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Working locally and
nationally for a beautiful
and living countryside

Registered charity number 1164410

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Planning Policy Team
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16th February 2016

Dear Sirs,

Response to the Eastleigh Borough Council Local Plan 2011-2036: Issues and Options

Please find below the comments of CPRE Hampshire on the Issues and Options document. We would welcome being involved in the process and request that you keep us informed of the progress of the Plan through to an examination, at which we would like to appear, in particular on the issues of housing numbers and spatial strategy.

In summary, CPRE Hampshire is a registered charity and its objects are to promote and encourage for the benefit of the public the improvement, protection and preservation of the countryside of Hampshire and its towns and villages, and the better development of the rural environment. We have evaluated in detail the Eastleigh Borough Council Issues and Options document, as well as the accompanying Sustainability Appraisal, Transport Strategy and Housing Background Paper. We would like to give full support for the Councils endeavours to prepare a Local Plan, and to encourage them to engage with their local communities and listen to their comments.

After appraising all the documents, CPRE supports the housing numbers as provided by the Eastleigh Housing Needs Survey of June 2015. These are based on the most up-to-date and robust data using the census and DCLG projections, and are in accordance with current government guidance. CPRE is in favour of all efforts to promote brownfield development and supports the Borough Council in its efforts in this regard, although we believe that there are more radical approaches to regenerating the older urban areas that they have not fully considered.

However, recognising that some greenfield sites will be required over the next 20-year period, CPRE has evaluated the alternative options in terms of their impact on the countryside. This process has confirmed that Options B and C are the most damaging to the finest landscape in the Borough, and the least acceptable in environmental terms, leading to an unnecessary new road across fine countryside, and probable adverse impacts on the River Itchen SSSI/SAC and the South Downs National Park. These sites are also the furthest geographically from Southampton, the railway and the transport links to the M27, connections to which the Corporate Strategy seeks to promote. To that end, CPRE Hampshire will be firmly objecting to Options B and C, and will propose an alternative scenario to meet the requirements, which does not necessitate these sites to be developed.

Yours faithfully

CPRE Hampshire

**Question 1: Do you agree with the summary of the characteristics of the Borough as set out above and amplified in the Borough Profile, Scoping Report and Authority Monitoring Report?
If not, please explain why?**

A1.1 Yes, in general, CPRE agrees with the summary of the Borough, although we would query that there are good communication links (para 2.4) by road (the M3 and M27), as these roads are already heavily congested and reaching capacity.

**Question 2: Do you think the research listed at www.eastleigh.gov.uk/lp36 appropriately covers what we need to know to write the new Local Plan?
If not, please explain why.**

A2.1 Yes, but we request the addition of the following documents, so that CPRE is able to refer to them in any subsequent inquiry.

<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4145-smarter-shmas-a-review-of-objectively-assessed-need-in-england>

<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside>

<http://www.cpre.org.uk/resources/housing-and-planning/planning/item/4147-local-plans-submission-of-evidence-to-the-expert-group>

**Question 3: Do you agree with the strategic key issues identified?
If not, please explain why.**

A3.1 The section on environmental capacity should include mention of light pollution and tranquillity.

A3.2 CPRE Hampshire believes that the last bullet point about identity should address the issue of preventing coalescence of the borough's towns and villages, and the protection of gaps, rather than a rather vague reference to ensuring a sense of identity. This is clearly set out in the document already under paragraph 1.4, but does not seem to have transferred to the strategic key issues, "1.4 Retention of gaps is a clear priority for the Council and local communities and the Council has published an updated Corporate Plan that gives tackling congestion as a high level priority. This consultation will seek confirmation of many of those priorities." This is also mentioned in para 2.2 "It also retains some areas of countryside that are locally significant because of the separation they provide between settlements and also their biodiversity and landscape characteristics."

A3.3 Furthermore, there should be a bullet point about design, as the Ministerial introduction to the NPPF states - "Our standards of design can be so much higher. We are a nation renowned worldwide for creative excellence, yet, at home, confidence in development itself has been eroded by the too frequent experience of mediocrity."

A3.4 In addition, there should be a statement on the commitment of EBC to involve and listen to the views of the public. Again, in his NPPF introduction, the Minister states “in recent years, planning has tended to exclude, rather than to include, people and communities.”

**Question 4: Have the key development constraints been identified above?
If not, please identify which constraints should be added or removed.**

A4.1 No, the location of the South Downs National Park (SDNP) is not mentioned in the constraints section and it is not shown on the constraints map. The SDNP is shown in the context map Fig 2.1, and whilst it is outside the Borough, it should also be included in this section, as its close proximity to the boundary is clearly a constraint to the north of Fair Oak. Its omission would put EBC in breach of their statutory duty to have regard to National Park purposes under Section 11 A(2) of the 1949 National Parks and Access to the Countryside Act, and Section 62 of the 1995 Environment Act.

Question 5: What are your views on a new vision for the Local Plan and the possible objectives?

A5.1 The Vision in the Corporate Plan is perfectly acceptable; the difficulty will be achieving the themes and objectives via the planning process.

**Question 6: What do you think of the summary of the options for calculating the Borough's housing requirement set out above?
Are any of the options appropriate to meet the housing requirements in this area?**

A6.1 CPRE Hampshire has studied the ‘Eastleigh Housing Needs Study (EHNS)’ of June 2015 by JG Consulting and the ‘Housing Background Paper’ of December 2015. Option A of the consultation suggests a mid-point figure of 552 dpa, which compares to the latest household projections figure from DCLG of 510 dpa, and also allows for an element to deal with any potential previous under-delivery. On this basis CPRE is firmly convinced that Option A is the most up-to-date, the most robust analysis of the population 2015 data from ONS, and the one most closely consistent with the household projection methodology as espoused by DCLG.

A6.2 The DCLG published their first complete set of household projections since the 2011 census in February 2015. These projections had been eagerly awaited because of the unexpected outcomes of the census which were that there were 500,000 more people living in the country than anticipated, but 325,000 less households. This suggested that the steady, and decades long, decline in average household size (AHS) had come to a halt. And it meant that a change in prognosis was needed by those demographers and planners who needed to make long-term predictions of numbers of households, as for years these had been predicated on the assumption that the AHS would continue its steady decline more or less in perpetuity.

A6.3 The reasons for this surprising census result have been hotly debated. The housebuilding industry have been keen to suggest that the 2008 recession caused much involuntary sharing of dwellings and that the pre-2008 trend in AHS will resume as soon as financial conditions and housing supply return to normality. However, others have suggested that there are deeper sociological factors as to why people of all ages are less inclined to live alone (another startling fact from the

2011 census was that there were almost a million less single-person households than expected). This uncertainty in interpretation, and that fact that the census data would soon be available, led ONS, in 2013, to make population projections only up to 2021, with DCLG making their resulting household projections to the same date (when the normal sequence is that ONS produces population predictions every other year and that the following year DCLG then work on turning these into household projections up to 25 years ahead, thus the 2015 DCLG household projections are based on the 2014 ONS population projections).

A6.4 The uncertainty also led LPAs everywhere into making their own ad-hoc assumptions about what was likely to happen with AHS etc. beyond 2021. In this case it was a PUSH SHMA which was based on the previous predictions. So the significance of the 2015 DCLG projections is that they should render all of these ad-hoc projections obsolete and unnecessary and they should become the basis for determining the amount of new housing needed in each district and region. It is also important to note that ONS have made some changes in recent years in an attempt to make their forecasts more reliable: there is now better tracking of international migration inflows and outflows, and the quarterly labour force survey (LFS) data are used to pick up recent trends in household formation rates. This application of newer data makes the older projections less relevant.

A6.5 It is acknowledged that the Inspector felt that the numbers from the PUSH SHMA (Option B) were too low, but the subsequent update as discussed above from the ONS in terms of the corrected output from the Census numbers shows that he was in fact incorrect in this assumption, although that was not necessarily to be predicted at the time of his Examination.

A6.6 The Inspector discussed (para 18 of his report) the use of a UPC (Unattributable Population Change) correction in the projections. In our view the use of a UPC is unjustified. The ONS report 'Consultation on the 2012-based Subnational Population Projections for England: Summary of responses' 29th May 2014 stated that 72% of users agreed with ONS's decision not to use a UPC in the 2012 SNPP and went on to say: "While ONS recognises that UPC can have a significant impact at some age and sex groups in some local authorities, there is insufficient evidence that an adjustment for UPC should be made."

A6.7 If one were to use a UPC because of presumed past underestimation of migration into Eastleigh; this would ignore the fact that the latest ONS methodology corrects for this past underestimation (which was a nationwide phenomenon with the 2011 census showing 493,000 more people in the country than expected). The ONS report 'Methodology: 2012-based Subnational Population Projections' states: "The 2012-based subnational population projections use the published international migration component of population change as used in the published population estimates series. Estimates from mid-2006 to mid-2011 will include the adjustments for additional EU8 migrants identified when the population estimates were revised after the 2011 Census."

A6.8 To add on another correction would be to double count the effect. The PUSH SHMA was based on a superseded set of demographic projections and surely should not be given the same weight as the EHNS study which is based on more recent data which indicates a slower rate of population growth; so Option B should be considered less realistic than Option A.

A6.9 The Inspector also suggested (paras 32,36 and 48 of his report) that it would be appropriate to raise the annual housing target in order to (a) deliver more affordable housing at 35% of the total, and (b) because of market signals. In CPRE's view LPAs need to be very cautious about deviating from the DCLG projections of need. The input ONS projections are normalised so that inflows and outflows for all districts sum up to the expected regional net migration and, in turn, the regional figures sum to the expected national net in-migration.

A6.10 So any increase (above ONS projections) in a district will have to be balanced by a decrease somewhere else across the country, and the question about where will the extra people come from becomes even more relevant as LPAs all over England plan for more housing than called for by DCLG projections to meet economic aspirations that simply compete with the aspirations of other LPAs in the region. At some point it has to be recognised that this is just not credible. In our view it would be better if LPAs stuck with the DCLG projections but had flexible plans which allowed for future demographic changes. It cannot be sustainable, in NPPF terms, to allocate large areas of greenfield land for development that according to official projections will not be needed; and then if built out will attract yet more people into the Borough and exacerbate the difficulty of finding developable land in future years.

A6.11 The Inspector also expressed concern at the role of the provision of affordable housing and the role of the private rented sector, with a threshold of 30% of income (he proposes 25%), which has led to Option C being brought forward. It is argued that because around 35% of all new housing development has to be affordable, this must be a reason for increasing the total amount of new housing. But increasing the amount of new housing beyond what is otherwise needed also implies that extra people need to migrate into the area to fill the additional houses. As noted earlier, this looks implausible - especially when considered alongside all of the in-migration planned by other LPAs in Hampshire. If the people do not arrive, the market homes will not get built and neither will the 35% affordable dwellings. CPRE recommends that consideration be given to the building of council houses. This does not create a multiplier effect on non-affordable dwellings.

A6.12 CPRE sees a valid role for the private rented sector, and believes that DCLG also recognises this sector as inputting into the housing market. There has been significant growth in the sector since 2003, and in 2013 it overtook the social rented sector. Increases nationally have been related to the removal of rent controls, the introduction of assured short-hold tenancies, and the growth in buy-to-let. Furthermore, SHMA guidance states that local circumstances can justify a figure other than 25% of gross income being used. In neighbouring authorities' 30% has been used, and it would seem that a similar figure would be defensible in Eastleigh, as any alternative would imbalance the sub-regional rental market. On that basis CPRE does not accept that Option C is the most suitable option when compared against others.

A6.13 As regards Option D which is predicated on accepting any unmet need from Southampton or the wider Housing Market Area, CPRE argues that this would not be in accordance with the Cities First approach as agreed by all the PUSH authorities in both their Spatial and Economic Strategies.

Question 7: What are your views on the estimates of travelling communities' need as set out above?

Do you agree with the Council's proposed approach?

A7.1 CPRE agrees that in the light of the August 2015 'Planning Policy for Traveller Sites' guidance that the Borough should undertake more research, and suggests that this matter is covered by an SPD so as not to delay progress on the remainder of the Local Plan.

Question 8: Do you have any views on the likely level of employment floorspace needed in the Borough for the period 2011-2036?

Do you agree with the Council's proposed approach?

A8.1 CPRE agrees with the Borough's proposed approach.

Question 9: Do you have any views on the likely level of need for retail floorspace and other town centre uses in the Borough for the period 2011-2036?

Do you agree with the Council's proposed approach?

A9.1 CPRE agrees with the Borough's proposed approach.

Question 10: What are your views on spreading new development across a number of extensions to settlements across the Borough? OPTION A.

Is this an appropriate option that merits further investigation? Please explain your reasons.

A10.1 CPRE believes that Option A merits further investigation. There would probably be more public support for this option, as no one settlement will feel overwhelmed by the scale of development proposed. It is not clear how the "blue blobs" on the map (Fig 6.2) relate to actual housing numbers and there are some locations which have not been identified as specific sites in the separate options.

A10.2 However, we feel that an alternative scenario which combines some of the elements of Option A, along with some of the site specific options should be considered. This is discussed in CPRE's answer to Question 18.

Question 11: What are your views on the idea of focussing new development in an expansion of Fair Oak and Bishopstoke to the north/north-east, with related development in Allbrook village and a new link road from Fair Oak through to the M3? OPTION B.

Is this an appropriate option that merits further investigation? Please explain your reasons.

A11.1 CPRE considers Option B is one of the most environmentally damaging options of the 8 suggested by Eastleigh BC and should not be taken forward.

A11.2 The proximity of this area of search to the River Itchen Special Area of Conservation would necessitate an Environmental Impact Assessment to comply with the EU Habitats Directive. Para 119 of the NPPF confirms that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Habitats Directives is being considered, planned or determined.

A11.3 The landscape in this rural gap between Bishopstoke and Brambridge/Colden Common is of a high quality and has intrinsic value for its own sake. Our assessment is that this area has the finest landscape scale views in the Borough, particularly in the valley separating these settlements. Please

see photos below.



A11.4 The woodlands of Stoke Park Wood, Upper Barn Copse, Park Hills Wood, Tippers Copse and Hall Lands Lane are of particularly fine quality, with views of open fields visible through the trees. These areas of woodland are not only crossed by extensive public footpaths, but they are joined by a network of paths and bridleways, allowing widely-used public access. They provide a pattern of linked green infrastructure which means they are particularly valuable for wildlife and recreation and well-being of local residents. This area of the Borough has particularly dark night skies.

A11.5 The so-called North Bishopstoke Bypass is shown extending into the adjacent district, which has not been considered in Winchester City Council's already adopted Local Plan. All options for the new road appear to direct the traffic to the Allbrook railway arch, a point of considerable congestion already, and intermittent flooding. CPRE does not believe that the proposed realignment of Highbridge Road is a solution to this congestion. Details have not been provided of how the bridge can be upgraded without adverse impacts on the River Itchen.

A11.6 There is some benefit to be gained by road improvements around Allbrook Hill and the potential for around 350 dwellings solely in this portion of Option B could contribute to these works. There could also be some limited development around Crowdhill, perhaps 500 dwellings straddling Winchester Road.

Question 12: What are your views on the idea of expanding Fair Oak village to the east and north? OPTION C.

Is this an appropriate option that merits further investigation? Please explain your reasons.

A12.1 CPRE considers Option C is one of the most environmentally damaging options of the 8 suggested by Eastleigh BC and should not be taken forward.

A12.2 It has likely adverse impacts on the South Downs National Park just to the north of the area proposed. Current legislation requires that 'in exercising or performing any functions in relation to, or so as to affect land' within a National Park, any relevant authority has a duty to have regard to their statutory purposes under Section 11 A(2) of the National Parks and Access to the Countryside Act 1949, and amended by Section 62 of the Environment Act 1995. The two purposes of National Parks are: to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and to promote opportunities for understanding and enjoyment by the public of the areas special qualities. CPRE suggests that development of the land in Option C would lead to adverse impacts

such as increased traffic, light, noise and air pollution, and harm to tranquillity and views out of the National Park.

A12.3 The countryside in Option C is of high quality and has intrinsic value for its own sake. There are wide-ranging views across East Horton and around Mortimers Farm, some of these from within the National Park, and also from higher ground at Wintershill. This area of the Borough has particularly dark night skies.

A12.4 The Issues and Options document (page 36) states that this option maximises the use of the North Bishopstoke link road. This is not a justification for this site to be chosen, it is reverse logic for a site to be dependent on another site for its infrastructure provision. This reliance just serves to demonstrate the isolated rural and unsustainable nature of this location. CPRE do not accept that the Crowdhill to Mortimers extension of the proposed road can be justified solely on the grounds of relieving congestion on the Bishopstoke Road, and suggests that it would be merely a road on which to hang additional housing. It will cause, not relieve, congestion. If it mitigates harm, it is harm which is directly caused by the development which it is designed to serve. The HCC Strategic Transport Study states that this section of the road has not been modelled as this would be premature. This means that no modelling has been done of the likely increase in rat running north of this site into and through the South Downs National Park impacting the villages of Upham, Owslebury and Baybridge.

Question 13: What are your views on the idea of expanding Bishopstoke to the south and Horton Heath to the west? OPTION D.

Is extending the permitted, but yet to be built, link road between Hedge End and Horton Heath further to the west towards Eastleigh town centre a good idea?

Please explain your reasons.

A13.1 CPRE considers that development of this site would, whilst a regrettable loss of open space, be less damaging than other options. Along with the already permitted site at Horton Heath there should be justification for a South Bishopstoke bypass. This option should be taken forward for further investigation.

Question 14: What are your views on the idea of extending West End to the north of the M27? OPTION E.

Is this an appropriate option that merits further investigation? Please explain your reasons.

A14.1 CPRE considers that development of this site would, whilst a regrettable loss of open space, be less damaging than other options. Alongside proposed development of Option D there should be justification for a potential new railway station. Furthermore, there should be further investigation into the possibility of an additional junction on the M27, the “missing” Junction 6. This option should be taken forward for further investigation.

Question 15: What are your views on the idea of extending Hedge End to the north-east and Botley to the north? OPTION F.

Do you think a new bypass to Botley is a good idea? Please explain your reasons.

A15.1 CPRE considers that development of this site would, whilst a regrettable loss of open space, be less damaging than some of the other options. It should be taken forward for further investigation.

A15.2 CPRE recognises that some benefits could be created by the Botley Bypass.

**Question 16: What do you think of the idea of developing Hamble Airfield with a mixture of residential, employment and open space? OPTION G.
Please explain your reasons.**

A16.1 CPRE believes that this option should be further investigated, but we have concerns over the “unplanned” nature of recent planning applications and appeals in this relatively isolated peninsula. The area should be looked at in a strategic manner to evaluate the most sustainable locations for development and infrastructure, with a masterplan type approach or preparation of a Development Brief.

**Question 17: What are your views on the option of redeveloping Eastleigh Riverside, primarily for employment uses? OPTION H.
Please explain your reasons.**

A17.1 CPRE fully supports this option. It is critical that the long awaited Chickenhall Lane Link Road is progressed further, and CPRE suggests that Eastleigh BC prepare a Development Brief for this area. Policies must ensure that the proposed employment development actually happens or the land must be released for alternative use such as housing in place of greenfield sites. It is possible that a higher density development could result in more than the 200 dwellings currently suggested for the railway works. This could help fund the proposed transport improvements to Chickenhall Lane.

**Question 18: Have we identified all the main spatial options and locations of development?
What options should we also consider?
What are their potential benefits and impacts?**

A18.1 Firstly, CPRE does not feel that sufficient evaluation has been made of the possibility of a more radical redevelopment of older urban areas, in accordance with recently released government statements on estate regeneration. This approach would be consistent with the objective in the Prosperous Places corporate theme which aims to reinvigorate town and local centres (page 18 of the Issues and Options document).

A18.2 Secondly, there is an alternative scenario which encompasses some aspects of Option A, combined with some of the specific site options. This would allow some of the larger sites with associated infrastructure to come forward, obviating the need for harmful development in the most valuable areas of countryside. This scenario was not offered in the consultation, and in order to be considered sound, the plan must be seen to have considered all reasonable and deliverable alternatives.

A18.3 It is not clear from Option A how much quantum of housing might be provided by the locations shown on the map (Fig 6.2). Some of the “blue blobs” are in the same locations as the individual

options, although of a different size, and some are not described in the individual options, but could be considered as Options I (approximate location east of Hedge End, Broadoak), Option J (approximate location east of Hedge End, Kings Copse Avenue) and Option K (approximate location south of Netley). For the purposes of this exercise, CPRE has estimated that approximately 200 dwellings could be provided on each of these sites.

A18.4 Along with some of the local community groups CPRE would like to see investigation of additional scenarios which combine could some of the specific options with some of the Option A areas of search. One possible scenario could be made up as follows:

Option B part only Allbrook (350 dwellings)
Option B part only Winchester Road (500 dwellings)
Option D part only Allington Lane (1,300 dwellings)
Option E West End (2,250 dwellings and 10,000m² of employment floor space)
Option F Hedge End (1,300 dwellings and 6,000 m² of employment floor space)
Option G Hamble Airfield (600 dwellings and 10,000m² of employment floor space)
Option H Eastleigh Riverside/Chickenhall lane (200 Dwellings and 40,000m² of employment floor space. A relief road onto the M27)
Options I, J and K (estimated 650 dwellings)

This scenario, which is one of many, would provide 7,150 dwellings and around 66,000 m² of employment space. This is significantly more dwellings than estimated by the 'Eastleigh Housing Needs Study'. A scenario which accommodates the requirements from the EHNS (approximately 4,000 dwellings) could be realised through the use of only a few of the options.

A18.5 There is an additional site which CPRE understands could be made available by the University of Southampton at its playing fields near Wide Lane. We believe that this site is around 80 acres and could therefore provide around 950 dwellings. This well located and highly sustainable alternative should also be taken forward as it could relieve pressure from some of the higher quality countryside and the more isolated Hamble peninsula sites.

Question 19: Which approaches to the countryside do you think are most appropriate?

A19.1 The countryside should be protected for its own sake, for its intrinsic value, for its importance in mitigating climate change impacts, and for the benefits it provides in terms of ecosystems services, health and wellbeing. In a letter in 2015, Brandon Lewis Minister of State for Housing and Planning said "plans and decisions should take into account the different roles and character of the different areas, and recognise the intrinsic character and beauty of the countryside - to ensure that development is suitable for the local context". CPRE supports any of the options which maximise application of this principle, as discussed above.

A19.2 There should be a policy on tranquillity as per para 123 of the NPPF. Eastleigh BC should "identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason." It is CPRE's view that the areas covered by Options B and C would meet these criteria.

Question 20: Do you think gaps still play a part in Eastleigh? Was the approach in the previous Plan sound? Should we review gaps to retain only the minimum land required to maintain separate identity?

A20.1 CPRE considers that generally the preservation of the gaps in Eastleigh Borough is important to its identity as a semi-rural, semi-parished borough. Without some of the gaps, it might be as well be one single urban sprawl. CPRE supports the first option, which maps the gaps to prevent settlement

Question 21: Do you agree with the proposed approach to addressing coastal issues?

coalescence. Reducing the gaps to the minimum will not serve the purpose for which the public envisage they are intended. In addition to the list provided, there should be further gaps between the settlements of Bishopstoke and Colden Common, and between Fair Oak and Lower Upham. Whilst these settlements are in Winchester District, policies for these gaps could be agreed under the duty to cooperate.

A21.1 CPRE agrees with the proposal to continue the policies from the previous Local Plan.

Question 22: Which approach to the thresholds over which affordable housing will be sought do you think is more appropriate?

Question 23: Which approach to the proportion of affordable housing to be sought from qualifying developments do you think?

A22.1 and A23.1 CPRE accepts that viability may in some circumstances be impacted by the requirement for affordable homes, and supports the option to vary the approach across the borough for both thresholds and proportion, although the targets as set in the previous Local Plan do not seem unreasonable. Over the plan period the economics of housing development may well change, so some flexibility should be possible in either direction, i.e to expect more affordable provision or contribution on lower thresholds, if the viability, and thus profit is likely to improve over the life of a development. Third party independent evaluations should be used when considering viability. Council housing should be considered to make up any deficit.

Question 24: Do you agree with any of these approaches? What else could we do to help meet needs for specialist housing?

A24.1 A combination of the first two options might serve to deliver current Government policy on Starter Homes and other specialist housing. This does not preclude the development of smaller homes as described in the last option as these can be allocated under the other options.

Question 25: Do you agree with any of these approaches? What else could we do to deliver sites for Travelling Communities?

A25.1 As discussed above in the answer to Question 7, CPRE believes that this subject should fall outside of the Local Plan, so as not to delay proceedings. But in principle CPRE supports Option B that existing pitches should be used wherever possible.

Question 26: Are there any areas in Eastleigh where HMOs are considered a problem? Is there a need to specifically address the issue of managing the provision of HMOs within the Borough? If so, how should the Council best address this? Please provide evidence to support your comments.

A26.1 CPRE has no comments on this question.

Question 27: Do you agree with any of the approaches identified for influencing building standards and density of development? Please explain why.

A27.1 Building standards and density are two separate issues. CPRE believes that density can be increased as long as design of both buildings and site layout is of sufficient quality to permit it. We would encourage high densities where appropriate to minimise land take. As we mentioned in Question 3, CPRE suggests that the Local Plan contains a policy on Quality Design. The Ministerial introduction to the NPPF states - "Our standards of design can be so much higher. We are a nation renowned worldwide for creative excellence, yet, at home, confidence in development itself has been eroded by the too frequent experience of mediocrity." In view of the magnitude of housing proposed and the rather indifferent quality seen in some recent development in the Borough, this is particularly important. Car parking standards could also be reviewed for sustainable urban locations.

A27.2 Building standards are to an extent dealt with under building regulations, but CPRE supports policies designed to reduce energy use, water use and emissions.

Question 28: Which, if any, of the policy approaches identified above to address existing employment sites do you support? Please explain why.

A28.1 In order to comply with the recent changes to permitted development rights, the previous Local Plan policies will need to be reviewed, as they are unlikely to be found to be sound with regard to consistency with national policy. Some specific sites may merit an Article 4 direction, as long as sufficient justification can be made.

Question 29: Which, if any, of the above policy approaches to address retail and other town centre uses do you support? Please explain why.

A29.1 CPRE supports the options in Question 29 B, C and D to prepare a masterplan for Hedge End, to promote regeneration of local areas as a condition of permission, and to permit more diverse town centre uses.

Question 30: Which approaches to addressing transport issues do you think are most appropriate? Are there any other options we can consider to try and help balance development with traffic and congestion?

A30.1 The first bullet point of para 7.50 (page 67) states that a key issue is “Potential for significant new transport infrastructure which could significantly improve the network, with corresponding improvements to congestion, air quality and travel times”, but CPRE is concerned that it is some of the development options themselves which will create congestion, decrease air quality and add to travel times. This is the case for Options B and C, for which a road is only necessary to deliver the housing which will result. CPRE supports the Chickenhall Lane Link Road and the Botley Bypass.

Question 31: Which approaches to delivering and protecting Green Infrastructure do you think are most appropriate? Are there any other options we can consider?

A31.1 CPRE suggests that consideration is given to the introduction of a new area of Greenbelt to prevent the coalescence of towns and villages, to encourage urban regeneration. Greenbelt was a topic of discussion in the current devolution prospectus to Government and has therefore already been considered in principle by the Borough Council. In the absence of this policy solution, a Borough-wide or South Hampshire-wide study should analyse the connected nature of existing green spaces on a landscape scale. Green Infrastructure can only be protected if it has sufficiently strong planning policies to enable this, otherwise it becomes a meaningless token label.

A31.2 In addition to (but not in place of) the previous Local Plan approach, Eastleigh BC should consider policies on all the options suggested. A call should be made for suggested locations for Local Green Spaces.

A31.3 The Green Infrastructure Study (October 2014) prepared by Eastleigh BC as part of its evidence base for the 2011-2029 draft Local Plan is still relevant, and should be retained in the evidence section for this version of the Local Plan. The development areas included as Options B and C are described in the Green Infrastructure Study as forming part of the ancient Forest of Bere, as follows: Extensive former royal hunting forest, extending into the Borough from the east. Key characteristics: Mixture of ancient semi-natural woodland, open space, heathland, farmland and downland. Contains both Oak and Conifer plantations. Extensive lakes, streams and networks of rides and paths. Range of habitats, plus a living and working environment that could be enhanced with increased connectivity and multifunctionality. It is important to note that these areas, particularly parts of Option B are described in this GIS study as being BAP priority areas (map 3.3) and having green infrastructure of strategic value (map 4.1).

Question 32: How should we provide for sustainable urban drainage systems in the future? Are any of the approaches identified above appropriate? Please explain why?

A32.1 CPRE has no comments on these options.

Question 33: Are there any approaches, other than that described in the previous Local Plan, to address pollution issues in the future?

A33.1 Light pollution should be considered in particular in areas neighbouring or impacting on the South Downs National Park in order to be in accordance with its emerging policies on light pollution. Para 125 of the NPPF says “By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.” It is important to note that Options B and C of the Spatial Options are particularly dark areas of the Borough.

Question 34: How do you think we should meet the future needs for sporting facilities within the borough? Please explain your reasons.

Question 35: Do you agree with any of the above approaches to delivering community facilities?

A34.1 and A35.1 CPRE has no comments on these questions.

Question 36: Do you have any comments on the proposed approach to addressing future nature conservation issues?

Are there any other approaches the Council should consider?

Question 37: Do you have any comments on the proposed approach to addressing future heritage issues?

A36.1 and A37.1 CPRE agrees with the approach in the previous Local Plan on nature conservation and heritage. CPRE sees nature conservation as inextricably linked with gap and countryside policies.

Question 38: Are there any other issues that you would like to comment on?

A38.1 CPRE feels that the Issues and Options document, whilst important progress towards an adopted Local Plan, has been rather reactive to developers in terms of site selection. A more strategic approach to identifying where the best and most sustainable locations are located, in a broad sense, could help to guide both proponents and opponents of development options. This could be an expansion of the work put into the constraints map, where generally areas of growth and restraint could be added. This should include some cross-boundary work.

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Colden Common PC
Twyford PC
Upham PC
Owslebury PC
Fair Oak PC
Bishopstoke PC
Stoke Residents Association
Winchester City Council