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Dawn Errington  
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24 April 2024

Dear Dawn,

Planning Application Reference: F/23/95844  
Land at Stoke Park Farm, Bishopstoke, Eastleigh, SO50 6DW  
Addendum to the Design & Access Statement and Planning Statement

I write on behalf of the Applicant, Eastleigh Borough Council, in respect of the above planning application.

The application seeks Full Planning Permission for:

*Use of agricultural land as Suitable Alternative Natural Greenspace (SANG) for recreational purposes, with associated access, car parking, paths, landscaping, infrastructure and other works.*

Following the initial submission of the application and as a result of the consultation process and representations received from local residents and statutory consultees, the Applicant has finalised a series of amendments to the proposed development.

Included with this correspondence are a set of drawings and supporting reports which illustrate the revisions to the development scheme and a summary of the effect of the changes. This correspondence also includes a response to the matters raised by statutory consultees where required, which I hope will assist you in your consideration of the application.

It is acknowledged that, given the nature of the changes, the proposed development will be subject to a second period of consultation to enable all interested parties to review the revisions and provide their comments to the Local Planning Authority (LPA). I trust that the revised drawings and technical reports provide you with the documents required to commence this process and I look forward to receiving confirmation of this in due course.

### Summary of amendments to the proposed development

The principal change proposed to the development scheme relates to the siting of the car parking provision. Previously, a designated on-site car park containing 20 spaces had been proposed to be constructed in close proximity to the entrance to the SANG. Access to this car park would have necessitated users of the facility driving through the residential development along Sewall Drive, as well as along a public bridleway (Footpath 724) to reach the site.

It was evident, however, from some of the representations received to the application that there were concerns from local residents and some consultees about the potential effects of this access route in a number of respects. In order to seek to address these concerns, therefore, the Applicant has explored alternative parking arrangements and, as shown within the updated information provided, revised provision is now put forward with the existing cemetery extension car park, which lies further to the west along Sewall Drive, being proposed to be used.

This car park lies only a short drive along this road when accessing the site from Stoke Common Road and, as set out in the section on 'highway matters' below, incorporates ample parking provision (26 spaces) to serve the anticipated level of usage of the SANG, with suitable direct connecting pedestrian routes from the car park available.

As a result of the changes, the red line for the application has been revised to now include the cemetery extension car park and the access drive to it, as well as to omit the areas along Sewall Drive which had been identified for the provision of widening works and passing places. As this route is no longer proposed to be used to access the car parking for the SANG, these works are no longer required.

In addition to the above, the site layout for the SANG has also been subject to minor updates to take account of the changes to the car parking proposals and some of the feedback provided by consultees. Further details on this are provided below.

As well as revising a number of the drawings for the application, it has also been necessary to update some of the technical reports previously submitted. This is to ensure that the reports correctly reference the development scheme which is submitted for approval. The revised development proposals should be read in conjunction with the original submission and where information has not been updated or superseded by this submission it remains relevant to the assessment of the application.

The updated drawings and reports which are now submitted for formal consideration by the LPA are as follows:

- Location Plan – 23036-CO-LP-0-03-REV-4
- Site Boundary – 23036-CO-LP-0-02-REV-7
- Site Plan – 23036-CO-LP-1-01-REV-9
- Site Plan (North) – 23036-CO-LP-1-02-REV-9
- Site Plan (South) – 23036-CO-LP-1-03-REV-9
- Site Plan (West) – 23036-CO-LP-1-04-REV-9
- Arboricultural Impact Assessment – 15845\_AIA\_JP – 10 April 2024
- Ecological Impact Assessment – BR0813/EcIA/B – March 2024
- Flood Risk Assessment – B06275-CLK-XX-XX-RP-FH-1001 – 8 April 2024
- Heritage Assessment – AN0723\_1 – April 2024
- Transport Assessment – B06275-CLK-XX-XX-RP-TA-002 – 24 April 2024

## **Assessment of the proposed amendments to the development**

A summary of the key technical matters that have been raised as part of the consultation process and which are relevant to the amendments to the scheme now proposed are covered below. Where necessary and appropriate, the issues raised are responded to with the evidence and conclusions of the updated technical reports and associated amended information being referenced as required.

### **Layout and design**

As part of the amendments to the development scheme, the Site Layout Plan has been revised (see Drawing No. 23036-CO-LP-1-01-REV-9), with the primary change being the omission of the on-site car park in the north-western corner of the SANG with, as noted above, alternative provision now proposed in the existing cemetery extension car park further along Sewall Drive. This area will, therefore, now remain as grassland which will be supplemented by additional tree planting. Whilst the landscape and visual effects of the development as originally submitted were considered to be minor in scale, the removal of the proposed car park and other directly associated works (for example, the drainage pond, fencing around the car park, access gates and earthworks etc.) will further minimise the impacts of the development in these respects and serve to enhance the character and semi-natural feel of the SANG, particularly as viewed from the public bridleway (Footpath 724) which runs parallel with its northern boundary.

As well as the changes to the car park, a woodland buffer has been added along the western and southern boundaries of the site in response to the comments of Natural England during the consultation process, with this being included for resilience in the context of the adjacent ancient woodland and to protect the woodland edge from impacts such as trampling/soil compaction and eutrophication from dog waste. In addition, and to further enhance connectivity, a footpath link has been added in the south-eastern corner of the site to the existing public bridleway (Footpath 729) which runs parallel to the boundary of the SANG. The archaeological features within the site have also been identified on the Site Layout Plan for context and in response to the comments of the Council's Landscape Officer.

A number of the other comments received in respect of the layout related to the car park and associated works and drainage infrastructure. As this is no longer proposed, it is not considered necessary to further address those comments here. With regards to the matters raised concerning the arrangement and layout of the footpaths within the site, including those from Natural England and the Council's Landscape Officer, whilst these are noted, the pathways are considered to provide an appropriate variety of legible walking options around the SANG, with these having been sensitively designed to respond to the natural contours of the land and enhance the visitor experience, with the latter being supplemented by map boards, waymarking features, benches and picnic areas, as well as a range of planting. It is important to also note that the planting proposals and associated landscaping comprise the first phase of the SANG development, with the Applicant's intention being that this would be further enhanced and supplemented as part of future phases.

Overall, it is considered that the development will provide an area of high-quality open space which conserves the open character of the site whilst enhancing its landscape diversity and establishing the semi-natural feel which is advocated within Natural England's published guidance for SANGs. The application therefore complies with the requirements of Policies DM1 and DM34 of the Local Plan, as well as the provisions of parts 11 and 12 of the NPPF.

## Highway matters

Hampshire County Council, as Highway Authority, submitted a consultation response in respect of the application proposals on 28 September 2023. This stated that further information was required to be provided in order to demonstrate that the development was acceptable in highway terms. This information included additional plans to show available non-private passing places along Sewall Drive for users of the SANG, as well as clarification that the Applicant had the required access rights over Bridleway 724, with the latter also being raised by both The Ramblers and Hampshire County Council's Countryside Service within their respective consultation responses.

Whilst no objection was raised by the Highway Authority on parking grounds and the parking provisions proposed were anticipated to be adequate for use, they highlighted the possibility of overspill parking potentially occurring in future should the site's popularity exceed expectations. The matters of the possibility of overspill parking, as well as of vehicular movements impacting on

residential properties along Sewall Drive, were also an evident point of concern within the representations submitted to the LPA on the application.

#### *Parking provision and access*

In order to address the issues raised, the scheme has been amended to relocate the proposed parking provision to the existing cemetery extension car park which, as shown on the updated Site Layout Plan (Drawing No. 23036-CO-LP-1-01-REV-9), is positioned to the west of the SANG and a short distance along Sewall Drive when entering from Stoke Common Road. This will remove the need for users of the SANG to drive through the residential areas further along Sewall Drive to reach the car park and mean that the previously proposed passing places and widening works are no longer required as part of the development. The matter of vehicular access rights for the SANG over Bridleway 724 is also no longer applicable.

In order to demonstrate that this alternative provision is suitable, the Transport Assessment (TA) for the application has been updated (see document ref: B06275-CLK-XX-XX-RP-TA-002, dated 18 April 2024, by Clarkebond) with this including an appraisal of the existing and proposed levels of usage of the car park, connecting routes to and from it, as well as an updated assessment of trip generation rates. The latter has been informed by a 7-day Automatic Traffic Count (ATC) to provide an accurate appraisal of existing movements that occur along the initial section of Sewall Drive between its junction with Stoke Common Road and the access to the car park (see below for further details).

The parking accumulation analysis set out within the TA demonstrates the forecast demand for car parking based on the predicted trip generation for the SANG. It then factors in the current level of usage of the car park based on a survey undertaken during a Friday and Saturday period between 0700 and 2000 (the proposed opening hours of the SANG) to show the anticipated cumulative parking demand. This shows that even at peak times of usage during the day, there would remain between 30 and 40% capacity within the 26-space car park. There would therefore be sufficient space available for existing and anticipated proposed users, with additional spare capacity to cater for any fluctuations in demand. The number of spaces available would also exceed the requirements set out within Natural England's guidance on the creation of SANGs for a facility of the size proposed.

#### *Connectivity and impacts on the footpath network*

Whilst the car park is acknowledged to be further away from the SANG than that which had previously been proposed, there are existing and convenient pedestrian connecting routes available which will provide suitable access between the two. These notably include Sewall Drive, as well as the existing network of paths through the adjacent Stoke Park Woods. Pedestrian entrance points will be provided into the SANG from both in order to allow direct access for users (see Drawing No. 23036-CO-LP-1-01-REV-9).

It is acknowledged that the route to the SANG through Stoke Park Woods may lead to an increase in recreational movements through this area of woodland and, as a result, the applicant has been positively engaging with the relevant responsible body, Forestry England, to discuss any requisite mitigation measures that may be necessitated. It is envisaged that these measures, once agreed, could be secured through a S106 Agreement as part of the planning application process, with these covering any initial facilitating works required (for example, upgrades to footpaths etc.) and ongoing management provisions to maintain access in perpetuity.

In terms of the other matters raised within the consultation responses received and notably those of Eastleigh Ramblers and Hampshire County Council's Countryside Team, for clarity, the proposed internal paths within the SANG will not be required to part of the PROW network and would be maintained by the Applicant as part of the overall management of the site. Connections are however proposed onto and from the right of way network, which includes links at the south-eastern and

south-western corners of the site onto footpaths 729 and 730. There is no intention to affect the rights of way at these connecting points and both are outside of the SANG site boundary.

### *Trip generation*

In terms of the traffic impact of the proposals, a 7-day ATC was undertaken to record traffic flows and vehicle speeds along the initial section of Sewall Drive referred to above. The full data from the ATC is included within Appendix 1 of the TA, with a summary of average flows and speeds provided within the main body of the document. This data shows 49 two-way vehicle movements currently occurring in the AM peak period and 58 in the PM peak period, with speed data indicating that vehicles travel below the permitted speed of 20mph along this part of the road.

The predicted level of movements associated with the SANG, which are based on a robust sample size taken from the TRICS database for equivalent uses, show a minor increase in two-way movements during the aforementioned peak periods (8 during the AM period and 13 during the PM peak). This increase equates to 1 additional movement approximately every 7-and-a-half minutes and every 4-and-a-half minutes respectively. The additional traffic arising from the SANG would therefore not be noticeable and would result in no more than a minor impact on highway operation and capacity.

### *Conclusion*

As demonstrated within the updated TA, therefore, the development will have safe and convenient access to the highway, meets local and national highway standards, will not cause or increase danger to road users or pedestrians, or impact on the safe operation of the highway network. A sufficient level of car parking will also be provided to serve the development. The application therefore complies with Policies DM13 and DM14 of the Local Plan and the provisions of Section 9 of the NPPF.

### **Trees**

The Council's Tree Officer raised no objection to the application as originally proposed subject to the development according with the submitted arboricultural report. As the scheme has been amended, however, the Arboricultural Impact Assessment (AIA) for the application has been updated to take account of the changes to the scheme (see document ref: 15848\_R01b\_JP, 10 April 2024 by Tyler Grange).

The revised report sets out that, by virtue of this being a SANG, it remains the case that the development has limited potential to impact trees. There will be no tree removal required, with a short section of hedgerow (approximately 8m) only being proposed to be removed to facilitate a footpath link to Sewall Drive from the SANG, along with minor pruning works to allow for a provision of a link from the south-western corner of the SANG to the existing walking routes within the adjacent woodland. It is envisaged that any works that may be required within the woodland itself, for example, resurfacing of footways, will be undertaken by Forestry England as part of the mitigation and management plan which will be separately agreed with them.

The pruning works that had previously been proposed to allow for the provision of the extended and new passing places along Sewall Drive are no longer necessitated due to the change in parking and access arrangements for the SANG which are detailed above. The ancient woodland will remain unaffected by the development and will be appropriately buffered in accordance with the relevant Standing Advice relating to ancient woodland and new development.

The Tree Protection Plan, which is enclosed with the updated AIA, provides measures to protect trees in line with BS5837 during the development works, and the extent of new planting in the form

of woodland and parkland trees, as well as native hedgerows, which are shown on the submitted landscape drawing, will provide an increase in canopy cover on the site and new arboricultural features to be enjoyed by future users.

The submitted information therefore demonstrates that the development does not involve the loss or damage to trees or other landscape features of value to the character of the area and the application therefore complies with Policy DM1 of the Local Plan and paragraph 136 of the NPPF, as well as the provisions of the Council's adopted 'Trees and Development' Supplementary Planning Document.

## Ecology

The Council's Ecologist, in their consultation response of 6 September 2023, raised no objections to the proposals and stated that they were satisfied that the development would not impact upon any designated or protected species and that suitable mitigation and enhancement measures were proposed within the submitted Ecological Impact Assessment, Landscape and Ecological Management Plan and Construction Environmental Management Plan.

To take account of the amended proposals, the EclA has been updated by the Council's appointed Ecologist, Burton Reid Associates (see document ref: DR0813/EclA/B, dated March 2024), with this including a reappraisal of the scheme and, notably, the changes to the parking and access arrangements. The Biodiversity Net Gain (BNG) for the development has also been recalculated to factor in the updated landscaping proposals, as well as the reduced loss of hedgerow and on-site habitat that will now occur as a result of the omission of both the on-site car park and the extended and new passing places along Sewall Drive. The updated BNG calculation now shows a net gain of 58.11% in habitat units and 105.3% in hedgerow units.

The revised EclA concludes that with proposed avoidance, mitigation and compensation measures that are detailed in the report in place, there will be no likely significant effects or adverse impacts on biodiversity at the application site or designated sites within the zone of impact. Biodiversity net gain requirements as set out in local planning policy will also be exceeded.

It can therefore be concluded that the development meets the relevant legislation and policy requirements in accordance with the Eastleigh Borough Council Local Plan 2016-2036, the Environment Act 2021, the NPPF (December 2023) and NERC Act 2006.

## Heritage

The package of amendments submitted includes an updated Heritage Assessment which has been revised to take account of the changes to the red line area for the application (see Document Ref. AN0723\_1 dated March 2024 by Cotswold Archaeology). In this respect, the updated report notes that the usage of the cemetery extension car park may necessitate the use of routes through the adjacent woodland. As these trackways are existing however, the report states that it is envisaged that this will have limited impacts upon any buried archaeological remains and, whilst the installation of signage along the route or any future maintenance or surfacing activities could involve minor ground disturbance which could potentially impact any archaeological remains close to the surface, it is unlikely that such activities would extend to a depth as to impact any buried archaeological remains. The other findings and conclusions of the report remain unchanged from the original Heritage Assessment.

Hampshire County Council's Archaeologist, in their consultation response of 3 October 2023, stated that they supported the assessment in the original report and broadly endorsed its conclusions. They noted that works planned outside of areas of identified archaeological sites presented a relatively low risk of impact and thus did not justify a programme of archaeological mitigation, and that no works

were proposed at this time in the areas containing the Romano-British enclosure and the Bronze Age burial mound which had been identified within the assessment.

The County Archaeologist had, however, alluded to potential additional/future works that may be required as part of the management and maintenance of the SANG and the need for these to have consideration of archaeological remains and their future treatment. It was therefore recommended that the management plan for the SANG include a heritage management plan that details the future treatment of the known heritage assets and provisions for mitigation in the event that impact on the features is unavoidable. The Applicant would be agreeable to these requirements being secured by condition in the event that planning permission is granted.

Accordingly, and taking account of the conclusions of the submitted Heritage Assessment, the proposals are considered to comply with policies S8 and DM12 of the Eastleigh Borough Local Plan and Section 16 of the NPPF.

## **Drainage**

Hampshire County Council, as the Lead Local Flood Authority for the area, confirmed within their consultation response of 5 September 2023 that they had no objections to the development subject to a condition to require the submission of a detailed surface water drainage scheme for the site based on the principles set out within the submitted Flood Risk Assessment (FRA) which accompanied the application.

As the majority of the drainage works associated with the scheme, however, were focussed on the provision of the on-site car park which no longer forms part of the proposals, the FRA has been updated, with this also taking account of the revisions to the red line area for the application to include the cemetery extension car park and the access to it. The revised FRA forms part of the amended package of information now submitted (see Document Ref: B06275-CLK-XX-XX-RP-FH-1001 dated 08 April 2024 by Clarkebond).

This document sets out that, based on EA fluvial floodplain mapping, the entire site is situated within Flood Zone 1, meaning that there is a less than 0.1% annual probability of fluvial/tidal flooding occurring. It also demonstrates that the impact of climate change will not significantly change the probability of flooding at the site and that other sources of flood hazards present negligible or low risk in this regard. The risk of flooding from the proposals elsewhere in the catchment (including to third-party land) is also assessed to be low.

Appropriate mitigation and flood management measures have been recommended for the proposed development, with the main mitigation to be set out within the drainage strategy which the Applicant is agreeable to being covered by a planning condition should the LLFA deem this to be required following consideration of the amended scheme.

The submitted information demonstrates that the development will be adequately protected from flooding and will not unacceptably increase the risk of flooding elsewhere, and that the scheme can incorporate appropriate surface water drainage provisions. The proposals therefore accord with Policies DM5 and DM6 of the Local Plan as well as Section 14 of the NPPF in these respects.

## **Summary and Conclusion**

This correspondence provides details of amendments to the application for the proposed SANG at Stoke Park Farm and includes updated drawings illustrating the revised development along with a range of supporting reports to accompany this.

The amended proposals have been developed to respond directly to the representations from local residents and consultation responses from statutory bodies and are considered to demonstrate the Applicant's commitment to minimising any potential impacts arising from the development.

The revised development scheme will deliver a range of benefits, which include the provision of a high-quality, natural open space for recreational use by local residents, as well as a significant net gain for biodiversity which will be delivered on site through a detailed landscaping scheme and the provision of additional habitat features.

As set out within the Planning Statement which accompanied the original submission, the SANG will also make a significant contribution to the offsetting of the impact of additional recreational disturbance arising from new residential development in the Borough upon the New Forest Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar sites, as part of the Council's wider mitigation strategy in this regard.

The updated suite of documents provided demonstrate that the proposed development complies with the relevant national and local planning policies and, in conjunction with this correspondence, respond directly to the matters raised by the Case Officer, residents and other consultees.

I trust that the revised drawings and technical reports provide the LPA with the documents it needs to commence the re-consultation process and we look forward to receiving confirmation of this in due course.

In the meantime, should you require any further clarification or additional information, please don't hesitate to contact Nicola Treeby using the details given in the top right-hand corner of the letter.

Yours faithfully

Nicola Treeby

Project Manager – Project Delivery (Corporate Projects)