

# Eastleigh Strategic Development Site Options: Why D and E are the most sustainable options for development



*prepared on behalf of*

## **Action Against Destructive Development**

December 2016

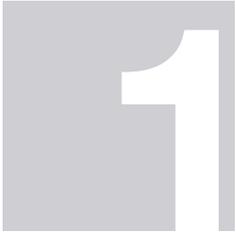
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# Executive Summary

The Government's Planning Practice Guidance emphasises that: 'The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.'

**It is crucial therefore that all of the evidence base is available before the Council decides which strategic development option to pursue. It is unclear how far this evidence base exists as none of the further reports listed in previous Cabinet papers have been uploaded onto the Council's website.**

Making a key policy decision on the draft Local Plan without this evidence base is likely to result in the plan failing to meet the tests of soundness set out in the National Planning Policy Framework (NPPF).

A number of key factors are outlined below which the Council should take strongly into consideration when examining the options for development;

- There is no evidence from the Hampshire County Council work that a solution to the **traffic problems** on Bishopstoke Road needs a north Bishopstoke bypass;
- Options D and E are located closer to the regional employment and service centres of Southampton and Eastleigh - a more **sustainable location** than options B and C;
- There is the potential to provide a **new station** adjoining Options D and E. There will never be the opportunity for significant travel by train from development on Option B and C land;
- In landscape terms, Options B and C are in a sensitive location close to the **South Downs National Park**. This presents **greater risk of harm to the National Park** and its setting by virtue of their proximity, scale and related traffic increases;
- **The NPPF states that National Parks 'have the highest status of protection in relation to landscape and scenic beauty'**.

- The area which comprises Options B and C consists of an area of **high quality attractive countryside**. Option B could provide for up to 3,700 dwellings and 29,000m<sup>2</sup> of employment space and Option C 2,500 dwellings. Development on this scale would completely ruin the sensitive rural character of this area and would be in **fundamental conflict with the NPPF**;
- The area which comprises Options B and C contains European protected species, **substantial areas of ancient woodland and locally designated sites**; and could adversely affect the European Solent sites and the River Itchen Special Area of Conservation and there would therefore be a **very negative impact on biodiversity** and;
- If not designed carefully Options D and E could lead to coalescence. This can be overcome by providing **well defined gaps** that would retain the separation between settlements, as well as providing **environmental enhancement** and improved recreational access.

**Whilst there are undoubtedly some sensitivities with all options, any harms associated with Options D and E are substantially outweighed by those which apply to options B and C, which should not be favoured.**

Options **D and E** represent a **much more favourable** and sustainable location for development, being **close to the services** and facilities in Southampton and Eastleigh, whilst also providing opportunities for the provision of **sustainable transport**, such as a new rail station. The **environmental impacts** are likely to be much **less**, as D and E **do not affect the setting** of the South Downs National Park.

**For these reasons, it is considered to be vitally important that the Council does not make a decision at this stage that Options B and C should be its preferred strategic development site, but continues to develop its evidence base and then makes an informed decision that meets the soundness test for the plan to be justified.**



## The Evidence Base

A report is due to be considered by Eastleigh Borough Council's Cabinet and Council on 15 December 2016 with regard to the Eastleigh Local Plan.

This report sets out why it is important that the **Council does not decide on a preferred option at this stage** owing to an **incomplete evidence base** and that based on current knowledge about locational and environmental constraints that Options **D and E are a more sustainable option** than Options B and C.

In the report by the Planning Policy and Implementation Manager to the Eastleigh Cabinet on 21 July 2016 it was stated that there was a requirement for **6,300 homes on additional greenfield sites** over the Plan period 2011-2036 (para 41).

While it was desirable for some of this development to be delivered on non strategic development sites (para 43), it was considered that this approach **would not be able to deliver the amount of housing** that the Borough needs on its own.

Of the areas considered in the Eastleigh Borough Local Plan Issues and Options consultation (Dec 2015) there are two areas which have the capacity to deliver development at the **strategic scale**, these being:

- North Bishopstoke and Fair Oak (Options **B and C** in the issues and Options Consultation), and;
- North of West End, Allington Lane (Options **D and E** in the issues and Options Consultation);

In a further report to Cabinet on the 27 September 2016 it was stated that 'work is underway **investigating further the feasibility and deliverability** of the areas noted in that report and the intention is to report back to Members on progress by the end of 2016, with the implications for the Local Plan' (para 8).

The report acknowledged that it is 'essential that the plan is under-pinned by a **robust and up to date evidence base** and reasoned justification' (para 18).

Both the July and September reports to Cabinet stated that the further evidence being prepared consisted of:

- An **analysis of gaps** to address the settlement pattern in the borough;
- A **landscape sensitivity** assessment;
- Transport modelling- **deliverable** transport improvements;
- Ecological and **environmental impacts** of new development;
- The impacts of **Starter Homes** and other factors on the housing strategy for this borough;
- Work on the **viability** of development;
- A full Infrastructure **Delivery Plan** identifying the infrastructure needed to support delivery of the Plan and the mechanism for securing its delivery;
- Investigating environmental limits of development in this borough, including the **capacity of waste water treatment** works; and
- An assessment of the green infrastructure of the borough to **ensure a high quality environment** is maintained.

It is **unclear** just how far the Council has got with preparing its evidence base as none of these reports have yet been uploaded to the Council's web site. It must therefore be assumed that none of them have yet been completed.

The Government's Planning Practice Guidance (PPG) states that: 'Local planning authorities should publish documents that form part of the evidence base as they are completed, rather than waiting until options are published or a Local Plan is published for representations. This will help local communities and other interests **consider the issues and engage** with the authority at an early stage in developing the Local Plan.' (Paragraph: 014 Reference ID: 12-014-20140306)

The PPG also emphasises that: 'The evidence needs to inform what is in the plan and **shape its development** rather than being collected retrospectively.' (Paragraph: 014 Reference ID: 12-014-20140306)

It is **crucial that all of the evidence is available** before the Council makes a decision on which option to pursue. Publishing the reports as they are completed will also enable **local community groups** to scrutinise the evidence base and to make representations to Cabinet and/or Council based on a position of knowledge.

This is important in order to ensure that the Local Plan meets the first of the twelve Core Planning Principles set out in the NPPF, which is that planning should 'be **genuinely plan-led, empowering local people to shape their surroundings**, with succinct local and neighbourhood plans setting out a **positive vision** for the future of the area.'

Paragraph 150 states that: 'Local Plans are the key to **delivering sustainable development** that reflects the vision and aspirations of **local communities**,' and paragraph 155 states that: '**A wide section of the community** should be **proactively engaged**, so that Local Plans, as far as possible, reflect a collective vision and a **set of agreed priorities** for the sustainable development of the area...'

The PPG states that: 'Every Local Plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential **environmental, economic and social impacts** of the proposals to be taken into account, and plays a key role throughout the plan-making process. The Sustainability Appraisal ensures that the Local Plan reflects **sustainability objectives** and has considered reasonable alternatives'.

As Options B, C, D and E could affect the **European protected sites** including those along the Solent and the River Itchen Special Area of Conservation there is also a need for a **Habitat Regulations Assessment** to be undertaken which will highlight the likely impacts on any protected sites.

Where an adverse impact is likely to arise, a key part of this process is assessing whether there are **alternative options** that would not have a detrimental impact.

**In the absence of substantial parts of the evidence base, the Sustainability Appraisal and the Habitat Regulation Assessment and the opportunity for the community to engage with it, it would clearly be wrong for the Cabinet/Council to make a decision on the preferred strategic option at the December 2016 meeting.**

This is likely to result in the Local Plan **failing to meet the tests of soundness** as the NPPF states that in order to be justified 'the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.'

It is therefore **unsound to make the decision** before key parts of the evidence base are complete.

There are concerns in the **local community** that a decision could be made early to choose Options B and C. We consider that this would be **the wrong decision** as the advantages of D and E significantly outweigh the harms of Option B and C which is **not a suitable location** for development.

Options D and E **must continue to be assessed** in the evidence base as it is developed, so that if the evidence base confirms that they are the most suitable locations for strategic scale development that they are **allocated in the pre-submission Local Plan** on which the Council is intending to consult in May/June 2017.



## Sustainable Development and Transport

The reasons why the current evidence base is considered to show that **Options D and E have substantial advantages** over B and C in locational and environmental terms are set out below.

The fundamental principle underlying the NPPF is the principle of **sustainable development**. There are three dimensions to sustainable development: **economic, social and environmental**. In our view development of options D and E would be most likely to contribute to each of these components.

### Housing Numbers

According to the Local Plan Issues and Options consultation (Dec 2015) preliminary investigations indicate that the following housing and employment could be accommodated on options B, C, D and E.

Option	Housing	Employment (m2)
Option B	3,700	29,000
Option C	2,500	
Option D	2,300	
Option E	2,250	10,000

The total capacity of B and C is therefore 6,200 dwellings and 29,000 m2 of employment, while D and E have capacity for 4,550 dwellings and 10,000 m2 of employment.

As there is an identified need for **6,300 dwellings** this would suggest that Options D and E would show a shortfall of 1,750 dwellings. However, there are also many other schemes coming forward in other option areas to make up any shortfall.

Investigations by Action Against Destructive Development also indicate that potentially **240 hectares of land** could be developed on D and E avoiding all protected areas, while the figure for B and C is **267 hectares**. Both sites could adequately provide the 6,300 dwellings, with the density at D/E being **26 dwellings per hectare** and B/C being **23 dwellings per hectare**.

The **environmental sensitivities** associated with B and C, indicate that it is likely that **substantially less** development than that indicated could be achieved. Options D and E are located in a **much more sustainable location** than options B and C, as they are located much closer to the regional employment

and service centres of Southampton and Eastleigh, than options B and C, which are located several kilometres further away. D and E are also located in close proximity to local services and facilities, including the Moorgreen Hospital; Hedge End Retail Park; sporting facilities and the Itchen Valley Country Park.

There are particular opportunities for promoting rail travel at D and E as the existing Eastleigh to Hedge End railway line runs adjacent to options D and E and they are close to the existing train station at Hedge End. There is the potential to provide a new station immediately adjoining these two sites.

The Eastleigh Strategic Transport Study Interim Report – Issues and Options' Report (ESTS), states in paragraph 7.3.10 that development of land south of Bishopstoke (option D) 'could **potentially provide support for** 'the potential development of a rail halt/station on the Fareham-Botley-Eastleigh line accessed via a road link connecting to Allington Lane.'

There is also the opportunity in the **shorter term** to improve **linkages** to Hedge End station as the ESTS report states that alternatively development at D could contribute towards 'improving access to the south-east to Hedge End Railway Station; improvements to the existing station footbridge and the provision of further cycle storage.'

Rail travel has the potential to make a **significant contribution** to modal share from the new developments as acknowledged in the ESTS report at paragraph 7.2.5 that: 'It can be demonstrated that in locations where rail services are frequent and of a **high quality, they are well used** and can attract a significant share of modal journeys.... it is not therefore surprising that existing destinations in the east of the Borough such as Fair Oak that are not served by a frequent train or within a walkable distance of a rail station, have the **highest dependency on the car**.' (para 7.2.7)

There will never be the opportunity for significant travel by train from development on **Option B and C** land as there are **no train stations or train lines** in close proximity to these sites. In respect of bus travel, **journeys will be much shorter and more convenient** from D and E as they are much closer to the key employment service centres of Southampton and Eastleigh. While new bus services could be provided to serve development for all options it is important to note that paragraph 2.4.10 of the

ESTS report states that: 'On its own, the provision of sustainable transport infrastructure is often insufficient to encourage sustainable travel habits.

Sustainable transport infrastructure should be supported by development which is either self sufficient, or can utilise existing services and facilities to reduce the need to travel,' so given the lack of proximity of B and C to key employment and service centres in the borough, it is likely that even the provision of bus services **would not lead to a substantial modal shift.**

There are **good opportunities** for **walking and cycling** as Options D and E are relatively flat, with a good existing footpath network linking to the neighbouring settlements. There is also the opportunity to significantly improve cycle access by using development on options D and E to contribute towards the creation of the **Hedge End to Eastleigh cycle route** identified in the 2011 – 2029 Local Plan.

The opportunities to improve cycling links on **Options B and C are much more limited**, owing to the distance to many services and facilities, which also reduces the attraction of cycling. The NPPF states in paragraph 34 that 'plans and decisions should ensure developments that generate significant movement are located where **the need to travel will be minimised** and the use of sustainable transport nodes can be maximised.'

Options D and E provide **greater opportunity to minimise the need to travel** and to make the fullest use of public transport, walking and cycling than options B and C. This is particularly pertinent in the Eastleigh area, because as is acknowledged in the ESTS report, the 'highway network is characterised by **peak period congestion**, particularly at motorway junctions and on the limited number of east-west connections between Eastleigh town centre and the areas to the east.' (para 2.2.2)

Locating development in the sustainable Option D and E locations will **reduce the number of vehicular trips** associated with the development and thereby minimise the impact on the local highway network.

The ESTS report states in paragraph 7.3.7 that census data indicates that in the area north-east of Fair Oak (Option C), commuting by car is the highest in the Borough, with **86% of journeys to work** starting in this area, being by car. In area B the Census data indicates that commuters typically use their cars

for **80 – 85%** of journeys to work (para 7.3.4). Locating strategic development in this area would therefore mean that most transport would be dominated by the car.

The Eastleigh Local plan 2011 – 2036 Issues and Options, states that by 2036 **115,500 m<sup>2</sup> – 142,100 m<sup>2</sup>** of additional employment space may be required. The accompanying ESTS report, prepared by Hampshire County Council, states that 'the new floor-space would be likely to be provided at Chalcroft Farm in Horton Heath, the Ageas Bowl, and Eastleigh Riverside/Airport Northern Business Park.'

All of these sites are in close proximity to options D and E, with Chalcroft Farm adjoining option D and the other two sites being one to the west and the other to the east, so that options **D and E are central to this very substantial extra employment provision** thus minimising the impact on climate change.

### Transport

At this stage assessment of transport impacts is still at a relatively **early stage**, with only the Hampshire County Council 'Eastleigh Strategic Transport Study Interim Report – issues & Options' Report (Dec 2015) available to date.

The lack of any base year reference flows or partial development package tests (to isolate the impacts of individual sites or groups of sites), are **weaknesses that need to be addressed** before the Council can reach any **reasonable conclusions.**

A key element of **delivering development on the Option B and C** land is delivery of the link road north of Bishopstoke. Frequently, provision of strategic infrastructure can be implemented **phase by phase.**

As Options B and C are **remote from existing classified roads**, apart from the B3354 which is going in the wrong direction towards Fareham, rather than Eastleigh and Southampton, the entire road would need to be constructed at the outset. This would create **major issues** with regard to **funding.**

There is **no evidence** from the Hampshire County Council work done so far that a solution to the traffic problems on Bishopstoke Road needs a north Bishopstoke bypass. Preliminary work suggests **there may be alternative solutions but these need further assessment.**



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## Landscape Impacts and Character

There has been no landscape and **visual impact assessment** regarding the potential ability of these sites to accommodate development. In this respect Options B and C are in a particularly **sensitive location** close to the South Downs National Park (SDNP). The South Downs National Park Authority have made representations relating to options B and C stating that:

'The landscape character in this area forms an **important contribution** in terms of the SDNP setting, both in visual and character terms. Landscape Character Assessments refer to the **undulating pastoral and wooded character** of the landscape and the **vulnerability of the area to urban sprawl** and increasing peri-urban activity to the south along the southern boundary of the National Park... any significant changes in character within the setting of the SDNP would impact on the National Park. The SDNPA is **concerned that this location presents greater risk of there being harm to the National Park and its setting** by virtue of their proximity, scale and related traffic increases and would encourage Eastleigh Borough Council to pursue other options that would have a lesser impact. A **landscape sensitivity and capacity study** should be undertaken to inform refinement of these sizeable allocations.'

The NPPF states that National Parks 'have the **highest status of protection** in relation to landscape and scenic beauty' (para 115) and that 'Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged.'

Local planning authorities also have a statutory obligation under the National Parks and Access to the Countryside Act 1949 **to conserve and enhance their natural beauty, wildlife and cultural heritage**. All public bodies and utility companies when undertaking any activity which may have an impact on the designated area, have a duty to have regard to this purpose.

Development of options B and C would **increase traffic** on the B3335 through the National Park to junction 10 on the M3. As well as leading to **congestion**, traffic generation on these roads would also **adversely impact on the tranquillity** of the National Park.

Options D and E are **further from the South Downs National Park** and separated from it by the substantial existing urban

areas of Bishopstoke; Fair Oak and Horton Heath. **There would not be a detrimental impact on the setting of the National Park from development in these locations.**

The character of area D has been fundamentally changed by the existing permissions relating to land adjoining Burnetts Lane. The land further west around Allington Lane is not of particularly high value and it makes sense to concentrate development in this area which will **enable a new community with services and facilities to be created.**

While there are some areas of more attractive landscape, the visual intrusions and low intensity uses would **enable new development without significant adverse visual impacts.**

Options B and C consists of an area of **high quality attractive countryside**. The Landscape Character Assessment for Eastleigh Borough (2011) states that 'the main unifying feature' of the character area forming options B and C 'is the ridge that extends eastward from the edge of the Itchen Valley, through Stoke Park Wood and Crowdhill/Pylehill to Tippers Copse ... the overall impression is one of a wooded, rural landscape with views provided of substantial woodland blocks. ...overall it is an attractive landscape with Stoke Park Woods and the sub area providing distinctive features that have amenity and wildlife value. Contained within the area is a very distinctive parkland landscape.' (paras 4.114, 4.115 and 4.99).

The area is therefore a **distinctive area of attractive countryside**. Providing a new settlement in this area would be **contrary to the NPPF** in that 'the planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes' (para 109) and 'recognising the intrinsic character and beauty of the countryside.' (para 17)

The harm would be accentuated by the **scale of the proposal** with Option B up to 3,700 dwellings and 29,000m<sup>2</sup> of employment space and Option C 2,500 dwellings.

There can be little doubt that **development on this scale would completely ruin the sensitive rural character of this area** and would be in **fundamental conflict** with 'contributing to protecting and enhancing our natural, built and historic environment.' (NPPF, para 7)



## Biodiversity Impacts

### European River Itchen Special Area of Conservation & Solent European Protected Sites

The Council's 'Sustainability Appraisal to accompany the Eastleigh Issues and Options' (SA) consultation (Dec 2015) identified that **all four options could potentially have significant adverse impacts** on European sites including the Solent European Sites and the river Itchen Special Area of Conservation (paras 6.79; 6.99; 6.120 & 6.146).

There is particularly the **potential for impacts arising from new road crossings of the River Itchen**, with potential adverse impacts arising from **air quality; aquatic pollution; noise impacts** on migratory fish; loss of **riparian habitat** and potential **impacts on species** such as southern damselfly and **otter** which move up and down the river.

The Southern Damselfly is an internationally **rare species which is declining** and research indicates that possibly 25% of the global population occurs in the UK.

In 1999 a Study was undertaken by Alison Strange for English Nature and the Environment Agency which indicated that the area around Bishopstoke including the River Itchen itself (Grid Ref 461 2016 and 468 210); Highbridge Russell's Meadows (Grid Ref 468 208) and Highbridge Meadows East (Grid Ref 469 210) in close proximity to the proposed north Bishopstoke bypass crossing contain populations of this species (paras 3.4.3 – 3.4.6).

As the council's SA noted with regard to Option B, 'any proposal which involved land take from the SAC would almost **certainly result in an adverse effect on the integrity of that site** and would therefore need to be able to demonstrate that there were **a) No Alternatives and b) Imperative Reasons of Over-Riding Interest** as to why such a project should nonetheless proceed (as well as compensation to preserve the overall Natura 2000 network). It could prove very challenging to meet those tests' (para 6.79).

**The new link road to the north of Bishopstoke is essential to the delivery of Options B and C**, so in the absence of a completed Habitat Regulations Assessment signed off by Natural England it would clearly **not be possible to make a decision** to proceed with Options B and C.

### European Protected species

The Council's evidence base also suggests that there are **important European protected species** associated with B and C. The Council's SA states that 'it is likely that **Beckstein's bats** utilise Stoke Park Woods. A strategic survey is likely to be required to identify where these populations are located in key woodlands in the borough.' (para 6.80) The Bat Conservation Trust states that 'The Bechstein's bat is a rare tree-dwelling bat, mostly associated with old growth broadleaved woodland,' and is found in southern England.

The Council's Landscape Character Assessment also stated that **Dormouse**, another European protected species is known to live in Stoke Park (para 4.110). It is likely that dormice are also found in the surrounding hedgerows and woodlands across Option B, as dormice habitat is known to consist of suitable woodland areas that are connected by hedgerows.

Other European protected species that could be present on the option sites include **otter and great crested newt**.

### Local sites – ancient woodland

A very substantial area of Option B consists of Sites Important for Nature Conservation. These include **Stoke Wood**, which the notice board at the entrance states contains Purple Emperor and Silver Washed Fritillary **Butterflies**; valley mires and streams; **bluebells**; and **reptiles**.

Two other protected sites are Upper Barn Copse and Crowdhill Copse, both of which are thought to be ancient woodland sites and are owned by the Woodland Trust.

The Woodland Trust in its representations on the Local Plan 2011 – 2031 Issues and Options consultation stated that the Trust opposes development North of Bishopstoke due to **concerns that the proposals will result in permanent and temporary loss and damage of ancient woodland**, fragmentation and degradation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats and cause large amounts of disturbance and pollution.

The Trust also believes that the **North Bishopstoke Bypass** would cause significant fragmentation of the natural environment north of Bishopstoke, particularly intersecting two Woodland Trust-owned ancient woods, Upper Barn Copse (grid ref: SU484201) and Crowdhill Copse (grid ref: SU486198).

The fragmentation of these two large ancient woodland habitats would be **completely inappropriate and significantly damaging** to the wider environment. The Trust is also concerned about the link road bisecting Hall Lands Copse (grid ref: SU500193), another ancient woodland. It therefore considers that the indicative alignment of the **North Bishopstoke Bypass needs re-routeing to prevent the destruction** and fragmentation of ancient woods in the area.

The potential **effects on ancient woodland** are a significant planning issues as the NPPF states in paragraph 118 that: 'planning permission **should be refused for development** resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.'

**The land within Option B that consists of Sites Important for Nature Conservation forms a very substantial proportion of the total area** and with the connecting hedgerows forms a network.

In order to ensure that there is not a significant adverse impact on biodiversity it would be necessary to provide buffers around these sites and also connecting links. This would **substantially reduce the area that could be developed** and, even so, with the road creating severance there would be likely to be adverse impacts, especially on species such as dormice and bats which use hedgerows for feeding and as corridors to travel between sites.

**Development of Option B would therefore be likely to have a very significant biodiversity impact.** By contrast the area occupied by Sites of Important for Nature Conservation on **Options D and E is much smaller** and although care would need to be taken to ensure that they would not be adversely affected, they would represent a much **lesser constraint than on Option B.**

## **Conclusion on Biodiversity**

Biodiversity is a **key consideration in determining** which options should be chosen for the Strategic Site for Development as Section 40 of the Natural Environment and Rural Communities Act 2006, places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.

The NPPF is also clear (para 9) that pursuing sustainable development includes **moving from a net loss of biodiversity to achieving net gains for nature.** Developing on an area such as Options B and C that contains European protected species; substantial areas of ancient woodland and locally designated sites; and **could adversely affect European protected sites is not therefore consistent with Government advice or objectives.**

Of particular importance is the potential impact on European protected sites, because as paragraph 55 of Circular 06/2005 states if a proposal for a particular type of development in a particular location would be likely to adversely affect the integrity of a such a site, or the effects of the proposal on such a site are uncertain, planning authorities **should not allocate the site for that type of development unless there are no alternatives** and imperative reasons of over-riding interest as to why such a project should nevertheless proceed and there is a reasonable prospect that compensatory measures that may be required can be secured so as to protect the coherence of the Natura 2000 network.

**In the absence of such evidence there would be significant problems with the Local Plan, including unsoundness and potentially for a judicial review, if the Council were to decide to proceed with options B and C at this stage in the process.**



## Coalescence and Deliverability

With Options D and E, there is the **opportunity to provide well defined gaps that would contain green infrastructure and public open space that would retain the separation between settlements**, as well as providing **environmental enhancement and improved recreational access**.

Options D and E **do not occupy either the Local or Strategic Gaps** which the Council has identified in the Eastleigh Borough Local Plan 2001 – 2011. The Council has also already granted planning permission for a substantial area of development to the west of Burnetts Lane, which has **substantially reduced the degree of separation** between Fair Oak, Horton Heath and Bishopstoke.

The issue of **coalescence also affects B and C**, where designation of a strategic site would be likely to lead to **coalescence between Bishopstoke, Highbridge; Brambridge and Colden Common and between Fair Oak and Lower Upham**.

Whilst it is desirable to **avoid coalescence**, there are also important **planning considerations**, such as protecting European biodiversity sites and protected species; ensuring that development would not lead to a loss of biodiversity; protecting the setting of the South Downs National Park and ensuring that **development takes place in the most sustainable locations**.

Another more important planning principle is to **protect the intrinsic character and beauty of the countryside** (NPPF para 17). **Safe guarding the countryside** from encroachment is also an important principle of Green Belt designation. While none of these options are in the Green Belt, **development of Options B and C would involve the loss of an area of attractive countryside** at the edge of the Eastleigh/ Southampton urban area, that is within the setting of the South Downs National Park. **This would be a significant loss in planning terms**.

This is not to say that coalescence is not a worthwhile planning policy objective, but in this respect it is considered that **it could be avoided on Options D and E**, by the retention of substantial green gaps at least 250 metres wide to enable settlements to retain their distinct identity.

In this respect the Partnership for Urban South Hampshire 'Policy Framework for Gaps,' (2008) states that 'In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation' (p 5)

### Deliverability

One of the tests of soundness is that the plan should be deliverable over its period (NPPF, para 182). In this respect, Bovis Homes and Hallam Land Management have options on the Option E land; while Highwood and Drew Smith have options on Option D land. **The indications are therefore that development on the Option D and E land would be deliverable**.

### Inspector's Report on Eastleigh Borough Local Plan Review to 2011

At the inquiry into the Eastleigh Borough Local Plan Review 2001 - 2011, the Local Plan Inspector, Mary Travers, considered the allocation of a Major Development Area in Allington, to the west of Horton Heath and south of Bishopstoke and Fair Oak, involving the potential allocation of 275 ha. While the Inspector concluded that the Plan would make satisfactory provision for the Borough's baseline housing requirement without a Major Development Area, the Inspector **did not rule out development of this area at a future stage** and said that she considered that 'any justification for including the Allington MDA in the Plan would have to arise from sub-regional need in the post-2011 period' (para 5.143). She also stated that **'the proposed scheme allows for local gaps to be preserved between the MDA and the existing settlements of Bishopstoke, Fair Oak, Horton Heath and Hedge End by means of a large 'green zone' around the developed area,'** and that 'there would be relatively **little impact** on the areas identified by the Blandford Associates 'Landscape Assessment of Eastleigh Borough' as having **distinctive landscape character'** (para 5.140).

**This suggests that she considered development on Option D land would potentially be acceptable should the housing need justify it. Development on the Option B and C land has never been tested.**



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## Summary and Conclusion

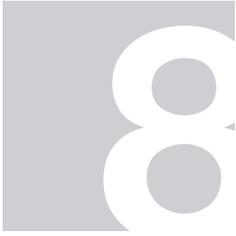
While there are undoubtedly some sensitivities regarding Options D and E, they are **substantially outweighed** by the harm which apply to B and C.

In locational terms **Options D and E represent a much more sustainable location** for development, being close to the services and facilities in Southampton and Easteigh, while also providing opportunities for the provision of **sustainable transport**, such as a new rail station.

The **environmental impacts** are also likely to be much less as D and E **do not affect the setting** of the South Downs National Park and contain a smaller area of land that is designated for its biodiversity importance.

For these reasons and those outlined in this report, it is considered to be vitally important that the Council does not make a decision at this stage that Options B and C should be its preferred strategic development site.

The Council should **continue to develop its evidence base** and then make **an informed decision** that it can demonstrate meets the soundness test for the plan to be justified.



## Appendix A - comparing Option B & C with D & E

### Strategic Priorities from EBC policy paper Oct 2016

Increased provision and more diverse mix of housing to meet the housing needs of the Borough and contributing (where feasible) to meeting the needs of the wider Southampton housing market area.

Ensuring sufficient land for businesses of all sizes to support economic growth within the Borough and across South Hampshire.

Reinvigorating our existing town and local centres to create vibrant, active places where people want to spend time, providing the right environment for economic, social and cultural prosperity.

Ensuring the delivery of infrastructure needed to accommodate future development including: roads, public transport, utilities, community facilities (including schools, health facilities, sports facilities, village halls), open spaces and other multi-functional 'green' infrastructure.

Ensuring that future development contributes to the Borough's sustainability, including green infrastructure provision and safeguarding wildlife and natural resources.

### How do B and C rate?

270 Hectares (310 if east of Stroudwood Lane is included) to take 6,200 houses plus 30,000 sq m of business use, plus schools, etc.

Provides 30,000 sq m of business use.

Proposals would create a series of isolated developments linked only by a road, with little relationship to themselves, or a local centre that is remote from Eastleigh town centre.

Scheme will part fund delivery of the North Bishopstoke bypass. Little scope for enhancing public transport other than bus route. Community facilities can be provided but there is no obvious focal point for a community hub west of Mortimers Lane.

Development would destroy one of the Borough's priority diversity areas, severely damaging ancient woodland and much of the best agricultural landscape in the borough.

### How do D and E rate?

250 Hectares plus the Highwood land adjacent to Bishopstoke equals, pro rata, approximately 5,000 houses.

Retains Chalcroft Distribution Park.

Proposals would create a compact, easily walkable development centred around a public transport node (a new station) with a short, direct, level and easily cyclable link into Eastleigh town centre.

Centralised form of development establishes an obvious community hub at the new station, at which community facilities can be provided to effectively serve the whole community.

Development enables provision of a new station and easy public transport links to Eastleigh town centre and other employment centres. Scope to enhance Itchen Valley Country Park. Route across Itchen valley for South Bishopstoke bypass needs careful design to minimise environmental impact. Priority biodiversity links maintained.

Maintaining a sense of identity for the Borough's communities, particularly by maintaining settlement gaps, retaining important landscape and heritage features, enhancing landscape character, and protecting residential amenity.

Development would add to the northern edges of Bishopstoke and Fair Oak, thereby cutting off these communities from access to good quality countryside. Gap between Fair Oak and Lower Upham likely to be lost. Severe damage to ancient woodland and much of the best agricultural landscape in the borough.

Gap in accordance with PUSH policy statement would be maintained between new development and West end, Fair Oak and Bishopstoke. New development of West Horton Heath removes gap between D and E and Horton Heath.

**Policy elements informing emerging development strategy from section 2.1 of policy paper**

Principles of sustainable development.

Form of development and its location far from public transport nodes will inevitably lead to a car-dominated development.

Development creates a walkable community with 80% of housing within 1km of local centre/public transport node.

The outcomes of transport assessment, sustainability appraisal and Habitats Regulations assessment of development options.

Development would destroy one of the Borough's priority diversity areas, severely damaging ancient woodland and much of the best agricultural landscape in the borough.

Development enables provision of a new station and easy public transport links to Eastleigh town centre and other employment centres. Scope to enhance Itchen Valley country Park. Route across Itchen valley for South Bishopstoke bypass needs careful design to minimise environmental impact. Priority biodiversity links maintained. South Bishopstoke bypass and improvements to junctions close to town centre will, according to current modelling by HCC, provide for a net reduction of traffic on Bishopstoke Road even after development.

An assessment of development viability and deliverability.

Development delivery would require upfront investment by EBC of c.£50m to create infrastructure in early stages of development. Land largely under developer control, therefore deliverable in land ownership terms.

Development requires South Bishopstoke bypass (HCC estimated cost £16.5m). Land largely under option, therefore deliverable in land ownership terms.