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Sent by email to: localplan@eastleigh.gov.uk

For the attention of Graham Tuck

Dear Graham,

Hampshire County Council provides the following response to the Eastleigh Borough Council Local Plan Main Modifications in its capacity as the local highway authority and the local minerals planning authority.

Local Highway Authority

Hampshire County Council as the local highway authority (LHA) for the area submitted comments in August 2018 in response to the Eastleigh Borough Local Plan 2016-2036 Regulation 19 consultation. As LHA, the County Council is focused on maintaining the safe and efficient use, management and maintenance of the local highway network, including all links to the Strategic Road Network.

The LHA considers that in combination the proposals represent essentially a different development scenario from the previous version of the plan and highlights its concern that this scenario has not been fully tested using a transport model. The response will also provide comments on the Borough Council's proposed approach to the future safeguarding of the Chickenhall Lane Link Road (CLLR) before providing some more detailed comments on the transport implications of some of the individual proposed Main Modifications.

Strategic Transport Assessment – general

The LHA notes the transport evidence submitted so far in the form of Transport Assessment documents TRA001-TRA015 (2018-2019) focussed on the inclusion and impact of the former SGO at Bishopstoke and new link road on traffic distribution on the strategic road network. However, following the removal of the SGO from the Local Plan, the LHA has not seen any

**Director of Economy, Transport and Environment
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evidence in the form of a revised Strategic Transport Assessment, transport modelling work or sensitivity testing. In the absence of such evidence the LHA is unable to form an “evidence led” view of the likely combined impact of the new proposed development scenario presented in the Main Modifications. While noting that a number of individual sites have had TAs prepared, there is no overall assessment of the cumulative impact of all development proposals together. The LHA also notes that there appear to be some inconsistency between proposed housing numbers in the Main Modifications and within individual planning applications, for example on the Botley Road corridor. This makes the assessment of the combined transport impact of proposed development difficult.

The LHA notes that, in combination, the Main Modifications reduce the overall quantum of housing development, albeit that it also applies within a reduced plan period. The reduction is principally as a result of the deletion of the formerly proposed Strategic Growth Option at Bishopstoke, although the level of reduction is offset by increases in proposed allocations at a number of other sites. The revised development proposals represent a different development scenario to that presented under the previous version of the plan. The absence of a Strategic Transport Assessment means the combined transport impact resulting from the plans have not been tested.

Chickenhall Lane Link Road (MM12, MM32, MM97, MM98, MM99, MM100)

In writing to the Borough Council on matters relating to Chickenhall Lane Link Road (CLLR), at paragraphs 53- 55 the Inspector found that there was a “clear evidential gap” in terms of the timing, delivery, funding and phasing of the CLLR and identified two potential ways forward:

(1) the Council could provide the evidence on timing, phasing, delivery and funding of the CLLR to demonstrate that there is a reasonable prospect of it being delivered within the Plan period (as well as clarifying the reliance or otherwise of the 3 employment sites on the CLLR). This evidence would be tested through the Local Plan examination (paragraph 54); or

(2) the CLLR could be deleted from the Local Plan, which would require main modifications to delete the CLLR and, potentially, also to address the delivery (or otherwise) of the employment allocations on which the Local Plan relies. The effect of the deletion on the supply of employment land would need to be unambiguously set out, and the need or otherwise for further employment land explained in a concise paper (paragraph 55).

The Borough Council considered the issues concerning the CLLR and employment provision, as well as the Inspector’s two potential ways forward and proposed that a third potential way forward is preferable to the two proposed in the Inspector’s letter of 1st April 2020 (set out above), namely for the Borough Council to:

1. Provide evidence on the strategic need for the CLLR and the benefits of continued safeguarding;
2. Provide detailed evidence to demonstrate the deliverability of sufficient employment land to meet the residual target over the Plan period;
3. Provide broader evidence on the potential long-term deliverability of the CLLR overall (which may be beyond the Plan period); and
4. Thereby justify an approach whereby the Local Plan safeguards the full route of the CLLR, but does not seek developer contributions towards it until such a time in the future as there is a stronger prospect of / clearer timescale for delivering the road.

The desire to see a comprehensively planned new/regenerated employment development at the Southampton Airport/Eastleigh railway works/Chickenhall Lane area has a long history going back around 30 years. The allocations in Policy E6, 7 & 9 in the Local Plan reflect not only those in the draft 2011-2029 Plan but also the adopted 2001-2011 Plan and the Fair Oak, Bishopstoke & Airport Local Plan which preceded it.

This comprehensive approach to development and regeneration has always been inextricably linked to the delivery of a new through route from, broadly, junction 5 of the M27 to the B3037 Bishopstoke Road. It is known as the Chickenhall Lane Link Road (CLLR) as its northern length would follow the route of the existing Chickenhall Lane and run south through the airport land to the A335 Wide Lane and on to junction 5 of the M27.

The challenges of delivering the CLLR have never been under-estimated. At 2007 prices it was estimated that it was likely to cost in the region of £120m to deliver. In today's prices the cost is likely to be much higher. The existing B3037 and A335 in the vicinity of Eastleigh town centre both experience significant journey time delays and peak hour traffic congestion.

Two of the main roads in Eastleigh town centre which link to the M27 at junction 5 (the A335 Southampton Road) and the M3 at junction 13 (Romsey Road/Leigh Road) have been declared an Air Quality Management Area. As well as opening up land in the Southampton Airport Economic Gateway (SAEG) for employment development, the CLLR would perform the role of a south-eastern bypass for Eastleigh town and so help alleviate traffic and air quality problems on these routes.

A number of alternative routes, designs and schemes have been investigated and costed over the years, including in the relatively recent past. The challenging economic conditions and complexity of constraints are significant matters to overcome in bringing forward this key economic site and the need for a comprehensive access strategy based around some form of the CLLR or refresh of the link road has also provided key challenges. At this point in time the timing, delivery, funding and phasing of the CLLR all remain unknown.

In view of the complexity the LHA has promoted a 'Flexible and Phased' approach to scheme delivery, recognising that varying land interests and high scheme cost may make delivery as one single scheme delivered over one local plan period impractical. The LHA accepts that elements of the scheme may come forward separately, but equally it is important that any 'phased' delivery is contributing too, and not prejudicing, the overall objective of a through route providing traffic relief to Eastleigh Town as well as providing future access to employment sites. The provision of a road bridge over the Botley Line is clearly fundamental to that overall scheme objective.

The LHA is supportive of elements 1-3 of the Borough Council's proposed way forward as set out above. With regard to the fourth point, the LHA considers this may create unnecessary constraints within an approach which requires flexibility in how a scheme may be developed and delivered by developers or by the LHA itself. The LHA has no funding available to deliver the CLLR and would require others to fund the scheme in its entirety and may depend on future section 106 contributions to deliver elements of the CLLR that are in control of the LHA.

Whilst supportive of the development allocations and in taking a "flexible and phased approach" the LHA will be placing a great deal of emphasis on the quality and scope of the transport assessments being submitted by the developers in support of their applications. These should and must reveal the critical phasing and dependency issues that will become apparent over time.

In particular, the LHA in supporting planning applications will need to be confident that the CLLR delivery is not compromised.

In the eventuality that the CLLR road were determined to be either technically undeliverable or unaffordable then developers would need to demonstrate that their sites impact could be mitigated in other ways. In practice this would mean demonstrating that an alternative package of measures that mitigate the developments impact are deliverable. The LHA would be seeking to ensure this address the capacity and air quality issues in Eastleigh Town Centre and Bishopstoke Road. The complexity and costs of this alternative package should not be underestimated.

The recent freeport announcement from Government is subject to an ongoing business case process. It appears to the LHA that this could create a funding mechanism that has potential to work well with the “flexible and phased” approach the County Council has been advocating. Clearly this would be subject to a successful business case which has not been determined at the time of writing this submission.

The LHA is aware that much of the discussion about the sites has related to the CLLR as a vehicle access. In due course and as part of future Transport Assessment greater consideration will need to be given to looking at how non car modes of access to the sites. The LHA encourage developers to come forward with convincing multimodal plans of high quality. The opportunities to do so are apparent to the LHA but have not been fully elaborated upon by the local planning authority or developers to date.

Criteria for Distribution of Development (MM5 and MM7)

The LHA welcomes the inclusion of criteria for development to be focussed first on suitable brownfield sites within the defined settlement boundaries of the Borough’s most sustainable settlements of development and through densification based on a settlement hierarchy (MM5 para 3.8). However, the LHA wishes to be reassured that the methodology and scoring process used to identify the settlement hierarchy gives sufficient weight to the role of public transport (bus service frequency and rail station) and also to active travel connectivity in identifying and selecting locations for new housing.

Additionally, MM5 highlights that the settlement hierarchy for ongoing developments at Boorley Green and planned at Horton Heath through expansion will experience an increased range of services and facilities which will result in their settlement level rising from the current level 4. It is indicated that the settlement hierarchy will be updated in future Local Plans, by which time the development will have been committed and may be largely completed.

The idea of settlements changing their position within the settlement hierarchy over time is accepted. However, the manner of these changes detailed within the current Main Modifications is questioned. The capability of a development to lock in sustainable transport and take advantage of moving up the settlement hierarchy will also be related to density, mixed uses, tactical masterplanning to lock in active travel and use of public transport. This will also be affected by public transport services with at least 10 minute frequency, proximity in settlement hierarchy to other centres and their relative attractiveness.

Where there is an extension to settlements (in addition to the hierarchy point raised above), it is important that consideration of the location of facilities and the integration of existing non-car

infrastructure such as rail stations, bus hubs, cycle/pedestrian routes is at the forefront of master planning to improve accessibility for all and provide travel choice without need to use the car.

Strategic Policy S1 – Delivering sustainable development (MM6)

The LHA has concerns that the proposed changes to the policy do not fully accord with the NPPF for promoting sustainable transport and in part weaken the policy wording with the inclusion of “longer distances” and removal of “provide access” in the Main Modifications text.

Infrastructure Delivery Plan – (MM21 and MM25– paras 6.1.43 and 6.5.86)

The LHA would recommend the provision of an updated Infrastructure Delivery Plan (IDP) encompassing the estimated timing, cost of delivery and anticipated funding sources for all developer committed improvements over the plan period.

The IDP should encompass the estimated timing, cost of delivery and anticipated funding sources for all walking, cycling, public transport and highway proposals associated with the updated local plan.

Strategic Policy S12, Transport infrastructure (MM32)

The LHA welcomes the inclusion of active travel proposals associated with the Transforming Cities Fund public transport, cycling and walking upgrades on the following corridors:

- Southampton - Chandler’s Ford - Winchester.
- Southampton - Portswood - Eastleigh - Fair Oak.
- Southampton - Bitterne - Hedge End - Bursledon - Hamble.

The LHA would like to see reference to the draft Eastleigh Local Cycling and Walking Infrastructure Plan (LCWIP) and reference to emerging Eastleigh Transport Strategy.

Strategic Growth Area (MM52 and MM11)

The LHA welcomes the removal of the proposed Strategic Growth Option (SGO) at land north of Bishopstoke and at land north and east of Fair Oak (S5) and associated transport infrastructure (S6), which addresses previous concerns about deliverability and lack of opportunities for access by sustainable modes.

HH1, Land west of Horton Heath (MM73)

The development site in the Main Modifications document has an allocation of 1,500 dwellings with a corresponding 950 dwellings in the June 2018 local plan submission.

The development site currently has extant permissions for a total of 1,400 dwellings across two sites:

- O/14/75735 (X/19/86475) Chalcroft Farm and Land West of Horton Heath: Up to 950 dwellings, 3-form entry primary school, 8-form entry secondary school and local centre with community building and commercial use.
- O/16/79354 (X/19/86303) Fir Tree Farm and Victoria Farmhouse: Up to 450 dwellings.

The site access approved under the extant permissions are currently under construction.

However, there are currently two planning applications that would supersede the extant permission and the Main Modification dwelling quantum. One is an outline planning application (O/20/89498, 11/01/2021) for 2,500 dwellings, primary and secondary local centres, office, commercial and industrial uses and a primary school. The other is a full planning application (F/20/89500, 11/01/2021) is for 381 dwellings, that essentially is the first phase of the outline application (but submitted in parallel). Clarification is needed in respect of the potential land use mix and development quantum for this development site within the emerging local plan.

Future Early Local Plan Review

It is noted that the Inspector recommended the shortfall in housing numbers of 2,614 dwellings over the plan period to 2036, (which will occur in the later years of the plan period and arise from the deletion of the Strategic Growth Option) should be addressed through an early review of the local plan. Accordingly, the Borough Council has committed to commence an update of this Local Plan within 1 year of its adoption.

The commitment by Eastleigh Borough Council to a future Local Plan update provides an opportunity for the County Council (as local highway authority), in partnership with the Borough Council and other transport stakeholders, to more fully review the transport requirements arising from the adopted plan and the future local plan review. This is important particularly in light of the adopted and emerging development strategies, the commitments made by the local authorities to Climate Change resilience and carbon reduction and the emerging policy framework set out by Hampshire County Council in a new Local Transport Plan.

Minerals and Waste Planning Authority

Mineral Planning Authorities are required by National Policy to safeguard mineral resources of local and national importance and encourage prior extraction of minerals to prevent sterilisation from non-minerals development. Local Planning Authorities are required by National Policy to not normally permit development in Minerals Safeguarding Areas which may sterilise safeguarded mineral resources. The Hampshire Minerals and Waste Plan (2013) is the overarching Minerals and Waste Policy in Hampshire. The plan safeguards sand and gravel (sharp sand and gravel and soft sand), silica sand and brick-making clay against sterilisation unless prior extraction takes place.

As the Minerals and Waste Planning Authority for Hampshire, Hampshire County Council has concerns regarding some of the Main Modifications proposed for the Eastleigh Borough Council Local Plan Submission. Hampshire County Council's concerns surround the inclusion of appropriate text within development allocation text which will require any forthcoming applications to be accompanied by a Minerals Resource Assessment.

The County Council has identified that often when planning applications are submitted within the Minerals Safeguarding Area, the design and layout of development sites are fully formed to allow for the consideration of the meaningful extraction of minerals. Therefore, the County Council is working with the Local Authorities to get the requirement for Minerals Resource Assessments into Local Plans so that developers will consider the issues of minerals safeguarding and extraction at the earliest opportunity in the design and application process to avoid any unnecessary delays in the planning process and delivery of housing.

The County Council has therefore identified a number of sites within the proposed Main Modifications that it considers do not currently have sufficient robust text to adequately safeguard minerals and inform potential developers of their requirements for prior extraction. The County Council sets out its concerns on these sites below.

The County Council notes that the SGO Policy S5 is to be removed as part of the Main Modifications (MM13) to the Plan, and that this policy contained a requirement for prior extraction of minerals to take place as part of any development. Although the County Council has no objection to this modification, it would like to stress that the requirement for the assessment of mineral resources and the potential for their extraction prior to development in the areas north of Bishopstoke and north and east of Fair Oak, covered by the Minerals Consultation Area (MCA), remains in place under Policy 15 (Safeguarding – mineral resources) of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP). As such, the County Council would like to see that a Minerals Resource Assessment is required to be submitted as part of any planning application that falls within the MCA and the now removed S5 area.

The County Council would also like to see the requirement for a Minerals Resource Assessment be applied to the following areas of land that have been proposed to be removed from the settlement gaps as shown in MM27 and in the PM3 map document, should a development application come forward in these areas:

- Areas in Allbrook, Map 1;
- Land south of the M27, Map 5;
- Area west of Ageas Bowl, Map 9;
- Land north west of Hamble-le-Rice, Map 18; and,
- Land north and north east of site S5, Map 19.

Given the updates to Policy E9 – Southampton Airport through MM100, the County Council request that wording is added to E9 (2) to require the submission of a Minerals Resource Assessment to the County Council, as the Mineral Planning Authority, if this area under E9 (2) is to be developed.

With regard to Main Modification MM73, while the County Council notes that a current application has been submitted for Policy HH1 and is indeed in discussions with the developer and the responsible development management officer, due to a large section of the site being within the MCA the County Council request that wording is added to Policy HH1 in the event that the current application is not progressed further. The County Council recommend the following wording:

The requirement for a detailed Minerals Resource Assessment including an intrusive investigation in line with the guidance set out within the Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document (<https://www.hants.gov.uk/landplanningandenvironment/strategic-planning/hampshire-minerals-waste-plan/supplementary-planning-documents>),

Whilst the County Council agree that there is no need to repeat policy within the Local Plan, the amended wording suggested would help to make clear the requirements to address mineral safeguarding issues and prevent any unnecessary delays at later stages in the planning process. In the event that the wording is not acceptable, the policies within the Hampshire Minerals and Waste Plan would set out the same requirements.

I trust that these comments are of assistance to you. If you wish to discuss any of the comments raised, please do not hesitate to contact Neil Massie on 0370 779 2113 who provides the coordinating role for the County Council on Local Plan responses.

Yours sincerely,

Stuart Jarvis
Director of Economy, Transport and Environment