for a Plan driven by the community's desires, there is a heavy focus on achieving a greater level of social sustainability in the town, albeit without the strategy being to the detriment of either the economy or the environment. The Plan provides strong support for the delivery of a balance of homes, services, facilities and means of moving around that seeks to serve all sections of the community. The combination of the DE, HO and TR policies, in particular, seeks to ensure that all new development coming forward in the town is well designed, fit for purpose (including the requirement to meet the direct needs of the town) and encourages access to a variety of modes of transport.

In terms of housing supply, the central set of HO policies identifies six specific sites that will meet both the town's quantitative and qualitative need for homes over the Plan period. Each site is deliverable and has had its sustainability credentials tested as part of both the site assessment process and the overall sustainability assessment of the Plan.

The wider suite of CH, ED and ES policies of the Plan then seek to complement the proposed growth of the town by introducing ways in which supporting services, facilities and jobs can be delivered to support the lifestyle of both current and future residents. Many of these policies have been underpinned by a combination of consultation and analysis of evidence that has allowed the Town Council to identify the specified needs of its residents.

## **NPPF sustainability objective and synopsis**

### Environmental sustainability

The Plan should contribute to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

### **Related Plan objectives**

1a: To ensure that future housing development in and around Alton respects the character of the town and the surrounding countryside.

1c: To influence the location, scale and pace of housing development over the plan period (to 2028).

2b: To encourage walking and cycling.

2c: To encourage the provision of public transport services, both within the town and beyond.

3c: To support the retention of existing public open spaces and the provision of new ones capable of offering sport / recreational opportunities in line with population growth.

### **Relevant Plan policies**

DE1: Town setting and natural assets

DE2: Building design and town character

H02: Storage facilities for household waste

H03: New housing allocation sites

H03a: Land at Borovere Farm

H03b: Land at Lord Mayor Treloar (phase 2)

H03c: Land at Cadnam, Upper Anstey Lane

H03d: Land off Wilsom Road (between numbers 60 and 86)

H03e: Land at Will Hall Farm

H03f: Land adjacent to Alton Convent School, Anstey Land

TR3: Pedestrian networks

TR4: Cycle routes

TR5: Cycle storage and parking

TR6: Bus service provision

CH5: Local green space and open space

CH6: Playing fields

CH7: Allotments

ES2: Reuse of commercial brownfield land

ES3: Regeneration of the brewery site

### **Commentary**



Whilst the Plan does not include an objective directly focussing upon the protection of the environment, its policies are underpinned by the framework provided by both the NPPF and JCS in terms of their joint contribution towards environmental sustainability. To this extent many of the objectives and the policies of the Plan have environmental protection and enhancement at their heart.

Primarily, the DE and ES policies provide a framework which seek to ensure that any development in the town, by way of allocation or otherwise, is delivered in a manner that respects the setting, heritage and character of Alton. Policy DE1, in particular, gives great weight to the relationship of Alton with its hinterland and seeks to ensure that the integrity of the National Park to the south is maintained. It also recognises the importance of the town's habitats and natural corridors, whilst ensuring that future development is directed away from areas prone to flooding. The ES policies seek to prioritise the reuse of brownfield commercial land in the town to accommodate the needs of a changing economy. In addition, TR policies 3 to 6 seek to encourage and facilitate a modal shift away from the private car, by ensuring that all new trip-generating development is accessible via a wide variety of quality sustainable travel options.

Perhaps the most notable impact the Plan will have on the protection of the environment is through the informed and sensitive manner in which it seeks to facilitate a significant quantum of housing growth in the town. The Plan has directed this growth to the most appropriate locations in and around Alton and has put in place a suite of allocations policies that individually recognise the environmental constraints of each site and provide a framework to manage them accordingly. These policies have been led by a thorough assessment of the opportunities and threats presented by each site, captured in the accompanying set of documents explaining the site allocation process. Particular attention has been paid to the way in which they respect the rural setting of the town, interact visually with the National Park and help retain (and where possible enhance) any ecological assets in the vicinity of the site. In a number of instances the need to protect the setting of important heritage assets has also been built into the policy.

### **Compatibility with EU obligations**

Full consideration has been given as to whether the plan should be subject of either a Strategic Environmental Assessment (SEA), as required by the Environmental Plans and Programmes Regulations 2004 (EAPP), or Appropriate Assessment, as required by the Conservation of Habitats and Species Regulations 2012.

The requirement for screening for any Appropriate Assessment was ruled out at an early stage, as the designated neighbourhood area does not contain and is not within close proximity to a European site. Regardless, the Plan will be in

accordance with the JCS, which was itself subject of assessment under the terms of the Regulations, as set out in EHDC's letter dated 20<sup>th</sup> October 2014.

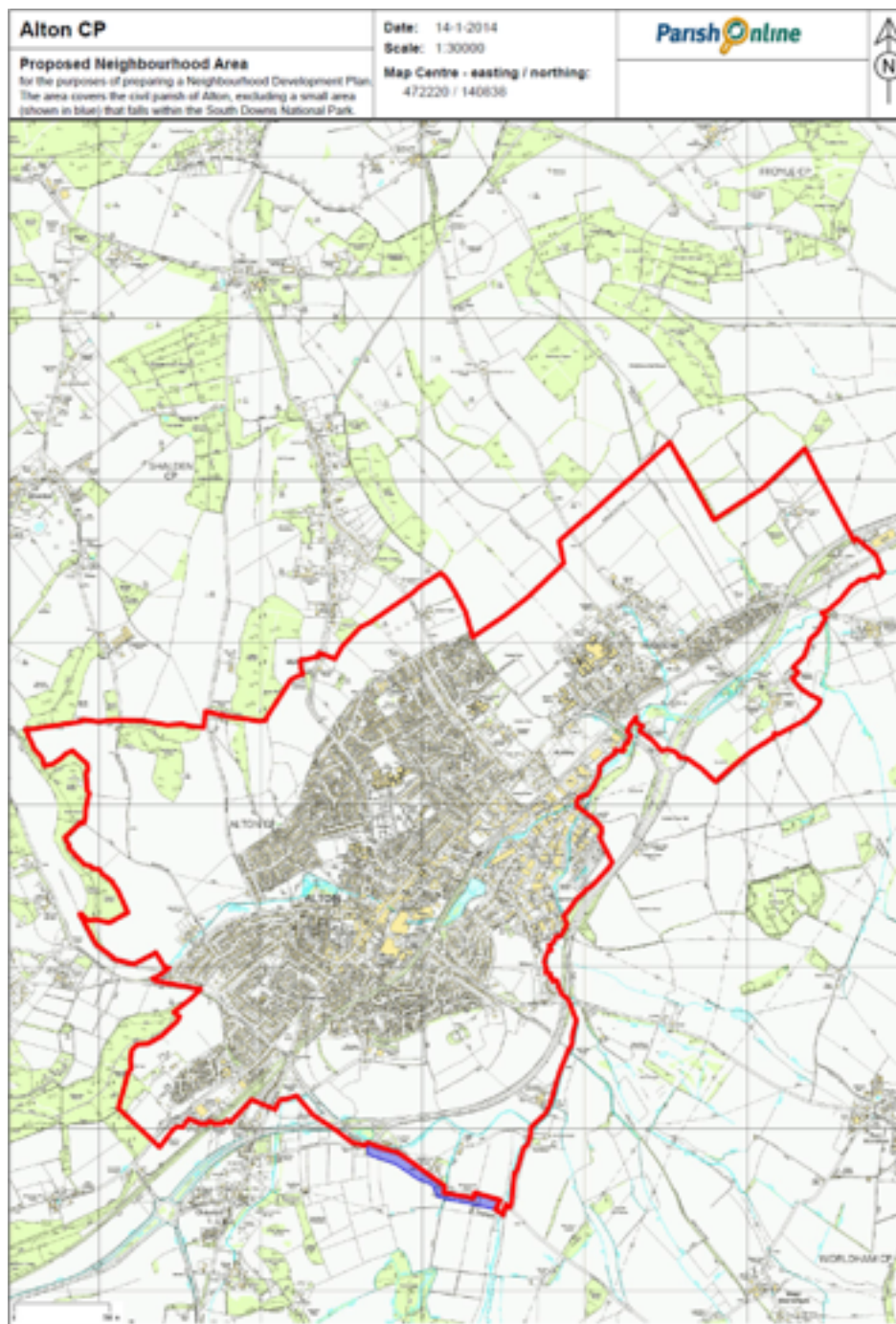
The requirement for SEA was also considered by EHDC prior to the issue of their 20<sup>th</sup> October 2014 letter. At this stage they sought the initial views of the statutory bodies (Natural England, Environment Agency and English Heritage) on the objectives and scope of the Plan, along with an initial indication of the range of sites that may be allocated. The letter from EHDC then indicated that SEA would likely not be required.

Recognising that SEA is an iterative process, the Submission Draft Plan was then re-screened in May / June 2015 to allow the statutory bodies to take on board any subsequent changes to the Plan and to assess its full suite of policies. Once again it was considered that SEA would not be required in support of the Plan. A full statement of reasons, explaining why SEA is not required in support of the Alton Neighbourhood Development Plan, has been submitted as part of the Plan proposal package. This statement forms the basis of EHDC's statutory determination in line with the requirements of the EAPP Regulations.

A copy of both the letter from EHDC dated 20<sup>th</sup> October 2014 and the letter plus statement of reasons dated 11<sup>th</sup> June 2015 can be found attached to this document as Appendix B.

June 2015

## APPENDIX A - The Neighbourhood Plan Area



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Footnote: the area in blue is the small strip of land which falls within the Town Council boundary, but is excluded from the designated neighbourhood plan area.

## APPENDIX B - Correspondence from EHDC relating to SEA

Initial letter, dated 20<sup>th</sup> October 2014



Penns Place, Petersfield, Hampshire GU31 4EX  
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/EastHampshireDistrictCouncil

Mr Steve Parkinson  
Town Clerk  
Alton Town Council  
Town Hall  
Market Square  
Alton  
Hampshire GU34 1HD



Enquiries to: Amanda Dunn  
Direct line: 01730 234213  
Email: Amanda.dunn@easthants.gov.uk  
My reference:  
Your reference:  
Date: 20th October 2014

Dear Mr Parkinson

**Request for a local planning authority screening opinion:  
Strategic Environmental Assessment and Habitats Regulations Assessment  
Submitted by Alton Town Council  
Submitted to East Hampshire District Council**

Thank you for your letter addressed to Ms V Dobson dated 19<sup>th</sup> May 2014 regarding whether a Strategic Environmental Assessment and Habitats Regulations Assessment is required to support the proposed Alton Neighbourhood Plan (ANP).

Following advice from Natural England, English Heritage and the Environment Agency, the Council can advise that the ANP Strategic Environment Assessment (SEA) and Habitats Regulations Assessment (HRA) are both covered by the Council's own Sustainability Appraisal/SEA and HRA work on the recently adopted Joint Core Strategy (JCS) and the forthcoming Local Plan Site Allocations document.

The Council carried out a Sustainability Appraisal/SEA and HRA for the now adopted JCS which sets a strategic target for Alton of a minimum of 700 dwellings. Unless the ANP is intending to significantly exceed this target any environmental effects of this quantum of development will have already been considered.

In addition, further work is being undertaken to support the Local Plan Allocations document that follows on from the JCS. This will include assessments of potential housing sites in Alton. Together these two sets of SEA/HRA work will provide adequate assessments of development policies and proposals in Alton.

Yours sincerely

A handwritten signature in cursive script that reads 'A. J. Dunn'.

Amanda Dunn  
Principal Policy Planner  
East Hampshire District Council

Covering letter and statement of reasons why SEA is not required, dated 11<sup>th</sup> June 2015

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

Enquiries to: Amanda Dunn  
Direct line: 01730 234213  
Email: [neighbourhoodplans@easthants.gov.uk](mailto:neighbourhoodplans@easthants.gov.uk)  
My reference:  
Your reference:  
Date: 11<sup>th</sup> June 2015

Dear Sir/Madam

**Alton Neighbourhood Development Plan  
Strategic Environmental Assessment (SEA) Opinion Screening Determination**

This letter addresses whether an environmental assessment of the Alton Neighbourhood Development Plan is required and as such whether it meets one of the basic conditions that a neighbourhood plan must meet in order to proceed to referendum: that it does not breach, and is otherwise compatible with, EU obligations.

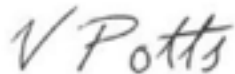
On the basis of the contents of the neighbourhood development plan and subsequent consultation with the relevant statutory bodies the following determination can be made.

The screening determination is that an environmental assessment of the Alton Neighbourhood Development Plan is not required due to there being no adverse comments from the Statutory Bodies and for the reasons set out in the attached statement of reasons and response of screening.

As such it is the opinion of East Hampshire District Council that the Alton Neighbourhood Development Plan is in accordance with the provisions of the European Directive 2001/42/EC as incorporated into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004.

This decision has been based on the information provided. If the contents of the Plan are revised and/or there is a material change in the environmental characteristics in the locality (eg. any additional nature conservation or other environmental designations), then the comments contained in this decision would need to be reconsidered in order to take account of the changes.

Yours faithfully

A handwritten signature in black ink that reads "V Potts". The letters are cursive and slightly slanted to the right.

**Victoria Potts**  
**Planning Policy Team Manager**

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## **Determining the need for SEA: Alton Neighbourhood Development Plan**

**Date of assessment: 11<sup>th</sup> June 2015**

The Planning and Compulsory Purchase Act 2004 requires all local development documents (LDDs) to be supported, and to a great extent led, by a formal Sustainability Appraisal (SA) designed to meet the requirements of the SEA Directive. This requirement was amended as part of the Planning Act 2008 to only require full SA of development plan documents (DPDs) which are those documents that make up a 'local plan.' There is no requirement under either Act for a full SA to be prepared for Neighbourhood Development Plans. However, SEA may still be required.

Following the amendment to the Neighbourhood Planning (General) Regulations 2012 in February 2015 there is now a requirement for either an Environmental Report or a statement of reasons why an Environmental Report is not required to be submitted to the Local Planning Authority under Regulation 15. In the event that the following report is completed and no SEA is required then this document will comprise this aspect of the submission package.

The National Planning Practice Guidance (NPPG) suite, amended in February 2015, provides an overview of the approach that should be taken when identifying the need for SEA of Neighbourhood Development Plans:

*“In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental assessment. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a “screening” assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.*

*If likely significant environmental effects are identified, an environmental report must be prepared in accordance with paragraphs (2) and (3) of regulation 12 of those Regulations.*

*One of the basic conditions that will be tested by the independent examiner is whether the making of the neighbourhood plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).”*

The Environmental Assessment of Plans and Programmes Regulations 2004 (EAPP Regulations) are used to determine whether a plan or programme (PP) such as the Alton Neighbourhood Development Plan require SEA, directing the responsible authority in a series of steps to reach a view.



The following assessment, in accordance with the EAPP Regulations, was undertaken by East Hampshire District Council to identify any requirement for full SEA. The relevant Articles from the SEA directive are given in brackets:

Regulation	Yes/No	Reason
<p>Regulation 2 (1)</p> <p>PP means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which –</p> <p>(a) are subject to preparation or adoption by an authority at national, regional or local level; or</p> <p>(b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and in either case,</p> <p>(c) are required by legislative, regulatory or administrative provisions;</p> <p>(Article 2(a))</p>	Yes	<p>The Alton Neighbourhood Development Plan is prepared by Alton Town Council. Upon successful completion of an examination and referendum it will be made by the local authority as part of the development plan. It is regulated by legislative procedures.</p>
<p>Regulation 5(2)</p> <p>Is it a PP which:</p> <p>(a) Is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, tele-communications, tourism, town and country planning or land use; AND</p> <p>(b) Sets the framework for future development consent of projects in Annex I or II to Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by Council Directive 97/11/EC?</p> <p>(Article 3.2(a))</p>	Yes	<p>The NP is a PP required for town and country planning purposes.</p> <p>The NP seeks to allocate a number of development sites that may be used to deliver development consents requiring EIA. Whilst this will be screened on an application by application basis, this requirement cannot be ruled out at this stage.</p>
<p>Regulation 5(3)</p> <p>Has the PP, in view of the likely effect on sites, been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive?</p> <p>(Article 3.2(b))</p>	No	<p>Natural England has been consulted in relation to the requirement. The settlement of Alton is well over 5km from the Wealden Heaths Phase II Special Protection Area and Solent European sites therefore no further assessment work will be required.</p>

<p>Regulation 5(4)</p> <p>Is the first formal preparatory act of the plan on or after 21<sup>st</sup> July 2004; and does the plan set the framework for future development consent of projects?</p>	<p>Yes</p>	<p>The first formal preparatory act falls after 21<sup>st</sup> July 2004 and the plan does set the framework for future development consent of projects.</p>
<p>It may be required that the Plan would be automatically eligible for full SEA, unless:</p> <ul style="list-style-type: none"> <li>- The answer to the questions posed by Regulation 5(2) are both No; or</li> <li>- The answer to questions posed by exemptions set out under Regulation 5(5) or 5(6) apply.</li> </ul> <p>In either event the tests set out under Regulation 9(1) below must then be satisfied to ensure that no significant environmental effect is likely and no SEA is required.</p>		
<p>Regulation 5(5)</p> <p>Is the PP's sole purpose to serve national defence or civil emergency; a financial or budget PP; or is it co-financed under Council Regulations (EC) No's 1260/1999 or 1257/1999?</p> <p>(Articles 3.8, 3.9)</p>	<p>No</p>	<p>These do not apply.</p>
<p>Regulation 5(6)</p> <p>Does the PP:</p> <ul style="list-style-type: none"> <li>(a) Determine the use of a small area at local level; or</li> <li>(b) Propose a minor modification of an existing PP subject of the regulations.</li> </ul> <p>(Article 3.3)</p>	<p>Yes</p>	<p>(a) The strategic framework for Alton is included in the adopted Joint Core Strategy for East Hampshire. It identifies the development requirements for the town and considers how these can be delivered in the context of the District as a whole. In this context the Neighbourhood Development Plan only seeks to determine the precise locations of growth within the locality of Alton, on specific development sites. To this end, it is considered that the Plan principally seeks to determine the use of small areas of land at a local level.</p> <p>(b) The Alton Neighbourhood Development Plan does not propose minor modifications of an existing PP subject of the regulations.</p>
<p>It may still be required that the Plan would be eligible for full SEA, unless it is determined that it will not give rise to significant environmental effects under Regulation 9.</p>		

<p>Regulation 9(1)</p> <p>Is the PP likely to have a significant effect on the environment taking into account the views of the consultation bodies and the criteria set out at Schedule 1 of the Regulations?</p> <p>(Article 3.5)</p>	<p>No</p>	<p>Following consultation with Natural England, Historic England, the Environment Agency, the LPA and the qualifying body's own assessment of likely environmental effect, the following conclusion has been reached:</p> <p>The Neighbourhood Development Plan is unlikely to have a significant effect on the environment.</p>
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### Determining significant environmental effects

The following assessment has been made as to whether the plan is likely to have any significant environmental effects. Along with advice from the LPA, this takes into account the responses and independent assessments of the three consultation bodies against the Schedule 1 criteria in the EAPP Regulations, set out below.

Following consultation the three consultation bodies have returned the following opinions:

Consultation body	Date of response	SEA required?	Summary comments
<p>Natural England</p>	<p>Email dated 3<sup>rd</sup> June 2015</p>	<p>No</p>	<p>Given the additional information that has been provided by EHDC on behalf of Alton TC, Natural England do not require a SEA for the Alton Neighbourhood Plan.</p>

Historic England	Letter dated 26 <sup>th</sup> May 2015	No	<p>The SEA-compliant Sustainability Appraisal of reasonable housing site options across East Hampshire (outside the South Downs National Park) undertaken for the Local Plan Part 2 included sites at Alton, from which the proposed allocations sites have been selected. It is clear that this appraisal has included an assessment of likely effects on the historic environment.</p> <p>Historic England is therefore content that the proposed allocations sites in the Alton Neighbourhood Development Plan have been subject to an adequate and appropriate Strategic Environmental Assessment. In addition, the Town Council has undertaken further assessment of proposed allocation sites.</p>
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Environment Agency	Email dated 29 <sup>th</sup> May 2015	No	The Environment Agency are satisfied that unless the Alton Neighbourhood Development Plan is intending to significantly exceed the Joint Core Strategy target of a minimum of 700 dwellings or change the sites that are being allocated, any environmental effects of this quantum of development and alternative sites will already have been considered.
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Copies of the full responses of the consultation bodies are appended to this statement.

The assessment set out below, as well as the assessment of the three consultation bodies, has been undertaken bearing in mind the following context:

- The Alton Neighbourhood Development Plan has been produced to be in general conformity with the strategic policies of the adopted *East Hampshire District Local Plan: Joint Core Strategy*, which itself was subject of SEA;
- Where relevant, we have had reference to the SEA work undertaken in support of the emerging aspects of the further parts of the development plan;
- The assessment set out below has been informed in a large part by discussions and the written responses of the three named consultation bodies;
- The assessment set out below has also been informed by other relevant screenings of the Alton Neighbourhood Development Plan against the Habitats Regulations.

<b>Criteria set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004</b>	<b>Assessment</b>	<b>Significant environmental effect (positive or negative)?</b>
The characteristics of plans and programmes, having regard to:		

<p>The degree to which the plan or programme sets a framework for projects and other activities, either in regard to location, nature, size and operating conditions or by allocating resources.</p>	<p>The PP only sets the framework for projects in a local context. There is a statutory requirement for this Plan's policies to be within the context of strategic policies in the adopted development plan. It therefore cannot provide for development that significantly exceeds, at a strategic level, the intentions of the adopted Local Plan. Rather, it provides for local Town allocations.</p>	<p>None likely</p>
<p>The degree to which the plan or programme influences other plans and programmes including those in the hierarchy.</p>	<p>Whilst Neighbourhood Development Plans comprise part of the statutory development plan for the LPA area, they are required to conform with the strategic policies of the development plan. They are effectively the bottom tier of the statutory policy pyramid.</p>	<p>None likely</p>
<p>The relevance of the plan or programme for the integration of environmental considerations, in particular, with a view to promoting sustainable development.</p>	<p>Neighbourhood Development Plans are required by legislation to help achieve sustainable development. This is one of the basic conditions against which the Plan will be tested at examination. This includes environmental sustainability, as one of the three pillars identified in the NPPF. The primary objective of the Plan is to plan positively and achieve a sustainable level of growth, whilst maintaining both the built and natural environment of the town and its surrounding area.</p>	<p>None likely</p>
<p>Environmental problems relevant to the plan or programme.</p>	<p>The Plan will seek to address environmental, economic and social issues in the neighbourhood area.</p>	<p>None likely</p>
<p>The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).</p>	<p>The Plan is not relevant in this instance, as the matters described are guided by higher level legislation (and in some instances these matters fall under the category of 'excluded development' for Neighbourhood Development Plans). Instead, the policies of the Plan must have regard to these matters and seek to ensure that any development it promotes does not compromise the objectives of higher level strategies.</p>	<p>None likely</p>
<p>The characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</p>		

<p>The probability, duration, frequency and reversibility of effects.</p>	<p>The Neighbourhood Plan will set the local vision, objectives and policies to guide new housing development in the neighbourhood area. It is likely to result in long-term effects associated with changes to land use and physical development of land.</p>	<p>None likely</p>
<p>The cumulative nature of the effects.</p>	<p>The cumulative nature of the effects is described in part above. Ultimately the cumulative nature of the effects can be characterised by the impact that residents of the level of new homes planned for the Town will have on the environment. Whilst it is accepted that, unmitigated, there may be a number of potential effects around traffic movement, waste generation, recreational uses and impact on the water environment, the Plan in combination with the adopted development plan and other plans and programmes propose measures to restrict and neutralise the impact of new development in and around areas of sensitivity.</p>	<p>None likely</p>
<p>The trans-boundary nature of the effects.</p>	<p>In context the Plan is seeking to manage future development on specific sites in a small, parish level area within the wider LPA area. It is unlikely that the Plan will have any significant trans-boundary effect, taken primarily to mean impacting on another EU member state, as defined in the EIA Regulations. Even if 'trans-boundary' were to be defined as impacting on the jurisdiction of other administrative areas within the UK (for example between parishes or districts) the effect would be minimal.</p>	<p>None likely</p>
<p>The risks to human health or the environment (for example, due to accidents).</p>	<p>It is highly unlikely that the Plan will give rise to any significant instances of risk to human health. It principally proposes the delivery of residential and domestic scale development by way of a set of policies that seek to take into account all residual effects on residents, including traffic movement, fumes and pollution.</p>	<p>None likely</p>

<p>The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).</p>	<p>As identified above it is highly unlikely that any environmental effect brought about by the Plan will be of any magnitude or impact on any area of scale. Neighbourhood Development Plans have a very limited ability to influence the delivery of strategic levels of development and this particular Neighbourhood Development Plan only seeks to direct development to small areas at local level.</p>	<p>None likely</p>
<p>The value and vulnerability of the area likely to be affected due to (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land use.</p>	<p>There are parts of the Neighbourhood Area which are both highly valued and vulnerable, namely areas prone to flooding, landscape, the Conservation Area and maintaining the Alton/ Chawton Gap.</p>	<p>None likely</p>
<p>The effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>The settlement of Alton is well over 5km from the Wealden Heaths Phase II Special Protection Area and Solent European sites. It is also outside the designated South Downs National Park.</p>	<p>None likely</p>

### **Determination of the requirement for SEA**

As a result of the assessment set out above, incorporating the comments of the three consultation bodies, East Hampshire District Council, as the responsible authority, determines that:

**Following its assessment against Schedule 1 of the EAPP Regulations it is the unanimous view of the three statutory bodies as well as the LPA that the Plan will not give rise to any significant environmental effects. Therefore, a full Environmental Report is not required in support of the Alton Neighbourhood Development Plan.**