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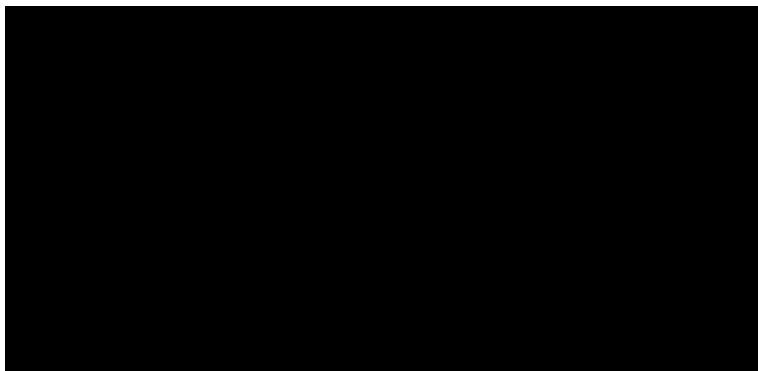
Dear Sir / Madam,

I am pleased to provide the attached representation to the Local Plan 2021 – 2040 consultation.

The attached includes comments on:

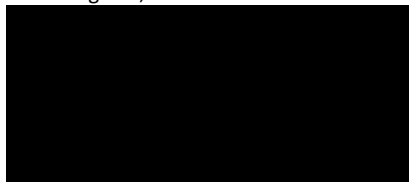
- Vision and Objectives
- LP Chapter 3 – Managing Future Development
- LP Chapter 4 – Responding to the Climate Emergency
- LP Chapter 9 – Homes for All
- LP Chapter 12 – Site Allocations

The representations are prepared by Boyer, on behalf of Wates Developments. Details as follows:



I should be grateful for confirmation of safe receipt.

Kind regards,



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Land North of Gilbert White Way, Alton

Representation to Local Plan Regulation 18
Consultation



Boyer

REPORT CONTROL

| | |
|-------------------------------------|--|
| Project: | Land North of Gilbert White Way, Alton |
| Client: | Wates Developments |
| Reference: | 22.1092 |
| Document and revision number | Document No. IMS-F-08, Revision 2 |
| File Origin: | Click to add file location. |
| Primary Author | LB / DGN / CR |
| Checked By: | SC |

| Issue | Date | Status | Checked by |
|-------|------------|--------|------------|
| 1 | 19/02/2024 | Draft | |
| 2 | 29/02/2024 | Final | |
| | | | |

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APPENDICES

Appendix 1. Site Location Plan

Appendix 2. Vision Document

Appendix 3. Crawley Local Plan Examination - Post Hearing Letter Extract

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1. INTRODUCTION

Background

- 1.1 This representation is submitted by Boyer, on behalf of Wates Developments ('Wates'), which is promoting Land North of Gilbert White Way ('the site'), for allocation in the emerging 'East Hampshire Local Plan, 2021 to 2040'. A Location Plan is provided at **Appendix 1: Site Location Plan**. The representation responds to the current Regulation 18 Consultation on the 'Draft Local Plan 2021-2040' (the 'Draft Local Plan') and the 'Integrated Impact Assessment for the East Hampshire Local Plan', both published in January 2024.
- 1.2 Wates welcomes the opportunity to comment on the consultation documents and supports the preparation of a new Local Plan, which will shape development within East Hampshire up to 2040. The production of this new Plan is essential to meet future housing needs and address other key priorities, such as promoting sustainable development and addressing the potential impacts of Climate Change.
- 1.3 We have specifically sought to comment on policies and matters that are directly or indirectly pertinent to the promotion of Wates' land interests. However, we also comment more widely when appropriate and where it is considered that this assists in the creation of a Plan which meets the tests of soundness.

Scope of this Representation

- 1.4 Our comments regarding the site are made in the context of the 'tests of soundness', as set out at paragraph 35 of the National Planning Policy Framework, 2023 ('NPPF'). These tests specify that for a Plan to be sound, it must be;
 - (a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.*
 - (b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - (c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 - (d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework."*

Structure of this Report

1.5 Consistent with the scope described above, where possible we have sought to align the structure of these representations with the Consultation Document.

1.6 Accordingly, the remaining sections of this report are:

- Section 2 – Local Plan Chapter 2 – Vision and Objectives
- Section 3 – Local Plan Chapter 3 – Managing Future Development
- Section 4 – Local Plan Chapter 4 – Responding to the Climate Emergency
- Section 5 – Local Plan Chapter 9 – Homes for All
- Section 6 – Local Plan Chapter 12 – Site Allocations

2. LOCAL PLAN CHAPTER 2 – VISION AND OBJECTIVES

Proposed Vision

2.1 At page 24, the Draft Local Plan sets out an overall vision as follows;

“By 2040 and beyond, our residents will live in healthy, accessible and inclusive communities, where quality affordable homes, local facilities and employment opportunities in sustainable locations provide our communities with green and welcoming places to live, work and play and respond positively to the climate emergency.”

2.2 Wates supports the overall vision. The vision is further articulated through three overarching objectives.

Proposed Objectives

Objective A: Providing Sustainable Levels of Growth through the Local Plan

2.3 Objective A sets out that the Plan seeks to;

“...provide a sustainable level of housing growth to meet future housing needs and to provide homes for all, helping to deal with the issues of affordability and an ageing population.”

2.4 At the A2, it is then indicated that the Local Plan will;

“...identify and maintain a flexible and varied supply of land and buildings for business that is the right type and in the right location, including the rural areas.”

2.5 Wates agrees with the above and supports the provision of housing in sustainable locations. However, it is vital that this aspiration is adequately secured by the policies proposed in the Local Plan, including the suite of allocations identified. As detailed in this representation, Wates does not agree that the Draft Plan achieves this in its present form.

Objective B: Providing Better Quality, Greener Development in the Right Locations

2.6 Wates agrees that new developments must be sustainably located and improve the quality of built and green environment. This includes working towards net zero carbon emissions.

2.7 However, the Government has recently confirmed that Local Plans are not expected to include policies that go beyond standards expressed in Building Regulations. This is unless such policies are robustly justified and costed. Wates is concerned that the Draft Local Plan (at this stage) has not adequately assessed the costs and ramifications of the proposed Climate Change / net zero carbon policies. This matter is assessed within Section 4 of this representation.

Objective C: Prioritising the Health and Well-being of the Community in Delivering What's Needed to Support New Development

- 2.8 Wates supports the principle of Objective C, ensuring that suitable infrastructure is available to support public access and opportunities and address future needs. However, this highlights the importance of allocating sites that are both sustainable and deliverable in order that infrastructure (and policy-compliant levels of affordable housing) are brought forward as the Plan intends.

3. LOCAL PLAN CHAPTER 3 – MANAGING FUTURE DEVELOPMENT

Policy S1 Spatial Strategy

- 3.1 Draft Policy S1 sets out a proposed Spatial Strategy. Wates agrees with the broad strategy for distributing growth, as per the Key Diagram on page 37 of the Draft Local Plan, and in accordance with the Settlement Hierarchy identified in Policy S2 (and as discussed below).
- 3.2 Wates is nonetheless concerned that the envisaged Spatial Strategy fails to propose an appropriate Housing Requirement. Wates has three fundamental concerns;
1. The lack of provision for unmet needs arising from the South Hampshire authorities & the Duty-to-Cooperate;
 2. The appropriate Housing Requirement for years 2021/22 to 2022/23 of the Plan period; and,
 3. The significant need for affordable housing, which is not fully addressed.
- 3.3 The proposed Housing Requirement is more fully explained in Chapter 9 of the Draft Local Plan 'Homes for All'. Wates, therefore, provides detailed comments under the equivalent section of this representation (Section 5).
- 3.4 However, the consequences of the above are that the housing requirement must necessarily be revised upwards. This, in turn, necessitates a revisiting of the proposed Spatial Strategy. To assist in redressing these concerns, Wates promotes the Land North of Gilbert White Way at the Tier 1 settlement of Alton.

Policy S2 Settlement Hierarchy

- 3.5 At Policy S2 'Settlement Hierarchy', the emerging Local Plan identifies Alton as the single Tier 1 settlement with the highest potential for sustainable growth. This is due to its greater access to public transport and the presence of high-level services and amenities.
- 3.6 Wates agrees with the proposed hierarchy, noting that Alton is evidently the key urban centre in the Plan Area. The locational sustainability of Alton, whilst conspicuous, is substantiated in the 'Settlement Hierarchy Background Paper' (2022), which comprises an important part of the Local Plan evidence base.
- 3.7 Wates further agrees that it is appropriate to treat Holybourne and Alton as a single settlement for the purposes of the Settlement Hierarchy and the Spatial Strategy. This is in recognition of Holybourne's functional economic, transport and housing market relationship with Alton.
- 3.8 Wates' interests at Land North of Gilbert White Way, Alton (LAA ref: AL-059) should be considered to represent an accessible site that is well-placed to assist in meeting identified housing needs. Wates is concerned, then, that the site has not been identified for allocation despite it being assessed by the Council as a more suitable candidate site than some of the sites that are proposed for allocation at the town. This is further detailed in Section 6 of this representation.

4. LOCAL PLAN CHAPTER 4 – RESPONDING TO THE CLIMATE EMERGENCY

Policy CLIM1: Tackling the Climate Emergency

- 4.1 In principle, Wates supports the aspirations set out in Draft Policy CLIM1. Clearly, developments should contribute to mitigating future Climate Change, adapting to its impacts and helping society meet local, national and internal climate-related objectives. Indeed, many of the overarching principles, such as those relating to identifying sustainable locations for development, promoting active travel modes and taking into account environmental constraints, are entirely reasonable, achievable and consistent with good practice.
- 4.2 However, Wates is concerned that Draft Policy CLIM1 (as an overarching policy that is cross-related to Draft Policies CLIM2, CLIM3 and CLIM5) seeks to introduce concepts such as embodied / whole life cycle net zero as requirements for new developments. These are concepts that are not yet readily implemented or implementable across the development industry and the construction supply chain.
- 4.3 The document 'Provision of Professional Advice & Guidance to Inform Net Zero Carbon Planning Policies' (December 2023), which forms part of the evidence base, provides some examination of the cost impacts of the enhanced net zero carbon building/design measures proposed. However, as indicated on page 13 of that document, the study did not actually test the embedded carbon and 'whole life' emissions standards proposed in Draft Policy CLIM3 (as detailed below). That is a significant omission.
- 4.4 The East Hampshire Net Zero Evidence Base Study' (2023), on pages 95 to 97, does give some initial consideration to cost implications. It suggests that build costs, resulting from these policies, are likely to be (on average) 3% to 5% higher than the already uplifted Part L 2021 standards, which are in turn an average of 4.3% higher than the Part L 2013 standards. It should be noted that the percentage increases are also much higher for detached and semi-detached dwellings when compared to flats.
- 4.5 Moreover, this study's assessment of cost implications is subject to significant caveats. For example, the report (on page 40) explains that it does not take into account the impact of high levels of inflation, saying this is outside of its scope. That is another significant omission, which suggests that the report cannot be relied on when considering the overall viability of development across the Plan area.
- 4.6 In a similar vein, it is concerning that the Plan, which is clearly well advanced in relation to its emerging approach to Climate Change-related policies, is not accompanied by an up-to-date assessment of Plan-wide viability. The most recent assessment of viability appears to be that undertaken in 2019. There has evidently been a period of high inflation since the last assessment was concluded, and this has significantly impacted the construction industry.

- 4.7 The Council has not (at this stage at least) appropriately tested the implications of the net zero carbon policies it now proposes, including in terms of viability implications for the provision of infrastructure and affordable housing and, indeed, the deliverability of the Plan as a whole. This casts doubt on the Plan's *effectiveness*, which is a matter of soundness.
- 4.8 The approach also raises concerns in relation to a recent Written Ministerial Statement (WMS), published 13 December 2023 by Lee Rowley MP (Minister for Housing). This outlines that the Government does not expect Plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations.
- 4.9 The WMS states that the proliferation of multiple local standards by different Local Authorities can add further costs to building new homes by adding complexity and undermining economies of scale. Accordingly, the WMS clarifies that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at Examination if they do not have a well-reasoned and robustly costed rationale.
- 4.10 Wates appreciates that a further assessment of Plan-wide viability is intended to be undertaken in support of the future Regulation 19 consultation. However, at this stage, the absence of a robust assessment of the cost implications associated with draft policies CLIM1 to CLIM5 (that accounts for recent inflation) means that a key feature of the Plan remains untested.
- 4.11 Therefore, whilst Wates certainly supports the principles and direction of travel that the Council are seeking to achieve through the Plan's emerging net zero carbon policies, they cannot be regarded as *justified* and *effective*, against the tests of soundness.

Policy CLIM2: Net-zero Carbon Development: Operational Emissions

- 4.12 As indicated, Wates supports the move towards net zero carbon, and the development industry has a key role to play in supporting this agenda. To this end, Draft Policy CLIM2 sets out a range of standards that (in summary) prohibit the use of fossil fuels for the purposes of heating or cooking. The policy also limits heating and electricity demands, and development should generate the same amount of renewable energy (on-site) to match their operational demand.
- 4.13 Whilst the provision of renewable sources of energy is improving, Wates' primary concern with the requirements outlined within CLIM2 is that the timescales are not achievable and in line with the rate of national / government support for the transition within the construction industry. It is certainly questionable whether or not the house building sector, its supply chain and workforce, will be capable of providing these requirements at the time of the Local Plan's adoption in 2025/26.

- 4.14 It is relevant that many major housebuilders have signed-up to the House Builder Federation (HBF) 'Future Homes Delivery Plan', which sets out how the industry will transition to net zero carbon. This process of transition requires an interim step, with new homes being expected to be 'net zero carbon ready' in the short-term, and fully net zero carbon in the medium-term.
- 4.15 Given the wide remit of the HBF, the Future Homes Delivery Plan provides a good indication of what the housebuilding industry considers to be possible. On this basis, Wates recommends that any future Local Plan policy requirements (as may be proposed to help address the Climate Emergency) reflect this necessary intermediate step. This is consistent with the approach expected by the Government, as outlined in the recent WMS.
- 4.16 A related concern is that the draft policy expects 100% of energy consumption (required by new residential homes) to be generated on-site via renewable energy generating schemes. This may well be achievable in some instances, but in many other instances, this will be impractical. The supporting text to the draft policy (in paragraph 4.25) does acknowledge this and makes some allowances.
- 4.17 Nonetheless, the Council does not appear to have estimated the proportion of future developments where it expects this policy requirement to be successfully met in practice. This is relevant because developments on greenfield sites typically have greater flexibility regarding the layout and orientation of plots than do brownfield redevelopments. This could have a bearing on the plan's overall strategy and approach to site allocations. This is to say that the Plan may be more likely to address energy generation objectives through the allocation of additional greenfield sites.
- 4.18 Likewise, the suggestion (made in paragraph 4.27 of the Draft Plan) that completed developments will need to monitor actual energy use (and report this to the Council) will likely have practical implications, which the Plan, as currently drafted, does not appear to have explored.
- 4.19 Overall, Wates considers that a transitional approach to domestic energy usage is necessary. This would reflect the fact that most residential developments can only become fully net zero carbon (in terms of operational energy consumption) when the wider power generation network is free from carbon-based power stations. For housing developments to become net zero in advance of the transition of the wider grid, they effectively need to achieve self-sufficiency in terms of energy generation. In most instances, achieving self-sufficiency will simply not be practical.
- 4.20 Wates reiterates that impacts on viability will require careful consideration and is surprised that a new Plan-wide Viability Assessment has not been progressed, given the prevailing focus (in the emerging Plan) on net zero policies.

Policy CLIM3: Net-Zero Development: Embodied Emissions

- 4.21 Wates supports the underlying principle of this policy. However, the complexities and implications arising from it serve to highlight why such matters should be led by the national Government. Specifically, CLIM3.2 proposes that developments of 10 or more homes will be required to calculate and report the development's life-cycle emissions within a 'Whole Life Carbon Assessment'.
- 4.22 In seeking to justify this, the '*Provision of Professional Advice & Guidance to Inform Net Zero Carbon Planning Policies (2023)*' document states in paragraph 3.2.3.3. that;
- "This is an aspect of design that is within the developer's ability to control, and within EHDC's ability to influence."*
- 4.23 It also states at 3.2.4 that;
- "From a developer's perspective, policies CLIM2 and CLIM3 are significant because they will require a change in 'business as usual' construction practices, in terms of masterplanning/ site layout, building design, and onsite quality control procedures. They will also require different forms of evidence to be submitted as part of the planning application. For larger developments of 10 or more new homes, Policy CLIM3 would require developers to focus on minimising embodied emissions from the very outset. This may require changes to their project management arrangements."*
- 4.24 In practice, developers are beholden to supply chain and manufacturing processes over which they have limited control. If the manufacturing sector that sits behind the construction industry is not yet able to deliver net zero embodied inputs, then it will be impractical for developers to deliver new homes that meet this requirement. It is also acknowledged in the report (in paragraph 3.2.4, page 9) that the construction workforce is not yet sufficiently skilled to deliver this policy. Likewise, the report also explains that EHDC also lacks the in-house expertise to administrate such a policy effectively.
- 4.25 Furthermore, at 3.2.5, it is added that the;
- "Costs of reducing embodied emissions (CLIM3) are more difficult to quantify as there has been significantly less research in this field compared to operational carbon emissions."*
- 4.26 Wates, therefore, considers that a move to embodied net zero carbon, particularly the 'cradle to grave' definition of this proposed in Policy CLIM3, is essentially untested and without clear precedent when applied to Plan-making. Indeed, such a proposal effectively rests on a transformation of the wider construction industry and supply chain, which would require a platform of Government support. This goes beyond what a Local Plan in East Hampshire can reasonably hope to achieve.

- 4.27 Noting our previous comments regarding the absence of robust costing and the omission of an up-to-date assessment of Plan-wide viability, Wates considers that the provisions of CLIM3.2 are not merited at the present time. As such, Policy CLIM3 should be modified through the removal of CLIM3.2. This is necessary to ensure the Plan's *effectiveness* and to reflect that lack of credible *justification* within the evidence base.

Policy CLIM5: Climate Resilience

- 4.28 Compared to proposed policies CLIM 1, 2 and 3, Wates considers that draft Policy CLIM5 represents a more realistic and achievable proposition, as it focuses on best-practice measures to allow for passive / cooling, preventing overheating, providing natural shade and promoting rainwater collection.
- 4.29 Wates would remark that the proposal in CLIM5.3 that new residential gardens be oriented to allow for food production is clearly only going to be feasible in some instances. Indeed, this part of the policy may conflict with wider urban design considerations (such as organising development into perimeter blocks or achieving suitable densities).
- 4.30 As such, the policy wording should be reflected to include the words "where feasible". This is necessary to ensure it is effective as a test of soundness.

5. LOCAL PLAN CHAPTER 9 – HOMES FOR ALL

Policy H1 – Housing Strategy

- 5.1 In Draft Policy H1, it is indicated that of the 3,500 additional homes proposed to be delivered by the Draft Local Plan, 1,700 dwellings (circa 56% of the total) will be provided at Alton. This is broadly consistent with the Spatial Strategy and Settlement Hierarchy outlined in draft Policies S1 and S2. Wates agrees that Alton, as the only settlement in Tier 1, should accommodate a high proportion of the growth envisaged in the Plan.
- 5.2 Nonetheless, further consideration must also be given to the opportunities presented by directing further additional growth to Alton. The settlement contains some of the most deprived wards within the District and whilst the town centre economy performs reasonably well (as noted in the Draft Local Plan), it is still facing challenges.
- 5.3 Housing development comprises a central aspect of promoting the regeneration of an area; indeed, this comprises a core tenet of the Government's Levelling Up agenda. The introduction of an additional quantum of households to Alton would comprise an important component in maintaining the viability of its services and amenities in the longer term.
- 5.4 Wates considers that allocation of the Land North of Gilbert White Way, Alton, represents an excellent opportunity to assist in the wider regeneration of Alton in this regard. Indeed, Wates' high-quality development would provide flexibility and choice in the supply of new homes to households wishing to locate close to the well-connected Tier 1 Settlement, which has an unparalleled range of services in East Hampshire.
- 5.5 This approach would be consistent with Objective A of the Draft Local Plan, as the Spatial Strategy seeks to provide homes to address needs, but also to facilitate economic growth ambitions within the District. Objectives B and C would also benefit from the introduction of an allocation for residential development at the Land North of Gilbert White Way, Alton.
- 5.6 Overall, Wates supports the Housing Strategy's focus on Alton. However, Wates does not agree with the Housing Requirement identified in the Draft Policy H1, as detailed below.

Housing Requirement

- 5.7 Wates does not support the overall Housing Requirement identified in the Draft Local Plan. Indeed, in setting the appropriate Housing Requirement, Wates maintains that the Draft Local Plan has not sufficiently addressed three foundational areas, namely;
1. Provision for unmet needs arising from the South Hampshire authorities & the Duty-to-Cooperate;
 2. The appropriate Housing Requirement for years 2021/22 to 2022/23 of the Plan period; and,
 3. The significant need for affordable housing specifically.

- 5.8 Once these considerations are sufficiently accounted for, Wates considers that EHDC's proposed Housing Requirement must necessarily be revised upwards. This is further considered below.

Unmet Need & the Duty to Cooperate - Legislative and Policy Context

- 5.9 Section 33a of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to cooperate with other authorities, the relevant County Council, and prescribed bodies or other persons in relation to the preparation of an emerging Plan.
- 5.10 The Duty requires Councils to engage constructively, actively, and on an ongoing basis in the preparation of the Plan insofar as it relates to a strategic matter. A strategic matter includes the sustainable development and use of land that has or would significantly impact at least two planning areas, such as housing allocations and unmet needs.
- 5.11 Government policy, set out in paragraph 26 of the NPPF (December 2023), states that “...*effective and ongoing working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy*”. It goes on to state, in particular, that “...*joint working should help determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere*” (emphasis added). Co-operation, therefore, is about maximising the effectiveness of plan preparation.
- 5.12 The NPPF makes clear that the Duty is not simply a bureaucratic exercise, but one which is fundamental to ensuring that Local Plans are *effective* and *positively prepared*. Cooperation, therefore, is about maximising the effectiveness of plan preparation. Indeed, paragraph 35 of the NPPF makes it clear that a Local Plan will be found to be ‘positively prepared’ where it meets an area’s objectively assessed need and where unmet need from neighbouring areas is accommodated where practical to do so.

Unmet Need & Duty to Cooperate

- 5.13 The Draft Local Plan recognises that the Standard Method of calculating Local Housing Need (‘LHN’) does not take account of the provision of unmet need from other local authorities in the area; specifically, from the southern Hampshire authorities.
- 5.14 The Draft Local Plan acknowledges that there are several authorities within the southern extent of Hampshire that are unable to meet their own housing requirement. Indeed, the Draft Local Plan makes note of the latest Partnership for South Hampshire (‘PfSH’) Spatial Position Statement, which sets out the significant level of unmet need amongst the PfSH Authorities. This equates to some 11,771 dwellings up to 2036¹.
- 5.15 Importantly, the report also identifies that of the Southern Hampshire Local Authorities, only Fareham and Test Valley have a ‘surplus of supply’, and Winchester is noted to be at an ‘equilibrium’. All other Authorities are identified as being in ‘deficit’, with a corresponding shortfall in future housing supply.

¹ At Table 1: Comparison of housing need and supply 2023 – 36. Page 97 of the Committee papers.

- 5.16 Despite this recognition, the Draft Local Plan makes no provision for assisting in meeting this significant level of unmet need. The Housing Background Paper provides that '*... whilst no assumptions have been made on the unmet in South Hampshire that should be addressed by East Hampshire, it is considered that any dwellings surplus to the identified requirements in this Local Plan could go some way to potentially address those unmet needs*'.
- 5.17 Clearly then, the Council recognises the functional relationship between East Hampshire District and the remaining PFSH authorities. Therefore, it is disappointing that the Draft Local Plan makes no specific provision for this significant unmet need. Furthermore, there is no justification given for the Council to take this position.
- 5.18 East Hampshire District (outside of the SDNP) is relatively unconstrained when compared to many Local Authority Areas within South Hampshire. Wates, therefore, contends that the omission of a specific figure to meet the unmet needs of these authorities is wholly inadequate when compared to the scale of unmet needs and the proportion of that need which could reasonably be accommodated within the East Hampshire District.
- 5.19 Furthermore, the Draft Local Plan presents the 'buffer' over its own perceived housing needs as being necessary for the District to ensure that its own housing requirement will be met, with any surplus then being capable of assisting in meeting the unmet needs of South Hampshire.
- 5.20 However, the proposed 'buffer' cannot mutually serve these dual purposes, making it unclear what (if any) provision the Draft Local Plan makes to meet unmet needs within South Hampshire. Indeed, in this scenario, it would only become clear what contribution is capable of assisting with those unmet needs at the close of the Plan Period (i.e., once the Housing Requirement has been accounted for).
- 5.21 Such an approach introduces further confusion to the derivation of housing targets among the other PFSH authorities, as it will not be clear whether their unmet needs have been accounted for or otherwise. Wates, therefore, considers that a specific contribution toward the unmet needs of the PFSH authorities must be identified and accounted for to ensure an *effective* approach.
- 5.22 For the reasons set out above, Wates holds significant concerns regarding the approach to the Duty-to-Cooperate and the issue of unmet need as currently formulated in the Draft Local Plan. The proposed approach is not considered to be *justified, effective* or *consistent with national planning policies*.
- 5.23 Furthermore, the Duty-to-Cooperate remains a matter of 'legal compliance', wherein any failure to address the requirements represents a risk to the *soundness* of the draft plan as a whole. Wates, therefore, recommends that EHDC revisit its approach, such that it makes specific provisions to accommodate the significant identified level of unmet need arising from the Southern Hampshire authorities.

- 5.24 To assist in resolving this issue, Wates firmly contends that the Land North of Gilbert White Way, Alton, should be allocated for residential development. The site is *available*, *suitable* for residential development, and *achievable* within the early part of the Plan period, as detailed elsewhere in this representation. Allocation of the site at the Tier 1 Settlement of Alton would be consistent with the proposed Spatial Strategy, per the Settlement Hierarchy.

The Appropriate Housing Requirement (2021/22 – 2022/23)

- 5.25 The Draft Local Plan period proposes to cover the 19-year period between 2021/22 and 2039/40. In deriving the Housing Requirement for this period, the Council proposes to utilise the District's Local Housing Need figure, as derived through the Standard Method of calculation, plus a proportion of SDNP's anticipated unmet need. This figure is applied to the entire emerging Plan period.
- 5.26 Wates considers this approach to be fundamentally flawed. The Local Housing Need figure, as derived through the Standard Method, is not functionally capable of meaningfully being applied to a period prior to the base date of the calculation's inputs. It is pertinent that the Standard Method utilises population projections from the relevant base year (in this case, from 2023), alongside housing affordability data (in this case, including up to March 2022).
- 5.27 Therefore, in applying the LHN figure derived in the 2023/24 period to the 2021/22 and 2022/23 periods, the Council retrospectively applies an estimate of housing needs based on population projects that post-date these periods. Furthermore, it is notable that homes completed during the 2021/22 and 2022/23 periods would materially affect the affordability factor applied to the population projections as part of the calculation.
- 5.28 Indeed, to retrospectively apply the Standard Method-derived LHN figure would be inconsistent with PPG, which confirms that the Standard Method seeks to address (albeit indirectly) previous undersupply through the affordability ratio uplift. As currently formulated, the plan artificially, and in our view inappropriately, therefore offsets the forward-looking requirement by artificially reducing the housing requirement for the 2021/22 - 2022/23 period.
- 5.29 In the absence of any explanation and compelling justification, the Housing Requirement for the 2021/22 and 2022/23 monitoring periods should be re-based to reflect the Local Housing Need figure derived at the base dates of those periods. Alternatively, the Council may reasonably rely upon the assessment of housing need, set out in the HEDNA (2022), of 608 dpa for the 2022/23 period.
- 5.30 In proposing to apply the current (2023-based) LHN figure to the 2021/22 and 2022/23 monitoring periods, the Council is miscalculating the level of relevant housing need during those periods. The effect of this would be to 'bake in' the underprovision of housing during these periods moving forward. Such an approach therefore provides an 'artificial' reduction to the housing requirement, by inappropriately applying a lower housing requirement figure during these periods.

- 5.31 Consequently, Wates considers that the Council should utilise the appropriate Local Housing Need figures for the 2021/22 and 2022/23 periods, as derived via the Standard Method calculation, as at 01 April on each of those years. The consequence of re-basing the Housing Requirement in these periods is that the overall housing need would increase.
- 5.32 Furthermore, it is pertinent that paragraph 22 of the NPPF requires that ‘...*strategic policies should look ahead over a minimum 15 year period from adoption*’. In this regard, Wates is concerned that the proposed plan period, which ends in 2040, would not be *consistent with national policy*, insofar as this requirement would not be met.
- 5.33 The emerging Local Plan covers the period 2021/22 – 2039/40, with each constituent monitoring period based on a one-year period running from 1st April through to 31st March the following year. It is noted that the Council’s Local Development Scheme (‘LDS’) (July 2023) anticipates that, at best, the Council is likely to adopt the emerging plan in ‘Autumn 2025’.
- 5.34 Given the proposed plan period covers up to 31st March 2040, the Local Plan would clearly not be capable of looking ahead over a *minimum* 15-year period at the point of adoption. To resolve this issue, the proposed plan period must be extended by an additional year to cover the period up to 2040/41. In doing so, the Housing Requirement must be uplifted to reflect an additional year of LHN.
- 5.35 Relevant in respect of the above, is the recent Examination of the Crawley Borough Local Plan, where the correct calculation of LHN and the length of the plan-period was a matter that was raised by the Local Plan Inspector, and which resulted in proposed Main Modifications to ensure the soundness of the Plan. The points raised by the Inspector are not dissimilar to those that Wates expects may be raised in relation to East Hampshire’s emerging Local Plan. An extract from the Inspector’s Post Hearings Letter is provided at Appendix 3.

Affordable Housing as a Component of Housing Need

- 5.36 East Hampshire District faces a significant need for affordable housing up to 2040, as the Draft Local Plan affirms. The Housing and Economic Needs Assessment (HEDNA) (2022) confirms a net need for 613 affordable homes per annum across the District up to 2040, with some 420 (of these) being outside of the National Park area. This presents a need for 11,647 affordable homes over the 19-year plan period, with 3,667 of those within the SDNP and 7,980 in the Draft Local Plan areas.
- 5.37 To deliver the number of affordable homes needed in the Draft Local Plan area, the Plan would be required to identify a housing supply of approximately 19,950 homes (or 1,050 dpa), assuming a policy requirement of 40% affordable housing is taken forward. However, the Draft Local Plan seeks to provide for less than half of this figure.
- 5.38 Furthermore, the HEDNA (2022) identifies that 193 affordable homes per annum are needed within the SDNP area. The Draft Local Plan recognises that the total number of homes predicted to come forward in the SDNP area is some 100 per annum. Assuming a rate of

40% affordable housing within the SDNP, this would result in an unmet need of some -153 affordable homes per annum arising from the National Park.

- 5.39 Patently, the Draft Local Plan is not currently capable of meeting the District's affordable housing needs. Furthermore, no Plan-wide Viability Assessment is published alongside the Regulation 18 Consultation, and the previous Viability Assessment (2019) is considered significantly outdated at this stage. Therefore, until a new Viability Assessment has been prepared, Wates cannot offer a firm view on whether the suggested 40% affordable housing requirement is feasible on a Plan-wide basis.
- 5.40 Notwithstanding this, it is clear that a requirement significantly above the 40% rate is unlikely to be viable. Indeed, as set out in Table 9 of the Council's Authority Monitoring Report ('AMR') (2023), EHDC has historically only secured an average of 27% affordable housing provision.
- 5.41 This reflects the impacts of prior approval permitted development rights (allowing the change of use of existing office space), the national exemption of minor developments from needing to provide affordable housing, and reduced viability associated with developments on previously developed sites.
- 5.42 Consequently, the only prospect for East Hampshire District to meet its affordable housing need is to allocate a greater amount of housing sufficient to deliver it at a rate of 40%. For this reason, there is a clear case for examining the extent to which further growth could be accommodated within the Draft Local Plan to provide for the delivery of a sufficient amount of affordable housing.
- 5.43 Such an approach would be consistent with national policy insofar as the NPPF (December 2023) provides, in paragraph 60, that '*...it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed...*'. (our emphasis).
- 5.44 In this context, paragraph 63 is clear that '*...Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing...*' (our emphasis).
- 5.45 Indeed, Planning Practice Guidance² is clear that increasing the overall housing requirement may be necessary where this helps to meet the need for affordable housing. Such an uplift would be achievable in this case if the Local Plan's spatial / housing allocation strategy were aligned with this objective. For example, the Local Plan should prioritise the allocation of those sites that are most likely to be free from hard constraints or abnormal development costs and are at the District's highest-order settlement of Alton.
- 5.46 Wates does not consider it to be an *effective* approach to omit the allocation of such *suitable* sites, which could assist in alleviating the demonstrable need for more affordable homes in the near term. EHDC does not appear to have considered the potential for additional growth

² PPG ID: 2a-024-20190220.

to be accommodated for this purpose within the Integrated Impact Assessment ('IIA'), which is a concerning omission.

- 5.47 It is our view that the Council must properly assess and objectively consider the potential to increase the housing requirement to better meet affordable housing needs. Such an over-provision is also necessary to provide flexibility and choice in the supply of new homes and to ensure the effectiveness of the Plan.

Summary

- 5.48 Cognisant of the discussion above, Wates considers that the approach currently formulated within the Draft Local Plan (at Draft Policy H1) fails to address several matters sufficiently. This concerns the need to include provision for unmet needs arising from the South Hampshire Authorities and the Duty-to-Cooperate; the need to re-base the housing requirement for the 2021/22 and 2022/23 periods; the need to increase the plan period and housing requirement accordingly by a further year; and the omission of exploring growth potential to accommodate the significant need for affordable housing specifically.
- 5.49 Wates, therefore, considers that Policy H1 (as relevant to the overall Housing Requirement), as currently formulated, is unsound, as it is *inconsistent with national policy*, it is *not positively prepared*, it is *not justified*, and it is *not effective*.

Policy H2 – Housing Mix

- 5.50 Proposed Policy H2 indicates that Self-Build and Custom Housebuilding proposals will be supported where these comply with other Development Plan policies relevant to the site and location.
- 5.51 Wates supports this approach insofar as no specific requirement is identified for sites to provide a certain proportion of plots for Self and Custom-built homes. Indeed, based on Wates's experience elsewhere, the inclusion of self-built plots within larger developments can create significant problems during the construction stage, creating delays and reducing implementation rates overall.
- 5.52 Wates considers it appropriate that the need for this form of development is treated separately from the overall market and affordable housing needs of the District, as it is often more appropriate for self/custom-build developments to come forward independently.

Policy H3 – Affordable Housing

- 5.53 Wates agrees that the Draft Local Plan must deliver a range of house types and sizes to meet identified housing needs. However, the proposed Policy H3 – Affordable Housing will need to be revised to improve its effectiveness and practical implementation as a development management tool.
- 5.54 In our view, greater clarity is required within the policy with regard to the mix of housing that will be sought through developments, insofar as this should have regard not only to the latest evidence of need but also to the characteristics of the site and the local area.

- 5.55 The second Criteria H3.2 (there appears to be an error with the criteria numbering) currently provides that the types and size of dwellings will be determined on a site-by-site basis, using '*...the most appropriate information that helps deliver the type and size of affordable units needed*'.
- 5.56 Wates considers that this wording is currently too vague to be effective. The lack of specificity as to what sources of information the Local Planning Authority considers relevant in such circumstances introduces confusion to the policy wording, which may result in unnecessary delays to the planning process.
- 5.57 This clarification is particularly necessary, noting East Hampshire's extensive geography, which includes both urban and rural areas in three distinct character areas, where patterns of development and housing needs will be very different.
- 5.58 Wates considers that, in this regard, Policy H3 (as presently drafted) is not *justified*, nor will it be *effective* when used to determine planning applications. Therefore, the draft policy requires revision to introduce greater clarity, rendering it more practical and capable of reflecting the distinct requirements of the District's defined spatial areas.

6. LOCAL PLAN CHAPTER 12 – SITE ALLOCATIONS

6.1 Chapter 12 of the Draft Local Plan identifies 42 sites for allocation to meet housing and economic needs. Wates has no observations of the majority of the proposed allocations. However, it is concerned that the approach to selecting sites for allocation at Alton is not robust and is also inconsistent with the Council's evidence base. This is detailed below.

Reliance on a Review of the Alton Neighbourhood Development Plan

6.2 At Chapter 12, it is indicated that 1,700 homes will be apportioned to Alton. This will comprise the proposed strategic allocation at Neatham Down (1,000 homes), four new housing allocations proposed in the emerging Local Plan (equivalent to 264 homes) and a residual of 436 dwellings to be identified through a review of the Alton Neighbourhood Plan.

6.3 Wates appreciates that Alton Town Council is already working on the Neighbourhood Plan Review and had been expecting to allocate sites for development, to address any pending apportionment in the the Local Plan. However, at **Appendix 4** of this representation is provided a Neighbourhood Plan Steering Group Meeting Note (following a meeting 21 February 2024).

6.4 The Meeting Note confirms that it is no longer the intention of the Steering Group to allocate further sites for residential development. This appears to be based on a misunderstanding of the language and implications of the updated NPPF (December 2023). This suggests that the Alton Neighbourhood Plan Review cannot be relied upon to deliver the 436 homes currently proposed to be apportioned to it.

6.5 Noting this uncertainty, the strategy of the emerging Local Plan (as relevant to Alton) will need to be revised, such that the Plan makes provision for additional housing allocations at the town. This revision is necessary to avoid a shortfall of 436 dwellings, and therefore to demonstrate that the Plan is both effective and justified, as matters of soundness. As detailed below, this should include Wates' site Land North of Gilbert White Way, which is generally very favourable assessed in East Hampshire's evidence base.

Proposed Approach to Alton - Integrated Impact Assessment (IIA)

6.6 Wates supports the general strategy for distributing future housing growth, focusing on Alton as the most sustainable settlement within the Plan area. However, Wates is concerned that Land North of Gilbert White Way, Alton (LAA ref: AL-059) has not been selected for allocation, despite being assessed by the Council as a more suitable candidate site than some of the sites proposed for allocation at the town.

6.7 The 'Integrated Impact Assessment (IIA) for the East Hampshire Local Plan' (2024) identifies a shortlist of sites that were 'sieved out' and, therefore, were not proposed for allocation. The

IIA assesses each site against a set of defined objectives. The IIA assessment of Land North of Gilbert White Way (ref: AL-059) is outlined below in Table 1³.

Table 1 – IIA Assessment of Land N. Gilbert White Way (AL-059)

| IIA Objective | Score | Reference |
|---------------------------|-----------------|-----------|
| IIA1: Biodiversity | Mixed Effect | +/- |
| IIA 2: Carbon Emission | Strong Positive | ++ |
| IIA 3: Climate Change | Neutral | 0 |
| IIA 4: Accessibility | Strong Positive | ++ |
| IIA 5: Safety and Crime | Strong Positive | ++ |
| IIA 6: Skills and Jobs | Strong Positive | ++ |
| IIA 7: Heritage | Neutral | 0 |
| IIA 8: Housing | Positive | + |
| IIA 9: Landscape | Minor Adverse | - |
| IIA 10: Natural Resources | Neutral | 0 |
| IIA 11: Water Quality | Neutral | 0 |
| IIA 12: Pollution | Neutral | 0 |

- 6.8 Appendix F of the IIA assesses sites promoted for development throughout the district. Of the long list of 217 sites assessed, Land North of Gilbert White Way is the **only site** where development results in **just one minor adverse impact against out of the twelve criteria**. This is to say that development at this site would result in no 'strong adverse' effects across the 12 IIA objectives/criteria, with all scores being neutral, mixed, or positive.
- 6.9 Following this, Land North of Gilbert White Way scores favourably when considered against the body of sites assessed at Alton. This includes when the site (currently an omission site) is compared to those proposed for allocation. Indeed, Table 2, overleaf (extracted from Appendix F of the IIA) sets this out very clearly.
- 6.10 Land North of Gilbert White Way achieves the most 'strong positive' scores out of all the shortlisted parcels at Alton and would result in no strong adverse impacts. This is the Council's assessment, and on this basis, the site should be allocated in preference to those less suitable sites currently proposed for allocation.

³ No adjustments are made to the IIA evaluation in Table 1 – this is simply extracted from the IIA.

Table 2 – IIA shortlisted sites within Alton

| East Hampshire Local Plan Site Allocation Options, High Level Assessment Score Summary | | IIA Objective | | | | | | | | | | | |
|---|--|---------------|-----|-----|-----|-----|-----|-----|-----|-----|------|------|------|
| Site ref. | Name | SA1 | SA2 | SA3 | SA4 | SA5 | SA6 | SA7 | SA8 | SA9 | SA10 | SA11 | SA12 |
| AL001 | 106-210 London Road, Holybourne | 0 | ++ | - | - | - | - | - | + | - | - | - | - |
| AL003 | St John's Works, Station Road, Alton | 0 | ++ | - | ++ | ++ | - | ? | + | 0 | 0 | - | - |
| AL004 | Cowdrey Park, Alton | 0 | ++ | 0 | - | ++ | ++ | ? | - | - | - | - | 0 |
| AL005 | Land at Brick Kiln and Bevington Road | - | - | - | - | - | - | ? | ++ | - | - | - | - |
| AL013 | Land at Weypings, Alton | - | ++ | - | ++ | ++ | ++ | ? | + | - | - | - | 0 |
| AL014 | Land at Weypings Park | - | ++ | - | - | + | ++ | ? | + | - | - | - | - |
| AL017 | Land at Manor Estate | 0 | ++ | - | ++ | ++ | ++ | 0 | + | 0 | 0 | - | 0 |
| AL018 | Land west of Old Odiham Road, Alton | - | ++ | 0 | ++ | ++ | ++ | 0 | + | - | - | 0 | 0 |
| AL019 | Windmill House, Windmill Lane, Alton | + | ++ | 0 | - | ++ | ++ | ? | + | - | - | 0 | 0 |
| AL020 | Limby's Field (E), south of Water Lane | 0 | - | - | - | - | ++ | ? | - | - | - | - | - |
| AL021 | Limby's Field (E), south of Water Lane | 0 | ++ | - | - | - | ++ | ? | + | - | - | - | - |
| AL023 | 21 Winchester Road, Alton | 0 | ++ | - | ++ | ++ | ++ | ? | + | - | 0 | - | - |
| AL026 | Land at Abbey House, S Omega Park, Alton | 0 | ++ | - | - | + | - | ? | + | 0 | - | - | 0 |
| AL029 | Land west of Old Odiham Road | - | ++ | 0 | - | ++ | ++ | 0 | ++ | - | - | 0 | 0 |
| AL030 | Land at Selbourne Road | 0 | ++ | - | - | ++ | - | ? | ++ | - | - | - | - |
| AL037 | Chaston Park Surgery | - | ++ | 0 | ++ | ++ | ++ | ? | 0 | 0 | - | - | 0 |
| AL038 | Alton Convent School Car Park | - | ++ | - | ++ | ++ | ++ | ? | - | 0 | 0 | - | 0 |
| AL040 | The Wilson Practice | 0 | ++ | - | ++ | ++ | ++ | - | 0 | 0 | 0 | - | - |
| AL041 | Land west of Selbourne Road | - | ++ | - | ++ | ++ | ++ | ? | + | - | - | - | - |
| AL042 | Cobblers, Wilson Road | - | ++ | - | ++ | ++ | ++ | ? | + | 0 | 0 | - | 0 |
| AL044 | Alton Convent School, Large site | - | ++ | - | ++ | ++ | ++ | ? | + | - | - | - | 0 |
| AL046 | Land north of A31, Alton | ? | ++ | - | - | ++ | - | ? | ++ | - | - | - | - |
| AL052 | Land at Alton Sewage Treatment Works | - | ++ | - | ++ | + | ++ | ? | 0 | - | - | - | - |
| AL059 | Land north of Gilbert White Way | - | ++ | 0 | ++ | ++ | ++ | 0 | + | - | 0 | 0 | 0 |
| AL060 | Land at London Road, Holybourne | 0 | ++ | - | 0 | + | - | - | ++ | - | - | - | - |

6.11 In addition to the above, Wates does not agree with some aspects of the IIA's evaluation of Land North of Gilbert White Way specifically.

Table 3 below provides a revised assessment, with commentary explaining where a different score is recommended.

Table 3 – Comparison of IIA Assessment by EHDC and Boyer

| IIA Objective | EHDC Score | Boyer Score | Commentary |
|-----------------------|--------------|-------------|---|
| IIA1: Biodiversity | Mixed Effect | Neutral | <p>The IIA states that an area of Ancient Woodland is indirectly impacted and that the site directly impacts two Priority Habitats. No other biodiversity constraints are identified.</p> <p>An area of Ancient Woodland lies to the east and the north of the site. However, there is clear potential for mitigation by providing a minimum 15m buffer, within which built form shall be precluded. Wates' emergent masterplan has taken this constraint into account. Therefore, development would not adversely impact the Ancient Woodland.</p> <p>A deciduous woodland Priority Habitat abuts the central section of the site. However, this only impedes the site's boundary to a marginal degree. The emerging masterplan responds by providing appropriate buffers and setting back built development to avoid potential adverse impacts. This is outlined in the accompanying Vision Document (Appendix 2). Another deciduous woodland lies to the north of the site. Again, adverse effects on this habitat can be avoided through appropriate masterplanning, including by providing green buffers.</p> <p>A concern raised regarding the IIA methodology is that (in assessing sites) the document appears to switch between 'policy off' and 'policy on' approaches. For example, in Paragraph 6.2.2, the IIA indicates that strong adverse effects on Priority Habitats and other ecological interests can be avoided through conventional mitigation (e.g., lighting strategies, Construction Environmental Management Plans, etc).</p> <p>This is a reasonable approach, but it appears to have been applied selectively, including to sites identified for allocation. For example, the evaluation of Land off Hollywater and Whitehall Road (IIA Para 6.2.4) identifies the immediate proximity of Ancient Woodland / Priority Habitats as a constraint. However, it adds that disturbance effects can be avoided through appropriate design and layout. Yet, when assessing sites not proposed for allocation, the IIA does not appear to consider potential mitigation. This highlights an inconsistency of approach.</p> |

| IIA Objective | EHDC Score | Boyer Score | Commentary |
|---------------------------|-----------------|-----------------|--|
| | | | <p>Wates maintains that all sites assessed in the IIA should be consistently evaluated, with a 'policy on' approach across all categories. On this basis, it is reasonable to account for Wates' emerging design approach, which would result in the provision of a substantial amount of open space, landscaping, and biodiversity enhancements around the perimeter of the site. This is consistent with the legislative requirement to secure at least a 10% biodiversity net gain and clear the scope (at the site) for new native species planting to create a further wooded buffer to the woodlands.</p> <p>The revised scoring of the site ('neutral') reflects the realistic potential for avoidance, mitigation, and enhancement whilst still expressing caution as to the overall balance of effects.</p> |
| IIA 2: Carbon Emission | Strong Positive | Strong Positive | Wates agrees with this score, noting the site's proximity to the major settlement of Alton and, therefore, its access to sustainable transport modes. The site, by virtue of its adjoining a large urban area, also ensures access to super-fast broadband infrastructure, facilitates home working, and reduces the need for travel (as relevant considerations for this IIA objective). |
| IIA 3: Climate Change | Neutral | Positive | <p>The site is wholly within Flood Zone 1, and only a small section is identified as being at risk of surface water flooding. Indeed, the section of the site subject to a low level of surface water flooding is proposed for public open space and woodland planting within Wates' emergent scheme design. Appropriate mitigation measures can also be incorporated within this location that will not have a harmful impact on the wider settlement.</p> <p>Objective IIA 3 also assesses the potential to promote adaption and resilience to Climate Change. By virtue of the development being designed in a sensitive and sustainable manner and being adjacent to the top-tier settlement of Alton, development at this location would have an overall positive impact on the mitigation of Climate Change impacts.</p> <p>Noting the absence of significant flood risk constraints and the sustainable and viable nature of this site, there is clear potential to help address Climate Change impacts. The revised score reflects this.</p> |

| IIA Objective | EHDC Score | Boyer Score | Commentary |
|----------------------------|-----------------|-----------------|--|
| IIA 4: Accessibility | Strong Positive | Strong Positive | IIA 4 states that sites located in and around settlements within the highest tiers of the proposed Settlement Hierarchy are scored most positively. Land North of Gilbert White Way adjoins Alton, which is the top-tier settlement. The accompanying Vision Document (Appendix 2) confirms that development at this location can be successfully integrated into the surrounding community. Wates, therefore, agrees with the IIA score for this criterion. |
| IIA 5: Safety and Crime | Strong Positive | Strong Positive | The site has good accessibility to care facilities, as well as multiple open spaces within 800m (i.e., one of the relevant criteria). Emerging Policy HWC requires development to be based on active design principles, and provide access to active travel networks, green and blue infrastructure, as well as community facilities. The Vision Document sets out how development at Land North of Gilbert White Way can promote active travel by improving connectivity with Public Rights of Way (PRoW), footpaths and pedestrian routes. The emergent design also incorporates large areas of accessible open space. Wates, therefore, agrees with the IIA score for this IIA objective. |
| IIA 6: Skills and Jobs | Strong Positive | Strong Positive | <p>The assessment of the site identifies 16 existing employment sites within 1,500m, in addition to employment opportunities within Alton town centre. Wates, therefore, agrees with the IIA score for this objective but would add that the site also lies within 1,400m to 1,900m of a range of newly proposed allocations for employment use. These are;</p> <ul style="list-style-type: none"> • 1,400m Alton Strategic Employment Site (Policy E1) • 1,500m Land at Lynch Hill, Alton (LAA/BIN-008) • 1,600m Land at Alton Sewage Treatment Works (LAA/AL-058) • 1,900m Wilsom Road, Alton (LAA/WOR-004) |
| IIA 7: Heritage | Neutral | Neutral | The site does not contain, nor does it lie within the vicinity of any designated heritage assets. Wates, therefore, agrees that the potential effect will be neutral, as per the IIA assessment. However, it is relevant to note that some of the sites proposed for allocation (i.e. Land Rear of 191-211 Lovedean Lane (LAA/HD-001) and Land at Brick Kiln Lane and Basingstoke Road (LAA/AL-005)) are scored negatively against this criterion and would appear to be less suitable for development. |

| IIA Objective | EHDC Score | Boyer Score | Commentary |
|------------------|---------------|-----------------|--|
| IIA 8: Housing | Positive | Strong Positive | <p>The site is capable of providing approximately 200 new market and affordable housing units to ensure the Council meets its future housing needs. The HLA site report (cross-referenced in the IIA) identifies the residential yield as 93. However, this contradicts the East Hampshire Land Availability Assessment (2023) which correctly identified the site capacity as 200 dwellings.</p> <p>Consistent with the parameters of this criteria, a site of over 150 dwellings is capable of providing the most beneficial mixture of market and affordable dwellings. This would have a 'strong positive' impact on overall housing provision, which is reflected in our revised scoring.</p> |
| IIA 9: Landscape | Minor Adverse | Neutral | <p>The IIA assessment outlines that the site is not within 2km of a National Park or AONB. However, it categorises the site as having a medium/low landscape capacity score, taking into account the East Hampshire Landscape Capacity Study (2018 and 2022). This conclusion is reached despite IIA Paragraph 6.10.1 reinforcing the fact that the East Hampshire Landscape Study did not examine individual sites promoted. Rather, it considered larger parcels, such that the results of the study do not imply that particular sites (within an assessment area) would be either suitable or unsuitable for development.</p> <p>Wates' is concerned that the approach adopted in relation to this objective (IIA 9) appears less robust than the other criteria considered in that the commentary/explanation is very general in nature. For example, in paragraph 6.10.2 of the IIA, it is indicated that site-specific landscape/townscape effects will be dependent on the massing and layout of new developments coming forward. It adds that Landscape and Visual Impact Assessments (LVIA) should be carried out to assess and mitigate impacts to sensitive landscape features. Whilst these statements are correct, they provide little insight for the purposes of the IIA's evaluation and the subsequent selection of allocations for development.</p> <p>Following from the above, it is also notable that the IIA, when assessing the landscape impacts of sites proposed for allocation, details how even 'major adverse' effects can supposedly be mitigated. Yet, the IIA does not consistently apply 'policy on' mitigation measures in respect of the omission sites. This is not an objective approach, and this casts doubt on the Council's consideration of reasonable alternative sites. This is particularly concerning, as the IIA indicates</p> |

| IIA Objective | EHDC Score | Boyer Score | Commentary |
|------------------------------|------------|-------------|---|
| | | | <p>that sites assessed as resulting in 'minor adverse' landscape impacts (or worse) were generally sieved out and not allocated. A consequence of this is that some high-scoring sites (including Land North of Gilbert White Way) are not considered suitable for allocation.</p> <p>Conversely, overall lower-scoring sites are proposed for allocation because the selective adjustment for policy-on landscape mitigation is cited as justification. This is apparent from IIA 'Appendix I: Detailed Assessment Matrices', where it is maintained that although many of the sites proposed for allocation are assessed as generating a 'moderate adverse' impact, these impacts are said to be capable of overcoming through mitigation identified in LVIAs, assumedly prepared at the planning application stage.</p> <p>If the IIA's logic were applied consistently, then mitigation measures (such as landscape-led masterplanning, as detailed in the Vision Document at Appendix 2), would clearly lessen the landscape impacts of development at Land North of Gilbert White Way. The score for this criterion is, therefore, reappraised as 'neutral'.</p> <p>To further illustrate the points above, a supporting technical note has been prepared on behalf of Wates. This compares the landscape characteristics of Land North of Gilbert White Way with the proposed strategic allocation at Neatham Manor Farm (ALT8). This is provided in Appendix 3.</p> |
| IIA 10: Natural Resources | Neutral | Neutral | Wates agrees with the scoring for this criterion. However, it is notable that the majority of the sites proposed for allocation score 'adversely' against this IIA objective and therefore compared unfavourably with Land North of Gilbert White Way. |
| IIA 11: Water Quality | Neutral | Neutral | The presence of low surface water flooding will have a positive impact on the allocation as proper mitigation will be provided, which will lead to the enhancement of the site. Development will be located away from areas with a low risk of surface water flooding, and SUDS can be provided to remove some contaminants from surface water runoff. Overall, Wates agrees that the impact of development against this IIA objective is likely to be neutral. |

| IIA Objective | EHDC Score | Boyer Score | Commentary |
|-------------------|------------|-------------|--|
| IIA 12: Pollution | Neutral | Neutral | <p>This IIA confirms that no sources of light, noise, or air pollution (within 150m) currently generate unacceptable amenity or health-related impacts.</p> <p>The proposed site boundary benefits from existing trees to the south and will help mitigate impacts from pollution, noise, and light on those residents along Gilbert White Way and Grebe Close. While there is more limited tree coverage between the site and Christmas Close, further north, there is a suitable distance between the properties and the envisaged extent of the proposed built form. Conventional mitigation will be provided to address pollution (dust, noise, etc) during the construction phase.</p> <p>Overall, Wates agrees that the impact against this IIA objective is likely to be 'neutral'.</p> |

Table 4 – Boyer Assessment of Land N. Gilbert White Way (AL-059)

| IIA Objective | Score | Reference |
|---------------------------|-----------------|-----------|
| IIA1: Biodiversity | Neutral | 0 |
| IIA 2: Carbon Emission | Strong Positive | ++ |
| IIA 3: Climate Change | Positive | + |
| IIA 4: Accessibility | Strong Positive | ++ |
| IIA 5: Safety and Crime | Strong Positive | ++ |
| IIA 6: Skills and Jobs | Strong Positive | ++ |
| IIA 7: Heritage | Positive | + |
| IIA 8: Housing | Strong Positive | ++ |
| IIA 9: Landscape | Positive | + |
| IIA 10: Natural Resources | Neutral | 0 |
| IIA 11: Water Quality | Neutral | 0 |
| IIA 12: Pollution | Neutral | 0 |

- 6.12 As set out in Table 4, Boyer’s assessment of Land North of Gilbert White Way against the criteria in the IIA provides a realistic evaluation of the site, taking into account the emergent design approach set out in the accompanying Vision Document (**Appendix 2**). However, even if the Council disagrees with Wates’ revised assessment (as set above in Tables 3 and 4), then it remains the case that Land North of Gilbert White Way scores more favourably than many of the sites proposed for allocation at Alton (as set out in Table 2).
- 6.13 Wates advised EHDC to reconsider the approach to site selection that has been pursued, and this includes addressing the inconsistency in applying policy-on mitigation and the seemingly arbitrary sieving out of some sites (including Land North of Gilbert White Way) based on ‘minor adverse’ landscape impacts, whilst simultaneously proposing to allocate sites where development will result in more severe impacts.

Comparison of Land North of Gilbert White Way and Neatham Manor Farm

- 6.14 It is apparent from the IIA evaluation that Land North of Gilbert White Way is a suitable and sustainable site. It should have been selected for allocation ahead of some of these sites actually proposed for allocation in the Draft Local Plan. As detailed above, it appears that the only reason the site has not been proposed for allocation is because of the ‘minor adverse’ scoring in relation to IIA9, ‘Landscape’.
- 6.15 Wates disagrees with this scoring, as detailed in Tables 3 and 4 above. However, Wates’ landscape consultant (SLR) has undertaken a comparative Landscape Sensitivity Analysis to illustrate the Plan’s flawed approach further. This compares the potential landscape effects of development at Land North of Gilbert White Way to the strategic allocation proposed at Neatham Manor Farm (allocation ALT8).
- 6.16 The methodology for the Landscape Sensitivity Assessment was based upon guidance prepared by Natural England (“*An Approach to Landscape Sensitivity Assessment – to Inform Spatial Planning and Land Management*”, Natural England, June 2019). The

methodology applies recent guidance on landscape value prepared for the Landscape Institute (“Assessing Landscape Value Outside National Designations”, Landscape Institute Technical Guidance Note 02/21).

6.17 The conclusions of this exercise are detailed below in Table 5.

Table 5 – Comparative Landscape Sensitivity Assessment (SLR Consulting)

| Landscape and Visual Factors to be Considered | Land North of Gilbert White Way | Neatham Manor Farm (ALT8) | Conclusion |
|---|---|--|---|
| Scale | 15.30 ha of agricultural land. | 97.9ha of agricultural land. | There is much greater potential for negative landscape effects on ALT8. |
| Elevation | The development would reach approximately 160m AOD, the highest point reached by any development on the existing settlement edges. | Development reaches approximately 152m AOD at Neatham Down, which would be the highest point reached by any development on any of the existing settlement edges. | There is no significant difference between the sites in this regard. |
| Landscape Value | The site is not within or close to a landscape or landscape-related designation and is crossed by one footpath. | The site is not within a landscape or landscape-related designation but is approximately 1.5km from the South Downs National Park, with potential for intervisibility with the SDNP. Two footpaths also cross the site, and it is adjacent to a regional trail, Hangers Way. The site also borders Ancient Woodland. | There is much greater potential for development at ALT8 to cause negative landscape effects on landscapes of higher value. |
| Position in Relation to Settlement | It is located immediately adjacent to the existing settlement edge, on land, which is therefore influenced by the visibility of built form, lighting, and noise. | Severed from the existing settlement by the A31, the site is wholly rural in character. | There is much greater potential for negative landscape effects on ALT8. |
| Potential Visibility | Potential for visibility from the existing residential areas to the south of the site and the footpath crossing the site, but also from higher ground at the southern edge of Alton | Potential for clear views by travellers on the A31, walkers on footpaths crossing the site, and from Hangers Way. Also, there is potential for visibility from rights of way within the South | There is a much more extensive potential Zone of Theoretical Visibility (ZTV) for ALT8 and, therefore, greater potential for a larger number of |

| | | | |
|--|---|--|--|
| | | Downs National Park and from higher ground to the north of Alton. | negative visual effects. |
| Potentially Sensitive Visual Receptors | Walkers crossing the site and nearby residents are the most sensitive receptors nearby. However, there may be potential for long views by walkers from Windmill Hill, approximately 2km to the south of the site. | Potential for views by walkers and cyclists in the SDNP, as well as close views from walkers crossing the site and using the Hangers Way | The most sensitive visual receptors in the locality of Alton are walkers and cyclists in the SDNP. ALT8 has greater potential to affect these receptors' views and walkers on a greater length of footpath and regional trail. |
| Potential for Mitigation in terms of new POS, Green Infrastructure and Habitat Creation | The Vision Document illustrates the potential for retaining existing hedgerows and trees and providing a new greenway along the northern edge of the site connecting the existing footpath with Upper Anstey Lane. New areas of POS would also be provided. | The draft Local Plan includes an indicative concept plan, which shows that existing hedgerows and woodlands could be conserved and areas of new POS could be provided. | There is no significant difference between the sites in this regard. |

- 6.18 The initial comparative review of Land North of Gilbert White Way and the proposed allocation at Neatham Manor Farm (as set out above) identifies that Neatham Farm is much more sensitive in respect of potential landscape and visual impacts. It, therefore, has a much lower capacity to accommodate residential development without causing transformative change to local character.
- 6.19 Wates does not provide the above analysis to suggest that Neatham Farm is inherently unsuitable for development. However, the point illustrates the inconsistency of the Council's approach. Namely, Land North of Gilbert White Way was discounted on the basis of minor landscape impacts despite otherwise scoring highly in the IIA. Yet, the main allocation proposed at Alton will result in far more significant landscape impacts.
- 6.20 Noting the preceding comments, the currently proposed approach to identifying sites for allocation at Alton is not *justified* by robust and objective evidence nor *consistent with national planning policies* and legislation, which require Local Plans to *contribute to sustainable development*.
- 6.21 This issue goes to the heart of the Plan, and if it is not resolved, there is a risk that the Plan will not be found sound when subject to Examination.

7. LAND NORTH OF GILBERT WHITE WAY

Site and Surrounding

- 7.1 As indicated, Wates controls Land North of Gilbert White Way, which consists of circa 15 hectares of greenfield land located north of Alton.
- 7.2 The subject land represents a sustainable and suitable site for residential development and is promoted for allocation in the emerging Local Plan. Part of the land has been promoted through the 'call for site's process and is identified in the East Hampshire Land Availability Assessment (LAA), with site references LAA/AL-002, LAA/AL-018 and LAA/AL-059 being assigned.
- 7.3 The 'Interactive Map' of sites submitted via the rolling call for sites procedure indicates that LAA/AL-002 was excluded from further analysis because the potential to provide access was 'unknown'. However, this issue is resolved as Wates now controls the land along Gilbert White Way, all the way to Old Odiham Road to the southeast.
- 7.4 Wates' controlling interest is reflected in LAA/AL-059, for which the LAA identifies an indicative capacity of 200 dwellings. The site is identified as 'developable' in the LAA (although, as noted below, Wates considers it 'deliverable') and is not subject to significant constraints. The totality of the controlled land interest is set out in **Appendix 1**. The control of this more comprehensive area of land allows for suitable vehicular and pedestrian/cycle access arrangements, with connections being formed to the public highway network via Gilbert White Way.
- 7.5 A range of other technical surveys and master planning work has been progressed in relation to this site. This has confirmed that it is not subject to 'hard constraints' or major/long-term infrastructure requirements which would impede its development or undermine its viability. Accordingly, the site is considered 'deliverable' (as defined in NPPF Annex 2) and can contribute to the supply of land for new homes within five years.

Site Characteristics

- 7.6 The promoted site lies on the north side of the settlement of Alton. As indicated in Section 6 of these representations, it was favourably evaluated in the IIA. The land comprises several existing (arable) field parcels, separated by existing hedgerows and tree belts.
- 7.7 The land is bounded along its southern boundary by a new residential neighbourhood distributed along Christmas Close and Rowden Way, alongside established residential areas along Gilbert White Way and Grebe Close. To the east, the site's boundary is formed by Upper Anstey Lane, whilst wooded areas and additional agricultural land lie to the north and west.
- 7.8 Topographically, the site is situated on a south-facing slope, which extends to more elevated ground to the north, with this northern extent of the land forming a plateau. The southern part of the site extends to approximately 145m AOD, broadly reflecting the elevation of the

existing residential areas to the south. At its highest point, the site rises to approximately 180m AOD (the built form is proposed to be no higher than 160m AOD).

- 7.9 One Public Right of Way (PRoW) intersects the southwestmost field parcel, connecting Grebe Close with Old Odiham Road. A further PRoW lies immediately to the northeast of the site, linking with Anstey Lane, which further connects with a longer route running along the alignment of a ridge of local high ground, linking Row Wood to the north and Alton to the south.

Site Constraints

- 7.10 Regarding constraints, the site is not subject to statutory or non-statutory landscape protection designations. The site is also free from Tree Preservation Orders (TPOs), and there are no areas of Ancient Woodland on the land. However, an area of Ancient Woodland lies to the north on the opposite (eastern) side of Anstey Lane.
- 7.11 Whilst further on-site surveys would need to be conducted to support any future planning application, the site is not subject to any prevailing international, national or local-level ecological designations. The land also lies beyond the 5km Special Protection Area (SPA) buffer. As the site primarily comprises arable farmland, areas of biodiversity value are restricted mainly to boundary hedgerows and trees. Initial analysis, therefore, suggests that it will be possible to exceed a 10% biodiversity net gain on-site.
- 7.12 There are no Listed Buildings or Scheduled Ancient Monuments within the site or in its vicinity. Likewise, the site is not located within a Conservation Area. The site is also outside of any 'Archaeological Areas of High Importance' (as identified on the Council's interactive mapping) and is not considered to have high archaeological potential.
- 7.13 Being elevated, the site lies within Flood Zone 1 (based on the Environment Agency mapping), which indicates the land is not subject to significant flood risk from fluvial sources. The land is also essentially free from surface water and groundwater flood risk constraints. Accordingly, flood risk and drainage would not significantly impede residential development at this location.

Site Sustainability

- 7.14 Alton is currently identified as a 'Market Town' within the Settlement Hierarchy presented in the adopted East Hampshire Joint Core Strategy (also known as Local Plan Part 1). This status is proposed to be carried forward, as set in Draft Policy S2, which confirms that Alton (now including Holybourne) is *the* Tier 1 settlement in the Plan Area.
- 7.15 Residential development on Land North of Gilbert White Way would be consistent with the concept of the '20-minute neighbourhood', which is expressed in the adopted Alton Neighbourhood Plan. In this regard, the town centre is a 15 to 18-minute walk from the site, whilst additional local shops, a post office and primary schools are situated within a 5 to 10-minute walk. Indeed, the Wootey Primary School lies in the site's immediate vicinity. Secondary and Further education facilities are available at the Amery Hill School and HSDC Alton, which are situated within a 15 to 20-minute walk of the site.

- 7.16 Accordingly, the settlement generally and the site specifically are capable of accommodating growth to address a share of localised and Plan-wide housing needs. Indeed, this would be entirely consistent with the assessment provided in the IIA.
- 7.17 Appendix 2 includes a Vision Document indicating how the site could be brought forward for a high-quality, landscape-led residential development.

8. CONCLUSIONS

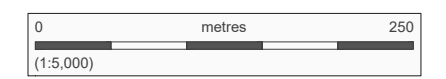
- 8.1 Boyer has prepared these representations on behalf of Wates Developments in response to the current Regulation 18 Draft Local Plan Consultation
- 8.2 Wates supports the preparation of a new Local Plan for the East Hampshire District, which will contribute to the provision of new housing and future sustainable development. Through these representations, Wates has responded to the emergent vision and objectives, the proposed Spatial Strategy, Settlement Hierarchy, Climate Change policies, the proposed Housing Requirement and the selection of potential sites for allocation at Alton.
- 8.3 Wates believes the proposed vision and the three related objectives to be aspirational and supports them in principle. However, some aspects of the objectives are not then appropriately addressed through proposed Local Plan policies, particularly those relating to the Housing Requirement and selection of sites for allocation. Conversely, some aspects of the vision and objectives, notably those linked to net zero carbon development, are then reflected in proposed policies that may be undeliverable and are not adequately justified and tested.
- 8.4 The proposed Spatial Strategy and Settlement Hierarchy are supported. Alton is the most sustainable settlement within the Plan area and is rightly the focus for future housing and employment growth. Indeed, the NPPF (in paragraphs 108 and 109) clearly indicates that the planning system should actively support sustainable patterns of development, taking account of locational accessibility.
- 8.5 Wates is however concerned that the approach of relying on a Review of the Alton Neighbourhood Plan to address the residual requirement will not be effective, as the Neighbourhood Plan Steering Committee no longer wish to allocate sites. This in turn means that the Local Plan will now need to directly allocate additional sites at Alton, in order to avoid a shortfall against the proposed housing requirement.
- 8.6 Wates does support many aspects of the Plan's agenda relating to net zero carbon development. Indeed, this further points to the necessity of directing growth to Alton. Nonetheless, the proposed suite of policies (i.e., CLIM 1, 2 and 3) set requirements that go well beyond what is required in existing building regulations and, indeed, the Future Homes Standard, which is expected to take effect in 2025. The Local Plan evidence base does not support the Plan's proposed approach, and the approach has not been tested for viability purposes.
- 8.7 It is necessary for the overall Housing Requirement to be revisited. Currently, there is a lack of any provision for unmet needs arising from the South Hampshire Authorities and a corresponding concern regarding the Plan's compliance with the Duty-to-Cooperate. Likewise, Wates does not consider that the appropriate Housing Requirement for years 2021/22 to 2022/23 of the Plan period has been identified. Furthermore, the significant need for affordable housing will not be fully addressed by the Plan as it is currently formulated.

- 8.8 As indicated in Section 6 of this representation, the approach to selecting sites for allocation at Alton is not considered robust. The evaluation presented in the IIA points to the suitability of Land North of Gilbert White Way for allocation as a site for residential development. Indeed, it scores more favourably against the IIA objectives and criteria than several of the sites proposed for allocation at Alton.
- 8.9 The site appears to have been discounted because of concerns regarding landscape impacts ('minor adverse'). Yet, the single strategic allocation proposed in the Plan (Neatham Manor Farm, allocation ALT8) is far more sensitive in landscape terms. This is borne out in the comparative assessment presented at Table 5 (pages 31-32) of this representation.
- 8.10 Within this context, Land North of Gilbert White Way represents a suitable and sustainable site for residential-led development, creating a walkable residential neighbourhood that integrates with the existing town. Significant areas of open space and land for ecological enhancements can be provided to exceed the requirement to achieve a 10% biodiversity net gain and to support broader environmental objectives.
- 8.11 As presently prepared, the Draft Local Plan would not meet the tests of soundness. As detailed in this representation, several key policies require significant modification, and the overall Housing Requirement should be increased. The approach to the allocation of sites at Alton is not robust, and Land North of Gilbert White Way should be allocated for residential development, consistent with the Council's own evidence.

APPENDIX 1. SITE LOCATION PLAN



— Redline boundary



Project
Land north of Gilbert White Way

Drawing Title
Site Location Plan

| | | | |
|------------|---------------|----------|----------|
| Date | Scale | Drawn by | Check by |
| 10/01/2023 | 1:5,000 at A3 | MR | SR |
| Project No | Drawing No | Revision | |
| 1383 | 001 | - | |

APPENDIX 2. VISION DOCUMENT



LAND NORTH OF GILBERT WHITE WAY, ALTON

VISION DOCUMENT

January 2023

Masterplanning, Desk Top Publishing and
Graphic Design by Mosaic.



MOSAIC
Urban Design & Masterplanning

Spaces
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United Kingdom

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| Issue date | 30/03/23 |
| Document status | Issue |
| Revision | V3 |
| Author | MR/LM |
| Checked by | SR |

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01



INTRODUCTION

INTRODUCTION

This Vision Document has been prepared by Mosaic on behalf of Wates Developments Ltd (Wates) to support the allocation at Land North of Gilbert White Way, (the “site”) to deliver much-needed new family and affordable homes as part of the sustainable growth of Alton.

The Land North of Gilbert White Way presents a unique opportunity for supporting the future growth of East Hampshire District Council. Specifically, the location of the site is ideal for meeting the five themes outlined in the Alton Neighbourhood Development Plan, as it is a sustainable extension that aligns with the principles of 20-minute neighbourhoods established by the Town and Country Planning Association. The proposal includes up to 204 new homes in a highly sustainable location, close to the centre of Alton, and with excellent connections to Farnham, Brookwood, Winchester and the wider surrounding leisure resources of the countryside.

This document demonstrates that the Land North of Gilbert White Way is technically viable, deliverable and a sustainable location for new development. Additionally, this document presents a vision for the site and an appropriate development capacity.

SUMMARY OF BENEFITS



Meeting Housing Need

The site is deliverable and has no technical or viability constraints. The site is capable of delivering up to 204 new market and affordable homes to ensure the Council meets its future housing needs. Homes will be designed to high quality standards within a range of types and tenures



Sustainable Location

The site is ideally located near to the local services and facilities of Alton town centre and is a short walk from Alton Railway Station. 'New pedestrian routes to, from and within the site provide the opportunity to better connect Alton to the surrounding pedestrian network and the leisure resource of the countryside



Provision of new public open space

The site is able to provide additional semi-natural public open space for Alton. Existing green infrastructure is retained where possible and enhanced through additional landscaping to help create an attractive environment.



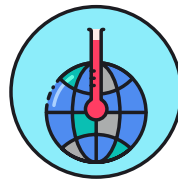
Connect together existing woodland features to Anstey Copse and Row Wood

The site presents a unique opportunity to connect together the existing woodlands surrounding the site with new woodland tree planting to create a linked green infrastructure network for the benefit of flora, fauna and the residents of Alton



Biodiversity Net Gain

The proposals present an opportunity to provide significant biodiversity net gain through the creation of new green infrastructure.



Carbon Neutrality

This site can help the Council to meet its target for carbon neutrality by locating homes sustainably and maximising opportunities around building efficiency.



Healthy Living

Spaces will be designed to be easy to navigate with generous green spaces allowing residents to flourish within their own surroundings. A range of landscapes are proposed to promote health and wellbeing including active landscapes and "naturalistic" and growing landscapes to reconnect with nature.



Quality Homes

The site will deliver new homes that are high quality and well-designed with distinctive character that reflects their location and which responds robustly to the challenges of climate change.



Community Contributions

Contribute financially to new infrastructure through s106/ Community Infrastructure Levy payments.

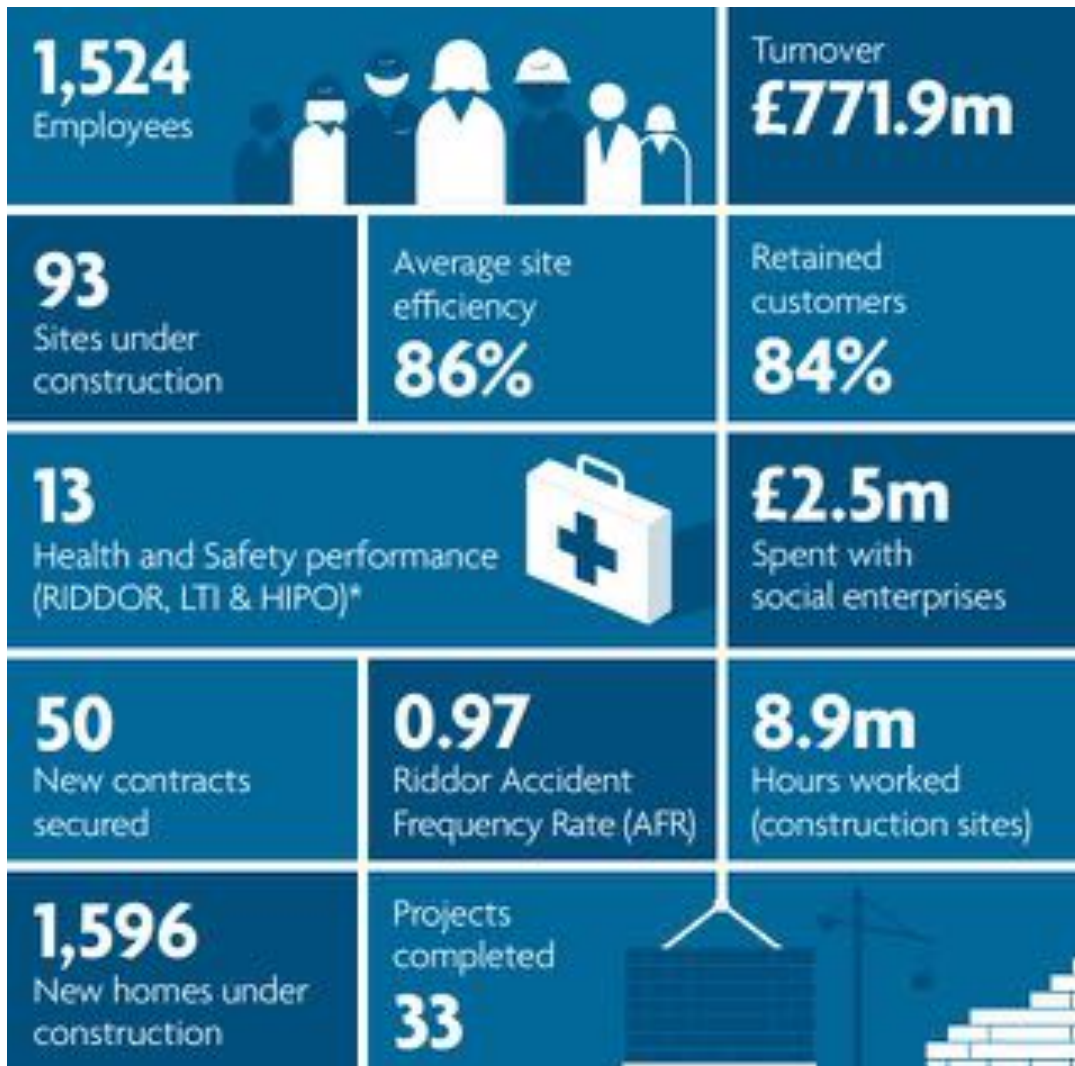
ABOUT WATES DEVELOPMENTS

Wates Developments is an expert in land, planning and residential development throughout Southern England. The business focuses on securing land and delivering planning consents in sustainable locations in areas of high demand. The business partners with a number of national housebuilders in joint ventures to deliver much-needed housing developments.

Everything Wates do is guided by their purpose of working together to inspire better ways of creating the places, communities and

businesses of tomorrow. Wates goals are to be more sustainable, trusted and progressive, and their people are driven by the principle of **'we care'**, **'we are fair'** and **'we look for a better way'**.

Wates are committed to reducing the building industry's environmental impact. Their five-year strategy sets out this commitment and how they can be better custodians of the environment and protect the Earth's precious resources and habitats for future generations.



THE FRAMEWORK IN CONTEXT

A logical and seamless expansion in the natural evolution of Alton



Framework in town context. Not to scale



View looking south-east across the site



View from Gilbert White Way looking towards the site entrance



View looking north-west across the site

THE SITE

Located on the northern edge of Alton, the site benefits from good access to a range of facilities, amenities, employment and leisure and recreation opportunities within a 20 minute walk.

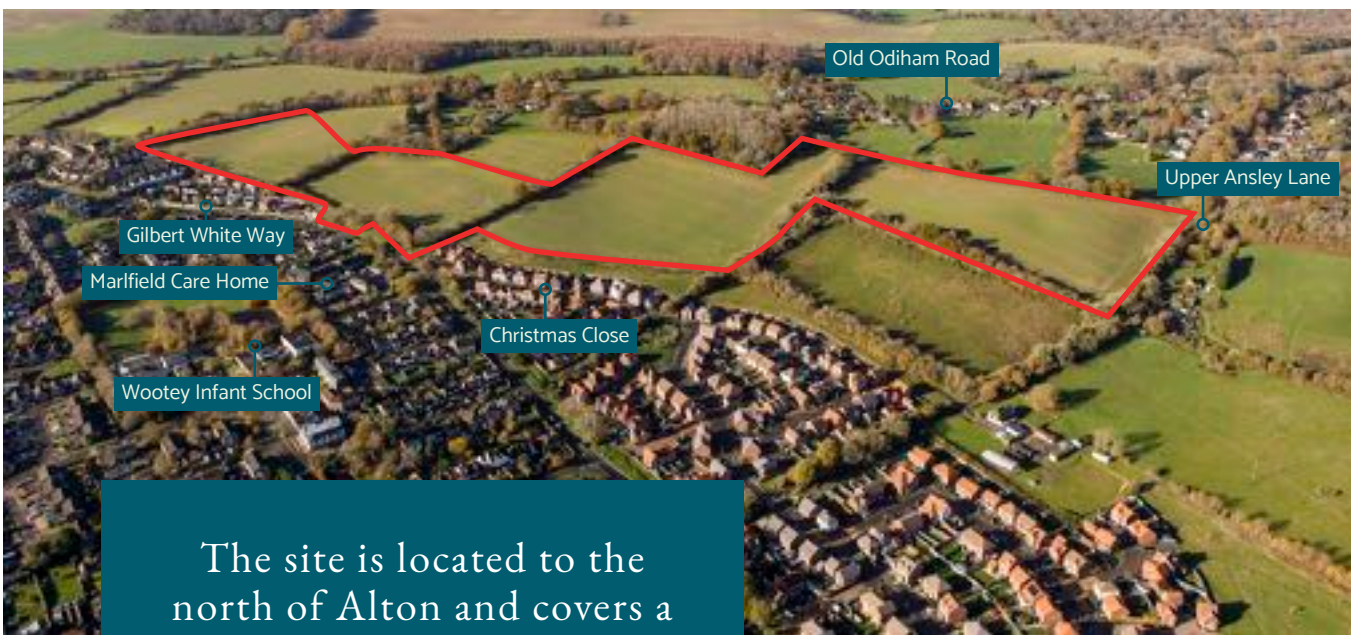
The site extends to some 15.30 hectares and comprises four arable field.

The site is bound to the:

- north-west by existing woodland, vegetation and fields that are currently being used for agriculture
- south-west by tree planting and fields in agricultural use beyond
- south-east by new development at Rowden Way and Gilbert White Way, as well as the residential neighbourhoods of Alton
- north-east by Upper Ansley Lane, tree planting and a field beyond



Site in context. Not to scale

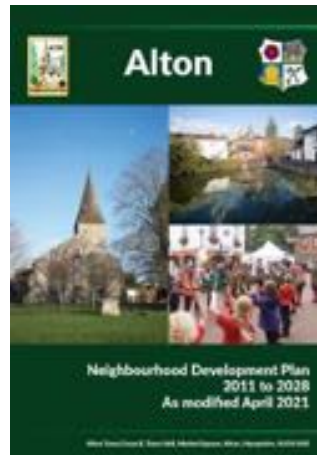


The site is located to the north of Alton and covers a total area of approximately 15.30 hectares.

View looking north-west across the site

SUPPORTING ALTON'S FIVE THEMES

The Alton Neighbourhood Development Plan outlines five key themes to guide the future growth of the town. The following pages explore how the Land North of Gilbert White Way supports and enhances these themes. Additionally, the proposal will align with East Hampshire's vision and core objectives, as well as Alton's Town Design Statement guidance, to create a proposal that Alton can be proud of



Housing

Response:

We envisage new housing for Alton that offers a large variety of house types and tenures to suit a wide range of households looking to get on the housing ladder, buy a family home or to downsize. Accessible and adaptable homes enable people to stay in their homes as their needs change. This approach encourages social cohesion by providing the opportunity for residents to stay in the local area and maintain all-important friend and family networks throughout their lifetime.

In addition to meeting the minimum requirements for affordable housing, we would explore local needs to provide for an informed mix of house types and tenures that align with local incomes.



Transport

Response:

The Land North of Gilbert White Way promotes active travel to encourage sustainable journeys without using a car to meet daily needs by locating homes within a comfortable walk to Alton's town centre. The proposals will make walking and cycling an attractive and viable choice for residents by providing a network of foot and cycle paths set within interconnected green corridors.

Designing roads and pavements in such a way that prioritises walking and cycling is key to the proposals, making active travel appealing from the outset. The site will also connect to off-site walking routes to the wide range of local jobs, services, facilities and bus stops.





Community, health and recreation

Response:

The Land North of Gilbert White Way delivers a high quality, sustainable and attractive place for people to live in close to facilities, employment and education offers. This will help to ensure that essential infrastructure is delivered to support existing residents as well as future growth.

Land North of Gilbert White Way offers the potential for its residents to work remotely from home through flexible housing design to reflect the new working patterns of a post-pandemic world. A survey from the British Council for Offices predicts white-collar workers will adopt a mixed approach, combining remote working with several days a week in the office. Our proposal for the Land North of Gilbert White Way recognises this as an opportunity to reduce carbon emissions and enhance the wellbeing of residents by providing the opportunity to live and work nearby.

Land North of Gilbert White Way would also protect and enhance the natural environment by embedding green infrastructure and biodiversity gains in designs and layouts, as informed by existing local provision and any identified deficiencies/opportunities. This includes the creation of a significantly sized new public open space for the benefit of all who live in Alton. Our proposals also create a network of green corridors and spaces to help mitigate the effect of climate change, link existing green infrastructure on-site and connect with surrounding neighbourhoods and green spaces.



Education

Response:

Land North of Gilbert White Way would provide financial contributions to existing local schools. The proposals would also propose a range of landscapes to educate local children in the natural world. This might include outdoor learning areas and classrooms, nature-rich ponds as part of a sustainable drainage system and areas of biodiverse woodland and meadow.



Economic sustainability and viability

Response:

The site provides new homes within a 18 minute walk to the Alton town centre and Railway Station. Alton Railway Station offers excellent and sustainable connections to Farnham, Guildford and London. The proposal aim to reduce commuting distances by supporting growth in locations close to existing business areas and transport connections.

The site also helps to encourage tourism by protecting Alton's built and natural assets. The site provides services and facilities for visitors, including new public open space and new woodland walking routes.



ANALYSIS

SUSTAINABLY LOCATED

The site is sustainably located and is well served by existing infrastructure

Sustainability audit

The Sustainability Audit is a comprehensive analysis of the site and the wider area encompassing assessment of the site's access to local facilities, landscape and open space and connectivity.

Access to local facilities is fundamental to the concept of locating sustainable development. New development needs the full range of social, retail, educational, health, transport and recreational facilities to allow people, especially those of limited means or mobility, to go about their daily lives without over reliance on a private car.



Building for a Healthy Life

Building for a Healthy Life (BHL) is a tool to assess and compare the quality of proposed neighbourhoods.

It has been written by

Design for Homes in partnership with Homes England, NHS England and NHS Improvement. Whilst BHL is usually awarded to completed schemes, the site selection criteria have been applied to Land north of Gilbert White Way to demonstrate the sustainability of the design proposals.

Building for a Healthy Life principles advise places should **'offer social, leisure and recreational opportunities a short walk or cycle from their homes'** and that developments should provide or be near to **'community facilities, such as shops, schools, workplaces, health facilities, co-working spaces, parks, play spaces, cafés and other meeting places that respond to local community needs'**.

Facilities

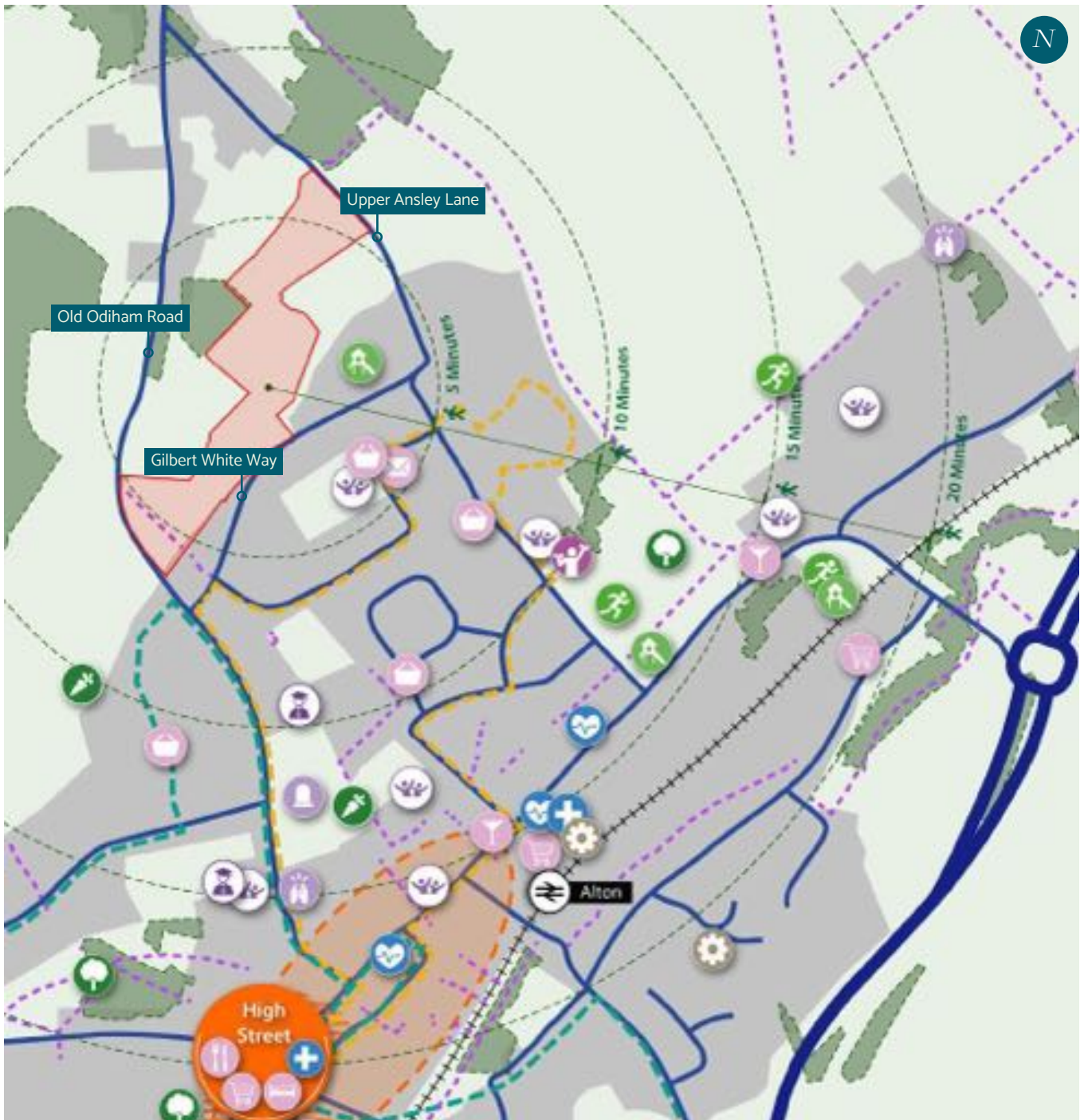
The site is situated in a highly sustainable location due to its relationship with Alton town centre, which is within a comfortable walking distance. The town centre offers a range of facilities, amenities, restaurants and employment opportunities to support development at this location.

Alton has a range of leisure and recreation facilities, including a swimming pool, a leisure centre with a gym and fitness classes, and a number of parks and open spaces. The town is also surrounded by beautiful countryside, offering plenty of opportunities for outdoor activities such as walking, cycling, and horse riding.

Alton has a number of primary and secondary schools, as well as a further education college. There are also a number of health care facilities, including Alton Health Centre within walking distance.

Overall, Alton has a full a range of facilities and amenities to cater for the needs of its residents and visitors.

The facilities audit set out below and on the following pages demonstrates that the site is a sustainable location and fully meets the Building for a Healthy Life principles through existing local facilities and the opportunity to provide facilities missing in the area.



Facilities audit plan. Not to scale

| Key | | | | | |
|---|---------------------|---|------------------|---|----------------------|
|  | Site boundary |  | Local Shop |  | GP practice |
|  | Town centre |  | Restaurant |  | Pharmacy |
|  | Public right of way |  | Public house |  | Park or open space |
|  | Roads |  | Place of worship |  | Allotment |
|  | Railway |  | Cemetery |  | Children's play area |
|  | Railway station |  | Primary school |  | Recreation ground |
|  | Bus route 9 |  | Secondary school |  | Business park |
|  | Bus route 13 |  | Leisure centre | | |
|  | Super Market | | | | |

Connectivity Audit: Public transport

The site benefits from excellent public transport connections. The bus stops on Wooteys Way and Old Odiham Road are within a short walk from the site (400m and 550m respectively) and are served by several frequent services to local towns and villages that offer genuine opportunities for non-car travel further afield:

- Services 13 / 13x provide at least hourly services between Liphook and Basingstoke from Mondays to Saturdays
- Service 9a circular route serving Alton High Street – five services on weekdays

Alton Railway Station is located 1.6km south of the site, within the town centre. The station is served by bus service 9 and has cycle stands available. There are two trains per hour to London Waterloo, with a journey time of approximately 1 hour and 15 minutes. The trains also stop at Farnham (15 minutes), Brookwood (30 minutes), and Woking (35 minutes).

Connectivity Audit: Pedestrian and cycle network

The site has easy access to a range of facilities within walking distance, including Eggar's Primary School, Alton College, and local shops. The footways of Gilbert White Way connect to a network of pedestrian routes that link the site with these facilities, with the High Street being within a comfortable walking distance from the site. Additionally, local streets have a speed limit of 30mph and are single carriageways, making cycling around Alton convenient for riders of all abilities.

An existing footpath to the east links the site to the public rights of way network surrounding the site.

Connectivity Audit: Road network

By road, Alton is connected to the A31 and also to the M3 motorway to the north. There are also a number of local bus routes that connect Alton with nearby towns and villages.

Facilities within a 20 minute walk or cycle, include:



Rowden Way Playground (5 minutes)

Fish and Chip Shop (4 minutes)

Energique Health Club (12 minutes)

Alton Rugby Club (13 minutes)

Alton Community Centre (19 minutes)

Hilltop Convenience Store (11 minutes)

Wootey Infant & Junior School (4 minutes)

HSDC Alton College (10 minutes)

Amery Hill Secondary School (15 minutes)



Alton Industrial Estate (8 minutes)

Lloyd's Pharmacy (7 minutes)

Alton Health Centre (5 minutes)

Alton School (3 minutes)

Alton Railway Station (6 minutes)

Alton town centre (6 minutes)

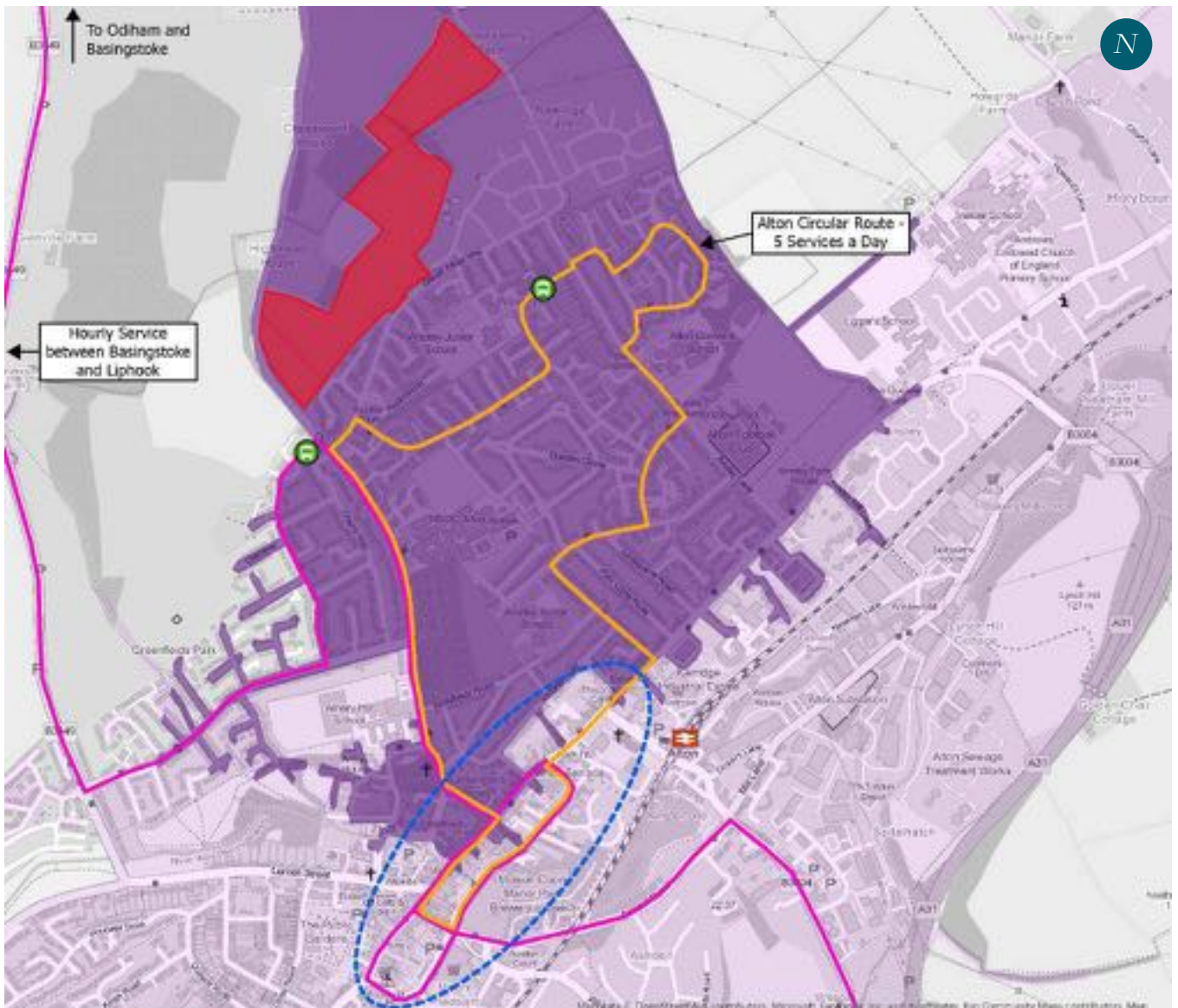
Hampshire Constabulary (8 minutes)

Eggar's Primary School (6 minutes)

Waitrose (6 minutes)

Sainsburys (8 minutes)

Alton Football Club (4 minutes)



Connectivity audit plan. I-transport. Not to scale

- Key
- Site boundary
 - Town centre
 - B Bus stop
 - Railway station
 - Bus Service 9
 - Bus Service 13
 - 1.6km Walking Catchment
 - 3.2km Walking Catchment

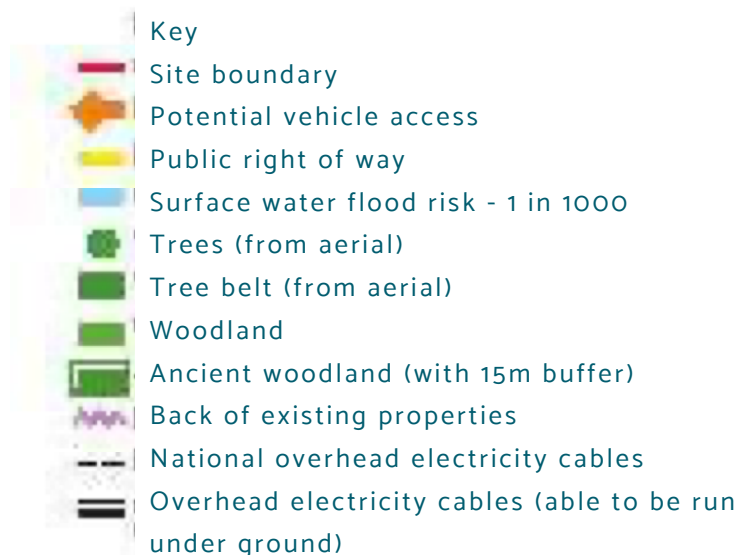
CONSIDERATIONS

A number of technical assessments have been conducted on the land north of Gilbert White Way, Alton, and it has been concluded that there are relatively few constraints on development.

The site, as is typical for developments of this scale, has a number of technical considerations and opportunities that have been taken into account in the masterplanning proposal.

An informed and considered approach has been taken in order to positively contribute to the local area and create a unique and distinctive addition to Alton.

The plan to the right summarises the findings.



Considerations. Not to scale







VISION

VISION: THE 20-MINUTE NEIGHBOURHOOD

The vision for the site follows the principles of the 20-minute neighbourhood, a model for sustainable placemaking developed by the Town and Country Planning Association.

As demonstrated on pages 16-19, the Land North of Gilbert White Way is situated at an inherently sustainable location with a range of facilities, employment and education opportunities accessible within a 20 minute walk, cycle, bus or train ride. Combined with the opportunity to provide facilities missing locally on site, the Land North of Gilbert White Way meets the characteristics of a 20-minute neighbourhood.

What is a 20-minute neighbourhood?

Societies around the world are facing a number of urgent, interconnected problems, including how to reduce carbon emissions, how to help people become more active to improve health and wellbeing, how to reduce loneliness and how to improve high streets and neighbourhoods that have declined.

The idea of the 20-minute neighbourhood (also known as 15-minute cities) supports the vision of Alton's Neighbourhood Development Plan and has grown with interest around the world, especially since the COVID-19 pandemic put a spotlight on the importance of the liveability of where we live.

20-minute neighbourhoods are complete, compact and connected places where people can meet their everyday needs within a short walk or cycle. The idea of the 20-minute neighbourhood presents multiple benefits including boosting local economies, improving people's health and wellbeing, increasing



Sources:

<https://www.tcpa.org.uk/garden-city-principles>

<https://www.tcpa.org.uk/guide-the-20-minute-neighbourhood>

social connections in communities and tackling climate change.

Every community has its own context and aspirations for the future. Any plans to create a 20-minute neighbourhood should be based on what the local community wants. However, the following characteristics, or 'ingredients', are likely to be part of the mix:

- Diverse and affordable homes
- Well-connected paths, streets and spaces
- Schools at the heart of communities (already present within Alton)
- Good green spaces in the right places
- Local food production
- Keeping jobs and money local
- Community health and wellbeing landscapes and facilities
- A place for all ages

The 20-minute neighbourhood is also closely aligned with the Active Design principles developed by Sport England in partnership with Public Health England. Active Design is focused on enabling people to incorporate physical activity into their daily routine through a built environment designed and laid out to support healthier and more active lifestyles. Active Design is a key guidance document intended to help unify health, design and planning by promoting the right conditions and environments for individuals and communities to be active and healthy.

Although national planning policy does not refer directly to 20-minute neighbourhoods, the National Design Guide (updated January 2021) and the draft National Model Design Code (issued in January 2021) contain useful guidance on topics such as masterplanning, street layout, connectivity, density and active travel, all of which can contribute to the creation of 20-minute neighbourhoods.

Based upon the principles of 20-minute neighbourhoods, the Land North of Gilbert White Way is a sustainable location for new development and benefits from a wide range of nearby facilities in the town centre and wider area whilst also being able to deliver significant new publicly accessible open space.

New homes for everyone

The development offers a large variety of house types and tenures to suit a wide range of households looking to get on the housing ladder, buy a family home or downsize. Accessible and adaptable homes enable people to stay in their homes as their needs change. This approach encourages social cohesion by providing the opportunity for residents to stay in the local area and maintain all-important friend and family networks throughout their lifetime. Homes will also be designed to facilitate comfortable home working and be future-proofed for flexible working arrangements.

A Healthy and Attractive Place

There is an opportunity for the development to provide a positive contribution to the green infrastructure and public open space of Alton. The landscape is currently used for agricultural purposes and is inaccessible to the public. The site's allocation would open it up to the public through the provision of strategic open space which would encompass play, landscaping, parklands, as well as significant biodiversity improvements, to allow both people and nature to live alongside each other.

High quality communal green spaces would be connected with green corridors that facilitate active travel and encourage walking and cycling, especially to onward sustainable transport connections and existing public rights of way. This approach combined with the creation of safe, attractive routes serves to reduce reliance on the car, reduce carbon emissions and help to promote the health and wellbeing for all.

Wildflower meadow grassland planted within open space and verges would provide new habitats for invertebrates, and thus foraging habitats for both bats and birds. This would improve the character of the landscape, peoples' contact with nature and their general wellbeing.

Existing hedgerows would be retained and enhanced with gaps filled to ensure a greater diversity of species would occur, including with many more trees.

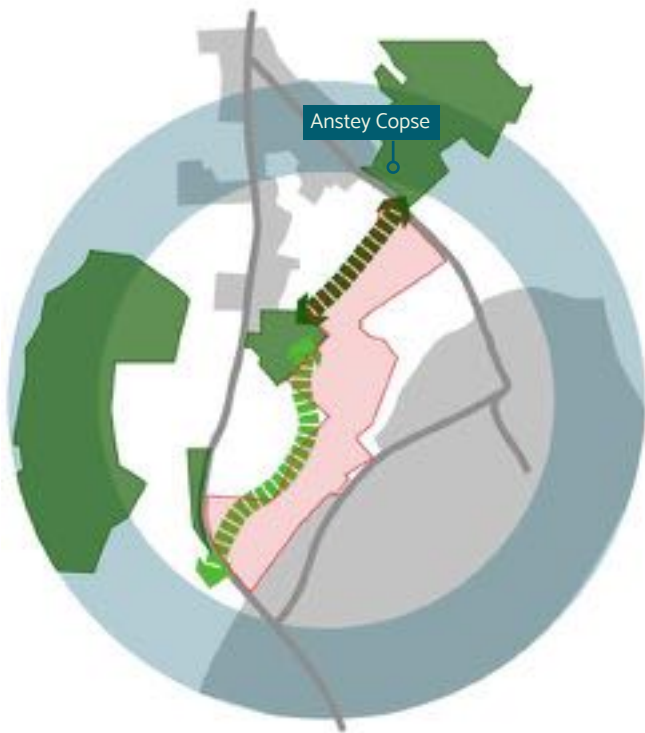
SuDS would be incorporated to treat and hold surface water prior to discharge. Features could include swales, rain gardens, pervious surfaces, filter trenches, and infiltration basins/ponds.

Community allotments and orchards could provide opportunities for on-site food growing.

There is evidence associating the quality of the built and natural environments with the health and wellbeing of communities. The Land North of Gilbert White Way will provide a range of high-quality landscapes to promote health and wellbeing.

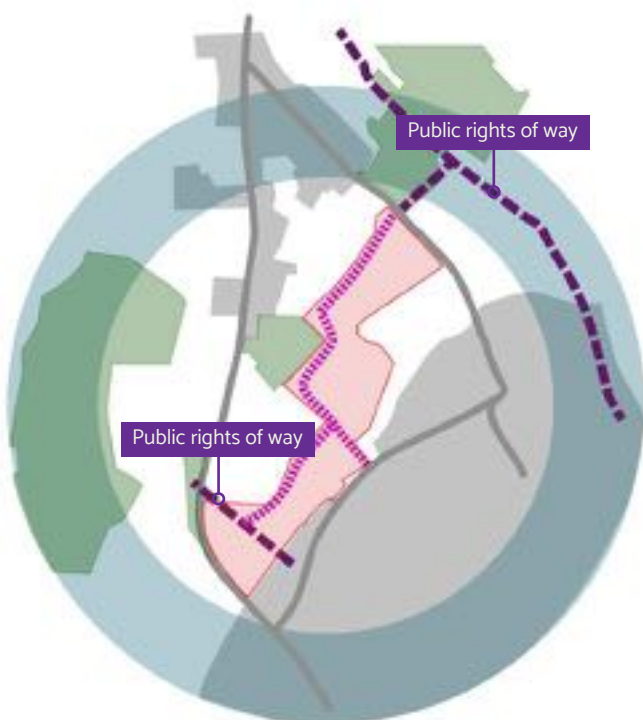


CONNECTING WOODLAND TOGETHER



The site presents a unique opportunity to connect together the existing woodlands surrounding the site with new woodland tree planting for people to enjoy via proposed walking routes. Woodland planting also provides an opportunity for biodiverse habitats.

ADDING BENEFIT TO THE TOWN



The site presents an opportunity to create additional footpaths to contribute to the wider connectivity of the town. Allowing pedestrian and cycle access to the newly proposed public open space will be positive for both new and existing residents within the town.

FRAMEWORK MASTERPLAN

A new sustainable and well-connected neighbourhood for Alton based upon the principles of a 20-minute neighbourhood.

The Land North of Gilbert White Way includes the potential for:

- up to 204 homes
- improved and enhanced pedestrian links to existing public right of way network on site/adjacent to site
- a considerable amount of new publicly accessible open space, for the benefit of all. New green infrastructure will create biodiversity enhancements across the site



- 01 Proposed vehicular access point
- 02 Pedestrian access point connecting to Upper Anstey Lane
- 03 Emergency vehicular access point
- 04 Sustainable drainage system (SuDS)
- 05 Retained/enhanced boundary hedgerows
- 06 Proposed woodland tree planting
- 07 Public open space
- 08 Orchard planting
- 09 Primary access road
- 10 Development set back from higher ground
- 11 Swale
- 12 Informal footpath and trim trail around development
- Proposed pathways/trim trail
- Key pedestrian route
- Public Right of Way
- ★ Children's play spaces
- Meadow planting



Framework demonstrating up to 204 units. Not to scale.

ACCESS STRATEGY

The access complies with national and Hampshire County Council guidance:

- 2m footway, i.e. in line with the recommended width to amply accommodate pedestrians.
- 5m wide carriage, which is sufficient for two large vehicles to carefully pass one another;
- 6m junction radii, which will accommodate movement by large (e.g. refuse collection) vehicles whilst providing slow turning speeds and encouraging a slow speed environment within the site; and
- Visibility splays in accordance with national / HCC guidance for the prevailing 30mph speed limit.

‘Taking up’ the Opportunities

The site is in a highly sustainable location for residential development and the scheme will encourage the ‘take up’ of sustainable modes in accordance with the NPPF through a package of measures, e.g:

- Ensuring new homes are designed to facilitate home working and home shopping
- Designing to accommodate delivery vehicles
- A masterplan which includes segregated cycle / footways, shared surface routes and road design which encourages low vehicle speeds
- The funding of upgraded bus stops, for example with seating, real time passenger information and shelters within the vicinity of the site
- A Car Club available to new and existing local residents. This will enable residents to have access to a car when they need one and are proven to reduce car ownership and useage
- Installation of electric vehicle charging facilities
- Provision of a Travel Plan – a package of measures aimed at promoting sustainable transport, such as:
 - A website / social media page
 - Promotion of connections to broadband network
 - Promotion of home delivery services
 - Travel Welcome Packs providing
 - (a) Information on home delivery services in the area
 - (b) Walking and cycling maps and health information
 - (c) Bicycle User Group
 - (d) Details on public transport connections, routes and frequencies
 - (e) Offer of a sustainable travel voucher for each dwelling for bus/rail tickets or cycle equipment purchase
 - (f) Promotion of car sharing schemes through Liftshare



MOOD BOARD: HOUSING



MOOD BOARD: PUBLIC OPEN SPACE

Potential activities within the country park.

1. Animal grazing
2. Dog walking paths
3. Picnic areas
4. Allotments, community gardens and productive and edible landscapes
5. Walking and cycling routes
6. Outdoor trim trail & outdoor gym equipment
7. Nature interpretation boards
8. Meadow landscapes
9. Quiet areas
10. Public art
11. Formal play areas
12. Natural play areas
13. Education landscapes
14. Wildlife habitats and hides



Creating a Nature Recovery Network

1. *Improve species diversity*
2. *Connect a network of semi-natural habitats*
3. *Allow habitats to develop naturally over time in accordance with rewilding principles*

Play for all

Play for all ages including formal children's play area, natural play and nature trails.





CONCLUSION

This document has demonstrated the site is deliverable, technically unconstrained and is an inherently sustainable location for new development.

This document has also set out our overall vision for the site and development capacity options.

Overall, Land North of Gilbert White Way provides an excellent opportunity to deliver new housing very close to local supporting facilities within the town. In addition to providing much needed new housing in a suitable location, the site offers the opportunity to create public open space while increasing biodiversity and the health and wellbeing of its residents.

The Land North of Gilbert White Way is a small to medium sized site which the NPPF clarifies, at paragraph 68, can make an “important contribution” to meeting housing requirements, as it can be built out relatively quickly and is not reliant on significant infrastructure delivery.

Within this context, first consideration should be given to the Land North of Gilbert White Way. We would be delighted to work with East Hampshire District Council and other stakeholders to bring forward this exciting opportunity.

APPENDIX 3. CRAWLEY LOCAL PLAN EXAMINATION - POST HEARING LETTER EXTRACT

“Plan Period

3. *The end date of the submitted plan is sound and would provide the required 15 year horizon for strategic policies on plan adoption as required by NPPF paragraph 22. As discussed at the hearings, we recommend that the base date of the Plan is clarified as 1 April 2023, so that the plan period is clearly 2023/24 to 2039/40. This would align with the submitted evidence base and would be supported by the revised housing land and employment land trajectories. The ramifications of this would be to address an additional year’s housing need (755dpa) with corresponding updates to Policy H1 in terms of both housing need and the supply-led housing requirement. Following the Part 1 hearings the Council has reflected on this and in general terms we consider that the relevant changes that the Council has proposed would be necessary for plan soundness.*

Housing Requirement and Land Supply

4. *Given the clear constraints facing the Borough, the submitted plan’s approach of presenting the housing requirement as a supply-led figure would be sound. We are satisfied that plan preparation has sought to optimise housing delivery as far as is practicable. In particular, we consider the Plan provides a positively prepared framework to support the revitalisation of the town centre as a neighbourhood for approximately 3,000 homes over the plan period. We will deal with this in more detail in our report but, ultimately, we find the Plan would be consistent with national planning policy, positively prepared and justified in accommodating approximately 42% of the Borough’s housing need over the plan period. No major sources of potential housing supply have been omitted and the proposed significant uplift in the windfall allowance would be justified.*

5. *Various main modifications would be required to the housing requirement in Policy H1 (and as expressed in Policy H2) to reflect the amended plan period. We are satisfied that the housing requirement should be increased from a minimum 5,030 net dwellings to 5,330 to reflect supply capacity. The additional year in the plan period will have consequential implications for the scale of unmet housing need which will increase from 7,050 dwellings to 7,505 over the plan period.*

6. *The extended plan period and other factual amendments have generated proposed modifications to the housing trajectory. In summary, the proposed modifications to step the trajectory from 386 dwellings per annum for years 1-10 to 210dpa in years 11-17 would be necessary for plan soundness. We will set out our full reasoning for this in our report. In taking this approach and noting the 10% buffer (as sought in accordance with NPPF paragraph 74b), the latest evidence on the delivery profile of individual sources of housing supply indicates there would be a five-year deliverable supply on plan adoption against the plan’s amended housing requirement. There would also be a strong prospect of the housing requirement being met during the mid period of the plan (years 6-11). Taking account of the latest housing trajectory [PS/H/HD/14] we see no reason to further amend housing site capacities or the profile of delivery.”*

APPENDIX 4. NEIGHBOURHOOD PLAN STEERING COMMITTEE MEETING NOTE



**ALTON NEIGHBOURHOOD PLAN STEERING GROUP
MEETING NOTES
WEDNESDAY 21st FEBRUARY 2024**

In attendance:

Mike Heelis – Chair (MH)
David Allan – Vice Chair (DA)
John Bound – Community Representative (JB)
Rob Fowell – Community Representative (RF)
John Grace – Community Representative (JG)
Peter Holden – Community Representative (PH)
Richard Parratt – Community Representative (RP)
Councillor Suzie Burns – EHDC Representative (SB)
Councillor Graham Hill - ATC Representative (GH)
Pat Harris – Interim Town Clerk (PMH)

Adam Harvey – EHDC Officer (AH)
Jenny Wood – EHDC Officer (JW)

1. **Apologies** – No apologies as all members present
Ex-officio - Councillor Annette Eyre & Councillor John Chubb
Not required: Leah Coney – O’Neil Homer (Consultants)
2. **Updates since Last Meeting**
 - 2.1 MH welcomed both Adam & Jenny to the meeting
 - 2.2 RF advising that he was meeting with LC in the morning to go through the amenity land mapping and that this would be circulated once completed. RF apologized that this had not happened as yet.
 - 2.3 Steering Group actions in taking photographs of buildings in the Local List – only 4 photographs received from the list that was circulated. Those who had indicated they would assist with the taking of photographs assured the group that these would be forthcoming as soon as there was a “break” in the weather in order to achieve good quality photographs for inclusion in the Plan. AH enquired whether the Conservation Officer had been consulted on the Local List and requested that once completed that details were provided to the Conservation Officer. PH advised that the Conservation Officer had been consulted and were aware of the Listing.
 - 2.4 The Chair of the Holybourne Village Association had sent in a FOI request to the Town which had been satisfied with the publication of all of the meeting notes of the Steering Group, which had been redacted as appropriate. The Steering Groups Terms of Reference were already published on the Town Council’s website, but this was also provided to avoid any confusion as to the terms under which the SG operates.
 - 2.5 Ashdell Road Residents Association had approached MH for clarification on a number of matters relating to misinformation on some websites which had been satisfied
 - 2.6 The Chair of the Holybourne Village Association had issued a letter to advise that it was joining the Windmill Hill pressure group – which was acknowledged
 - 2.7 Original Scenario Planning document is the current document being applied pending an outcome decision today (see item 4 site allocations)

2.8 JB had worked on a Press Release but it had been agreed that nothing would be released until after the meeting taking place today.

3. Review of Housing Allocation Approach

3.1 MH acknowledged that there were 4 pressure groups namely Chawton Park Farm; Windmill Hill, Holybourne & Neatham Down and that as a result of his presentation to District Councillors in January that concerns mounted over the allocation approach being followed by the SG which the consultants had worked up namely the 4 scenarios:

- Scenario 1 Brownfield sites
- Scenario 2 Will Hall Two; Pertuis Avenue & Travis Perkins
- Scenario 3 Holybourne
- Scenario 4 Windmill Hill & fields (South Alton)

In November 2023, ANLSG were given by District a target allocation of 700 with the District Local Plan allocating a strategic site for 1,000 which made up the total of 1700 allocated to Alton.

4. Site Allocations

4.1 The Steering Group, following lengthy discussion and input from all attendees were requested to determine which of the 3 options as advised by District they wished to take forward.

Option A: As is evident by a number of ‘made’ Neighbourhood Plans in East Hampshire, the plan does not need to include site allocations. All relevant applications are still determined by the policies within the neighbourhood plan and the increased CIL contributions (if applicable) still apply. The main significant difference is paragraph 14 in the NPPF (December 2023) would not apply. As a result, in situations whereby the LPA cannot demonstrate a sufficient supply of housing, the tilted balance is engaged and the presumption in favour of sustainable development would apply. However, Alton is currently in a favourable position, as the updated NPPF has extended the protection afforded by paragraph 14 to five years (from the Neighbourhood Plan being ‘made’) from the previous two, meaning the paragraph 14 applies until November 2026. Similarly, changes to the NPPF now mean the LPA are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing for decision making purposes if the following criteria are met:

- their adopted plan is less than five years old; and
- that adopted plan identified at least a five-year supply of specific, deliverable sites at the time that its examination concluded.

Therefore, following adoption of the Local plan, for a five-year period the tilted balance would not be engaged.

Option B: As determined by the Draft Local Plan, a housing requirement of 700 dwellings as well as a strategic allocation of about 1,000 has been proposed in and around Alton. As detailed in previous correspondence, growth of a strategic nature, such as Neatham Manor Farm, should be addressed by the Local Plan process. However, the 700 dwelling figure could be met via the Neighbourhood Plan. Three sites have been included in the Draft Local Plan, where they fall outside (or partly outside) the designated Neighbourhood plan area. We welcome your comments on those sites as part of the current consultation.

Option C: The final option would be to allocate some sites in the Neighbourhood Plan. We would need to work together to determine how the 700 dwelling figures is addressed by both plans, but similar to the 2021 Modification, the Neighbourhood Plan could concentrate on those

sites within the settlement policy boundary. The scenario planning in September identified up to 600 dwellings that could be delivered from existing sites in the SPB. Whilst EHDC raised concerns on the deliverability of some of those sites, it would be useful if more detailed work was done as part of the neighbourhood plan to fully realise those sites that could be developed in such locations, making the best use of existing brownfield opportunities in the SPB. This approach would result in paragraph 14 being engaged.

By a majority decision, the ANPSG voted for Option A: Do not allocate sites and therefore the ANP3 would go forward without site allocations.

5. Confirmation of Policies

- 5.1 This work on updating and refining of the Policies continues and (LC) will carry on with producing the Draft NP plan in readiness for the Reg 14 Consultation scheduled for 26th/27th April
- 5.2 AW & JW requested that once updated, a copy to be forwarded to them which was agreed

6. Update on Public Engagement/Communication

- 6.1 Approximately 200 residents attended the Local Plan engagement session at The Maltings
- 6.2 JB would work up a Press Release to be circulated to the group Monday, 26th but will await publication of the Agenda for the Extra-ordinary Meeting of the Alton Full Council due Thursday/Friday of this week.

7. Next steps in the Project Plan

- 7.1 An updated Project Plan will be drawn up given the decisions of the meeting today
- 7.2 The Alton Neighbourhood Plan Reg 14 consultation will take place on Friday, 26th & Saturday 27th April – the location to be confirmed but hopefully the Assembly Rooms.

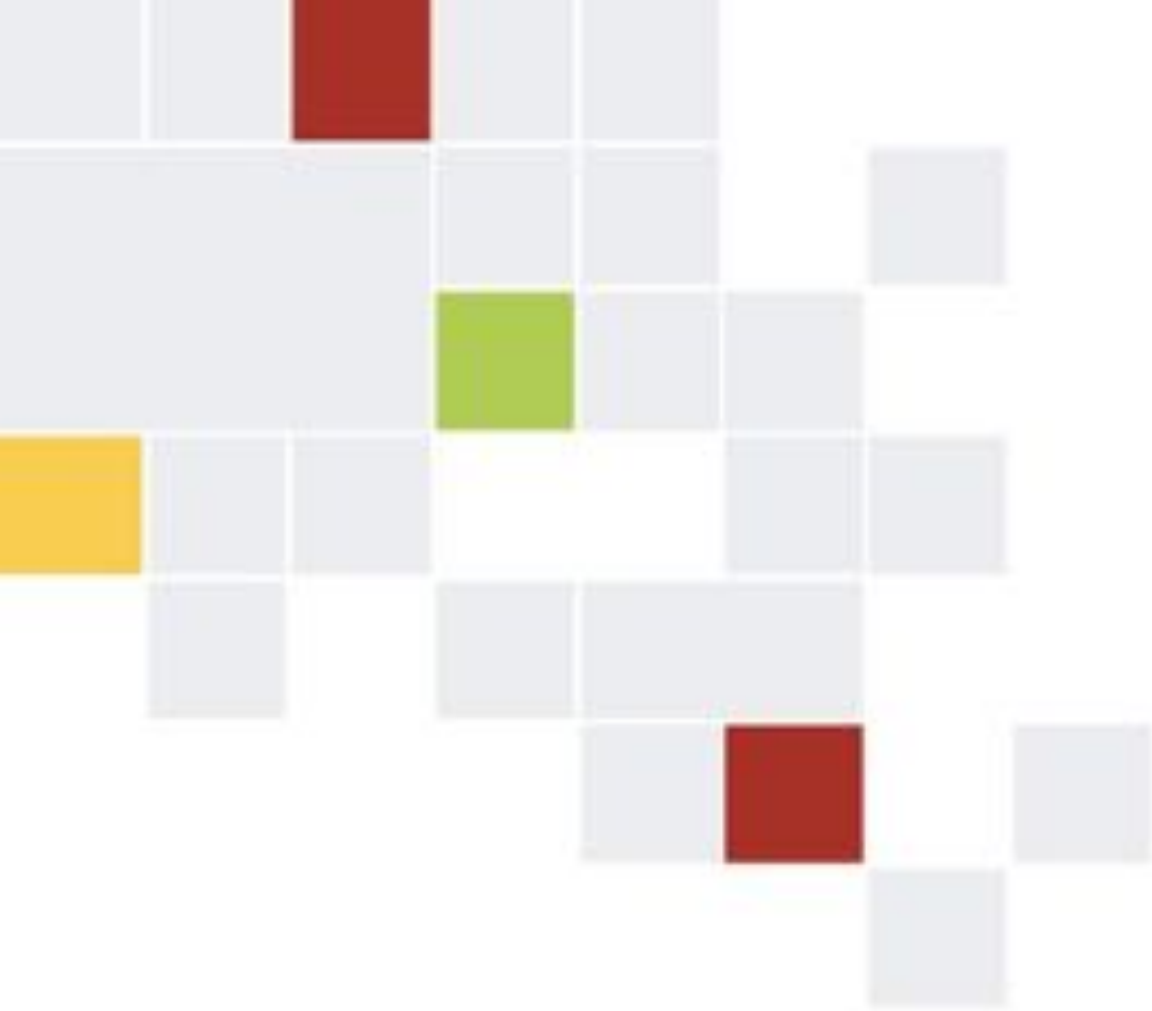
8. Any Other Business

- 8.1 There was none

9. Next Meeting

The next meeting will be on **Wednesday, 13th March at 2.00 p.m.**

Meeting concluded at 16:05 p.m.



Boyer Wokingham

Boyer