

APPENDIX 3 - Response to comments made at Issues and Options stage

1. *The following text is an updated extract from a report taken to Cabinet on 6th April 2017 entitled “Eastleigh Borough Local Plan 2011-36: Progress report and response to consultation representations”. The full original report can be found [here](#).*
2. In December 2015, the Council undertook public consultation on a Local Plan [Issues and Options paper](#). The [Cabinet report of 16 June 2016](#) sets out at paragraph 9 - 11 the most significant comments made. These are set out below (*in italics*) with the Council’s initial response (in standard text). In many cases this response refers to further evidence gathering which is underway.
3. *Questions regarding whether the housing requirement is correct.*
4. The latest housing target for the Borough is that set out in the PUSH Spatial Position Statement: 14,950 dwellings (2011 – 2034), or 650 dwellings per annum. This was informed by the PUSH report ‘Objectively Assessed Need for Housing’ (2016), and by an assessment of the appropriate strategic spatial distribution of housing based on the ‘urban areas first’ approach, transport, infrastructure and environmental factors. These assessments were undertaken in line with national planning policy and the ‘duty to co-operate’. The PUSH reports referred to above are available [here](#).
5. The ‘Objectively Assessed Need for Housing’ has been updated in response to more recent evidence. The housing target of 650 dwellings per annum still exceeds the updated ‘Objectively Assessed Need for Housing’.
6. *Support for need for further work on travelling communities, employment and retail development.*
7. The Council is progressing an assessment of the need for retail space and travellers’ pitches. The PUSH Spatial Position Statement sets a target for employment space in the Borough: 114,000 sq m (2011 – 2034). This is based on PUSH’s Economic and Employment Land Evidence Report (GL Hearn, March 2016). This in turn has been informed by the positive economic forecasts underpinning the Solent LEP Strategy, by the distribution of housing, and by an assessment of the property market, which are the factors identified at paragraph 5.29 of the Issues and Options paper. PUSH’s target for the Borough is broadly the same as the 115,500 – 142,100 sq m to 2036 suggested at paragraph 5.28 of the Issues and Options paper.

Spatial Options:

8. *Mixed response to option A (spread development across extensions to settlements);*

Significant concerns by majority of respondents to options B and C (north of Bishopstoke / Fair Oak);

Mixed response to options D and E (south of Bishopstoke; north of West End);

Broad support for option F (expanding Hedge End to east and Botley to north);

9. The concerns raised on different options were as follows, with most factors being referred to in relation to options B and C, and some being referred to for the other options. Concerns included unsustainable locations, lack of accessibility, impact on countryside, landscape, gaps, village character / identity / urban sprawl, ecology (including rivers, ancient woodlands), the South Downs National Park, equestrian activities, flooding, open recreational spaces, transport / congestion, infrastructure (e.g. schools, health, water/sewage) and infrastructure costs. Specific concerns were raised regarding the desirability and deliverability of the new link road associated with options B and C in terms of some of the above factors, and the rail bridge constraint. Where support for options was expressed, this generally related to the sustainable location, provision of infrastructure, and potential links to the motorway and rail stations.
10. The Council recognises that these are all relevant planning considerations, along with other considerations set out in national planning policy. They are all being taken into account in the Council's on-going work on undertaking a Strategic Land Availability Assessment (SLAA) and gathering other evidence in support of the emerging proposals. This evidence is being placed on the Council's website as soon as it is available. The SLAA can be found [here](#).
11. This work will inform the Council's decision on which options to select and the reasons for that selection. This will be subject to the formal 'proposed submission' public consultation, with further representations considered at the public examination (see below).
12. *Significant concerns raised on option G (Hamble Airfield), particularly regarding traffic.*
13. The site is allocated in the Hampshire Minerals and Waste Plan (2013) for sand and gravel extraction. It is therefore very unlikely it would be able to deliver a significant number of homes during the plan period. In any case the Hampshire Plan anticipates that following extraction it will be restored to open space uses. On 15th December 2016 the Council endorsed the Development Distribution Strategy and Principles, including the statement that "There should be no significant additional development in the Hamble peninsula... [given transport, mineral and countryside gap issues]". Therefore, at this stage in the plan making process it is considered that this option should not be progressed.
14. *Strong support for option H (Eastleigh Riverside), with some suggesting housing rather than employment development. Generally supportive comments regarding the Chickenhall Lane Link Road.*
15. This area is in long established employment use and fulfils an important economic use. The area is bisected by the airport public safety zone. It is likely to be difficult to introduce significant residential uses in to this environment. The area has the potential to deliver a link road to by-pass the

town, relieve congestion, and enhance links to the M27 and Southampton International Airport, raising the economic profile of the area. The Local Plan will safeguard the route of this road. To rely on new development coming forward, there will need to be strong evidence that the road can be delivered. The Council continues to assess and review the prospects of this area.

16. *Substantial concerns about transport, in particular traffic congestion. Specific concerns regarding new link roads, including the North of Bishopstoke bypass, including the impact on the landscape / rural character, environment (including River Itchen), flood risk, doubts as to whether it would relieve congestion and the Allbrook rail bridge constraint.*
17. The Council fully recognises the importance of planning for transport alongside major new development. If the Allbrook and north of Bishopstoke / Fair Oak Strategic Growth Option were pursued this would be in association with a new link road which will help relieve congestion on Bishopstoke Road. The Council is assessing the relative merits of different development options in transport terms, including the potential for options to support improved public transport and more local facilities (to support some walking and cycling). The intention is to use the 'sub regional transport model' to identify in more detail the likely effects on the road network and the measures that would be needed to manage this. Further environmental studies have been commissioned to understand more fully the effects of and design requirements for the north of Bishopstoke bypass in relation to the issues raised. With regard to the Allbrook rail bridge, measures are proposed to improve the 'sight lines' and warnings approaching the bridge, that would enable existing and additional HGVs and buses to pass more easily. As set out in the Council's summary of infrastructure discussions¹ (see also Appendix 8) at this stage neither the highways authority (Hampshire County Council) nor Network Rail have objected in principle to the development or stated that the bridge itself needs substantial alteration. However, these are initial responses and further transport modelling and assessment is required.
18. *Some concerns regarding Botley by-pass.*
19. This was based on a misunderstanding that the road would extend on to Kings Copse Avenue.
20. *Significant concerns about the capacity of community facilities, particularly school and health facilities.*
21. The Council fully recognises that the capacity of these facilities will need to be expanded alongside major new development. The Council's summary of infrastructure discussions sets out the position of service providers. For example, Hampshire County Council has provided advice on the scale of new school facilities needed for strategic growth options. The West Hampshire Clinical Commissioning Group is working with the Council to improve primary and community based health facilities. It is usual for developers to contribute

¹ [Consultation with Infrastructure Providers and Regulators 2015-2016 \(December 2016\).](#)

towards such facilities alongside other funding streams (e.g. from Government). This is being factored in to the assessment and planning of strategic growth options and smaller sites.

22. *Concerns regarding the sustainability appraisal (methodology, scoring and whether all options had been tested) and the habitat regulations assessment (high level and does not fully take into account key issues such as the River Itchen). The PUSH water study is needed.*
23. The Issues and Options Sustainability Appraisal assessed options on the quantum of development (section 5); locations for development (section 6) and topic policies (section 7). The work streams described in this report, and the PUSH water study (which is now nearing completion) will enable further and more detailed testing of options for the next iteration of the sustainability appraisal. This will be available for the next public consultation on the plan.
24. *Characteristics of Borough / Research: amendments and additions proposed.*
25. Noted. These will be reviewed and amended as needed.
26. *Additional strategic issues and constraints identified: specific housing needs of certain groups; protected status of South Downs National Park; environmental impacts; access in the Hamble area; quality of the countryside; air quality; rivers; countryside gaps; capacity of infrastructure; impact of development in the surrounding areas.*
27. These are all issues which are being assessed as part of the work underway on compiling a robust evidence base in support of the emerging plan proposals. For example, the sub regional transport model will be used to assess traffic impacts in the Borough and surrounding areas; the landscape impact on the South Downs, and the environmental quality of different areas in the Borough, is being assessed. This will help inform which areas to protect and which are more suitable for development.
28. *Local Plan Vision: some considered this did not reflect the scale and location of development proposed. Amendments proposed.*
29. The vision has been reviewed in the emerging draft preferred option local plan document.
30. *Housing requirement: methodology; relationship to PUSH Strategy; over provision of housing; development industry consider at or above 743 dwellings per annum is the minimum.*
31. The December 2015 Issues and Options paper anticipated a range of potential dwelling targets. The PUSH Spatial Position Paper (approved in June 2016) sets a target for Eastleigh Borough which falls within this range. The Position Paper is based on an objectively assessed need for homes consistent with national policy, and on a strategic consideration of the potential for different areas to accommodate growth in the light of transport, infrastructure and environmental factors. The Position Paper reflects the 'duty

to co-operate' amongst Councils within South Hampshire. It sets a target for 650 dwellings per annum in Eastleigh Borough, which equates to 16,250 dwellings (2011-2036). This is above the PUSH objectively assessed need for the Borough and also higher than the more recently updated figure. It means Eastleigh Borough is making a contribution to meeting needs across the wider housing market area. The Council considers the PUSH Spatial Position Statement provides a good foundation for the preparation of the Local Plan. It is acknowledged that there is a 4% shortfall in housing provision across the wider Southampton housing market area (to 2034). The Council will consider whether it can meet any more of this remaining need although notes that the Borough already has a high target and a range of environmental and other constraints.

32. *Travelling Communities: questioning the need for new sites or suggesting joint working to meet needs.*
33. The Council is assessing the need for sites in line with national policy, and continues to liaise with adjoining Councils.
34. *Employment needs: queries regarding scale of growth (either greater ambition or taking account of changing working practices); and whether there is capacity / locations to accommodate it. Marine sector needs noted. Support for retaining major employment sites.*
35. The PUSH Spatial Position Statement sets targets for economic development. They are based on the ambitious targets in the Solent Local Enterprise Partnership's Strategy to achieve a growth rate of 2.7%, and also recognise changing working practices. The Council considers that this sets a positive basis for the preparation of the Local Plan. The Council is currently considering the appropriate locations for this growth, taking account of existing (draft) allocations, and the need to retain major employment sites (including marine sites).
36. *Retail needs: Some agreed a study is needed; others queried whether there was further needs, and sought no increase in Hedge End retail park given congestion and pollution issues. Impact on other centres is also relevant.*
37. The Council has commissioned a retail needs study and will consider the outcomes, reflecting the 'town centres first' where possible approach. As with other supporting evidence, this study will be published on the Council's website [here](#) once it is finalised (see also Appendix 12).
38. *Other spatial options: developers are promoting other sites, the Council should consider all reasonable alternatives, not just sites for 200 or more dwellings. Some preference for dispersal option. Other development options proposed.*
39. The Council is has considered all sites (including sites of under 200 dwellings) proposed by developers as part of the update of the SLAA.

40. *Strong community support for protecting countryside gaps, and coastal areas. Urban uses in the countryside are inappropriate.*
41. The Council supports these propositions which are being taken into account in the work producing a robust evidence base in support of the emerging plan policies and proposals.
42. *Housing: considerable interest in proportion of affordable housing sought and size threshold applied, with support for varying the approach across the Borough. Support for seeking a proportion of specialist and smaller housing for an older population. Mixed views regarding houses in multiple occupation.*
43. The Council has commissioned a study of the need for affordable and other housing and will use its findings to support an appropriate policy approach in the emerging draft preferred option local plan document.
44. *Densities / Building Standards: varied support for higher densities, support in areas of higher accessibility; sustainability standards should undergo need / viability test; provision of homes for disabled people is important.*
45. The Council supports higher development densities in areas of higher accessibility and is considering the need to apply national sustainability and accessibility standards for new homes.
46. *Transport: no support for a reduction in parking standards. Queries on accuracy of transport model. Comments regarding traffic congestion on Hamble Lane, and the need for highway improvements.*
47. The Council considers the sub regional transport model to be robust. It is also supported by Hampshire County Council and Highways England. The model will be used to help identify the need for highway improvements. On 15th December 2016, the Council endorsed the statement that “There should be no significant additional development in the Hamble peninsula...”, partially for transport reasons (see paragraph 13 above).
48. *Environment: Support for multifunctional benefits of green infrastructure, protection of national parks and ecology designations, sustainable drainage, protecting water and air quality. Heritage policies should accord with NPPF.*
49. The Council agrees with all these statements, and is preparing a Green Infrastructure Strategy which will be published on the Council’s website once finalised.
50. *Public consultation process has been inadequate and lacked transparency. Some alternatives have been excluded.*
51. The Council considers the Issues and Options consultation was clear, comprehensive and set out a wide range of alternative strategic growth options. The Council consulted widely, contacting over 4,000 individuals and organisations, receiving around 3,300 representations. The Council will continue to undertake wide ranging public consultation as it progresses the local plan.

52. *Community facilities: support for multi-use facilities.*
53. The Council supports this principle.