

SCENARIO IDENTIFICATION AND ACTION PLAN : PART 2 of 2

Purpose of this Document

Subsequent to the actions as set out in Scenario Identification and Action Plan Part 1, the Neighbourhood Plan (NP) Steering Group set about three important tasks:

1. Undertake a public consultation with the general public on the content of Part 1. Receive, assess and document the feedback.
2. Update Tables 1 and 2 (from Part 1) to reflect the revised EHDC 2023 Land Availability Assessment listings. (The 2023 LAA numbers are as shown in Table 1 below).
3. Undertake a preliminary site allocation from the updated Selected Sites summary at Table 2 below to meet the housing number allocation which had been received from EHDC.

Thereafter workshops would be held to deal in detail with each of the selected sites.

1. Outcome from September 2023 Public Consultation

The summary of findings from the September 2023 NP public consultation are set out in the document ANP CONSULTATION 8th & 9th SEPTEMBER : SUMMARY version 1.4. This is included within the NP Evidence Base.

For convenience, this document can be summarised as follows:

- The data was analysed thoroughly using both qualitative and quantitative techniques. It is significant that the findings from both approaches, independently researched, are complementary and do not contradict each other.
- Some attendees offered comments that clearly were outside the scope of a Neighbourhood Plan; for instance, under Community and Green Spaces, the provision of kayaking on Kings Pond was suggested.
- NP Policies: A number of themes were consistent throughout the responses, and these should be reflected in the NP Policies. These are:
 - Character
 - Regeneration
 - Safety & Wellbeing
 - Infrastructure First
- NP Scenarios: There was support for “Scenario 1 plus NDO”. Attendees gave limited feedback on Scenario 2 suggesting it is not highly contentious. There was very strong opposition to Holybourne/Scenario 3 and very little support. There was mixed feedback on Scenario 4, which included sites in South Alton adjacent to A31, with a small balance in reserved support.

2. Update to Tables 1 and 2

Tables from the Scenario Identification Action Plan Part 1 have been updated, and can be found at the end of this document to identify listings as follows:

- Table 1 : Scenario Site & Allocated Details as Updated with 2023 EHDC LAA.
- Table 2 : Scenario Planning Potential Sites for Selection Summary with EHDC 2023 LAA Updates Applied and Brownfield NDO numbers removed.

Independently of the NP Steering Group updating of these Tables, EHDC Planning Policy advised “in confidence at the time” that the Alton NP will be expected to allocate 700 dwellings within its boundary as part of the current NP definition process. It was understood that an allowance for this number of dwellings to be excluded from the EHDC Local Plan would be made in their forthcoming Regulation 18 Part 2 consultation, this being expected in February/March 2024. Additionally, advice was provided that an allocation of 1000 dwellings on the Parish border, that

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would effectively form an extension of Alton, was to be proposed in the same EHDC Local Plan consultation.

3. Preliminary Site Allocation Work

3.1 Analysis

The EHDC information that 700 dwellings will be required, and furthermore that up to 1000 dwellings are proposed for Neatham Down (which lies outside, but abutting the Alton NP boundary), provided a crucial input to analysing the Scenarios. In effect Alton is being asked to take 1700 more homes out to the end of the Plan period in 2040, thus increasing its population by over 30 percent.

A review was therefore undertaken of the four Scenarios offered to the public in September 2023.

Scenario 1. This is the NP Steering Group and public preference as a way ahead, and it also meets current Government “brownfield first” policy. On the initial Scenario 1 work, a potential capacity to deliver 312 homes was identified. In order to meet this figure, a number of Neighbourhood Development Orders (NDOs) would require to be implemented, as several of the sites identified were not listed in the EHDC LAA and were in other ownership. The main landowners identified were EHDC for car parks, and ABRI, the local Housing Association. While potentially beneficial, the NDO process is lengthy and complicated, and taking these potential sites forwards lies outside of the Terms of Reference and capabilities of the NP Steering Group.

Discounting these NDO liable sites brings down the Scenario 1 potential total to **130**.

Scenario 2. EHDC have discounted the NP requirement for 700 in Alton by 264 homes by making allocations at three sites, namely Will Hall Farm Phase 2 (150 homes), Land at Travis Perkins (24 homes) and Land at Whitedown Lane (90 homes). Therefore taking Scenario 1 brownfield at 130 plus 14 at Winchester Road at Scenario 2 delivers 144 homes. With the 264 EHDC allocation, the total number of dwellings in this Scenario is **408**. (It should be noted that this figure does not include any buffer or a windfall allowance, as effectively it can be considered that they would cancel each other out.)

Scenario 3. The extra element of the Scenario 3 assessment comprises land at Holybourne with an LAA target of 101 homes (although it is noted that the developer has an aspiration for 223 on this site). Access to the site could be impeded by the current Neighbourhood Plan Policy CH5 (page 73 bullet 4) which prevents development of the access location as it is listed as a protected Local Green Space. An additional concern is that, due to the exceptionally strong feedback at both public consultations and through various representations, letters and e-mails from the Holybourne Village Association against any development in the village, there would be a real prospect of the Neighbourhood Plan being rejected at the required referendum. Accordingly it was considered inappropriate to allocate any further housing in Scenario 3.

Scenario 4. This scenario includes a number of additional sites, primarily in the South Alton area. EHDC require the Alton NP to meet the 700-home target within the NP boundary, and so a further **292** dwellings would be required. However, it should be noted that the overall EHDC housing requirement total for Alton is 1700.

The NP Steering Group consider that the EHDC proposed allocation to Neatham Down does not serve the future of Alton well and is substantially unsustainable.

There appeared therefore to be two significantly different options for allocation on the Scenario 4 sites (South Alton), as follows:

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1. One alternative, instead of EHDC having to allocate Neatham Down, is for the NP to allocate Scenario 4 (without land at Holybourne) to deliver **1700** homes. This could be done by allocating

- 1,080 at South Alton
- 408 from Senario 2
- 212 from town NDO/windfall/brownfield sites;

In that case, as the full allocation for Alton has been achieved, there would then be no need or rationale for EHDC to allocate Neatham Down in the Local Plan.

However, when this initiative was communicated to EHDC Alton Ward Councillors and Officers, strong and enduring resistance was encountered, as follows:

- From a town perspective, a proposal to allocate any land at Selborne Road/Windmill Lane would precipitate a strong pushback from the community. This was immediately apparent from a currently ongoing petition and a robust Windmill Hill & Fields Appreciation Facebook group.
- From an EHDC Officer perspective, the Steering Group were urged not to seek to make an allocation to compete with the EHDC emerging draft Local Plan, as in their view this would be a Strategic Allocation and, they believed, outwith the legitimacy of a Neighbourhood Plan. Additionally any development in South Alton area would compromise South Downs National Park (SDNP) intent to maintain unhindered views outwards from with the Park (contravening para 176 of the NPPF). The Neighbourhood Plan Steering Group had previously received a communication from SDNP confirming that they would object should development be proposed in this area. (See letter dated 27 September 2023 in the NP evidence base).

2. Alternatively, just the **292** outstanding homes from Scenario 2 could be allocated to the South Alton area. This appears to have several key risks:
 - Firstly, if part of the South Alton sites are built upon, there must be an acceptance in principle that all of these LAA sites will eventually come forward for development. With the development of the satellite village at Neatham Down forming an extension to Alton, that implies that by 2040 the town will potentially grow by between 2,200 and 2,700 homes. This would represent an almost fifty percent increase in Alton's population over its present level.
 - Secondly, allocating only part of the land may undermine the delivery of many non-housing benefits (schools, playing fields, community facilities, doctors' surgeries and the like) as there will be insufficient value created by 292 homes to meet 'big ticket' infrastructure costs. It is possible that a developer of later phases may argue that the residual housing numbers cannot meet those costs if they are not committed in a planning consent and Section 106 Agreement for the earlier phases.
 - Thirdly, the benefits of removing through traffic from the town might be lost if these sites are developed piecemeal, rather than as a whole which could provide a through route linking Selborne Road (B3006) with Wilsom Road (B3004).
 - Fourthly, the objections of South Downs National park would remain, regardless of the size of the development.

There are other factors to consider.

- Firstly, although the proposed development of 1000 homes at Neatham Down is reasonably self-contained, it will be too remote from the town to be capable of proper integration, thereby having the potential to be car dependent.
- Secondly, it offers the town no obvious advantage – it is not sufficiently remote from the town to be of no impact but is too remote to share its infrastructure (for example primary school places) without generating many more car journeys.

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- Thirdly, although the argument of the Local Plan (and its Sustainability Appraisal and evidence base) in favour of Neatham Down is not yet known, it would seem that it will not compare well with the locational and infrastructure provision advantages of the alternative South Alton location.

In summary, considering feedback from residents, Councillors and EHDC Officers, any pursuit of land at South Alton (Scenario 4) or Holybourne (Scenario 3) would seem to be unacceptable. The significant weight of pushback by means of e-mails, letters, social media and petitions to these potential site allocations was such that the NP Steering Group were effectively boxed in on the decision-making process, as the draft Neighbourhood Plan must firstly satisfy East Hampshire District Council and secondly be acceptable to a majority of Altonians voting in a referendum.

3.2 Options

The options open to the Steering Group were therefore as follows.

- Do not allocate any sites. This would then become the responsibility of the District Council, who have the flexibility of being able to reallocate sites within the District as seems appropriate to them to meet their District-wide targets.
- Allocate sites to meet the full requirements identified in the emerging Local Plan (i.e. 700 dwellings). This is not possible without allocating sites at either Holybourne, or South Alton, or both.
- Allocate sites to meet some of the requirements identified in the emerging Local Plan. It is not possible to meet the full 700 home allocation for Alton, and the identified shortfall of 292 homes is significantly below the provision required by the District Council.

3.3 Decision

Based on the analysis set out above it was agreed that, if it is to succeed at referendum, the Steering Group had no other option than to make **no allocation** of sites in its revised Alton Neighbourhood Plan.

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Table 1 : Scenario Site & Allocated Details as Updated with 2023 EHDC LAA (Ver1.3 Feb 24)					
Map Ref	Site name	LAA Reference	Area (ha)	Housing Number	Scenario
1	208-212 London Road, Holybourne	LAA/AL-001	0.25	5*	3
2	St John's Works, Station Road, Alton	LAA/AL-003	0.12	10	1
3	Cowdray Park, Alton	LAA/AL-004	2.53	(61)***	4
4	Land at Brick Kiln Lane and Basingstoke Road	LAA/AL-005	21.31	140-150	2
5	Land at Weysprings, Alton	LAA/AL-013	7.73	30	4
6	Land at Weysprings Park	LAA/AL-014	4.94	(44)***	4
7	Land at Manor Estate	LAA/AL-017	0.16	6	1
8	Land east of Old Odiham Road, Alton	LAA/AL-018	6.34	(93)*	2
9	Windmill House, Windmill Lane, Alton	LAA/AL-019	2.96	15	4
10	Lindsey's Field (N), South of Water Lane	LAA/AL-020	6.82	(41)***	4
11	Lindsey's Field (S), South of Water Lane	LAA/AL-021	6.49	(39)***	4
12	21 Winchester Road, Alton	LAA/AL-023	0.51	14	2
13	Land at Albany House, 5 Omega Park	LAA/AL-028	0.53	7	1
14	Land west of Old Odiham Road	LAA/AL-029	10.11	(101)*	2
15	Land at Selborne Road	LAA/AL-035	24.9	(430)***	4
16	Alton Convent School, Car Park	LAA/AL-038	0.38	6	1
17	Selborne Road Alton	LAA/AL-041	1.72	81	1
18	Cobblestone, Wilsom Road	LAA/AL-048	0.2	5	1
19	Alton Convent School, Car Park	LAA/AL-054	6.6	20	1
20	Land north of A31, Alton	LAA/AL-056	52.34	650	4

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21	Land North of Gilbert White Way	LAA/AL-059	15.3	(107)*	2
22	Land at London Road Holybourne	LAA/AL-060	?	101	3
23	Land at Berehurst		0.22	0	1
24	Land at Fontwell Drive		0.41	0	1
25	Rogers Court Car Park		0.05	0	1
26	St Lawrence Vicarage		0.24	0	1
27	Bank Car Park			0	1
28	Former Post Office		0.32	0**	1
29	Garages at Whitedown	Multiple ownership	0.21	0**	1
30	Cinema at Normandy Street	-	0.06	0	1
31	Town Centre Car Parks			0**	1
32	Victoria Rd Car Park		0.2	0**	1
33	Mount Pleasant Car Park		0.26	0**	1
34	Turk Street Car Park		0.2	0**	1
35	Iceland Car Park (Ringo)		0.43	0**	1
36	Lady Place Car Park		0.75	0**	1
37	Garages around Jenner Way		-	0**	1
38	West of Link Road		0.1	0**	1
39	East of Link Road		0.13	0**	1
40	Corner of Beaverstocks		0.02	0**	1
41	West of Beaverstocks		0.2	0**	1
42	Alton Jobcentre		0.066	0**	1
Outside Neighbourhood Plan Area					

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43	Land at Chawton Park Farm	LAA/ CHA-002+004 -00	84.97	855	
44	Land at Whitedown Lane	LAA/BEE-010	9.01	90	2
45	Land at Neatham Manor	LAA/BIN-010 + 011	125.17	1000	
46	Travis Perkins	LAA/CHA-009	1.21	24	2
	*** = Part of LAA/AL-056 ** = Scenarios 1 sites selected, but no LAA, however possible NDO action. * = sites appearing in 2023 EHDC LAA, but not selected due to suitability.				

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Table 2 : Selected Sites Summary with EHDC 2023 LAA Updates Applied (Ver1.3 Feb

Map Ref	Identification	Scenario							
		Original Scenario 1	EHDC 2023 LAA Update	Original Scenario 2	EHDC 2023 LAA Update	Original Scenario 3	EHDC 2023 LAA Update	Original Scenario 4	EHDC 2023 LAA Update
1	208-212 London Road, Holybourne					5		12	
2	St John's Works, Station Road Alton	24	10						
3	Cowdray Park, Alton							57	
4	Land at Brick Kiln Lane and Basingstoke Road			200	150				
5	Land at Weysprings Alton							70	30
6	Land at Weysprings Park							44	
7	Land at Manor Estate		6						
8	Windmill House, Windmill Lane, Alton							33	15
9	Lindsey's Field (N), South of Water Lane							80	
10	Lindsey's Field (S), South of Water Lane								
11	21 Winchester Road			14	14				
12	Land at Albany House, 5 Omega Park		7						
13	Land at Selborne Road							430	
14	Alton School Car Park		6						
15	Land at Selborne Road*	0	81						
16	Cobblestone, Wilsom Road	5							
17	Alton School Car Park	0	20						
18	Land north of A31							354	650

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19	Land at London Road Holybourne					223	101		
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Table 2 : Selected Sites Summary with EHDC 2023 LAA Updates Applied (Ver1.3 Feb 24)

Map Ref	Identification	Scenario							
		Original Scenario 1	EHDC 2023 LAA Update	Original Scenario 2	EHDC 2023 LAA Update	Original Scenario 3	EHDC 2023 LAA Update	Original Scenario 4	EHDC 2023 LAA Update
20	Land at Berehurst	6	0						
21	Land at Fontwell Drive	8	0						
22	Rogers Court car park	6	0						
23	St Lawrence Vicarage	15	0						
24	Former Post Office etc	36	0						
25	Cinema, Normandy St	4	0						
26	Town Centre car parks	168	0						
27	Garages around Jenner Way	26	0						
28	Garages Gilbert White Way	4	0						
29	Job Centre site	10	0						
30	Land at Travis Perkins				24				
31	Land at Whitedown Lane				90				
Totals		312	130	214	278	228	101	1080	695
Old Cumulative Scenario Totals		312		526		754		1034	
New Cumulative Scenario Totals			130		408		509		1204
32	Neatham Down								
34	Windfalls (not included)	0	(212)						

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