

1. The justification for residential development is now redundant: In early 2022 HCCC and LDA (Land Development Advisory Limited) submitted the Ageas Bowl development proposal for public consultation. The PRIMARY objective was to enhance the visitor experience of the stadium (rejuvenation was seen essential in securing its commercial viability, post-covid, thereby helping to protect the legacy of the club and venue for future generations.). The core of the proposed enhancements included a statement spectator arrival zone, a processional walkway and a brand new pavilion, and, *"to the West of the site, to fund the described improvements, we propose a new environmentally-focussed, landscape-led sustainable residential community, providing a range of new homes for first time purchasers to family housing and senior independent living"*. Housing was therefore publicly justified to consultees, as being necessary to provide the funding for the promised venue improvements. Unfortunately, all the venue enhancements (together with the affordable homes) have now been omitted from the applicant's revised proposal, based on their Financial Viability Assessment (FVA), which concluded there was not enough profit in the project to proceed. All that remains is; open market housing, and independent, commercial enterprise developments (i.e. a private hotel, a private therapy clinic and a private care home), none of these provide benefit to the venue (indeed, to the contrary, compromising it!), nor do they provide amenity value for the local community, instead they simply secure developer profit. LP Policy WE4 states: *'Development will be supported where it facilitates the site's important role in meeting sporting needs in the Borough and wider area' (and d. iii. enables the enhancement of sporting facilities on the site; and d. iv. does not compromise the function of the Ageas Bowl as an international cricket ground and events location)*. The application no longer meets these policy requirements.

2. Removal of all affordable housing: The developer (again citing its FVA) has now excluded the construction of any affordable homes. Eastleigh needs affordable homes for young, local people, not additional, expensive open market properties. Recently, a similar FVA reason to avoid affordable homes was cited by developers in West Berkshire. However Reading Borough Council refused to accept this and forced the developer to deliver those much needed affordable homes! Eastleigh owns the land at the Ageas and should insist on affordable homes as it did for Horton Heath (EBC tweet: *Government policy states, "if brought forward by a private developer, there is no requirement to provide affordable homes. Despite this, we are developing Horton Heath ourselves and will use grant funding ensuring affordable homes for Borough residents."*). The Ageas application proposal fails from not having a sustainable social impact.

3. The location of the proposed care home breaches LP policy WE4: The proposed location of the care home (outside of the residential development area as designated by SLAA-11-32-C), will encroach into the countryside, further reduce the settlement gap and cause the segregation of care home residents and be too far (1.2 miles) from West End village or other shops for them to walk to. There are already three other care homes within 500 metres of the site (one, F/22/94034, is currently under development), all are struggling to find staff. There is no need for yet another care home in the area. The application also fails to conform to Local Plan Policy DM25 *Delivering Older peoples housing* *".... Proposals should be: a. located in sustainable locations with good access to the public transport network; b. close to local facilities that residents can use, ideally Extra Care housing should be in or close to a local centre; and c. well integrated into the local community."* This proposal fails to satisfy these policies.

4. The proposed residential development creates significant harm to the SINC of Telegraph Woods (a Priority Biodiversity Site). Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006 and NPPF advice is that *"LPAs should aim to conserve and enhance biodiversity"* in such areas. The Application's Landscape and Visual Appraisal document mentions *"Steep grass slopes and mounding form the match day parking to the west of the site. This creates a high ridgeline running along the boundary of Telegraph Woods and subsequently a large, screened area for car parking due to sitting within an artificial bowl. The scheme proposes using the existing topography to sensitively arrange built form, density and scale with the taller elements arranged towards the stadium and a more organic and less dense layout towards Telegraph Woods and the north-western boundary."* However, the latest application proposes finished ground floor levels of Thirty Two 3-storey, townhouses adjacent to the woods, be at the height of the currently protective raised "bunds". With 8.1metre flat roofs the buildings will tower 14 metres above the woodland! In addition, one of the 5-storey blocks of flats is similarly adjacent to the SINC and will tower even higher! The proposed "partial eco-offset" measure falls way short of providing sufficient protection and the development will create a high degree of disturbance to woodland wildlife, through both vehicular and domestic, light and noise sources, as well as an enormous increase in recreational footfall, plus threats posed by allowing access to off-road motorcyclists (which used to plague the woods before fencing and kissing gates were erected on Telegraph Road). This is of particular concern at the extreme NW corner of the residential area, where the proposed ecology offset buffer does not even exist! but where there are Designated Priority Habitats for several resident, protected species. e.g. there is a reptile receptor site, where slow worms have recently been photographed, and also 3 active badger setts, within 20m of the proposed site boundary. Furthermore the application's ecology report warns of potential landslides into the woods, due to proposed dwellings and service roads being situated on top of man-made bunds (where soil composition is unknown). Local Plan Policy 23.NC states: *'Development which is likely to have a direct or indirect adverse effect on a SINC will not be permitted, unless it can be demonstrated to the satisfaction of the Borough Council that the benefits of the development clearly outweigh the need to safeguard the nature conservation value of the site. "If development is to be permitted, the Council will*

require appropriate measures to be taken to mitigate for the adverse effects on the SINC". Therefore, If permission is granted, then it should be conditioned by limiting access to the woods via complete boundary fencing with "kissing gates" (similar to that at Telegraph Road) In addition, all dwellings adjacent should be contained within the existing wild flower bunds and be built at the level of the current parking area (where the majority of the development is proposed) Furthermore, no alterations should be made to any existing footpath through the woods, that would harm its natural character and biodiversity. WE4 states that "Development should achieve a net gain in biodiversity as set out in policy DM11 and with reference to the site's Natural Environment Delivery Plan". The application in its current form, fails from an ecological and biodiversity sustainability perspective.

5. The proposed development's residents' hearing and mental health will be at risk, from harmful levels of venue sound. At the recent Arctic Monkeys concert, 70-92dB meter readings were taken at ground level in the centre the proposed residential area! (World Health Organisation considers levels above 85dB can cause permanent hearing damage). This will be of particular concern to residents living in the 4 (inappropriately-scaled) 5-storey flats. These will be closest to the venue and will tower over the rest of the site (providing penthouse occupants with views into the stadium and beyond) they are out of character with the area and the proposed street scene of the site. Their close proximity to the stadium will result in exposure to sound levels which will cause stress and anxiety to parents of small children, pet owners and any who venture outside (or even open their windows!). A Noise Impact Assessment was conducted for another application (X/12/7078) at the same site, in 2012. The resulting sound levels recorded in neighbouring roads (significantly more distant from the venue than the proposed residential area), were on average around 10dB higher than, and so call into question, those suggested by the developer's much lower figures of around 55dB within the site! - This application fails from Health and Safety and Social Impact Sustainability perspectives.

6. Hampshire constabulary have expressed concern about increased crime rate due to the development creating "leaky cul de sacs." This term is used by the police force, to describe a closed development which has multiple entry/exit routes, especially where those routes, (as is the case here), are in close proximity to the rear gardens of other properties, in these circumstances, similar developments, have experienced a 110% increase in crime, compared to "non-leaky cul de sacs." The application conflicts with the NPPF guidance (para 92.b, 130.f) on safety by design and with LP policy DM1.

7. There is no direct pedestrian, cycle or vehicular route from the residential site to West End village, other than 1.1 miles distance, via Marshall Road (which currently solely serves the venue). The omission of the new visitor entrance which was designed to de-conflict movements between event crowds and local residents, will cause uncontrolled mingling and chaos, on the roads and on pedestrian routes, resulting in considerable stress and risk of conflict for all concerned (something existing local residents can already attest to). The developer has been unable to secure an alternative, village access route for the new residents, due to land ownership issues - In the Highways report WSP state that the "land owner" will be responsible for maintaining any paths through the woodland – has this actually been agreed with them? This application fails to meet Policy WE4.1.d.ii and does not provide a sustainable transportation solution.

8. Nutrient Neutrality Statement is misleading/disingenuous by incorporating an unchanged area of the site, (the golf course, which is a very large producer of nutrients), within both the "before and after" calculations. This approach "camouflages" the true extent of increases in levels of nutrients generated by the developed areas proposed by the application and invalidates its conclusions. The application fails to meet with Natural England's TIN 186 Principles for Nutrient Neutrality.

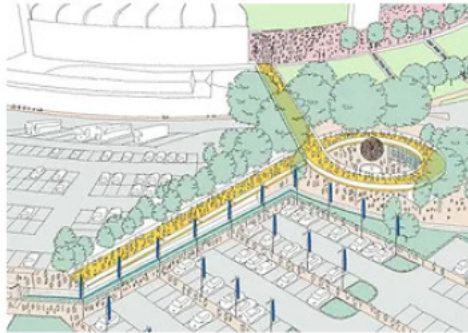
Summary: The proposed site is an inappropriate abutment to an already over-developed village and will result in significant additional strain on local infrastructure and immense harm to the adjacent SINC. The application is fundamentally flawed, it no longer delivers the core venue benefits upon which it was originally justified, and it does not represent sustainable development, as such I respectfully request permission for this application be refused.

Please also note the reference material on the following pages
(Numbering relates to the above paragraphs)

1. From 2022 Public Consultation Document:

To the West of the site, to fund the described improvements, we propose a new environmentally focussed, landscape led sustainable residential community, providing a range of new homes for first time purchasers to family housing and senior independent living.

"The scheme would rely on unlocking value from a proposed residential development scheme, the income from which would then be applied to redevelop the venue....."



B. ARRIVAL AND RAMP

This is one of the biggest changes to affect the visitor experience. The Ageas Bowl has access points, but these are functional and don't add to a sense of excitement and theatre on major event days.

To enhance the match day experience, the design team wanted to focus on the 'visitor's journey'. A new arrival space is created at the existing junction with Botley Road that funnels visitors towards a processional pedestrian ramp, which leads up to the stadium fan zone. Circulating around a new fan shop and central square, the ramp rises gently through the tree canopy and over Marshall Drive, and takes the visitor towards the stadium.

Now gone



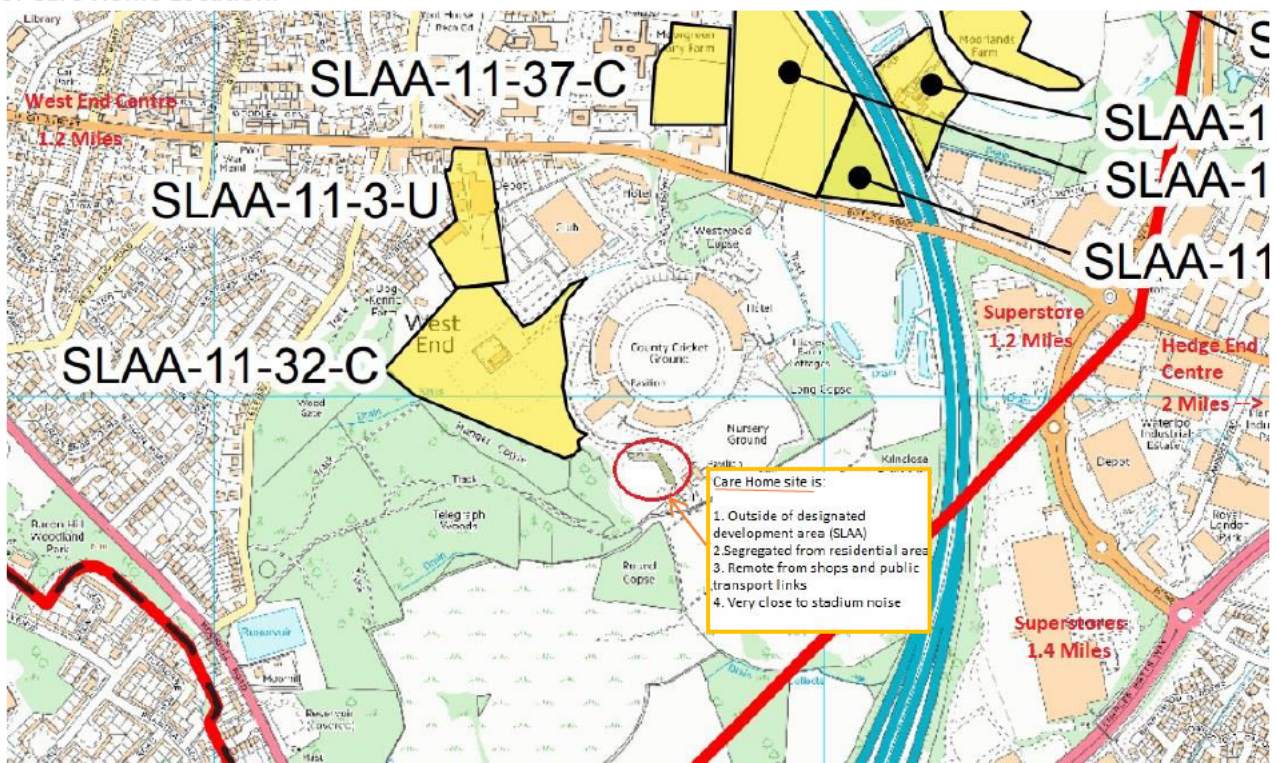
Now gone

All that remains is developer-profitable construction (i.e. Housing, Hotel, Care Home & Well Being Centre)

G. PAVILLION AND MAINTENANCE

A brand-new pavilion building is proposed to the south of the stadium, sitting directly between the main stadium pitch and the practice pitch on the fan zone area. It is proposed to reconfigure the space under the pavilion to provide new access, changing and shower facilities where the grounds maintenance area currently resides. The removal of maintenance vehicles from this area also addresses potential conflicts between these and players migrating from one pitch to the other. The maintenance facility will be relocated to a new space under an extended fan zone that provides a dedicated, larger and more usable space. The hover cover will also be rehoused in an more appropriate location.

3. Care Home Location:



4. Impact on SINC:



Three-Storey Town Houses are proposed to be built at the level of the protective “bunds” currently providing separation between the Ageas Site and the SINC of Telegraph Woods. These will also be visible from public vistas. 5-storey flats to the right (not shown) will be even more intrusive.



Location of Badger Setts and Reptile Receptor area

Car park being replaced is full on most events and currently at a level below the protective “bunds” (in foreground)



5. Dangerous Sound Levels:



Arctic Monkeys 2023 (reading taken at centre of proposed residential area)

Table 5 – Predicted and Measured Noise Levels (MNL) during concerts

	Botley Road [68]	Telegraph Road [63]	Hedge End [63]	Thornhill Road [63]
<i>Predicted</i>	62	62	55	53
Blue Concert	57	58	-	-
Oasis Concert	67	63	57	60
Billy Joel Concert	61	61	52	59
The Who Concert	62-68	61-63	56	-
Neil Diamond	67	57	48	57

Figures in brackets indicate the maximum acceptable LAeq noise level (MNL) at each location.

(Table from X/12/7078: Oasis 2005, The Who 2007, Neil Diamond 2008, 2022)

Applicant’s Noise Impact Assessment is questionable:

- 6.1.5. Noise levels across the majority of external amenity spaces are predicted to fall below the upper guideline noise limit of 55 dB set out in BS 8233, with the exception of 9 garden spaces (out of 102) where a minor exceedance is predicted. Across balcony spaces located in proximity to the Ageas Bowl, noise levels are predicted to exceed the upper guideline limit of 55 dB, however, this would only be for a few hours on a very limited number of event days (anticipated to be in the region of 21 across the year). The guidance in BS 8233 also suggests that imposing noise limits in balconies is not necessarily appropriate, given limited space constraints.

Five-storey flats will be above venue height – out of character and visible from public vistas and its residents will suffer from the load levels of sound from the venue.

