**IDEAS FOR COMPLETING SECTIONS 2 AND 5 OF EASTLEIGH’S BESPOKE ONLINE FORM**

**SECTION TWO: ‘Overall assessment of the Local Plan’**

I/we believe the Local Plan to be unsound because…

…it is not based on well researched evidence.  For example, the traffic analysis has only just been put to the Highways Authority, which infers that Eastleigh Borough Council (EBC) has not taken account of expert advice in developing their plan.  Similarly, the final Habitat Regulations Assessment was not provided in time for the Environment Agency to comment before the Plan was published - so it would seem once again that expert opinion does not underlie the Plan.

Furthermore, there is no evidence the Plan is based on the most appropriate strategy when considered against reasonable alternatives based on proportionate and public information.  All of this is linked to the feasibility of the proposed link road set out in the Plan (Policy S6), the plans for which seem to contain many uncertainties as to whether the infrastructure can be delivered on a timely basis, if at all.

Finally, EBC did not take account, in selecting the most appropriate Strategic Growth Option, the NPPF requirement to give the adjoining National Park the highest status of protection.  There is no considered assessment of the options available to EBC, and the council demonstrably agreed the final Strategic option and associated link road before it had completed a thorough and public review of the key evidence to support its Plan, i.e., the evidence collected is retrospective in order to support a pre-determined outcome.

The Plan is unsound.

**SECTION FIVE: Policy S5 - new communities north of Bishopstoke and north and east of Fair Oak**

I/we believe Policy S5 to be unsound because…

…the evidence base to support the proposed sites is incomplete, and a reasoned assessment of alternative sites has not been made to demonstrate EBC’s plans are the most appropriate.  EBC's reasoning for selecting Strategic Growth Areas B&C – its comparative assessment – is flimsy and based primarily on subjective rather than objective evidence.

Furthermore, the timing and delivery of the link road is problematical and even the financing is uncertain. The Plan (para 4.29) makes no commitment as to when the road will be built and opens up the possibility that all of area C (c. 4,200 houses) could be built without any link to the M3.

Furthermore, the traffic analysis makes no attempt to show the impact on local villages within the South Downs National Park such as Owslebury, Twyford and Upham.  These villages already suffer – together with Colden Common – from road congestion, congestion which infringe on enjoyment of the National Park and maintaining the countryside nature of this area.

Furthermore, EBC has failed to provide a reasoned assessment as to why Strategic Growth Areas B&C are preferred to D&E notwithstanding it promised to do so at the Council meeting in July 2017. The comparative analysis that has been provided is flimsy and overly subjective – it is not based on complete and objective information for an informed assessment to be made.  This includes the traffic analysis which is woeful not even having the benefit of comments from the Highways Authority, and failing to assess the impact on local villages and the countryside in or bordering the National Park. It is unconvincing that settlement gaps of 1.25km are deemed to be needed for areas D&E – supposedly justifying the council's exclusion of those areas – but only 750 metres is needed for B&C, as that seems to support the council's pre-determined preference for housing development.  Policy S5 is based on subjective criteria and not on an objective assessment.

**SECTION FIVE:  Policy details for S6 - new Allbrook Hill, Bishopstoke and Fair Oak link road**

I/we believe Policy S6 to be unsound because…

…the evidence base is flawed and the options have not been assessed on a like-for-like basis.  Accordingly, the case for a link road, as opposed to more appropriate development in options in D&E, has not been made.

Furthermore, paragraph 4.29 emphasises the essential nature of the link road to the delivery of  B&C.  Yet there are many uncertainties as to the timing and delivery of the road, not only in terms of feasibility (the work necessary at the Allbrook bridge, the capacity of the road given the increased volume of traffic and the history of flooding in the area by the bridge) but also the financial viability of the scheme. It will only take place if there is 'at least a strong likelihood' of the funding.  This doesn't seem to pass a reasonability test of demonstrating deliverability.  What happens if funding is not in place or the road is simply not feasible?  The Plan becomes undeliverable.  It is not sound.