



# **Alton Neighbourhood Plan Housing Evidence Base**

**(revised March 2015)**

## Part 1 (Evidence to 17 May 2014)

### Introduction

Information contained in this Part 1 of the Housing Evidence Base is focussed on actions and information gathered and considered up to the Consultation Feedback presentation by Alton Neighbourhood Plan Steering Group to the public on 17 May 2014. Evidence generated and gathered after that date is covered at Part 2 of this document from page 14 onwards.

A series of Objectives have been identified for the Alton Neighbourhood Plan. It is recognized that these and related policies should be built upon sound evidence. The present document deals with the Housing domain. The Evidence Base as a whole, including the views of Alton residents and consultees, has been used to define and enlarge upon the Objectives of the Plan. The most relevant source-references regarding Housing are cited at the end of each of the two Parts of this analysis.

The four main Objectives related to housing in the Alton Neighbourhood Plan have to be considered principally within the overall framework provided by the *Local Plan: Joint Core Strategy* (JCS). The requirements that it places upon the civil parish of Alton over the period 2011-2028 arise out of a policy decision which is itself derived from an assessment of housing need for the East Hampshire District viewed as a whole.

In essence, the JCS sets out a requirement of 10,060 houses (minimum) for the EHDC area. The Alton contribution is stated as a minimum of 1,731 houses of which 1,031 have already been approved for identified sites (including 256 coming within the category of 'windfall'). This leaves a requirement for a minimum of 700 more.

Matters have also to be considered within the even broader framework of the *National Planning Policy Framework* (NPPF), which in Paragraph 47 sets planning authorities the target of having five years land supply for housing already identified and approved, with a margin of at least 5% for underperformance in previous years. This target has to be considered as applying to the East Hampshire District as a whole.

### The first Objective

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

Evidence has been sought to understand the principal question which underlies that Objective.

#### **What characterises the town and surrounding countryside, and what are the resulting constraints on development?**

The issues raised by this question were included in the *Alton 2020* report (endorsed by EHDC and still a reference document), published by the then Alton Town Partnership (ATP) in 2005. This was based on extensive public consultation, and made use of the so-called Healthcheck sponsored by the Market Towns Initiative. In the case of Alton the top two of the sixteen key findings of the Healthcheck were (a) the need to protect existing parks, defined open spaces, allotments, and other green areas, and (b) the need to produce a Town Design Statement.

A summary of what has and has not been delivered as a result of *Alton 2020* has been used to influence policies contained in the Neighbourhood Plan. This is titled *Neighbourhood Plan: Analysis of Gap Since “2020” Document* see Alton Town Council website.

The topic of the town’s characteristics and setting was also addressed in the resulting *Alton Town Design Statement* (TDS, pp 5-30). This was published in 2008 by the ATP after full public consultation, and was endorsed by the ATC and EHDC. It remains an extant document where the design guidelines have been formally ‘adopted’ as non-statutory planning guidance that can be used as a material planning consideration. The sections of it most relevant here dealt with Setting and Landscape, the Settlement Pattern, an Architectural Overview, and the Natural Environment. The first of those sections opens with this General Description:

*The market town of Alton, at the northern source of the River Wey, is encircled by sloping downlands, woods and fields, both arable and pasture, bounded by ancient hedgerows. It is an important social and commercial centre for the surrounding countryside.*

*It is not one single element that provides the intrinsic landscape interest, but the composition as a whole. The essence of Alton resides in the fact that the town is “hidden” from the landscape whilst being an integral part of it. It is important therefore to ensure that the edge of Alton continues to be contained to prevent development encroaching up into the downland and into the landscape that surrounds the town.*

The TDS also generated Design Guidelines (DG) and Related Recommendations (R). In our review of the overall housing issue we have paid particular attention to DG 3.1-3.6, 4.1- 4.3, 5.1-5.20, 6.1-6.2, & 6.6 and to R 3.1-3.4, 5.1-5.6, 5.8-5.10, & 6.1. Within the more specific context of Setting and Landscape DG 3.1-3.6 is the most significant element.

As a result of the extensive consultations held in the process of completing the TDS, we can firmly state that it met with overwhelming public approval. In the new context of a Neighbourhood Plan, it was nonetheless important to check whether the 2008 findings and recommendations continued to be valid. The most crucial evidence about this point is now presented in the *Alton Neighbourhood Plan: Analysis of Results from Community Questionnaire and Other Public Consultation, February-March 2014* (cited hereafter more simply as ‘CQ’, and available on the Alton Town Council website under Neighbourhood Plan). It can be seen that Question 1 of the CQ focused partly on points related to development of the town, its character and its impact on the surrounding countryside. The results clearly demonstrate the continuation of strong support (at a level well above 75% in each case) for the approach commended by the TDS. However, the present Evidence Base document does not in itself deal with constraints on specific SHLAA sites (a matter to be considered elsewhere within the context of allocation policies).

In addition to the above documents indicating local opinion about the town’s characteristics and setting, a number of further relevant sources of evidence have been available to those preparing the Neighbourhood Plan.

The Introduction to the JCS identifies East Hampshire as a desirable place to live and work with historic market towns such as Alton, with attractive villages and countryside. The EHDC and the SDNP Authority share the desire to sustain this into the future, whilst realising that the area is evolving and that it is essential to balance economic and social needs with the requirement to protect the environment.

The EHDC’s four *Conservation Area Brochures for Alton* (1996 onward) cover the particular characteristics worthy of protection in the Historic Centre and the Anstey area, as well as at The Butts and at Holybourne.

The overall range and diversity of Alton’s historic and other interesting buildings, even beyond those formally Listed by English Heritage, have been reviewed in a *Local List* prepared under the auspices the Alton Society and recently re-submitted to EHDC (with latest updates) in 2014.

The District Council's *East Hampshire Landscape Character Assessment* (2006) considers the landscape character in terms of historic land use, biodiversity, cultural heritage, and natural beauty. This report includes a Summary Capacity Statement for all settlements in East Hampshire followed by an explanation of the unique landscape character, valley bowl position, and backdrop to the SDNP. In 2013 this was updated as *Landscape Capacity Study and SHLAA Site Assessment*, to include at pp.19-20 specific reference to the locations suggested for potential development at that more recent point. These documents are supportive of the setting of Alton and its character, and include recommendations about the need to be cautious about these aspects even whilst embracing some development.

The relevant characteristics of the town and the surrounding countryside are further detailed in the *Hampshire Township Assessment* (Alton) of the *Hampshire Integrated Character Assessment* (Character area 3f) published by the County Council in 2010 and 2013 respectively.

The EHDC's *Green Infrastructure Strategy, 2011-2028*, Part 2 of 2013 proposes that a framework be developed to deliver a high quality network of green infrastructure capable of sustaining the current quality and character of an area that includes Alton.

The issue of the character and setting of the town, and of the related constraints is also discussed in Sections 1 to 2.2 of the *Alton Study* prepared by Urban Initiatives for the EHDC in 2013. Although this work is aimed at the long-term future of Alton even beyond 2028, the observations made in these Sections remain applicable to the present context.

Some helpful mapping about the overall environment of the town has also been consulted within the context of the EHDC's *Alton Profile* document from 2003.

#### The second Objective

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

Here we have identified three principal questions requiring evidence-based answers.

- (1) **What size and type of households will be seeking local housing?**
- (2) **How much affordable housing or social housing will be needed?**
- (3) **What design features in new development will best meet the needs of the town?**

#### **(1) What size and type of households will be seeking local housing?**

On this issue two studies undertaken by local councils are particularly relevant to the evidence base.

First, *A Demographic Profile of Hampshire, 2012 - 2019* published by HCC in 2013 provides, together with its detailed annexes, a general source of data relevant to the JCS.

Second, the EHDC has prepared, in connection with its work on the JCS, an *East Hampshire Strategic Housing Market Assessment and Local Housing Requirements Study* (SHMA) published in 2013. As we note at certain points later on, this material has a bearing not only on the present question but also on some of the subsequent ones raised in this section on Housing. The SHMA includes an assessment of the need for new development, and provides not only information but also projections of future trends and requirements. It defines three future housing scenarios. (1) Demographic-led: "How much development is required to meet projected levels of population change?"; (2) Economic-led: "How much development is required to ensure forecasts of future employment change are sup-

ported by the local labour supply?"; (3) Housing-led: "How much development is required to meet current and future needs for 'affordable' (e.g. social rented) housing?". Sections 5-7 are particularly relevant to the issue of size and type of households. The overall Conclusion of the SHMA (p.107) indicated a need for 520-610 homes per year for East Hampshire across the period 2011-2028, representing an increased requirement of 17.7%-20.8%.

Since the publication of SHMA the JCS has been approved and signed off by the Government Inspector and adopted in June 2014 which requires a minimum of 10,060 new dwellings 2011 - 2028 which equates to 559 per annum.

Regarding local opinion, the issue of size and type of housing was central to the scope of Questions 4 and 5 in the CQ. Here again, additional evidence of Altonian opinion has come from further comments prompted by that same document, as well as from the public consultation sessions and from the meetings with local groups as listed in our present Consultation Statement. Full analysis of the CQ answers and of the other comments thus assembled can be found on the Alton Town Council website under Neighbourhood Plan. The responses can be broadly summarized as indicating a preference for prioritizing small, affordable, starter homes.

The demand for housing in Alton as specified in the SHMA is in line with the findings of the 2011 census where within East Hampshire Alton has the highest rates for:

- (1) Household Size where Alton in comparison with other Towns and Parishes in East Hants comes out ahead in all cases up to 5 persons in a household and a close second on 6 and 7 per household.
- (2) Household Tenure where Alton Social Rented from Council and also Other far outnumbers the rest of this measure for other Towns and Parishes in East Hants.
- (3) Room Occupancy Rating where Alton Room Occupancy outnumbers this measure for the rest of Towns and Parishes in East Hants.
- (4) Bedroom Occupancy Rating where Alton Bedroom Occupancy outnumbers this measure for the rest of Towns and Parishes in East Hants except on -2 where it is a close second.

The conclusions from above are that Alton has a higher demand for low cost and affordable dwellings than the rest of East Hants. Further, this confirms findings in the SHMAA, JCS and CQ.

## **(2) How much affordable housing or social housing will be needed?**

Local opinion regarding the topic of affordable housing was sought in the CQ document under Questions 5 and 6. Our analysis of the responses, and of associated comments from the various sources previously mentioned, are fully set out on the Alton Town Council website under Neighbourhood Plan. The main thrust of Altonians' views can be summarised here as indicating that 72% of respondents favoured inclusion of affordable homes for sale within the overall profile of tenure, and that 55% of them supported inclusion of affordable rented homes. A clear majority of responses also strongly supported prioritising the needs of those who were already living locally or had some other Alton connection.

The District-wide context for this issue is set by Section 5 of the SHMA. The overall finding (in para 5.60 at p.71) reads thus:

The analysis of affordable housing need illustrates that the District continues to face acute pressures for affordable housing need, in line with previous assessments, including the 2012 Housing Needs Assessment Update. It estimates that affordable housing need based upon gross household formation would total 1,228 affordable dwellings per annum over the forthcoming 5 year period, or 1,011 over a 17 year Plan period. Estimates using net household growth are lower at 461 and 256 affordable dwellings per annum based on the respective time periods.

As of April 2014 the EHDC's Homechoice list recorded the following numbers for those awaiting affordable housing across the District:

Area	Total
East Hampshire	1985
Eastleigh	1960
Havant	2548
Test Valley	2473
Winchester	2064
<b>Total</b>	<b>11030</b>

At that same date the statistics on the scale of assessed need specific to Alton were as follows:

Assessed Bedroom Need	Number of Applicants on HHC	%
1 Bedroom	286	58%
2 Bedroom	138	28%
3 Bedroom	52	11%
4 Bedroom	16	3%
TOTAL	492	100%

The above is clear evidence that affordable housing at the lower size range is urgently required for Alton. This is further underpinned by SHMA Figure 32, at p.85, where the split of need is depicted pictorially.

It is also worth noting (a) that the predominance of 1-bedroom need in the case of Alton is broadly in line with the wider picture presented by the SHMA (see Table 22 at p.67) for the District as a whole, and (b) that in April 2014 the EHDC's estimate of empty homes in Alton stood at 186.

### **(3) What design features in new development will best meet the needs of the town?**

On this topic, the principal evidence stems from the TDS. This provides a comprehensive analysis, together with explicit guidelines and recommendations. All of these were generally endorsed through extensive public consultation prior to the Statement's publication in 2008, by which time it had also attracted the endorsement of the EHDC and the ATC. In preparing the Neighbourhood Plan, we have fully reviewed the TDS and have acknowledged its continuing applicability as the most vital and comprehensive source of guidance. Although the whole document is devoted to various issues of design, those parts most directly relevant to the housing domain are as follows: Section 4 on the Settlement Pattern, Section 5 presenting the Architectural Overview, and Appendices C, D, and E. These portions of the text generate specific Design Guidelines (DG) and Related Recommendations (R) as follows: DG 4.1-4.3 & 5.1-5.41 and R 5.1-5.13.

Opinion on some aspects of this issue was also canvassed in the CQ document under Question 7. In essence, more than 70% of respondents emphasized adequate parking, low environmental impact, and 'fit' with the character of the neighbourhood, while over 50% of respondents were concerned about the provision of reasonably sized gardens

#### The third Objective

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

In this connection evidence has been gathered to assist in addressing three key questions.

- (1) How much housing development will Alton need to take?**
- (2) Where are the sites that could or should take this housing?**
- (3) At what rate does the need for more housing arise over the Plan period?**

#### **(1) How much housing development will Alton need to take?**

As explained at the outset of this whole section on Housing, the evidence base for an answer on this issue lies principally with the terms of the requirement laid upon the town by the JCS, where the figures stated for Alton stem from a policy decision which itself derives essentially from the overall assessment of housing need existing across the EHDC area as a whole. A summary of the requirement placed upon the town up to 2028 has already been provided on p.2 of the present document.

Supplementary information about the EHDC's justification for its allocation policy is available in the 2013 SHMA as previously cited.

The principal evidence base for the views of the Alton community is, once again, the response elicited by the CQ under Question 8. The replies and associated comments indicate that 75% of Altonians believe that no more than 1,682 (later [June 14] amended on JCS approval at 1,731) houses (the figure specified as the minimum being proposed by the JCS) will be required. 19% had no strong opinion on this, while only 6% thought that there would be need for a larger number.

The ATP's *Alton 2020* document recognized back in 2005 that the town needed to grow. Though it did not present any precise figure, this study argued for an increase that would facilitate delivery of 'the 2020 vision' by enabling current and future businesses to thrive. Equally, however, it accepted that Altonians did not want the appeal and character of the town to be compromised due to this growth.

Note has also been taken of the *Alton Study*, previously cited as work commissioned by the EHDC from Urban Initiatives. This presented outline scenarios for housing development that would be more extensive than anything previously considered by the District or Town Councils. However, it is essential to keep in mind that the Study did not involve any form of public consultation. For the present purpose of Neighbourhood Planning down to 2028, the evidential status of this document must be assessed with the further vital caveat that the exercise dealt with very long-term projections (explicitly spanning no fewer than 20-50 years) and thus generated speculative figures well in excess of the current JCS requirements applicable to the next 14 years.

## **(2) Where are the sites that could or should take this housing?**

The Government launched the National Planning Policy Framework in 2012 which effectively enables any developer to build housing in any location provided that the proposed scheme is sustainable and does not breach any Planning Authority requirements. Such Authorities must have endorsed plans in place to meet Government housing targets with an appropriate Allocations Policy to ensure that a 5 year land supply is maintained (plus 5% for poor performance in previous years). For EHDC no such plan is yet endorsed, but is expected to be delivered for those not pursuing Neighbourhood Plans in Sept 2015. The result therefore is that in the interim developers are able to submit large-scale planning applications with the expectation that these may well be approved provided they are sustainable.

In order to mitigate the impact of such inadequately controlled development the EHDC issued an *Interim Planning Policy on 1 August 2013*.

The EHDC had also identified potential sites for development as part of the JCS work and published these as the *Strategic Housing Land Availability Assessment (SHLAA)* of 2013 and later updated to a 2014 version.

Due to the topography of Alton and to the terms of the TDS, there are only a limited number of large sites appropriate for development. Nonetheless it was decided that the Neighbourhood Plan would concentrate on evaluating all the potential locations identified by the SHLAA, while recognizing that this listing produced an overall total well in excess of the minimum JCS requirement. A map of the sites with potential housing numbers is available in the EHDC SHLAA 2014.

As previously noted in connection with Objective 1a, the EHDC's *Landscape Capacity Study* has considered (at pp.19-20) 12 SHLAA sites and offered cautions about development on some of these.

Should developers be granted planning permission on East Hampshire's SHLAA sites to be developed at a higher rate than expected by the JCS then there is a real possibility that more housing numbers will be required from the District. This is because EHDC will need to maintain a 5 year land supply out to 2028 and if all the SHLAA sites have been taken due to NPPF in the early years more will need to come forward.

The current situation in Alton is that developers have indeed seen the SHLAA designations as an encouragement to submit early applications concerning those sites. The present position is that planning bids had already been submitted for 1,081 homes on 5 of the SHLAA sites. Potential applications that might yet be received for further sites could involve proposals for another 120 houses, if the amounts estimated by the SHLAA were to be strictly followed. On that basis, if all bids related to the full range of SHLAA sites were to be approved, the total tally of new-build permissions since 2011 would run to 2,232 - a figure well in excess of the minimum stipulated by the JCS.

Regarding local opinion on relevant preferences about location of new housing, the *Report on Public Engagement for the Core Strategy* presented in 2009 by the now dissolved Alton Town Partnership (ATP) provides some earlier information, albeit with 'general area' site-options rather than more specifically focused ones having been offered to respondents. This consultation was carried out with full public engagement and in support of work done for the Local Development Framework and then

for preparation of the JCS as well. The full Report from 2009 is provided on the Alton Town Council website under Neighbourhood Plan and the evidence of local opinion about site-areas at that time can be examined there. It will be seen that only three of the SHLAA sites identified in 2013 directly match those put up for consideration in the earlier ATP study. In the 2009 consultation 'East 2' (Borovere Farm) attracted support at a level of 51%; while the figure for 'North 3' (Cadnams Farm) was 45% and that for 'West' (Will Hall Farm) was 23%.

The ATP study has now been effectively updated by the 2014 CQ as a source of evidence concerning current views on potential choices.

Evidence about opinion concerning Alton's seven largest SHLAA sites was canvassed in the in the community questionnaire and at the CQ under Question 11 the responses with associated comments are further analysed. In essence, only two of the sites (then labelled Treloars 1 and 2) were considered as acceptable by a majority of respondents. Conversely, the other five locations all encountered a majority of opposition, with the Will Hall Farm site receiving strongest rejection.

It is vital to note that at the time when the community questionnaire was issued no site mentioned under Q.11 was the object of a formal planning application. The very different situation prevailing in March 2015 is described in Part 2 of this document.

Question 10 of the CQ dealt with local opinion about the sizes of site most broadly preferred for potential housing. In essence, the answers indicated a pattern of preferences gravitating towards sites of medium size (defined as 20-50 units).

Further evidence relating to the ways in which infrastructural issues have affected our assessments of site-suitability will be found the discussion of Objective 1d below, as well as in the Evidence Base documents for the non-Housing domains of the Neighbourhood Plan .

### **(3) At what rate does the need for more housing arise over the Plan period?**

Here we have consulted the evidence on housing trajectory/annualised rates for the District presented by the EHDC in its 2013 SHMA.

Community opinion on the most appropriate pace of development over the Plan period up to 2028 was directly sought as part of our Evidence Base by means of the Community Questionnaire under Question 9. Full analysis of the responses, and of related comments are set out in the CQ.

In essence, the principal concerns indicated by the Community Questionnaire material were that infrastructure should keep pace with new development, and that ideally the latter should await completion of the Neighbourhood Plan.

Our conclusions about how best to phase a positive response to Alton's need for more housing over the period up to 2028 are not addressed in the form of a phasing plan. This was due to the high number of current planning applications, lack of a 5 year land supply at the time of writing and the need to allow market forces to dictate the build rate. The planning authority has limited control over this rate and so the NP team made no attempt to include a proposed phasing plan as part of the definition work.

#### The fourth Objective

This reads: **1d. To ensure that, in the context of the sustainability requirements specified by the NPPE, the necessary infrastructural improvements will be implemented in a manner appropriate to the location, scale, and pace of all proposed development.**

This objective was added after the initial 01 Feb 2014 consultation and as a result of it. It was then reported back to the public on the feedback presentation on 17 May 2014. While other issues of in-

frastructure are addressed in other parts of the NP Evidence Base, we deal here with the supply of gas, electricity, and fresh water, together with matters of sewage disposal and flood prevention. Thus evidence has been sought to address the following:

What problems currently exist in Alton with regard to the supply of gas, electricity, and fresh water as well as to issues of sewage disposal and flood prevention, and what actions need to be taken so as to ensure that these elements of the town's infrastructure will be improved in a sustainable manner appropriate to the location, scale, and pace of all proposed development?

Hampshire County Council have produced a *Strategic Infrastructure Statement Version 1* (dated February 2013) where at Section 3.3 page 54 there is a Summary of infrastructure need as known at that time. This is followed by three tables setting out the HCC's perception of the utility support requirements needed at that stage for Housing.

As Part of JCS EHDC have also produced an *Infrastructure Delivery Plan Statement and Infrastructure Schedule 2013*. At Appendix 1 this sets out a table of infrastructure requirements for East Hampshire, some of which are costed. The Housing Utility and Water Drainage Section identifies two waste water sewage and waste water infrastructure infrastructure issues as critical, but no costs are estimated and the issues are listed as ongoing. Para 3.28 on page 13 of the same document states: "There is spare network capacity at Alton, although the exact location and scale of any upgrade can only be determined once certainty of development, location, size, and phasing are known." It goes on to say that in all cases "developers will be required to demonstrate that there is adequate waste water capacity both on and off site to serve the development and that it would not lead to problems with existing or new users". This stands in contrast to the letter of 09 April 2014 received by ATC from Thames Water as referenced below where only two of the 16 SHLAA sites can be sustained by the current infrastructure. It has been noted that the pair of unproblematic locations relate to an estimate of no more than 26 dwellings.

The Neighbourhood Plan Steering Group requested the major providers who were relevant to these areas of infrastructure to provide comment on the SHLAA sites and housing numbers proposed by the JCS.

Scotland Gas Networks confirmed in an e-mail dated 6 March 2014 that there was sufficient network capability to supply the necessary future supply for the level of new housing being suggested.

Scottish and Southern Energy confirmed in an e-mail dated 6 March 2014 that it expected no problems over supplying Alton with sufficient electricity to sustain the amount of development being proposed.

South East Water responded with a letter dated 17 March 2014 indicating that there would be no problems about supplying fresh water for development as forecasted and that this potential extra demand would be identified in the five-year plan due to be issued in April 2014.

The Town Planning Manager of Thames Water Utilities Ltd provided a letter dated 9 April 2014 dealing with issues of sewerage and waste water infrastructure. This recommended the development of a Strategic Drainage Strategy to support the Neighbourhood Plan, in the light of the fact that for 14 out of 16 SHLAA sites (the exceptions being AL003-5 and AL 026) there was an inadequacy of current sewerage network capacity. Further assessment would be required for each of the sites concerned, and account must also be taken of the cumulative impact of the various developments taken as a whole. The letter indicated that a 12-week period will be required to assess each site, and that it might take up to three years to install the appropriate sewerage requirements.

The Environment Agency sent an e-mail on 18 March 2014 stating that it was unable to make any comments about flood risk in connection with the JCS proposals for additional housing in Alton. It referred the Steering Group to the EHDC's JCS Infrastructure Plan, but this makes no reference to flooding issues.

Major public concern in Alton over matters of infrastructure also features very prominently in the responses and comments offered through the CQ process, and is particularly evident in relation to Questions 1 and 9 (see *Alton Town Council website*).

In addition, the Steering Group has maintained a Standard Consultation Log (which forms part of the Consultation Statement) to record any further inputs from the public that were provided outside the framework of the CQ itself. This Log provides valuable enhancement of the Evidence Base, and we take explicit note here of some of the items that seem particularly worthy of highlighting with regard to housing in particular.

### *Flooding*

Log Serial 1 focuses on drainage into the Lavant (Winterbourne) and Wey Rivers. This reports that surface water and ground water flow into these streams from two different directions at Alton. The hills to the north drain into the Wey, those to the south into the Lavant. The high levels of water table and Lavant flow are evidenced by two pictures. The first shows the flooding in the agricultural area of the Chawton triangle which lies very much below the level of the old Winchester Road, while the second illustrates the surface water flooding in Travis Perkins Yard on the opposite side of that same road near its end at the A31. The proposed development at the Treloar site, additional housing around the Sports Centre, and possible development on the hillside adjacent to Butts Bridge will all add to surface and ground water flows entering the Lavant stream. It is also noted that the housing development in Four Marks affects the ground water top up for which natural outfall is down the main A31 road valley through to the Lavant stream. The submission similarly observes that the proposed development sites north of Alton will all add to the surface water and ground water top up of the Wey.

Log Serial 4 addresses surface run-off to the North of Alton down Old Odiham Road and other Greenfield and Wooteys Estate housing areas. A series of 21 photos and an explanatory e-mail demonstrate the inadequate drainage that produces surface water run-off from above Greenfields and Wooteys estate onto roads and into an already developed area of housing.

Log Serial 9 provides further photographic evidence of run-off, as it also affects Curlews, Grebe Close and upper part of Old Odiham Road.

Log Serial 8 contains a photo and an explanatory e-mail dealing with flooding of a garden to the rear of a dwelling in London Road, Holybourne, caused by a spring-cascade in the hills to the east.

### *Sewerage*

Log Serial 5 illustrates sewage flowing into the River Wey to the east of Holybourne close to Neatham Mill and the Newman Lane pumping station. It provides two photos and an e-mail, with a link to video evidence of sewage leaking across fields and a footpath. This pollution of the river was ongoing for two weeks in the winter of 2013-14.

Log Serial 7 demonstrates by e-mail and three photos the leakage of sewage into a garden at New Odiham Road, due to a back-up in the system linked to an excess of run off during the winter of 2013-14.

Log Serial 13 focuses on issues both of flooding and of sewage overflow. It relates to sites at Cut Pound and Tanhouse Lane, and to difficulties likely to be exacerbated by potential development at Will Hall Farm. This submission also highlights, with particular reference to culverts, current problems of divided or disputed responsibility for maintenance.

Log Serial 20 contains a submission from the previous manager of Alton Sewage Works. This emphasizes that the plant already suffers from lack of proper capacity, and that any further housing development will require a significant upgrading of the facility. It notes, moreover, that the sewers which feed it also require attention.

### *Integrated Infrastructure Needs*

Log Serials 11, 12, 18, and 25 are all examples of representations concerning the need to ensure that issues of infrastructure are treated in an integrated and properly strategic fashion, rather than addressed merely on a piecemeal basis.

Log Serial 22, which is a 10-page submission from the Alton Society, reinforces that previous point by offering an overview not simply of the main SHLAA sites but also of the wide range of infrastructural concerns that need to be tackled in a sensibly holistic fashion if ‘sustainability’ is to be given any effective meaning during the process of implementing the JCS.

### **Part 1 Housing References (in order of first citation)**

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*Local Plan: Joint Core Strategy (JCS)*, SDNP/EHDC 2014 (JCS)

*National Planning Policy Framework (NPPF)*, Dept. of Communities and Local Government 2012

*Alton 2020: A Plan to Shape Alton’s Future*, ATP 2005 (Consultation Evidence File [CEF] 43a.1)

*Neighbourhood Plan: Analysis of Gap Since 2020 Document* see Alton Town Council website (CEF 43a.2)

*Alton Town Design Statement (TDS)*, ATP 2008 (CEF 1)

*Alton Neighbourhood Plan: Analysis of Results from Community Questionnaire and Other Public Consultation, February-March 2014 (CQ)*, ATC 2014 (CEF7)

*Conservation Area Brochures for Alton*, EHDC 1996 (and onward) (CEF43a.3)

*Local List*, Alton Society 2014 (CEF 43a.4)

*East Hampshire Landscape Character Assessment*, EHDC 2006

*Landscape Capacity Study and SHLAA Site Assessment*, EHDC 2013

*Hampshire Township Assessment (Alton)* 2010

*Hampshire Integrated Character Assessment*, HCC 2013

*Green Infrastructure Strategy, 2011-2028*, EHDC 2013

*Alton Study*, Urban Initiatives for EHDC 2013

*A Demographic Profile of Hampshire, 2012 - 2019*, HCC 2013

*East Hampshire Strategic Housing Market Assessment and Local Housing Requirements Study (SHMA)*, EHDC 2013.

*Interim Planning Policy*, EHDC (August 2013)

*Strategic Housing Land Availability Assessment (SHLAA)*, EHDC 2013

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*Report on Public Engagement for the Core Strategy, ATP 2009 see Alton Town Council website (CEF 2)*

*Standard Consultation Log (see Consultation Evidence File which is part of consultation Statement) (CEF 8)*

*Strategic Infrastructure Statement Version 1 dated February 2013 HCC*

*Infrastructure Delivery Plan Interim Statement and Infrastructure Schedule EHDC 2013.*

## **Part 2 (Evidence from 17 May 2014 onward)**

### **Introduction**

Information contained in this Part 2 of the Housing Evidence Base is focussed on actions and evidence gathered and considered from 17 May 2014 and up to the conclusion of the first six-week public consultation on 30 March 2015.

The draft Objectives identified for the Alton Neighbourhood Plan were confirmed as a result of feedback from 17 May 2014 Feedback consultation. This Part 2 of the document therefore summarises the material that we have reviewed under Housing and sets out how the proposed Policies were defined for the 22 November 2014 NP Policy public consultation and were further refined for the initial 6 week public consultation.

### **Definition of policies**

Draft Housing Policies were defined on an iterative and ongoing basis from the confirmed Objectives over a number of months from 17 May 2014 to 30 March 2015.

After presentation to the public on 17 May 2014 all feedback information was gathered, collated and then formalised as part of the CQ from page 58 onwards. Feedback was in the form of post-it notes (known as 'stickies' within the NPSG), a full commentary of which is contained in the Consultation Statement. Analysis of feedback and further emerging evidence allowed the ANPSG to begin to develop the NP policies.

The defined Policies then formed a key part of the Policy presentation to the public on 22 Nov 2014. After this presentation all information was gathered and collated in the form of the *Analysis of Comments from Public Presentation held on 22 Nov 14* (ACPP). This document is available for review on the Alton Town Council website.

As a result of the ACPP findings refinements and adjustments were made to the draft policies to reflect public responses where the weight of opinion and justification supported a change. These refined policies were then distilled into a draft NP document for consideration by Alton Town Council prior to the initial Pre-Submission Public Consultation formally conducted from 16 Feb to 30 March 2015.

### **Housing allocation policy**

A considerable amount of work was undertaken to define the draft housing allocation Policy during the period 17 May 2014 to 30 March 2015 on an interactive and evidence-based perspective. A summary of how this was undertaken is set out in the *Dwelling Site Selection Methodology and Supporting Narrative January 2015 Version 2* (DSSM). A copy of this is available for review on the Alton Town Council website. The key determinants for an allocation were very important and are set out in the DSSM. As they are so important it is considered prudent to repeat them here. They are as follows:

- *Government National Planning Policy Framework.*
- *EHDC Local Plan: Joint Core Strategy.*
- *EHDC Strategic Land Availability Assessment accepted findings.*
- *EHDC Strategic Land Availability Assessment Sustainability Assessment.*

- *EHDC Landscape Capacity Statement 2013.*
- *HCC Integrated Character Assessment for Alton.*
- *Alton Town Design Statement. (CEF1)*
- *Alton Town Partnership 2009 housing site consultation. (CEF2)*
- *Neighbourhood Plan Community Questionnaire findings. (CEF 7 and 28)*

In support of the allocation process further evidence to confirm a robust NP Policy was defined as follows:

- *Alton Neighbourhood Plan Sustainability Appraisal.* This was further refined on an iterative basis to underpin all draft policies and is available on the ATC website for review.
- *Strategic Environment Assessment and Habitats Environment Regulations (SEA).* No SEA was deemed to be required for the Alton NP definition process and this was formally confirmed in a letter from EHDC on 20 October 2014. A copy of the *EHDC SEA letter dated 20 October 2014* can be viewed on the ATC website.
- *A Template for information about the proposed allocation sites at Alton.* This spreadsheet appraisal seeks to map a full range of information pertinent to the initial allocation of sites. A copy is available on the ATC website for review.
- *Alton Housing (SHLAA) Site Assessment Document 010115.* This spreadsheet appraisal considers each selected and non-selected EHDC 2014 SHLAA site according to the following criteria: Availability, Deliverability, Sustainability and Public Support. It also provides a Summary. A copy of the complete document is available on the ATC website for review.

### **Planning applications**

The ANPSG has prepared the NP without being influenced by how major planning applications have been defined, accepted or progressed during the course of its work. This is explained on page 2 of the draft NP document. However, consultation with all Owners/Developers of allocated and non-allocated sites has been conducted and recorded in the Consultation Statement.

As of 30 March 2015 outline planning approvals (additional to the earlier 1,031 units) have been granted for 984 dwellings. This total exceeds the original JCS minimum for the period 2011-2028 by 284. Most of the 984 units are planned for greenfield sites that were not pre-allocated. The one exception relates to an allocation already present in the saved Local Plan, initially involving 150 dwellings at a density of 52 per hectare. Under current planning guidelines for density this was unrealistic and therefore the site was eventually deemed capable of accommodating only 90 dwellings. The shortfall of 60 units was then added to the minimum target due to be achieved through the NP process.

### **Part 2 Housing References (in order of first citation)**

*Analysis of Comments from Public Presentation held on 22 Nov 2014 (dated Jan 2015) (CEF 33)*

*Dwelling Site Selection Methodology and Supporting Narrative January 2015 Version 2 (CEF 43a.5)*

*Alton Neighbourhood Plan Sustainability Appraisal. (CEF 43a.6)*

*EHDC SEA letter dated 20 October 2014 (CEF 43a.7)*

*A Template for information about the proposed allocation sites at Alton (CEF 43a.8)*

*Alton Housing (SHLAA) Site Assessment Document 010115. (CEF 43a.9)*