

To:

Eastleigh Borough Council

29.01.2025

Dear Clare Martin

Re: Objection to Application Reference: O/24/98619

I am a resident local to Land South of Mortimers Lane, Fair Oak ('the Site') subject of planning application reference O/24/98619 for the an outline application with all matters reserved (apart from access) for the construction of up to 245 dwellings (Use Class C3) and up to 350sqm multi-functional building (Use Class E - commercial, business or service or Use Class F2 - Community), with associated open space and play area, landscaping, SuDS, infrastructure, mobility hub and vehicular access off Mortimers Lane. ('The Proposal').

I have listed separate reasons for objection to the Application under appropriate headings.

The main considerations for this objection letter are:

- Development Principle
- Transport and Infrastructure
- Environmental Concerns
- Landscape Impact

Development Principle

The site proposed for development was previously assessed and rejected in the last iteration of the Eastleigh Local Plan in 2020. The government Planning Inspector at that time identified that development in this location would have an unacceptable impact on the surrounding road network, local services, and the rural character of Fair Oak. There have been no material changes since that decision that would justify overriding that assessment. The application seeks to pre-empt the Eastleigh Borough Council Local Plan Review, bypassing the established planning process and failing to demonstrate why this location should now be considered suitable for housing when it was found inappropriate so recently.

The site lies outside of the defined settlement boundary and is currently undeveloped pastureland. Its development would constitute an unjustified encroachment into the countryside, contrary to both national and local planning policy objectives that seek to protect rural areas from unnecessary urban sprawl. The proposal conflicts with the National Planning Policy Framework, which requires new development to be sustainably located and supported by appropriate infrastructure. It also contradicts Eastleigh Borough Council's own policies aimed at maintaining the separation of settlements and protecting the rural setting of villages such as Fair Oak.

The Planning Statement submitted in support of the application attempts to justify the development on the basis that it aligns with national and local planning policies concerning sustainable development and housing need. The applicant relies heavily on the presumption in favour of sustainable development set out in the National Planning Policy Framework (NPPF), arguing that the site's proximity to Fair Oak makes it a logical location for new housing. However, these arguments fail to consider the site's historical planning context, conflict with local policy, and failure to deliver genuine sustainability.

The applicant asserts that the proposal is in accordance with Policy S1 (Delivering Sustainable Development) and Policy S2 (Approach to New Development) of the Eastleigh Local Plan 2016-2036. While these policies do indeed set a target for housing delivery in the borough, they do not automatically justify development in locations that are inappropriate or previously rejected for strategic planning reasons.

The site lies outside of the defined settlement boundary and is designated as countryside, meaning development should only be permitted in exceptional circumstances. The applicant concedes that the proposal does not comply with Policy S5, which restricts development outside settlement boundaries, but argues that the weight of this policy should be reduced in favour of housing delivery. This argument is flawed because:

- The Eastleigh Local Plan has already identified appropriate sites for meeting housing need, and this location was explicitly excluded during the 2020 Local Plan examination due to concerns about infrastructure, sustainability, and landscape impact.
- The borough is not failing to meet its housing targets, and as such, the presumption in favour of development should not override site-specific constraints.
- The assertion that the site is “well-related” to Fair Oak’s built-up area fails to acknowledge that the development would set a dangerous precedent for further encroachment into the countryside.

The applicant attempts to argue that the scheme meets the three pillars of sustainable development: economic, social, and environmental. However, when tested against these principles, the proposal fails to deliver sustainability in practice.

- **Economic Sustainability:** While the applicant claims that the development will generate economic benefits through construction jobs and local spending, this is a generic argument that applies to any development and does not justify this specific location. Fair Oak’s infrastructure is already under severe strain, and there is no evidence that local employment opportunities or services will expand in tandem with housing growth.
- **Social Sustainability:** The applicant claims that the scheme will contribute to local housing needs, but there is already a major strategic housing site less than two miles away at One Horton Heath, which is delivering thousands of new homes with appropriate infrastructure. The need for further speculative development in Fair Oak is not demonstrated, and adding further housing without infrastructure will harm rather than benefit the community.
- **Environmental Sustainability:** The development will result in the permanent loss of greenfield land, which serves as a vital ecological and landscape buffer. The proposal would cause significant biodiversity loss, increase surface water runoff and flood risk, and exacerbate air pollution from additional car journeys. These negative environmental impacts far outweigh any minor gains from potential biodiversity net gain measures.

Failure to Justify Departure from the Local Plan

The applicant argues that the Local Plan should not be given full weight because it does not currently allocate sufficient housing land. However, this claim is misleading. The borough’s housing land supply has not fallen below the five-year requirement, and Eastleigh Borough Council has an ongoing Local Plan Review, which will determine the most appropriate sites for future development. The applicant is attempting to circumvent the strategic planning process by forcing through development on a site that has already been deemed unsuitable.

The Planning Inspector’s 2020 assessment of this location remains highly relevant and must be given significant weight. The inspector found that:

1. Development at Mortimers Lane would cause unsustainable traffic congestion and pressure on infrastructure.
2. The site is not required to meet housing needs, given the availability of One Horton Heath and other allocated sites.

3. The rural character of Fair Oak would be permanently eroded by further speculative development.

Transport and Infrastructure

Fair Oak is already experiencing severe transport congestion due to the cumulative impact of recent housing developments, and the additional traffic generated by this proposal would further exacerbate an already unsustainable situation. Mortimers Lane is a key route for residents accessing schools, healthcare services, and employment hubs, yet it is already heavily congested during peak hours. The transport assessment submitted with the application fails to acknowledge the reality of some existing road conditions, particularly in light of recent accidents along Mortimers Lane that have resulted in cars crashing into residential front gardens.

Public transport provision in Fair Oak is inadequate, with bus services that are infrequent and unreliable. The development's reliance on sustainable travel modes is unrealistic given the lack of high-quality public transport links and safe cycling infrastructure. The increased demand for car travel will further strain local roads, leading to longer journey times, higher pollution levels, and increased risks to pedestrian and cyclist safety.

The Transport Assessment submitted with the application outlines a series of pedestrian and cycling improvements, including a 3m-wide shared footway/cycleway along Mortimers Lane, improved crossing facilities, and a potential new bus stop. While these measures are intended to promote sustainable travel, they fail to mitigate the development's impact on congestion.

The Transport Assessment acknowledges that there is currently no dedicated cycle infrastructure on Knowle Lane and that the existing footways are narrow and incomplete in some sections. While improvements are proposed, the existing poor infrastructure discourages cycling and walking, meaning that most new residents will still opt to drive rather than use alternative travel modes.

The nearest secondary school (Wyvern College) and primary healthcare services require travel into the centre of Fair Oak or towards Eastleigh, which cannot be easily accessed by walking or cycling alone. The applicant suggests that new residents could use "quieter residential streets" to access amenities, but these streets lack designated cycle lanes and are already congested.

The Transport Assessment relies on an assumption that a significant number of new residents will shift to walking or cycling, yet no robust evidence is provided to support this claim. Given the infrequent and unreliable nature of bus services in Fair Oak, there is no realistic alternative to car travel for many trips.

The Mortimers Lane/B3354 junction and the B3354/B3037 crossroads are already operating at capacity, with projected future congestion worsening even without this development. The proposed mitigation measures do not provide sufficient improvements to reduce queuing or travel times at these critical junctions, leading to an overall worsening of congestion rather than relief.

The pressure on local amenities and services is also of grave concern. The NHS Hampshire and Isle of Wight Integrated Care Board has confirmed that local GP surgeries are already operating at 152% capacity and do not have the physical space to accommodate additional patients from a development of this scale. The financial contribution proposed by the applicant towards primary healthcare expansion is a short-term solution that does not address the fundamental issue of a lack of capacity in local healthcare facilities. Without a significant and guaranteed expansion of medical services, the additional demand will result in reduced access to healthcare, longer waiting times, and an overall decline in patient care for both new and existing residents.

The NHS report explicitly states that NHS England does not routinely allocate additional funding to the ICB for infrastructure projects linked to new residential developments, meaning that even if contributions are secured, they cannot be used to expand or construct new GP surgeries but are instead limited to operational costs. Furthermore, the NHS funding model is reactive rather than proactive, meaning that financial allocations do not immediately reflect population increases following housing developments. As a result, there is a delay in service expansion, leading to longer appointment waiting times and reduced accessibility to healthcare for both new and existing residents.

The local GP practices have also confirmed that they do not have the physical capacity to expand within their current premises, making the proposed contributions ineffective in mitigating the additional strain that would be placed on local healthcare services. Without a new medical facility or significant structural expansion, the increased demand generated by the proposed development will worsen the existing crisis in primary healthcare provision, leading to further delays in treatment, increased patient-to-GP ratios, and a general decline in healthcare service quality. The failure to provide a strategic and deliverable healthcare solution alongside this development highlights the unsustainable nature of the proposal and further supports the case for its refusal.

Similarly, local schools are operating at capacity, with no clear provision for how additional pupils from this development will be accommodated. Wyvern College, the nearest secondary school, is already full, and primary schools in Fair Oak have limited places available. The lack of a strategic approach to educational infrastructure further demonstrates the unsuitability of this site for development.

Furthermore, Fair Oak has experienced significant development in recent years, including large housing estates at Crowdhill Green, Goater Way, Pembers Hill Drive, Pembers Hill Avenue, and Kingsmill Drive, along with commercial properties at East Horton Business Park. The cumulative impact of these developments has already placed immense pressure on local infrastructure, including schools, healthcare facilities, and transport links. The proposed scheme would exacerbate these pressures without providing the necessary strategic improvements to support further large-scale residential expansion.

Environmental Concerns

The proposed development would cause significant harm to local biodiversity, air quality, and flood risk management. The Ecological Appraisal identifies that the site supports a diverse range of species, including birds of prey, badgers, foxes, deer, and numerous protected bat species. The loss of mature trees, hedgerows, and open fields would result in a major reduction in suitable habitat for these species, undermining local conservation efforts and contradicting policies designed to protect biodiversity.

The site is located near the Knowle Hill Conservation Area, which already suffers from increased visitor pressure, habitat degradation, and antisocial behaviour. The additional population brought by this development would place further strain on this sensitive ecological site, increasing littering, footpath erosion, and disturbance to wildlife.

Air quality in the area is also a concern, particularly given the proximity of the site to the CWM Aggregates facility, which produces significant levels of airborne particulate matter. The air quality assessment fails to fully consider the impact of dust and emissions from this facility on future residents. Additionally, noise pollution from the nearby landfill gas engine and industrial estate was not adequately assessed, raising concerns that residents may experience long-term exposure to environmental nuisances that could have been avoided with more robust planning considerations.

Flooding is a further issue, with properties at the lower end of the existing adjacent estate already experiencing chronic flood risk. The additional hard surfacing introduced by this development will increase surface water runoff, worsening existing drainage issues and placing nearby homes at greater risk of flooding. The flood risk assessment submitted with the application does not provide sufficient reassurances that this risk will be adequately managed.

Landscape Impact

The proposed development would fundamentally alter the rural character of the site and its surroundings, causing permanent and irreversible harm to the landscape. The Landscape and Visual Impact Assessment submitted with the application acknowledges that the development would result in major adverse effects on the character of the area, particularly in relation to the loss of open countryside and the introduction of dense urban housing into a previously rural setting. Specific elements such as the block of flats, shops and proposed car park at the high end of the site and close to trees and other homes are especially unwelcome.

The site serves as a critical buffer between the built-up area of Fair Oak and the open countryside beyond. Its loss to development would erode this important transition, replacing pastoral fields with a housing estate that is entirely incongruous with the landscape's existing character. The visual intrusion of the development would be particularly pronounced when viewed from Mortimers Lane, Pembers Hill Drive, and local Public Rights of Way. Residents, visitors, and walkers would experience a dramatic and damaging transformation of the landscape, with open rural vistas replaced by an unbroken mass of urban development.

The setting of Grade II listed buildings at Mortimers Farmstead would also be severely impacted. The development would obstruct key views of these historic structures, diminishing their prominence and severing their historical relationship with the surrounding landscape. The irreversible loss of open space in the vicinity of these heritage assets would harm their setting, contrary to planning policies that seek to preserve the integrity and visual appreciation of listed buildings.

While the application proposes landscaping and screening measures, these would take decades to mature and would be insufficient to mitigate the fundamental change in character that the development would bring. The intrinsic value of the rural landscape cannot simply be replaced through planting schemes, and any suggested mitigation is wholly inadequate in preventing the significant and permanent harm that this development would cause.

Conclusion

The proposed development at Land South of Mortimers Lane is an unjustified encroachment into the countryside that would cause irreversible harm to Fair Oak's character, infrastructure, and environment. It contradicts the 2020 Local Plan, which deemed the site unsuitable due to its impact on traffic, local services, and landscape. No material changes have occurred to justify overturning this decision.

The scheme would exacerbate congestion, overwhelm healthcare and schools, and permanently degrade biodiversity and air quality. Flood risks remain unmitigated, and the rural landscape would be irreversibly altered, harming the setting of nearby heritage assets. The applicant's proposed mitigation measures are inadequate, and the development conflicts with national and local planning policies.

For these reasons, the application should be refused to safeguard Fair Oak's community, environment, and rural character.

Yours sincerely

Elise and Simon Mason
24 Pembers Hill Drive