



For official use only

**Publication of the Eastleigh Borough Local Plan
June 2018
Representations**

- Please quote the paragraph, policy, or map you are commenting on (question 1 in part B).
- If you wish to speak at the Examination, you need to clearly state you wish to take part (questions 6 and 7, part B).

You must send responses to Eastleigh Borough Council by **6th August 2018**

Responses can be submitted to:

**Planning Policy & Implementation, Eastleigh Borough Council, Eastleigh House,
Upper Market Street, Eastleigh, SO50 9YN**

By E mail to:

localplan@eastleigh.gov.uk

You can submit as many comments as you would like. Please complete a separate part B for each part of the plan on which you want to comment.

This form has two parts:

- Part A – Your Details
- Part B – Your comment(s). Please expand the comments table as appropriate

PART A

1. Personal Details

2. Agent's Details (if applicable)

** If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr	Mr
First Name	John	Steve
Last Name	Lauwerys	Pickles
Job Title (where relevant)		Policy Planner
Organisation (where relevant)	Action Against Destructive Development	West Waddy
Address		60 East St Helen St Abingdon Oxon
Postcode		OX14 5EB
Telephone		01235 523139
Email Address		s.pickles@westwaddy-adp.co.uk

3. Client Details

If you are an agent representing a specific site interest, please fill in the details below.

Site Interest	-
Client's Name	-

4. Please tick this box if you wish to be notified of future stages of the Eastleigh Borough Local Plan

5. Data Protection and Freedom of Information

For the purposes of the Data Protection Act 1998 processing of the representations you provide is necessary for the exercise of functions conferred on Eastleigh Borough Council in connection with the Local Plan under the Town and Country Planning (Local Planning) (England) Regulations 2012. **The representations will also be disclosed to the Secretary of State and may be put into the public domain, including on the council's website.**

PART B – Please copy and use a separate sheet for each representation

Name or Organisation:

Action Against Destructive Development

1. To which part of the Plan does this representation relate?

Paragraph number: 4.10 – 4.17 & 4.28

Policy Number: S4 & S5 (clause 6)

Policies map: North

2. Do you consider the Plan is:

2.(1) Legally Compliant

Yes

No

2.(2) Sound*

Yes

No

2.(3) Complies with the
Duty to co-operate

Yes

No

* The considerations in relation to the Plan being “sound” are explained in the National Planning Policy Framework in paragraph 182 and are set out in Appendix A of this form. If you have entered **No** to 2.(2) please continue to Q3. In all other circumstances, please go to Q4.

3. Do you consider the Plan is unsound because it is:

(1) Not positively prepared

(2) Not justified

(3) Not effective

(4) Not consistent with national
policy

4. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Strategic Policy S4 and Strategic Policy S5 are both unsound in that they allocate 30,000 m² of employment development space on green field land in the open countryside as part of the option C proposed development (contrary to policy S7 which carries a presumption against development in the countryside) & NPPF policy advice on protecting the intrinsic character & beauty of the countryside, (para 17).

The Council's Employment land supply background paper (June 2018) sets out the employment floorspace target of 124,000 m² for the period 2011-2036 so the allocation within the SGO of 30,000m² would be expected to meet almost a quarter of the Borough's total 25year requirement. However, as the paper further notes the potential for the development of additional employment floorspace on previously developed land at Eastleigh Riverside/Southampton Airport (allocated) is 131,000 m² which, taking account of the projected net additional supply elsewhere in the Borough, including the allocation in the SGO, would result in a potential surplus of employment space of over 100,000m² in 2036. This would create an additional need for housing, because as paragraph 4.17 of the Local Plan acknowledges, there is a need to balance the supply of new jobs and housing provision.

The key point about the Eastleigh Riverside/ Southampton Airport potential employment space is that much of it is on land that could not readily be used for other purposes, including housing due to the difficulty of providing satisfactory residential amenities. However this part of Eastleigh is located close to the motorway network at junction 5 on the M27 and junction 11 on the M3. By contrast the commercial vehicle traffic associated with 30,000m² of employment space in the SGO option C area would have to travel some distance through congested roads, including Bishopstoke Road or under the substandard Allbrook rail bridge or through Twyford up to junction 13 on the M3.

The Council's general policy is to create employment opportunities close to major housing development, which on one level sounds sensible. However it is very unlikely that many of those who might work in the employment centres created in the Option C area, particularly those working in the 20,000m² expected to be zoned light industrial , will be able to afford to live in the housing which will be built in this area which

will be one of the highest priced housing locations in the Borough.

Clearly it is unsound to plan employment related development on the finest greenfield land in Eastleigh which is unlikely to enable people in that area to work locally. At the same time just a few miles away there will be a potential surplus of employment space in an area very well connected to the motorway network on land it will be difficult to use for non- employment related purposes. A strategy that could potentially prejudice the regeneration for employment of previously developed land close to Eastleigh town centre by providing surplus employment land on an area of high quality countryside, with a network of hedgerows and ancient woodland, is clearly not the most appropriate strategy when considered against the reasonable alternatives, and is therefore unsound.

(Please continue on a separate sheet/expand box if necessary)

5. Please set out what changes(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. Please note that any non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Removal of the allocation of 30,000 sq m of employment floorspace as part of the strategic growth option under policies S4 and S5 as this provision would exceed the estimate employment need for the Borough by 101,819 sqm as acknowledged by the Council in Table 1 and paragraph 6.5 of the Employment Background Paper (June 2018) and thereby potentially prejudice the provision of employment provision on previously developed land at Eastleigh Riverside as proposed under policy S4 (clause i) and E6; accentuate the need for more housing; and lead to the loss of important countryside to the north of Fair Oak, and is therefore unsound as it does not constitute the most appropriate strategy when considered against the reasonable alternatives.

(Please continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Please note, you must answer yes to this question if you wish to have the opportunity to speak at the public examination.

No, I do not wish to participate at the oral examination

Yes, I do wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The proposed employment allocation under policies S4 and S5(clause 6) as part of the strategic growth option would have very significant adverse impacts on the environment and local community and Action Against Destructive Development has been specifically set up to oppose the selected strategic growth allocation. We therefore wish to strongly make our case at the examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

S. M. Pickles

Date:

6.8.18

Appendix A

Legal compliance

In order to be legally compliant, a Local Plan must meet the requirements set out in section 20(5)a of the Planning and Compulsory Purchase Act (2004). These requirements are:

- That the Local Plan is included in the current Local Development Scheme and that key stages have been followed.
- That the process of involving the community is in line with the Eastleigh Statement of Community Involvement.
- That the Local Plan complies with the Town and County Planning (Local Planning) (England) Regulations (2012), including making the required documents available at our offices and on our website, and notifying prescribed people and organisations (including those who have asked to be notified)
- That the Local Plan is accompanied by a Sustainability Appraisal report.
- In London, Local Plans must confirm to the London Plan (this does not apply to the Eastleigh Local Plan)

Soundness and the National Planning Policy Framework (March 2012, DCLG)

Paragraph 182 of the NPPF sets out the considerations in relation to a plan being 'sound' as:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Duty to Cooperate

The Duty to Cooperate was introduced in the Localism Act (2011). It requires Local Planning Authorities like ourselves to work together with other local authorities, and other relevant bodies to maximise the effectiveness of the strategic policies of our Local Plans.