



HOUSE OF COMMONS

LONDON SW1A 0AA

FAO The Planning Inspector
c/o Mr Nick Tustian
Chief Executive
Eastleigh Borough Council
Eastleigh House
Upper Market Street
Eastleigh, SO50 9YN

6th August 2018

Dear Sir

I am writing on behalf of Eastleigh constituents in my capacity as the Member of Parliament for Eastleigh, so as to provide a formal response to Eastleigh Borough Council's consultation on its proposed Local Plan for our area based on wide range of approaches I have received from individual constituents, local groups and businesses.

Local Plans were introduced to ensure that local communities are at the heart of the planning system. Right across the UK, many local authorities have embraced this opportunity and worked proactively with residents, local groups, businesses and elected representatives to produce Local Plans that reflect the future needs of their respective area as well as being mindful of the needs of their neighbours. In the main, this has included addressing future housing need, delivering community facilities and infrastructure, supporting growth in the economy – as well as forming a basis for safeguarding the environment, adapting to climate change and securing good design. As a result, the vast majority of these local authorities have produced well supported Local Plans that the community have faith in and will positively shape the local area for decades to come.

After seven years of delays this draft Local Plan still gives my constituents cause for concern, in particular with their perception that Eastleigh Borough Council has failed to listen to their views resulting in a draft Local Plan they have a complete lack of confidence in.

During the consultation period I have been approached by constituents, via social media and email, raising their concern about the cumbersome way the online consultation form functions, the slowness, and on occasion failure, of the system to update and the size, accessibility and unwieldy nature of the associated supporting documents on which to base their feedback. They have indicated that in some cases this has deterred them from completing the consultation process.

I have set out the concerns received from constituents regarding the draft Local Plan in my letter below.

Member of Parliament for the Eastleigh Constituency

TRANSPARENCY

One of the key themes communicated throughout the Local Plan process in Eastleigh is a lack of transparency. The top three concerns raised by local residents with Eastleigh Borough Council for consideration when producing their Local Plan were:

- Reducing traffic congestion
- Maintaining countryside gaps between towns/villages
- Managing Air quality and noise

These issues are raised with me daily – just as they have been raised by local people with their local Borough Councillors and Eastleigh Borough Council itself.

Local residents have communicated that they feel that they have not been listened to in the preparation of this Local Plan and that there is an inability or unwillingness to collate and respond to local views.

I, or my representative, have attended 3 public meetings where residents have been able to contribute verbally to this process. Each meeting has been better attended than the last and each has run longer as more residents speak on behalf of themselves and their communities. The last, in December 2017, was attended by around 600 residents and lasted from 7pm to 1am, before the Council moved on to other business.

In **October 2017** 1,600 completed surveys were returned as part of Eastleigh Borough Council's 'Shaping your Community' consultation. This represents just over 1% of the population.

During a meeting in **December 2017** Eastleigh Borough Council presented a report in relation to moving forward with their proposed Local Plan. Paragraph 29 of this report indicated that in **July 2017**, Eastleigh Borough Councillors had agreed that the Council, and not the councillors, would make a decision on the pre-submission Local Plan once all of the evidence was complete.

Also at this meeting, at a time when the administration at Eastleigh Borough Council were looking to move their draft Local Plan forward, it was clear that the evidence was not complete. The Council pressed ahead with the Leader's preferred option of B&C despite the fact that not all SGO options had been evaluated to the same extent.

The administration had failed to finish their Local Plan, but still allowed elected members, with responsibility for taking decisions on the Local Plan, to abdicate their responsibilities and duties by delegating the decision to the Chief Executive in consultation with the Leader.

On **Friday 22nd June 2018** the Chief Executive of Eastleigh Borough Council signed off the Local Plan stating that all the evidence and technical reports were in place. Constituents have needed to write to me at this late stage to highlight their concern that the unelected Chief Executive is making this decision in place of their elected local representatives. This is in addition to their ongoing concern over the lack of detail in the evidence and technical reports that are underpinning the plan.

The Local Plan was signed off with only two days, a Saturday and Sunday, before the consultation events began. This suggests a disregard for the concerns raised by local residents' right across the Borough.

ADHERENCE TO TIMETABLE

Eastleigh Borough Council has failed to adhere to its own timetable with no evidence provided that it had changed its working practices.

- By July 2015 the Local Plan period had expanded from 2029 up to 2036 with a draft Local Plan set to be published in 2016. This draft Local Plan was still not available by 2017.
- In December 2017, an unfinished Local Plan was presented to Full Council. Integral parts were missing, meaning that Hampshire County Council and the Highways Authority were unable to reach any final conclusion or technical assessment of the impact on transport as there was an insufficient evidence base.
- Delegated authority was given to the Chief Executive in consultation with the Leader by Full Council to finalise the Local Plan in December 2017, 6 years after the original draft Local Plan had been published.

HOUSING NUMBERS AND TYPE

According to the House of Commons Library, 2014-based projections put the number of households within the Eastleigh Borough by mid-2017 at 56,000. This is a rise of 13,000 when compared to the 2011 census, which stated that there were just 43,281 recorded households.

Paragraph 47 of Eastleigh Borough Council's proposed Local Plan explains why housing numbers are so high. It clearly states that the Council is planning to build even more than the government's draft assessment of need. I quote, "This Council is therefore still planning for growth above its own need to meet unmet needs (around 2000 homes) in the wider Housing Market Area".

The proposed development throughout the Borough has not been adequately assessed against infrastructure requirements. The inadequacy of infrastructure makes it inappropriate to include development in excess of what is required. It is recognised that this area does have a fair number of second homes due to its tourism, particularly in the Hamble area, renowned for its sailing prowess, however this will not account for the excess number of planned properties within the plan.

There is no evidence that appropriate consideration has been given to reasonable alternatives which would tackle congestion and improve health and wellbeing in the Borough. Nor is there adequate evidence that objective, sustained and supported reasons for discounting alternative strategic development exist.

In particular local residents have raised with me their concern that Eastleigh Borough Council haven't taken into account that the ONS are now the organisation that define housing types and numbers required, and that in autumn 2018 an update to housing needs will be made available. I am often approached regarding the limited opportunity for downsizing, particularly properties with sufficient dedicated parking, and compared to the number of large family homes being built.

As with most communities an ever growing senior generation means there is an increasing demand for retirement properties, including bungalows and adaptable homes, in particular to cater for the high number of amputees this area has due to high levels of diabetes in this area. There must be a stronger emphasis for the provision of this type of property, as well as starter and one-bedroom homes.

Potentially the need based upon the latest census data could indicate fewer houses are needed and the number defined by PUSH and EBC could be invalidated making the Local Plan unsound. At the last examination, the inspector was critical of the data from PUSH, and this was one of the reasons the then plan was found unsound.

EMPLOYMENT SPACE

There are already insufficient employment opportunities for local people to match the high skills and qualifications of our workforce – hence so many people commute out of the Borough adding to the congestion and air quality issues through no fault of their own.

The Plan states that a further 144,056 square metres of space will be allocated for employment. This 13% increase seems substantial, but paragraph 2.17 of the Plan reveals that between 2001 and 2014, 192,000 square metres of employment space was lost to other uses. The proposed Plan will therefore leave Eastleigh with less employment space than it had in 2001.

This prompts the question, where are the people living in the 17,000 plus new homes going to work? I would surmise that they will need to commute out of our Borough, unless we allocate more employment land. Typically people like to minimise their commute to work. At present it takes, on average, 1 and a half hours per 12 miles to travel in/out and around this area. Working close to home can improve residents' quality of life and bind our communities together.

A successful plan MUST therefore increase the amount of employment space as it increases the number of homes in the area.

Only by doing this will Eastleigh be able to retain its identity and be economically sound. If we don't address this issue, Eastleigh is destined to become a large residential suburb of Solent City.

INFRASTRUCTURE

My constituents contact me daily to raise the constant queues and delays to their journeys on the roads from the centre of Eastleigh through to Bishopstoke and down to Hamble.

Those constituents feel that Eastleigh Borough Council has not properly considered and promoted reasonable alternatives that would tackle congestion, as well as improve health and wellbeing in the Borough. There is no evidence that objective, sustained and supported reasons for discounting alternative strategic development exists.

With no Local Plan in place the administration at Eastleigh Borough Council have approved thousands of new homes in piecemeal developments across the Borough. There is no evidence of joined up work on how to support the extra cars on our roads – including working with neighbouring local authorities - or the extra need for access to GP services, school places or employment space.

Local businesses are now contacting me to say that, owing to growing local congestion, they are considering moving out of the Eastleigh Borough. This will mean that new homes are being built for people who will have no employment opportunities available to them in the area.

As Eastleigh's MP I have worked with Ministers, Hampshire County Council, the LEP, local Councillors, Parish Councils, local businesses and local residents to push for infrastructure for our area. This eventually led to Eastleigh Borough Council writing a joint letter with me in April 2017 to support an application for funding towards the Chickenhall Link Road – something that the vast majority of my constituents want to see delivered. Delays to the Local Plan process have continued to stand in the way of this vital project being realised and there is little detail within the plan that promotes the importance of this long awaited link road. There is insufficient evidence of comprehensive commercial stakeholder engagement, including, for example, a detailed consideration of the Southampton Airport Masterplan.

In respect of other areas of infrastructure, the Local Plan states that GP practises are adequate to meet existing needs. I am regularly contacted by constituents with concerns over the length of time that it takes them to see a local GP. Botley and St Luke's practice are in special measures whilst Hedge End Medical Centre is also struggling with the increase in local population and I understand others have sought or are seeking to restrict taking on new patients. This is before the more than 10,000 new homes are built across the Borough.

Commercial infrastructure, including the Esso Pipeline, which runs across a large section of the Borough through Netley, Hamble, Bursledon and Botley is not included under a separate policy within the Local Plan and is therefore vulnerable to adequate provision not being made for safeguarding its future including replacement of pipes.

PROTECTING AND ENHANCING THE LOCAL ENVIRONMENT

Residents and local campaign groups highlight that Eastleigh Borough Council's Local Plan is not in keeping with a green borough.

In particular, the proposed strategic development at S5 and link road at S6 will have a number of detrimental effects on the environment in the local area by:

Endangering valuable woodland

- The proposal to build a road between two areas of ancient woodland is destructive to both the woodland itself and to the wildlife. It does not offer any form of safe corridor for wildlife and the proximity of the development to the woodland is inappropriate and insufficient. The development will fragment and isolate ancient woodland areas, and is not in keeping with the need to maintain uninterrupted green corridors.

Failing to tackle congestion when reasonable alternatives are available

- The roads in the Bishopstoke, Fair Oak and Horton Heath areas are heavily congested during peak times, notably the route from Fair Oak into Eastleigh. The proposed strategic development to the north of Bishopstoke and land north and east of Fair Oak together with the link road (S5 and S6) offers nothing to alleviate the existing congestion problems or reduce travel time to Eastleigh. Instead, the proposals would promote longer journeys and increased traffic flow through Fair Oak and Horton Heath.
- In putting forward the strategic development at S5, alongside its other proposals in the Fair Oak and Horton Heath areas, Eastleigh Borough Council has not adequately assessed the impact on congestion on those areas.
- Eastleigh Borough Council has identified, in paragraph 4.81 of the Local Plan that the Chickenhall Lane Link Road is a high priority road scheme which it strongly supports. The Local Plan does not reflect this and the benefits of a Chickenhall link road would be vastly increased if the proposed Local Plan supported development along a corridor connecting to it.

Failing to reduce pollution

- The Local Plan, and in particular the strategic development at S5 and link road S6, does not offer alternatives to car journeys.
- It does not support development in areas which would offer the ability to create uninterrupted cycle networks or links into rail infrastructure. This could be achieved, for example, with development along the corridor following the railway line from Hedge End to Eastleigh. This would support a new railway station and be able to deliver a cycle super highway into Eastleigh town centre. Such alternatives are essential to development on this scale if Eastleigh Borough Council is to meet its strategic priority of a green borough.
- The Local Plan does not encourage development in areas which can support the need for a new train station, nor provided adequate explanations, supported by factual evidence for preferring the strategic development and link road at S5 and S6. Development which offers better cycle networks and access to public transport will assist neighbouring areas, such as Southampton and Winchester, also to meet their objectives in reducing pollution as Eastleigh residents would be able to travel to those areas without driving.

Maintaining local waterways

- The Eastleigh Borough is very fortunate to have within it the River Itchen, which was once described as 'probably the most iconic chalk stream in the world' within a World Wildlife Fund report. Expert anglers and local residents alike have raised serious concerns over the impact that sediment run-off from the development of thousands of new homes in Fair Oak and Bishopstoke, including the strategic development at S5, will have on the future of the River Itchen.
- The River Itchen is a Site of Special Scientific Interest.

Maintaining Green Gaps between Communities

- Constituents have contacted me on a regular basis concerned about the infringement into and loss of green gaps between communities impacting the individual identities of these villages and town. Of particular note is Hedge End into Botley and Botley into Fair Oak.

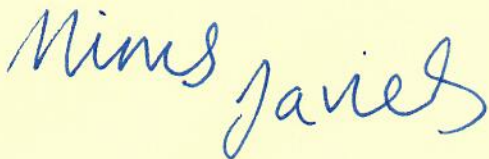
CONCLUSION

Considering all of the concerns raised above on behalf of my constituents, and particularly given those concerns relate to a document that is so crucial to the future of our area, I find, on behalf of my constituents, that the process is extremely unsatisfactory and that the draft Local Plan proposed by Eastleigh Borough Council runs the risk of being found to be unsound.

Further to this, like the majority of my constituents, this is hugely frustrating considering the years that it has taken to get to this point – during which time the face of our Borough has changed beyond comprehension, as a result of the approved piecemeal developments right across our area leading to increased journey times, deteriorating air quality and squeezed productivity.

Through this process, Eastleigh Borough Council had an opportunity, like hundreds of other local authorities across the UK, to produce a Local Plan that has the support of the local community that it is meant to serve. Unlike hundreds of other local authorities it has not effectively seized that opportunity, and the people that I represent will be potentially significantly worse off as a result.

If you would like me to provide any further clarity in relation to the above, then please don't hesitate to contact me.



Mims Davies MP
Member of Parliament for Eastleigh