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**By email only**

1 April 2020

Dear Mr Tuck

**EXAMINATION OF THE EASTLEIGH LOCAL PLAN**

1. I would like to thank the Council and all participants for the contributions made to the hearing sessions which have recently concluded. As I advised, I am writing to you regarding areas of the plan where I continue to have significant concerns and to set out options for taking matters forward. I appreciate that the current very difficult circumstances in respect of coronavirus may mean that the Council's resources are very stretched and its focus is likely to be on responding to the immediate situation. However, nonetheless, you have indicated to me that you wished to receive this letter as soon as possible.
2. The Council has kept a detailed log of some of the issues relating to soundness that have been identified during the examination and upon which the Council is undertaking the preparation of further evidence. This letter does not attempt to cover all of these issues. Instead, it outlines my most significant concerns.

**The spatial strategy and the development distribution strategy and principles (DDSP)**

3. Policy S2 as currently drafted sets out the approach to new development across the borough. The sites which make the most significant contribution towards the 5-year supply position already benefit from planning permission. Aside from the SGO, a further 740 dwellings are proposed to be allocated on smaller greenfield sites adjoining the settlements of Allbrook, Bishopstoke, Bursledon, Fair Oak, Hedge End, Netley and West End. The principle of these site allocations and the approach adopted has in my view been adequately justified by the evidence base and I have no fundamental concerns with regards to the overall approach adopted to these components of the supply position outlined at policy S2.
4. My concerns in relation to the spatial strategy are focused on the DDSP which the Council adopted in December 2016 to guide work on the plan, in terms of the new development proposed over and above that which already has permission<sup>1</sup>. The DDSP states that the borough's settlement hierarchy should be the main consideration in making decisions about the spatial distribution of new development, to ensure that development is located in areas which provide the widest range of employment opportunities, community facilities and transport infrastructure and in order to support, enhance and reinvigorate those areas. This objective is repeated at paragraph 4.6 of the Plan, which emphasises that the existing settlement hierarchy identifies the most sustainable locations. It highlights areas where facilities are needed and could be provided for by allowing sufficient development.

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<sup>1</sup> Eastleigh Borough Council Cabinet Report, 15 December 2016

Eastleigh Local Plan Examination  
Inspector Christa Masters MA (Hons) MRTPI

5. The DDSP goes on to advise that the separate identity of settlements and local communities should be safeguarded by ensuring the retention of undeveloped 'countryside gaps' between them and avoiding decisions which would result in their coalescence. I will return to consider this issue in further detail below and the influence it has had on the distribution of development proposed.
6. In principle, at least, I consider these aspects of the approach set out through the DDSP to be reasonable and justified. They aim to direct development to the most sustainable locations while retaining the individual identity of settlements.
7. However, a further development principle states that there should be no significant additional development in the Hamble peninsula. The reasons given relate to transport constraints, minerals safeguarding and the vulnerability of the open and undeveloped countryside gaps between settlements in this area and Southampton, the outer borders of which are clearly visible from many parts of the peninsula. This approach to the Hamble peninsula has effectively 'ruled out' strategic spatial growth in this location.
8. The problem here is that this stance is based on limited analysis of transportation issues relating to the Hamble peninsula. The Eastleigh Strategic Transport Study<sup>2</sup> used to inform the Issues and Options consultation assessed the effects of a range of strategic transport schemes across the borough using high level traffic modelling. The study concludes that further work is needed to fully understand the impacts of the proposed improvement options on the Hamble Lane corridor. However, no further work was undertaken because the Council had already adopted the approach set out in the DDSP. Furthermore, the initial Sustainability Appraisal<sup>3</sup> notes the proximity of strategic spatial option G (Hamble Airfield) to existing employment areas. Whilst existing congestion on Hamble Lane is identified, no assessment is made as to the effect of planned junction improvements and what effect these works would have on increasing capacity in this location.
9. The approach to sites subject to minerals safeguarding is inconsistent throughout the plan. A number of the proposed housing allocation sites within the plan are also subject to such safeguarding measures. However, in relation to these sites, the Council have confirmed that this issue can be satisfactorily addressed through policy 15 of the Hampshire Minerals and Waste Plan (October 2013).
10. Furthermore, it appears that the Partnership for South Hampshire (PUSH) Spatial Position Statement has been used to influence the spatial strategy. That is reasonable. However, in considering various Strategic Growth Options (SGO), SGO001<sup>4</sup> excludes option G from further consideration on the basis that the PUSH Spatial Position Statement indicates that the strategic growth should be in the north rather than the south of the borough. But that is not what the Position Statement says. Rather, it identifies criteria to help the Council select the location of new development. It provides no policy basis for directing the location of housing growth across the borough.

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<sup>2</sup> TRA010 Eastleigh Strategic Transport Study, Interim Report – Issues and Options, December 2015

<sup>3</sup> ORD007 Sustainability Appraisal, Main Report December 2015

<sup>4</sup> SGO001 SGO Background Paper, Part 1 paragraph 4.3

11. Overall, the decision to exclude additional development in Hamble peninsula appears to have been made through the DDSP prior to any detailed analysis being undertaken to inform the selection of preferred options to meet the required level of growth<sup>5</sup>. In addition, one potential option for strategic growth appears to have been discounted without any evidential basis.
12. To conclude, I consider that the spatial strategy is not justified. The DDSP has been drawn up without sufficient evidence to underpin elements of it, but yet it has had a fundamental influence on the consideration of reasonable alternatives for the chosen SGO. I explain this further below.

### **The SGO and the Sustainability Appraisal**

13. A fundamental part of the Council's proposed housing strategy from 2024 onwards is the provision of a SGO at land north of Bishopstoke and land north and east of Fair Oak. This is set out at policy S5 which allocates these two sites for 1000 and 4300 homes respectively. Approximately 3350 dwellings are anticipated to be delivered from these sites between 2024 and 2036, along with the necessary associated infrastructure. The remaining figure of approximately 2000 dwellings would be delivered beyond this current plan period.
14. In order to facilitate this scale of growth in this particular location, it would be necessary for a new link road to be constructed. The required link road is supported by policy S6. This is a 5-part phased road project which would be linked to the phasing of the SGO, and each phase is critical to the delivery of the SGO.
15. The Environmental Assessment of Plans and Programmes Regulations state that a Sustainability Assessment (SA) should identify, describe and evaluate the likely significant effects of implementing the plan and reasonable alternatives, with the aim of establishing that the plan is the most appropriate. The plan is supported by two SAs. The first is document ORD007 (2015) which assessed 8 potential strategic locations. The second is SUB003b, prepared at the pre-submission stage in 2018 in support of the submission plan, assesses 5 potential SGOs.
  - SGO B/C: Expansion of Bishopstoke and Fair Oak to the north and east;
  - SGO C: Expansion of Fair Oak to the east and north;
  - SGO D: Expansion of Bishopstoke to the south and Horton Heath to the west, plus land immediately to the northeast of Fair Oak a;
  - SGO D: Expansion of Bishopstoke to the south and Horton Heath to the west, plus land immediately south of option D and the railway line;
  - SGO E: Extension of West End to the north of the M27, plus land immediately to the northeast of Fair Oak b.
16. Taking account of the SGO Background Paper and the aforementioned SA work, there are two main shortcomings in respect of the consideration of reasonable alternatives for the SGO. These concerns relate firstly to the assessment of the individual options and secondly, as a result of this, the selection of the preferred option (which is

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<sup>5</sup> Eastleigh Borough Council MIQ response matter 3, page 19/20

Option B/C in the SA). The SA concludes that the key areas of difference between the SGO alternatives considered are that:

- a) the selected option has greater merit in meeting transport/accessibility aims;
- b) the selected option is more beneficial in terms of protecting settlement gaps; and that
- c) although the selected option has less merit in relation to protecting more sensitive (non-designated) landscapes, the benefits in relation to a) and b) above outweigh this factor.

I now turn to consider these issues in further detail.

*Transport and accessibility – in general*

17. Paragraph 34 of the Framework advises that plans should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. SGO001 Part 1 considers the key issues to be considered in terms of transport and accessibility are the distance which needs to be travelled, the ability of people to walk and cycle, the propensity to use public transport and the level of delay on the highway network. This seems to me to be a reasonable conclusion.
18. From the transport modelling work<sup>6</sup>, it is apparent that the selected option would lead to the longest average travel distances by car. Although the Council state that this is only very marginal, it seems to me this is something of a fundamental drawback. The fact that this maybe counteracted by SGO B/C providing more local facilities fails to acknowledge that other SGO options combined could deliver similar benefits.
19. The propensity to walk or cycle is very similar across all of the SGO options. Option D would provide the shortest new bus route to key destinations and would also result in more people using public transport. In terms of the SGO selected, the assessment of existing bus services notes that some of these services could be diverted/extended to serve more of the SGO and that this can be taken into account in terms of the form, density and location of development. However, this is not considered for option D. Similarly, the possibility of diverting existing routes close to option E is considered to be unlikely to be implemented by bus operators. But I see no particular reason why – Option E is the closest to the major employment area of Southampton. While there are a wide range of destinations accessible from Option E, the evidence base demonstrates that the most significant proportion of commuting takes place to Eastleigh and Southampton<sup>7</sup>. Furthermore, the assessment of potential for new bus routes is based on the assumption that option B/C will accommodate 5000 dwellings. Whilst this is reflective of the longer term capacity of the site beyond the plan period, it is not reflective of the housing delivery trajectory for this plan period.
20. Options D and E are recognised as having the potential to form rail access to the existing rail network. Although a long term prospect and uncertain at this stage, it would nevertheless provide the opportunity to maximise the use of sustainable transport modes as envisaged by the Framework.

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<sup>6</sup> SGO001 Part 1 SGO Paper summary of transport modelling

<sup>7</sup> HOU002a G L Hearn South Hampshire Strategic Housing Market Assessment

21. Overall, it is apparent that the process of considering the reasonable SGO alternatives has not been undertaken on an equal footing. Some forms of mitigation, or ways to reduce impacts, have been considered for some options, including the option selected, but not for others. The potential longer term advantages of some options have been either dismissed or, at best, given insufficient weight in the process. Both of these factors are a problem in and of themselves and, in short, I consider the process to have been flawed. Indeed, on the evidence I have seen and heard it appears to me that it could represent the least sustainable option in transport terms. Consequently, the SGO proposed in policy S5 would fail to meet the aim set out in paragraph 34 of the Framework, and the overarching principle of promoting sustainable development.
22. I note the Council's point that option B/C would represent a considerably larger SGO which could, as a result, support more new local facilities. That may be true and would represent an advantage in its favour. But there is no evidence that the other alternatives in combination could not provide similar facilities in more sustainable locations. There is no comparative analysis in this regard, including in relation to the provision of such local facilities on traffic movements. Therefore, this factor does not provide sufficient justification for the SGO selected.

*Transport and accessibility – effects of traffic on the South Downs National Park*

23. The proposed SGO is close to the South Downs National Park. Paragraph 115 of the Framework is clear that great weight should be given to conserving the landscape and scenic beauty of National Parks. The Council has a statutory duty to have regard to the purposes of the National Park, which include to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, as well as promoting opportunities for the understanding and enjoyment of the special qualities of the National Park. The evidence notes that the selected option would generate a greater increase in traffic overall on the rural roads within and on the edge of the South Downs National Park<sup>8</sup> when compared to the other SGO options. This is not surprising given the close proximity of the SGO to this location.
24. I note that the Council advises that caution should be exercised over these results as they are based on a strategic transport model. In this Council's view, the increases predicted could be lower. However, the evidence base does not support this position. Furthermore, I am not convinced that suitable mitigation could be brought forward to mitigate against this increase in traffic movements having regard to the South Downs National Park guidance on this issue<sup>9</sup>. Despite continued dialogue on this issue between the Council and the South Downs National Park Authority, no strategy has been prepared and there is disagreement between the two authorities as to when such a strategy should be in place.
25. The National Park comprises a sensitive rural landscape and given the significant scale of development proposed by policies S5 and S6 in such close proximity, the SGO has the potential to cause significant harm in this regard. The rural nature of these roads forms an integral part of the overall National Park experience. In particular, additional traffic at the sort of level predicted to be likely could have a detrimental effect on the communities concerned. Given the statutory importance of

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<sup>8</sup> SG00023 SGO Comparative Assessment Background Paper: Update on Transport Issues, June 2019

<sup>9</sup> Roads in the South Downs – Enhancing the safety and quality of roads and places in the National Park, June 2015

the National Park, the scale of development proposed and the potential impacts of increases in traffic movements within and on the edge of the National Park, I am unable to conclude that the selected SGO represents the most suitable option when considered against all other reasonable alternatives.

*Settlement gaps*

26. Gaps proposed between settlements are referred to under various names throughout the evidence base. I shall use the term settlement gap within this letter.
27. I have significant concerns regarding the approach adopted to the settlement gap strategy overall as contained within the plan and how this has been applied to the site selection process for the SGO. My concerns in this regard fall into three broad areas: the evidence base, the application of the approach to site selection and finally the detailed policy wording. I deal with each of these matters in turn.
28. The evidence base in relation to settlement gaps is set out within ENV002 Countryside Gaps Background Paper (June 2018). This paper provides an appraisal of the landscape and an assessment of the function and extent of existing gaps in the borough. The purpose of the report, outlined at paragraph 1.6, is to inform the selection of preferred options for development that meets the required level of growth for the plan period by assessing the implications of the development on settlement pattern, character and identity.
29. ENV002 draws on the PUSH criteria<sup>10</sup> for designated gaps which in essence states that (i) gaps should not include more land than is necessary to prevent the coalescence of settlements and that (ii) land to be included should perform an important role in defining settlement character and separating settlements at risk of coalescence. In my view, applying these criteria, would be in principle an appropriate approach.
30. The general principle of settlement gaps to prevent the coalescence of settlement is broadly supported by national policy. However, the extent to which the designations as proposed extend throughout the borough and take full account of both (i) and (ii) above is neither logical nor supported by a robust evidence base. For example, in the hearing sessions there was much discussion concerning the extent of individual gaps, the 'narrowness' or 'broadness' required to function as an 'appropriate gap', the needs for a 'strong/ decent/clear gap' in certain areas but 'slivers' of gaps being designated elsewhere. The evidence base does not support the approach adopted. Whilst there may well be some merit in the arguments put forward that the areas surrounding the urban area of Southampton require a greater gap in 'size' terms proportionate in scale to the urban area of Southampton, the same logic is not applied to other settlements within the borough.
31. Moreover, this approach is neither consistent with the evidence base nor the PUSH work upon which the appraisal purports to be founded. In some cases, more land than is necessary to prevent settlements from coalescing has been included, in other locations it is not clear how the settlement gap as defined provides an important role in defining the settlement character. As a result, there remains no rigorous or comprehensive basis for the gap designations as illustrated, the choice of the locations and the extent of the designations as shown.

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<sup>10</sup> HOU001 Push Spatial Position Statement, 2016

Eastleigh Local Plan Examination  
Inspector Christa Masters MA (Hons) MRTPI

32. I should emphasise that this is a significant problem in relation to both the influence that settlement gaps have had on the site selection process for the SGO – which I consider further below – and with respect to the justification for the proposed settlement gaps in themselves. In terms of the shortcomings I have identified in relation to the overall settlement gaps strategy, this could be addressed through the preparation of a clear and robust paper on this issue where I would recommend that each of the settlement gaps designations as currently proposed are revisited accordingly in light of the observations I have made above.
33. Turning to consider the specifics of the SGO issue, as I understand it, work to identify the proposed SGO has been evolving since 2017. The Council adopted revised draft countryside gap designations in June 2017. However, as already mentioned, the DDSP were settled upon by the Council in December 2016. These DDSP have been used to guide the preparation of the local plan. The difficulty here is that the DDSP had already concluded that no significant additional development could take place on the Hamble peninsula due to the vulnerability of the settlement gaps in this location. In short, the DDSP predetermined both the settlement gaps needed on the Hamble peninsula and thus ruled out the possibility of a SGO in this area. In advance of the work underpinning the settlement gaps, this is a flawed approach.
34. I am also concerned that there are other shortcomings in the site selection process leading to the identification of the proposed SGO caused by the effect of the approach taken to settlement gaps. Section 11 of ENV002 states that it provides a landscape and visual appraisal of spatial options A-H. However, in my view, the approach is based on limited technical appraisal. For example, in relation to option E, it was originally envisaged that an extension to the existing gap at Hedge End would be required. A subsequent update indicated that the original assessment did not appear to consider the need for a clear gap between the major urban area of Southampton/West End and Horton Heath. Additional masterplanning work for SGO B/C had established appropriate gaps whereas option D assumed no specific designated gap should be retained. The report does acknowledge the existing strong boundaries to the south formed by the railway and motorway and that if development took place here, the gap would be narrowed in places. However, no assessment is made as to the implications of this in terms of the separation of settlements.
35. Again, no assessment has been made of the combined option D/E or how a settlement gap could be integrated into this as a development option through any form of informed masterplanning process. The analysis merely summarises the SA findings. As a result, there is no robust assessment of the impact overall of the options for the SGO on the issue of settlement coalescence.
36. On this basis, I am unable to conclude that the approach to the site selection of the SGO represents a justified and evidence-based approach. It was explained to me at the hearing sessions that settlement gaps had been the determining factor in terms of the site selection process for the SGO. In light of my conclusions above, this approach is neither justified nor effective.
37. I now turn to the issue of policy wording. As submitted, policy S8 requires proposals to be assessed in terms of their effect on openness as well as the character of the countryside. This approach is at odds with the primary purpose of designating settlement gaps – as already mentioned, their purpose is to prevent settlement coalescence and define settlement character. As a result, the policy wording is

neither justified by the evidence base nor effective in its approach. That said, this is an issue that could be readily rectified. I note that ENV002 outlines policy wording from other authorities within Hampshire which has been found sound at local plan examinations, and I would recommend similar suitable wording accordingly.

*Landscape sensitivity*

38. Both the Planning Practice Guidance and the Framework say that plans should recognise the intrinsic character and beauty of the countryside, and that the cumulative impacts of development on the landscape need to be considered carefully. As noted above, the selected SGO is located in close proximity to the South Downs National Park. SGO001 advises that in relation to the criteria used to assess the SGO options, in terms of landscape sensitivity, the aim is to protect or manage change in landscapes with higher sensitivity to change, the main consideration being whether the characteristics of a landscape within a potential SGO make it sensitive to change.
39. Of all the alternative options considered the selected option proposed through policy S5 has the greatest impact on high sensitivity landscapes. This is based on the landscape appraisal work<sup>11</sup> which confirms that views towards the exposed skyline are particularly sensitive from Colden Common as well as open land to the north and west, close to the National Park and Lower Upham. Notwithstanding this conclusion, the SA allocates an equal score in terms of landscape effects to the other SGO options. I acknowledge the strategic nature of the SA. However, it is clear that the conclusions it draws in this regard are at odds with the evidence base.

*Conclusions about the SGO and the Sustainability Appraisal*

40. A number of significant concerns have been raised by representors regarding the sustainability appraisal work undertaken and in particular the assessment of reasonable alternatives to arrive at the SGO selected. On the basis of my consideration of the evidence base, I share a number of these concerns. In particular, I am not convinced that the assessment of alternatives and possible mitigation measures has been undertaken on a comparable basis and mitigation in relation to the issue of settlement gaps has not been consistently applied to the alternatives considered. There has been no combined analysis within the SA of option D and E. This was ruled out due to the effects on settlement gaps. As a result, the selected option of B and C does not represent the most justified and reasonable way forward.
41. I readily accept that a number of the issues facing the borough are matters of planning judgement. Notwithstanding this, because of the discrepancies I have highlighted above, and my assessment of landscape and transport issues, I regard the consideration of alternative options to be inadequate, such that the approach taken to the proposed SGO is insufficiently robust. As a consequence of this evidential shortcoming, policies S5 and S6 do not represent the most appropriate strategy when considered against the reasonable alternatives and are not justified. I therefore conclude that these policies should, therefore, be deleted from the local plan.
42. The deletion of policies S5 and S6 would leave some shortfall and introduce a degree of uncertainty to housing supply which would be evident during the last 4 or 5 years of the plan period. However, in the light of the need for housing delivery in the

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<sup>11</sup> SG0004 Landscape Sensitivity 2017



borough, I have at the forefront of my mind the significant advantages of having an adopted local plan in place. From the housing evidence, and notwithstanding my comments below about the housing supply position, it is clear that the remaining housing sites proposed through policies S2 and S3 would be sufficient to meet both the need and requirement for housing for the majority of the plan period. Delivering these sites through this local plan would, in the circumstances, be the most beneficial course of action. Legislation requires a review of the plan to take place within 5 years from the date of adoption and, in my view, the aforementioned shortfall could be appropriately addressed at this next review. Having regard to the plan as a whole, this would be a pragmatic way forward in this instance. Taking this approach would also provide an early opportunity for the evolving PfSH (formerly PUSH) joint strategy work to be taken into account in the selection of additional sites for housing<sup>12</sup>.

### **Housing supply**

43. The Council has outlined what it describes as a 'cautious trajectory' with a particular focus on discounting the various components of supply. Whilst I fully understand the reasons for taking this approach, it is neither warranted, necessary nor an approach supported by the Framework. The evidence concerning past delivery rates is sufficiently clear and sites where doubt remains about delivery have been addressed. Accordingly, the supply should be assessed in the standard way – through the application of a buffer, rather than through discounting.
44. My comments below are based on the latest information tabled by the Council in the form of ED61b which provides the 5 year housing supply position as well as HOU021 Main Report and HOU021 (Appendices) which provides, amongst other things, the trajectory for the plan period.
45. The Council tabled ED61b at the hearing sessions in order to clearly identify the 5 year housing supply position. This document suggests that a 5% buffer should be applied as the authority does not have a record of persistent under delivery. This plan is being examined under the 'transitional arrangements' of the most recent iteration of national policy – that is to say, it is the policies of the 2012 Framework that apply. Paragraph 47 of the Framework is clear that the buffer in question should be 5% unless there has been a record of persistent under delivery of housing, in which case a 20% buffer should be used. The Council has presented figures looking back over the past 9 years<sup>13</sup>. From this, the performance is somewhat mixed, with delivery during some periods being notably lower than others. However, taken overall, I do not consider that this amounts to persistent under delivery in the terms of the Framework. Consequently, a 5% buffer should be applied. Given my view on this point, the Council should update the trajectory for the whole plan period accordingly – removing any discounting and instead adding a 5% buffer – and this should be included in the local plan.

### **Affordable Housing**

46. Policy S2 says that the Council will support the provision of an average of 165 (net) new affordable dwellings per annum, which equates to at least 3300 new affordable homes over the plan period. However, the evidence base to support this figure<sup>14</sup>

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<sup>12</sup> Eastleigh MIQ response matter 4, page 35

<sup>13</sup> HOU015 Eastleigh Local Plan, Housing Land Supply Position, October 2017

<sup>14</sup> HOU006 ORS Assessment of Affordable Housing and Other Housing Types, July 2017

relates to an overall housing need of 580 dwellings per annum over the plan period. It is not based on the most up to date assessment of need upon which the Council are now relying.

47. An update to HOU006 is therefore necessary to ensure that the basis for establishing the need for affordable housing is properly aligned with the overall housing need figure. I ask the Council to provide this as soon as possible.

### **Employment provision and the Chickenhall Lane Link Road (CLLR)**

48. The supply of employment land and the delivery of the CLLR are closely related issues. I therefore consider them together here.

#### *Employment land supply*

49. At the hearing sessions, the Council accepted that the requirement for employment land should be based on the latest figures. These reflect market demand and trends and are summarised within the evidence base<sup>15</sup>, and I agree that these are satisfactorily robust. As a consequence of using these figures, the residual employment floorspace requirement over the Plan period is reduced from the 144,050sqm currently identified at policy S2 to a figure in the region of 110,000sqm and a main modification will be necessary to reflect this. Taking into account the supply position and anticipated future losses, this would result in a surplus of 94,810sqm over and above the identified requirement. This need not be a problem in itself. An oversupply against the requirement allows for competition and 'churn' in the market.
50. However, these figures take full account of the 3 sites allocated through policies E6, E7 and E9 which the evidence base refers to collectively as Eastleigh Riverside/ Southampton Airport Economic Gateway. These 3 employment sites around Eastleigh collectively amount to almost 132,000sqm of floorspace. They are identified as strategic employment locations of sub-regional importance<sup>16</sup>. They are also noted as providing the most significant prime, large scale employment opportunity in southern Hampshire. Indeed, site E6 in particular is extremely well connected to both the town centre and the main railway station within Eastleigh. However, as currently drafted, there is a significant constraint to the development of these sites. My primary concern in this regard relates to the delivery of the CLLR.

#### *The CLLR*

51. The CLLR is described as an important long term aspiration of the Council as well as a high priority road scheme which the Council supports. It would, in effect, provide a bypass around Eastleigh Town Centre. This would go some way towards addressing traffic congestion, delays and air quality problems. Policies E6, E7 and E9 of the Plan all seek to safeguard a route for it, as indicated on the policies map. I understand that, without the CLLR, the employment site allocated under policy E9 would not be accessible. At around 21.6 hectares this is a significant allocation.
52. However, the Council has provided very little evidence to support the inclusion of the CLLR in the plan. The only information provided within the evidence base concerning the potential delivery of this road is an indicative costing from 2007. This is clearly out of date. I note that policies E7 and E9 include a requirement for contributions to

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<sup>15</sup> ECON008 Updated Employment background Paper, June 2019

<sup>16</sup> ECON006 LEP Transforming Solent Growth Strategy, January 2015

Eastleigh Local Plan Examination  
Inspector Christa Masters MA (Hons) MRTPI

be made towards the longer term provision of the link road. But the Statement of Common Ground signed with the Highways Authority confirms that the timing, delivery, funding and phasing of the CLLR all remain unknown at this stage.

53. There is a clear evidential gap here and, as things currently stand, I am not able to conclude that safeguarding the route of the CLLR or requiring financial contributions to help fund it is justified. Moreover, there is some ambiguity about the necessity for the CLLR for the delivery of the 3 aforementioned employment allocations. During the hearings, the Council's officers indicated that the full length of the link road may well not be required to access the site allocations concerned.
54. There are two potential ways forward here. The Council could prepare specific evidence concerning the timing, phasing, delivery and funding of the CLLR for consideration through the examination. The aim here would be to demonstrate that there is a reasonable prospect of the CLLR being delivered in the plan period. Moreover, the reliance or otherwise of the 3 employment sites would need to be clarified. All of this would need to be substantiated through the preparation of clear and robust evidence.
55. In the alternative, the CLLR could be deleted from the Plan. This would lead to the necessity for a number of main modifications, potentially including to the allocation of the aforementioned employment sites. If the Council wishes to pursue this course, then I ask that draft main modifications be produced and provided to me. The effect of the deletion on the supply of employment land would also need to be unambiguously set out, and the need or otherwise for further employment land would need to be explained by the Council through a concise paper.

### **The way forward**

56. I appreciate that the content of this letter covers a significant number of issues which the Council will wish to digest. I also recognise that some of my conclusions will come as a disappointment to the Council.
57. I have set out above ways in which the problems I have identified could be remedied through a number of main modifications to the plan and I have requested further evidence in relation to some additional issues. If the Council are content to adopt the plan on the basis of the main modifications outlined above, please let me know in order that we can liaise over the details and the preparation of these as necessary. If this is not the case, please advise me as soon as possible in order that I can consider how best to progress the examination, but it may be that withdrawal of the plan from examination would be the only other realistic option.
58. I fully appreciate that it may take some time for you to reply, given the national situation with regard to the coronavirus. I would, though, be grateful for an indication of the likely timescales for your response, when you are ready and able to provide one.
59. In the meantime, I also ask that this letter is published on the examination website. I am not presently seeking any comments on the content of this letter from other parties although should the examination progress to main modifications stage then there will of course be an opportunity for parties to comment then.

Eastleigh Local Plan Examination  
Inspector Christa Masters MA (Hons) MRTPI

Yours sincerely

*Christa Masters*

INSPECTOR