Planning Statement Addendum: Response to National Policy and Consultee Comments

O/24/98619: Land South of Mortimers Lane, Fair Oak

April 2025

Turley

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Our reference
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1. Introduction

1.1 An application for outline permission for the site at 'Land South of Mortimers Lane, Fair Oak' (hereafter referred to as 'the Site ') was submitted to Eastleigh Borough Council (EBC / the Local Planning Authority (LPA)) in December 2024.

1.2 The planning application (EBC Reference: O/24/98619) is yet to be determined by the Council, and seeks permission for the following development:

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

1.3 A copy of the Site Location Plan is enclosed in **Appendix 1.**

1.4 The Consultation Period for both statutory and public consultee comments on the scheme ran from the 3rd January 2025 to the 7th February 2025. During this time a number of responses were received with regards to the submitted planning information.

1.5 This report set out a response to the comments received in relation to the application O/24/98619 and seeks to address a number of the issues that were raised as part of this process.

1.6 It should be noted that a range of additional and revised material was submitted to the LPA during the consultation process. This material serves a number of purposes, including, where necessary and relevant, addressing the comments made by consultees and in representations.

1.7 An extension of time on the application was agreed until 13th May 2025 to allow the additional information to be submitted and reviewed by consultees. The Applicant is committed to working positively and pro-actively with the LPA throughout pre-application and subsequent determination process, seeking to assist consultees and provide additional material to supplement their comments, including site visits.

1.8 References in this report to the National Planning Policy Framework ('NPPF' / 'Framework') are to the version dated December 2024.

Background

1.9 As you will be aware, the original planning application for the redevelopment of this site was submitted in December 2024.

1.10 At present, the site currently comprises two pastured fields extending across 11.06ha (combined) which are divided and bounded by mature hedgerows, scattered trees, and post and wire fencing. The site is located adjacent to the identified development limits of Fair Oak, with the eastern and southern boundary of the site defined by a series of mature trees.

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1.11 Beyond the eastern boundary is the grounds of East Horton Golf Club that has been sculpted, heavily managed, and landscaping maintained in accordance with its current use. To the south lies existing commercial buildings, recently completed and occupied, with residential development immediately abutting the western boundary of the site. To the north, the site abuts Mortimers Lane, with Mortimers Farm located to the northeast.

1.12 In this context we would also draw your attention to the baseline planning status of the site, and the emerging changes in the vicinity of the site, which have planning permission.

1.13 Firstly, we note that there is an approved application at Mortimers Farm ref. F/22/94435 (and associated listed building consent ref. L/23/94460), that proposes alterations, extensions and conversion of 4 existing barns including Grade II listed Threshing Barn and Granary to create 4 dwellings, as well as the construction of 5 new dwellings approved in December 2023. This consent (ref. F/22/94435) is also subject to a live application to vary the plans (ref. X/25/98908) relating to the amended drawings for one of the barn buildings. A copy of the revised drawings submitted as part of X/25/98908 are enclosed in **Appendix 2**.

1.14 As part of the approved works, the above development ref. F/22/94435 makes provision for a 1.8m footpath connection from Mortimer's Farm development westward to link with the existing footpath on Pembers Hill Drive. A copy of this improvement to the footpath network is enclosed in **Appendix 3**. The proposed development on the application site therefore has the opportunity to connect into this extended footpath network, providing safe, convenient and direct access to the centre of Fair Oak as well as adjoining developments to the east and west.

1.15 The application site formed part of the proposed allocation at 'land north and east of Fair Oak' in the submitted Eastleigh Local Plan (2016-2036) under then Policy S5 as one of two strategic growth options to support the then proposed housing strategy for Eastleigh. Notwithstanding the removal of the strategic growth options from the final adopted Plan, the site represents part of a former strategic allocation within the submitted Local Plan that was endorsed by the Council.

1.16 It is also noted that this site forms part of Parcel A3 of Strategic Development Option A (SDO A - Northeast of Fair Oak) in the Regulation 18 Issues and Options Document. The Applicant has submitted representations to the Local Plan Consultation, re-affirming the suitability, deliverability, and achievability of the site given the continued identification of Fair Oak in successive Local Plans as being an appropriate location to accommodate strategic levels of growth, without significant detrimental impacts on environmental or landscape constraints that are present elsewhere in the Borough.

1.17 Fair Oak is a Category 3 settlement within Eastleigh Borough. As one of a few 'larger villages' within the Borough, it has been identified in the adopted Local Plan (adopted April 2022) as a settlement capable of principally serving the day to day needs of their local catchment, and employment centres. Fair Oak has a range of community facilities including community halls.

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1.18 Infant, junior and secondary schools are located at the Wyvern College site in the centre of Fair Oak. A youth facility has been built at Blackberry Drive, on a site that is accessible to residents of Fair Oak, Horton Heath parish and Bishopstoke Parish.

1.19 The emerging Local Plan continues to identify Fair Oak as the third largest centre, beyond Eastleigh, Chandlers Ford and Hedge End. In identifying Strategic Development Options for new communities as part of the Issues and Options document, it is recognised that these are based in locations that "*avoid extensive areas of the most important (international and national) designations, and may have the ability to create and deliver new communities which respect the Borough's other important characteristics*".

1.20 The Appeal Site has the potential to deliver a sustainable and healthy, landscape-led development, with high-quality homes. These new homes would be supported by a mix of uses, to be provided through a multi-functional space, potentially including a community hub, befitting of its edge-of-settlement location and cognisant of Eastleigh's long-term objective for strategic growth at Fair Oak.

1.21 The proposed development seeks, through the current application ref. O/24/98619, to provide for the long term needs of all members of the community, including the provision of housing, open spaces and a potential mixed-use mobility hub that would promote health and well-being and would meet the long terms needs of the Fair Oak community.

1.22 The Applicant has provided detailed commentary to the comments made by consultees and stakeholders and where the scheme has enhanced. A summary of the key aspects of the scheme are provided in the following sections.

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2. Planning Policy Update

2.1 Section 6 of the submitted Planning Statement noted the likely publication of the new version of the National Planning Policy Framework ('NPPF'/'Framework'). Following the submission of the planning application, the Government published an updated NPPF was published on 12 December 2024.

2.2 Additionally, the Housing Delivery Test ("HDT") 2023 measurement was published in December 2024. This Addendum provides a summary of the changes to the NPPF, Planning Practice Guidance and the HDT results before explaining the implications for this Application.

Five Year Housing Land Supply

2.3 The updated Framework restored the requirements for Local Planning Authorities to demonstrate a five year housing land supply of deliverable housing sites (with the appropriate buffer), in turn revoking the previous 'four year supply' for LPA's at an advanced stage in progressing the Local Development Plans identified in earlier publications of the Framework.

2.4 In respect of Plan-Making, Chapter 3 of the Framework was updated to reiterate the importance of effective strategic planning across local planning authority boundaries and its vital role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs (Paragraph 24). This includes providing for the unmet needs of neighbouring areas (Paragraph 27).

2.5 In supporting the Government's objective of significantly boosting the supply of homes, Paragraph 61 has been revised to ensure that the "*overall aim should be to meet as much of an area's identified housing need*" in full, including with an appropriate mix of housing types for the local community.

2.6 Paragraph 62 is clear that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard methodology. This is highly relevant for Eastleigh as the new standard method significantly increases the number of homes that need to be planned for on an annual basis:

- Adopted Local Plan requirement: 729 dwellings per annum
- New standard method: 911 dwellings per annum[1]
- **Increase of 182 dwellings per annum**

2.7 Whilst the standard method derived figure will not apply in Eastleigh for the purposes of calculating five year supply until April 2027, it is relevant to consider the true scale of the housing need in the area. Clearly the annual requirement will increase in future years

[1] This is an up-to-date calculation as at March 2025, following the publication of the latest figures on affordability ratios

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and this will have consequences both for the calculation of supply, and also for the preparation of the emerging Local Plan Review.

2.8 The new NPPF (at Paragraph 78) restores the requirement – in all circumstances – to identify and update annually a supply of deliverable housing sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

2.9 During the examination of the adopted Local Plan for Eastleigh, Paragraph 48 of the Inspector's Report acknowledged that there will be a shortfall over the Plan period housing requirement of some 2,614 dwellings towards the end of the Plan period, with this shortfall requiring an immediate review "*within one year from the adoption of this Plan*".

2.10 Eastleigh Borough Council are in the process of reviewing its Local Plan. The Local Plan Issues and Options (Reg. 18) document was published for consultation prior to the publication of the revised Framework, and identified the following:

- 12,900 new homes in total, or 645 annually, using the previous NPPF (2023);
- 18,040 new homes in total, or 902 annually, based on the draft NPPF (July 2024).

2.11 The new standard method (published alongside the Framework in December 2024) increases this figure to **18,220 new homes** (911 new homes per year).

2.12 As part of the Local Plan Issues and Options, it was considered that **9,970 new homes** would be needed on greenfield sites to meet this need (**note:** this figure excludes the unmet needs from Local Planning Authorities within the wider connected area that will also need to be considered and so this figure should be treated as a minimum).

2.13 Any shortfall in housing across the Plan Period will only increase across the Plan period unless positive and pro-active action is taken to remedy this shortage.

2.14 Work undertaken by Turley provides a Five Year Housing Land Supply Assessment at Eastleigh Borough Council. A detailed report accompanies this submission and is enclosed in **Appendix 4.**

2.15 The Council's latest formal housing land supply position statement is dated August 2022 and covers the period from 1st July 2022 to 30th June 2027. It claims a deliverable supply of 3,943 homes, against a requirement of 3,827 homes. This equates to a claimed supply of 5.1 years (a surplus of 116 homes).

2.16 However, there is more up to date information available in the form of a draft statement prepared in relation to an appeal in the Borough at Land to the West of Cobbett Way, Botley (ref. APP/W1715/W/24/3350858). When calculating it's 5 year housing land supply requirement, the Council use the adopted Local Plan requirement figure (from Policy S2) of 729 homes per annum equating to a five year requirement of 3,645 homes.

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2.17 The Council claim that 3,227 homes should be considered deliverable in the period 2024/25 to 2028/29. A calculation is set out that this equates to a supply of only 4.4 years, a shortfall of 418 homes. This position was set out in evidence to the appeal at Land to the West of Cobbett Way, Botley (ref. O/23/96432 / PINS ref. 3350858) and enclosed in **Appendix 5** and within Statement of Common Ground (Housing Land Supply) enclosed in **Appendix 6** associated with that appeal.

2.18 Turley's assessment notes that that the above calculation fails to apply the requisite 5% buffer to the calculation, which is now required under the December 2024 Framework. If this is included, which we consider it should be in line with paragraph 78 of the NPPF, the Council's own actual supply position would reduce to only 4.22 years, a shortfall of 600 homes.

2.19 Further, based on a detailed assessment of the Council's published position, Turley's assessment considers the actual deliverable supply is 1,074 homes less than claimed by the Council. Based on this assessment, the supply is reduced to 2.81 years, with a deliverable supply of 2,153 homes. This is a shortfall of 1,674 homes.

2.20 This represents a **serious and significant shortfall** in the supply within the Borough and the Council should take positive and proactive action to address this both for the current monitoring period and to ensure a deliverable supply going forwards.

2.21 The site at Land South of Mortimers Lane represents a suitable and sustainable location for additional growth, at one of the most sustainable settlements in the Borough, beyond the centre of Eastleigh and settlements of Chandler's Ford and Hedge End. This is exemplified by the continued identification of Fair Oak, and this site, within successive Local Plans as being an appropriate location to accommodate strategic levels of growth without significant detrimental impacts on environmental or landscape constraints that are present elsewhere in the Borough.

2.22 This change in national planning policy is material in the consideration the proposed development and represents a fundamental shift in the Government's approach to housebuilding as part of a set of national changes designed to boost the supply of land and better meet community needs in order "*in order to tackle the housing crisis*"[2].

2.23 In an open letter to Housing Industry Stakeholders on 13 December 2024, Rt. Hon. Angela Rayner MP[3] noted that

> *"where it applies, the presumption in favour of sustainable development must have real teeth. The changes we made yesterday [publication of NPPF 2024] ensure that the presumption carries real weight, acting as a significant adjustment to the decision-making balance in favour of approving development"*

2.24 The presumption in favour is at the heart of the Framework such that sustainable development is pursued in a positive way (Paragraph 10). The thrust of the

[2] MHCLG (13 December 2024): Building the Homes we need.
[3] *Ibid.*

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Government's position in the revised National Planning Policy Framework to facilitate and meet the Government's objective is set out within Paragraph 61 of the Framework:

"significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community".

2.25 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The Framework remains a signification material consideration that must be taken into account in planning decisions. Paragraph 11 reaffirms that plans decisions should apply a presumption in favour of sustainable development:

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date[8], granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

2.26 Footnote 8 of the NPPF notes that policies that are the most important for determining the application are out-of-date includes "*for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years*".

2.27 It is noted and accepted that Eastleigh cannot demonstrate a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies as required through Paragraph 78 of the NPPF. The presumption in favour of sustainable development is subsequently engaged.

2.28 It is understood that Eastleigh are one of twelve local authorities that are signatories to the Partnership for South Hampshire (PfSH), having completed a Spatial Position Statement (SPS) in December 2023.

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2.29 In line with the aim of addressing the national housing crisis, PfSH "*agreed, and remains committed to, the need for its constituent authorities to work together to deliver cross-boundary coordination*". As identified within the Statement of Common Ground between PfSH authorities, it was identified that, at the time of writing (June 2023 SoCG; **Appendix 7**):

"*if the standard method and duty to cooperate are retained in their current form, or if any update takes a broadly similar approach, these areas may have housing needs they cannot fully meet. In this case the other PfSH LPAs would need to consider whether they could accommodate some of these wider needs through their own local plan reviews, recognising that South Hampshire's housing markets operate across local authority boundaries*" (Paragraph 1.38)

2.30 Accordingly, noting that neighbouring plans are at various stages of the plan-making process, it is likely that Eastleigh will need to accommodate the unmet need of neighbouring authorities in accordance with the PfSH framework. This will likely further the housing requirement beyond that identified within the revised standard methodology and application of the appropriate buffer.

2.31 It is therefore critical that the Council take the opportunity to support sustainable housing proposals, including that proposed through this planning application. In this case, the proposals not only delivers a remedy to the Borough-wide housing supply shortfall, but it also presents an opportunity to address local housing issues in a location free from environmental constraints or designations that otherwise restrict development in other locations across the Borough.

2.32 Through effectively bolstering its housing supply in this way, the Council would help safeguard, and counter, the ongoing uncertainty around housing delivery, which would directly support the Government's objective of significantly boosting the supply of homes, consistent with the approach as set out within Paragraph 61 of the Framework.

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3. Response to Consultee Comments

3.1 This section provides a response to comments that were raised by statutory consultees on the submitted application. Their comments are summarised below alongside the Applicant's response.

Design

3.2 The application is made in outline form, with detailed design to be decided at the reserved matters stage. The scheme seeks to build upon the existing landscape characteristics of the site, focusing built development towards the centre of the site to be set back from the public highway and comply with the levels of amenity set out sought through Policy DM1 (General Criteria For New Development).

3.3 As set out in the updated reports and supporting information, it is the applicant's intention to incorporate significant landscaping and green / blue infrastructure features to ensure the development respects the character and appearance of the surrounding environment. The residential amenity standards will be met at the detailed stage and it is intended that the development will form a logical extension to the adjoining developments to the north-east at Mortimers Farm, and with adjoining commercial development to the south, and residential development immediately west of the application site at Knowle Lane.

3.4 The application site and its immediate surrounds have been subject to changing landscape character and built form that changes the receiving context through which development is sought. Residential development north of the site at Pembers Hill Drive has been completed and is now occupied, alongside residential development to the immediate west of the site, with residential dwellings fronting onto the site (on Land east of Knowle Lane). Commercial development abuts the southwestern boundary of the site as an extension to East Horton Business Park that is now occupied.

3.5 In a similar pattern, residential development approved to the northwest of the site, at Mortimers Farm creates a gateway and entrance feature on approach to the built up area of Fair Oak from the east, along Mortimers Lane.

3.6 The site is effectively enclosed by residential and commercial developments either under construction, or completed and subsequently occupied. The surrounding impact of built form is present on-site and creates a sub-urban character with neighbouring dwellings predominately being semi-detached in terms of form and density. The proposed development therefore responds positively to this context, and can better align through the detailed design and reserved matters process.

3.7 The proposed Development Framework Plan has been updated (ref. P23-2261_DE_007_01_D; **Appendix 8**) to reflect potential pedestrian and cycle access points and further potential connections to the site boundary. These connections remain in outline and are reserved for future consideration and determination by Officers at Eastleigh Borough Council and respective consultees to ensure a high-quality development can be delivered on-site once outline consent is secured.

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3.8 It is considered that providing options for future connectivity is a sensible approach in this context in the interests of enabling future connections to ensure the development is as permeable as possible. The precise locations of connections would be determined at the reserved matters stage. Only the vehicular and pedestrian access into the site is sought in detail at this time.

3.9 The design approach has sought to maximise the site's inherent opportunities for development and mitigate as far as practicably possible any perceived 'constraints' through the design evolution process.

3.10 The design has integrated suitable landscape and green and blue infrastructure throughout the layout as a means to assimilate the built form with the built up area of Fair Oak, whilst preserving and respecting the character and identity of the area.

3.11 Adjoined by residential development to the north, northeast, and west, and commercial development to the south, the proposals for an edge-of-settlement development that aligns with the emerging Strategic Development Option proposed through the Local Plan Review whilst allowing for a varied scale and density in built as you transition across the development to ensure that appropriate typologies and urban grain can be achieved across the site.

3.12 It is noted that the Urban Design Officer cited an 'in-principle objection' to the scheme noting its location within the countryside. The Appellant acknowledges its location outside of, but adjacent to, the settlement boundary of Fair Oak and subsequently does not meet the exception criteria of Policy S5 that allows development outside of defined settlement limits. Notwithstanding this, the development proposals are considered to be in accordance with Policy S1 and S2 as Fair Oak is a Tier 3 settlement, therefore one of the most sustainable settlements in the Borough.

3.13 It is recognised through supporting Paragraph 4.30, that Policy S5 seeks to restrict "*development in the countryside principally in order to maintain its rural character and to limit urbanisation*". However, there is an identified shortfall of housing to be delivered across the Local Plan period, identified within the Inspector's Report to the Local Plan, furthered by an identified lack of rolling housing land supply identified by the Council in the Botley appeal (ref. O/23/96432; 3350858).

3.14 This is likely to worsen in line with the revisions to the Framework and standard methodology for assessing housing need, raising the annual housing requirement for Eastleigh to 911dpa whilst requiring Local Planning Authorities to meet their needs in full, whilst also addressing the unmet need in neighbouring authorities where possible.

3.15 Thus, whilst there is an acknowledged conflict with the Policy S5, the Development Plan should be read as whole, and in accordance with the provisions set out within Framework. In such circumstances, any perceived conflict should be accounted for in the 'planning balance' and the recognised shortfall in five year housing land supply across the Borough and the presumption in favour of sustainable development.

3.16 In the determination of this application, Paragraph 11(d) of the Framework is engaged, which emphasises that decisions should apply a presumption in favour of sustainable development. For decision taking, this means:

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c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

3.17 As recognised throughout this addendum, as well as the supporting material that accompanied the original submission, the application site is located in a sustainable location, surrounded by residential and commercial development at a Tier 3 settlement that has been identified by Eastleigh Borough Council in successive Local Plan's as being suitable of accommodating strategic and significant levels of growth. The Council therefore should take positive and proactive intervention in considering greenfield sites for development that are not identified within the adopted Development Plan.

3.18 The Urban Design Officer cites an overreliance in private car resulting from the development.

3.19 We understand the Committee Report for the adjoining planning application to the north of the application site at Pembers Hill (ref. O/15/77190) considered that site as follows:

"It is considered that the proposed development would be sited in a location that is sustainable in transport terms and could be made more sustainable with the off-site highway improvements and financial contributions required by HCC for improving connectivity and sustainable transport opportunities … The site is reasonably well served by public transport with bus stops on Mortimers Lane with current hourly services to Southampton, Eastleigh and Bishop Waltham, but this would need improvement through transport contributions. Thus the site's location is sufficiently sustainable in transport terms in relation to its proximity to local facilities and transport infrastructure, with the site's overall sustainability increasing further if it becomes part of any strategic development site".

3.20 There has been no material change in the conditions of the application site, or its surrounds, beyond the impending implementation of off-site highways measures resulting from the Mortimer's Farm scheme ref. F/22/94435 (**Appendix 3**) that have enhanced the accessibility and connectivity of this site, and that this application looks improve through the provision of a shared 3m foot/cycleway westward towards the facilities within Fair Oak.

3.21 Further ongoing discussions with Hampshire County Council Highways are summarised later in this addendum. The Applicant is committed to ensuring off-site pedestrian and

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cycle improvements to ensure a 'genuine choice' in transport methods are available to existing and prospective residents, as advocated in Paragraph 77 of the Framework.

3.22 The applications also proposes a 'mobility hub', with provision for electric vehicle charging and covered cycle storage that will raise the sustainability credentials of this site, and immediate locality, noting recent growth in this area of Fair Oak. The proposed development seeks to provide swathes of Public Open Space and enhanced permeability through potential connections for pedestrians and cycles shown on the revised Development Framework Plan, connecting the site the immediate surrounds to create an inclusive and sustainable development in and edge-of-settlement location.

3.23 In respect of architectural detail and materiality, the application is submitted in outline form with other matters save for access into the site reserved for future determination. The outline consent sought through this application seeks to establish the principle and scale of development in this location, with detailed matters relating to, inter alia, layout, scale, massing, and landscaping reserved from the decision.

3.24 The Hampshire Constabulary commented on the scheme on 13 January 2025 requesting that a planning condition be attached to any consent seeking details to how the development will achieve the 'Residential Secured by Design Award'. The Applicant would like to discuss the requirement for such a condition to be imposed on the proposed development with Officers.

3.25 It is recognised that site-specific public art may be required to support the integration of the development with the local community. The Applicant would welcome additional guidance from Officers on this element to ensure a direct and proportionate contribution can be made in conjunction with EBC to accord with this request and the requisite tests for planning obligations and contributions.

3.26 It is considered that any subsequent reserved matters application will be able to ensure clear definition between public and private realm to ensure that streets and spaces are well overlooked, with proposed scheme enhancing the local character and provides a high quality development in a sustainable location, which is easily accessible by a variety of sustainable transport methods.

3.27 It is considered that any subsequent reserved matters application will be able to ensure clear definition between public and private realm to ensure that streets and spaces are well overlooked, with the proposed scheme enhancing the local character and providing a high quality development in a sustainable location.

Housing Mix

3.28 The EBC Housing Officer provided their comments on the development on the 14 January 2025. It is noted that affordable housing should reflect the overall housing mix on-site, with a 65/35% split between rented and low-cost homeownership. Affordable homes should be distributed in clusters of 10-15 dwellings among market-rate homes. 2-bedroom units should accommodate four people and 3-bedroom units should support five to six people.

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3.29 The Applicant welcomes this approach, with matters to be discussed during reserved matters, as the most appropriate stage in the development process. The Applicant is willing to engage with Registered Providers, and the Housing Officer during the detailed design stage to ensure an integrated and inclusive development can be achieved. The Applicant has no further comment in this matter.

Landscape

3.30 The Landscape Officer presented comments on the proposed application in February 2025. It was acknowledged that the site was designated as 'countryside' in the adopted Local Plan, and that a significant package of information was provided, which is typical of a major application of this scale.

3.31 Additional commentary by the Landscape Officer noted a preference for supplementing boundary screening, attractive SuDS features, deliverable street planting and connected green and blue infrastructure. Such features can be provided at detailed design stage, utilising the guiding principles established in the Landscape Strategy Plan that accompanied the original submission.

3.32 The Landscape Officer visited the Site on 13 March 2025, and acknowledged that the EDP LVA had covered all key views into the site, including mid and long-range views into the site. Further viewpoint photography was provided on 24 March at the request of the Landscape Officer following the site visit to reflect changes to the landscape through the construction of the offices to the south and review the impact of the development in winter months. For completeness, these views accompany this addendum in **Appendix 9**.

3.33 The Applicant welcomes the opportunity to address any further points of clarity regarding landscape matters at the appropriate time in the determination process but would like to reaffirm that the conclusions of the LVIA remain valid, and that further details can be controlled via a suitably worded planning condition that secures requisite information at reserved matters stage.

Heritage and Archaeology

3.34 A response dated March 2025 was received from the Built Heritage Officer that noted that there was 'no objection' to the proposed development. The Built Heritage Officer recommended reinforcing natural barriers near Mortimers Farm. This included addressing non-retainable trees and enhancing natural separation on the eastern boundary to help preserve the rural setting around the heritage farmstead.

3.35 The Development Framework Plan shows how a suitable green buffer is proposed in the northeastern corner of the site (if required) to respect the setting of the listed buildings at Mortimers Farm, noting the changing context within they sit resulting from the approved development ref. F/22/94435.

3.36 In respect of archaeological matters, HCC Archaeology provided their comments in February 2025, and proposed no objection subject to conditions requiring geophysical surveys and the potential for trial trenching across the site to identify the presence, or lack thereof, archaeological artefacts during the construction process.

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3.37 Detailed matters of heritage significance and impact are provided within the accompanying Heritage Statement that accompanies the original submission and the Applicant has no further comment at this time.

3.38 The Applicant considers that other heritage and archaeological matters can be suitably addressed via suitably worded planning condition and the Applicant has no further comment on this matter.

Ecology

3.39 The Ecological Officer provided their comments in February 2025. A summary of their comments are as follows:

- Concerns regarding extent of loss of hedgerow to facilitate vehicular and pedestrian access;
- To provide clarity on buffer distance to existing vegetation on site boundaries;
- To provide clarity on proposed pedestrian connections to Site Boundaries;
- Details of sustainable drainage measures to be provided; and
- Recommended Conditions.

3.40 With regard to loss of hedgerow features to facilitate site accessibility, this matter has been discussed extensively with HCC Highways during pre-application discussions regarding the potential delivery of this site. Through this process, it was necessary to explore different accessibility options to ensure requisite visibility splays can be achieved for highways safety, whilst optimising the characteristics of the site, and site features, that are worthy of retention as well as biodiversity enhancement. The proposed access is considered to have the least biodiversity and visual impact in comparison to alternative access scenarios. Indeed the access solution proposed would require a departure from standard, which has already been sought and agreed in principle with the County Highways Department with a view to ensuring there is a deliverable proposal in place that minimises impacts on ecological and landscape assets.

3.41 The Applicant is committed to ensuring a minimum 10% net gain in biodiversity across the site as a result of the proposed development. This net gain is shown in Appendix 8 of the submitted Ecological Appraisal that accompanies the application. This includes detail regarding the classification of existing site features (including dry and wet ditches). The intrinsic site features are to be retained and enhanced where possible, with the potential for the Council, if it deemed appropriate, to ensure arboricultural supervision and ‘hand/no dig areas’ during construction to avoid any unnecessary harm to trees.

3.42 The revised Development Framework Plan establishes general areas of ‘potential pedestrian access’ points into and across the site to maximise permeability. These areas are indicative and will be subject to determination at the reserved matter stage. The Development Framework Plan seeks to balance a range of development uses, including built form and formal and incidental open space to ensure an efficient use of land that will respect the character and appearance of the area.

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3.43 A minimum 10m buffer has been shown on the Development Framework Plan along the western and southern boundaries to ensure sufficient space for supplemental planting to take place and strengthen site boundaries throughout the lifetime of the development. The Applicant notes that such measures of control, including the retention of trees and other measures can be controlled by suitably worded planning condition. Strategic Open Space is provided along the southeast and eastern boundaries to provide suitable offsetting to identified ecological features and create a rural-fringe to the development, whilst assimilating built form with existing settlement edge of Fair Oak.

3.44 In respect of drainage matters, Paragraphs 6.18 onwards of the FRA submitted alongside the application discuss the water quality and pollution prevention performance of the SuDS treatment train provided and show that using the hazard index approach laid out in the SuDS Manual the proposed drainage strategy provides almost twice the level of treatment required for the development type proposed and therefore has a very good level of performance which will not have any adverse impact on the local water environment.

3.45 The Applicant is willing to discuss suitably worded planning conditions in respect of ecological mitigation and management with Officers at an appropriate time in the application process.

3.46 Natural England provided their response on the proposed development on 17 January 2025. This response recognised that the development is within the catchment of a European designated Habitat site that is vulnerable to nutrient impacts. Natural England advises that such development require a Habitat Regulations Assessment (HRA), that is informed by nutrient budget calculations.

3.47 In response, a shadow HRA (sHRA) has been prepared by EDP and enclosed in **Appendix 10** for consideration by the LPA and Natural England.

3.48 The sHRA provides a screening assessment of the effects of the Project on European Sites, including the River Itchen SAC, and Solent and Southampton Water Ramsar and SPA (amongst others). The sHRA concludes that, following an assessment of the site as part of a wider Strategic Growth Option within the adopted Local Plan (prior to its removal), the effects of the proposed development, being significantly smaller in scale, are considered to fall within the scope of the previous assessment undertaken to inform the evidence base of the adopted Local Plan in 2022.

3.49 It is also noted that the site lies outside of the River Itchen hydrological catchment. Therefore, increased phosphate inputs to the SAC are not anticipated as a result of the development as outlined within the sHRA.

3.50 In respect of nutrient neutrality, the nutrient budget of the site and proposed development has been calculated using the Solent Nutrient Calculator for the Solent Area and accompanied the original application submission. Based on the development delivering 245 units, the development will generate approximately 142kg per year of additional nitrogen.

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3.51 It should be noted that the nutrient budget does not fully consider enhancements to retained habitats and how improved habitats have an increased capacity to store nutrients, particularly enhancements to scrub, tree planting, SUDs and grassland.

3.52 The Applicant will continue to liaise with the respective statutory bodies to ensure any identified impact and mitigation measures can be suitably delivered and managed in perpetuity. Measures will be detailed within a Nutrient Mitigation Strategy which can be secured via Condition and appropriate s106 or other legal agreement, such that no likely significant effects on Solent sites are anticipated.

3.53 A response from NatureSpace was received in February 2025. It is noted that the Applicant could either pursue the Council's District Licensing Scheme in respect of ponds in close proximity to the application site, or provide further information on the ponds with ecological connectivity to the site to assess the presence of great crested newts.

3.54 Additional site visits were conducted in February and March 2025 for eDNA sampling in line with best practice with Newt Testing scheduled for mid-April 2025. The outcome of these surveys and respective actions in line with best practice will be provided once available.

3.55 This information can be used to suitably inform the most appropriate mitigation strategy to be secured through and appropriately worded planning condition in the usual way.

Trees

3.56 In respect of arboricultural matters, the Tree Officer noted that at, at pre-application stage, there were concerns regarding visibility splays the new site access. Having reviewed the submitted arboricultural report, Tree Officers are satisfied with the new entrance and visibility splays.

3.57 The Applicant welcomes this and the outcome of positive pre-application discussions with the LPA, as advocated by Paragraph 40 of the Framework.

3.58 The Tree Officer noted that additional arboricultural information has not addressed the 3m segregated footway/cycleway proposed from the Site entrance westwards towards the centre of Fair Oak.

3.59 An Arboricultural Impact Assessment that assesses the identified trees at the highways access to the site is enclosed in **Appendix 11**. It is considered that 10 arboricultural features may be impacted by the proposal, including the complete removal of two Category U trees (trees of poor quality and value) and one Category C tree (trees of low quality and value). It is reiterated that the provision of a footway in this location, and subsequent impact on arboricultural features has been reviewed and accepted in the determination of the Mortimers Farm application and footway subsequently approved (enclosed in Appendix 3). The proposed development sought should subsequently be considered in the context that an existing impact on these features to facilitate sustainable and active travel methods for residential development, beyond the application site, has been reviewed and accepted by the Local Planning Authority.

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3.60 It is acknowledged that there will be minor encroachment into the Root Protection Areas of the remaining eight arboricultural features, of which only one is identified as a Category B tree, with others identified as Category C.

3.61 It is proposed that physical protection measures to safeguard the retained trees, including robust protection in the form of a barrier can be secured through a suitably worded planning condition. Further, the Applicant is willing to commit to a 'no-dig' approach were this is identified as being suitable during the appropriate time in the reserved matters stage and detailed design and materials are known.

3.62 The wider masterplanning of the development has been informed by arboricultural recommendations, to ensure the retention and enhancement, wherever possible, of the existing landscape features to assimilate built form within the surrounding landscape and built up edge of Fair Oak.

Mineral and Waste

3.63 Hampshire County Council in its capacity as Mineral Planning Authority (MPA) commented on the proposals on the 14 January 2025.

3.64 The MPA agreed with the conclusions of the Minerals Resource Assessment and accepted the proposals set out within the submitted Minerals Management Plan regarding incidental extraction during the construction process.

3.65 Hampshire County Council, as MPA propose the following condition proposing the submission of a construction management plan, that includes a statement outlining the following:

(i) a method for ensuring that minerals that can be viably recovered during the development operations are recovered and put to beneficial use; and

(ii) On the 1st April of each year, following commencement of the development, the tonnes of minerals extracted, quantity re-used on site, and if exported from site its location of processing, shall be reported to the Mineral Planning Authority. The reporting of such shall be required until such time as the development is considered to be completed by the Local Planning Authority.

3.66 In response, GESL prepared and submitted a Mineral Safeguarding Assessment on 17 January 2025 that included details of intrusive site investigations across the site. The majority of soils encountered beneath the site comprised cohesive soils of the London Clay Formation, which are considered to have no/negligible mineral worth.

3.67 The more granular soils encountered were within the London Clay Formation, not the Whitecliff Sand Member (which was not encountered) and thus the potential mineral reserve identified in the Hampshire Minerals and Waste Local Plan was absent.

3.68 Given the absence of the Whitecliff Sand Member from the exploratory holes constructed on the site, it is considered that there is no potential to extract or win 'soft sand' as a mineral resource. It is therefore considered that conditions regarding the

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detailed monitoring of incidental extraction are not necessary or appropriate given the under-ground resources identified through the Mineral Safeguarding Assessment.

3.69 The Applicant would welcome the opportunity to discuss this matter further with Officers if it would resolve any outstanding matters in respect of mineral safeguarding through the development process.

Flooding and Drainage

3.70 The Environment Agency responded to the application on 13 January 2025, raising 'no objection' to the proposed development. The Applicant welcomes this response and has no further comment on this matter.

3.71 Southern Water provided their comments on the 25 February, noting that a formal foul sewerage and surface water disposal plan must be submitted and approved before construction begins.

3.72 It is accepted that some dwellings will be able to connect to the existing drainage network subject to network capacity and reinforcement. Southern Water will require and advise on this following consideration of the development programme and the extent of network reinforcement required to accommodate the development. Southern Water will endeavour to provide reinforcement within 24 months of planning consent.

3.73 The Applicant will continue to engage with Southern Water as the application progresses to ensure the swift and efficient delivery of housing to remedy a significant and growing shortfall of housing in the Borough.

3.74 Hampshire County Council in its capacity as Lead Local Flood Authority provided their comments in February 2025.

3.75 The proposals are to use a mix of swales, pipes, basins and cellular storage prior to discharge into the watercourse at green run-off rates.

3.76 The LLFA accept this approach in principle, and that the level of information provided is acceptable for an outline application. Further information is proposed to be secured by way of suitably worded planning conditions.

3.77 The Applicant accepts the comments of the LLFA and has no further comment on this matter.

Highways

3.78 The Applicant has had constructive dialogue with HCC Highways following the receipt of their comments in February 2024, including meetings and additional survey modelling to ensure the most up-to-date data is used to assess the development proposals. As such, the Applicant has been working positively to address these comments in conjunction with HCC Highways.

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3.79 This includes scoping and reviewing off-site mitigation measures and improvement works to enhance the capacity of the road network, as well as facilitating sustainable transport methods to reach local amenities and services.

3.80 Regarding access into the site, HCC Highways noted that during pre-application discussions, a 'departure from standard' was agreed in principle to provide a reduced visibility, with the inclusion of a splitter island to the west of the access, prevent any overtaking manoeuvres along this stretch.

3.81 Chapter 9 of the National Planning Policy Framework (NPPF) has been revised to ensure a vision led approach to development proposals, including ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places, and identifying and pursuing opportunities to promote walking, cycling and public transport use. The proposals suggested as part of this application will promote connectivity and encourage sustainable modes of travel as advocated by the NPPF.

3.82 The Applicant would welcome further discussion with Officers at Eastleigh Borough Council and Hampshire County Council in its duty as highways authority so as to fully address any outstanding issues regarding to this matter to be agreed through appropriate S106 and S278 discussions. It is understood that the Highways Authority have no objection in principle to the proposed development and subsequent accessibility of the site, subject to off-site improvement works. The Applicant will continue to work positively with the Highways Authority and has no further comment beyond the additional material to be submitted in due course from Glanville Highways.

Active Travel

3.83 Active Travel England (ATE) became a statutory consultee on developments in June 2023 for schemes comprising of 150 homes or more, working to ensure new planning applications consider active travel provision from the outset.

3.84 ATE raised no objection to the proposed development and issued standing advice in respect of the proposed development. The Applicant welcomes this, noting the sustainability of the proposed development, and its surrounds, as well the commitment to ongoing highways and travel improvements sought through direct liaison with LPA and HCC in its capacity as the Highways Authority.

Environmental Health

3.85 The Environmental Health Officer presented their comments on the scheme in January 2025 including matters of noise, contaminated land, lighting, and the impacts of demolition and construction works. Overall, the Officer confirmed that the application is acceptable subject to a number of planning conditions regarding the provision of a Construction Environmental Management Plan and restrictions on external lighting, operating hours.

3.86 The Applicant is satisfied that these conditions are appropriate and has no further comment on this matter. Specific matters are addressed in turn below:

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Noise

3.87 In respect of noise matters, a response from the Pollution Control Specialist found that baseline noise levels were low, with internal daytime/nighttime noise levels within the requirements of BS 8322 with partially open windows, including private amenity spaces and the noise from the commercial elements to the south and golf club to the east imperceptible from a noise perspective. In summary:

- Significant levels of noise from the Golf Club are not expected, the development will not place unreasonable restrictions on their operations.

- Noise from the commercial units on the East Horton Business Park [there are Noise Management Plans conditioned from other approvals] assessed by BS 4142 will not affect receptors in the new development.

- The landfill gas engine again assessed by BS 4142 an adverse noise impact is not expected to occur; additional mitigation similar to the houses affected at Mortimers Lane may be appropriate at the construction stage.

- Details of proposed multifunction space at the noisiest part of the site are unknown at this stage, therefore the report proposes a condition for design/plant noise and NMP; which is acceptable to the LPA.

3.88 The Pollution Control Specialist raised no objection to the proposal, recommending that the submitted Acoustic Assessment prepared by Suono be referenced within any approval.

Air Quality

3.89 In respect of air quality matters, the Pollution Control Specialist commented on the scheme on 23rd January 2025. In their response, it is acknowledged that that fully support the proposed best practice measures and recommend incorporating them into the development design, either as part of a formal agreement or as a planning condition.

3.90 It is understood that the impact of the development on local air quality is negligible, particularly for nitrogen dioxide, and this is supported by the findings of the report using the ADMA model and Defra most updated tools for its verification. The consultee response cites detailed consideration of site layout and physical barriers to address dust arising from CWM Aggregates along Knowle Lane to the west. Such matters can be considered during the reserved matters stage to address any potential exposure to localised emissions arising from the aggregate depot. It is noted that there is significant built form, including residential development in between the application site and the existing aggregate depot. This provides and additional barrier, as well as proposed landscaping and planting along the western boundary of the site to further screen the development.

3.91 An additional Technical Note accompanies this submission and is enclosed in **Appendix 12**. This technical note addresses points raised regarding the choice of meteorological station to inform the Air Quality Assessment submitted with the original application, as well as the impact of the CWM Aggregates facility. The CWM facility is not included on the Pollutant Release and Transfer Register database, indicating that it does not meet the pollutant threshold (for example, 50 tonnes per day for the disposal of non-

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hazardous waste) to require inclusion, and therefore is not considered a major source of pollutants. In any event, the CWM facility approximately 150 m west of the proposed development and separated by several residential properties that form part of the Knowle Lane East development, such that there will be no significant effects at the proposed development.

3.92 Any potential air quality impacts during the construction phase can be suitably mitigated into a detailed Construction Environmental Management Plan (CEMP) sought through an appropriately worded planning condition. Such an approach is advocated by the EHO in respect of air quality matters and the Applicant has no further comment on this issue.

Contaminated Land

3.93 In respect of Contaminated Land matters, a response was received on 21 January 2025. The Officer agreed with the findings of the submitted Geo Environmental Desk Report (GE21215/DSRv1.1/NOV24) and Geo Environmental Ground Investigation Report (GE21215-GIRv2.1-NOV24). They requested additional points of clarification in respect of the radon potential for the site and dissolved gas testing across the site.

3.94 The Applicant noted in their written response dated 14th March the following:

With regards to potential scenarios where the active gas extraction system on the Fair Oak Landfill site is either deactivated or fails, it is considered that a gas migration pathway is not present from the landfill site (source) to the Mortimers Lane subject site (receptor). Lateral migration of gases from the landfill would be intercepted by the shallow stream running along the southern boundary of the site. Therefore, shallow lateral migration of gases to the site is not considered a plausible pathway for gases. The soils underlying the subject site have been demonstrated through intrusive investigation, to comprise clay soils of the London Clay Formation. Therefore, soils underlying the subject site (receptor) are considered relatively impermeable and preferential pathways via more permeable Whitecliff Sand soils are absent. These more permeable Whitecliff Sand soils are present beneath the landfill site (won out), and land immediately to the south and west of the subject site. Any gases originating from Fair Oak Landfill (whether the gas extraction system is operational or not) are likely to follow these preferential pathways, where soils are more permeable. Therefore, any gas migration would be considered to be in a south westerly direction away from the subject site.

As such, and as demonstrated within the updated CSM the technical note (GE22375-FG-TN01-250205), it is considered that gas migration pathways are not present therefore, any changes in the active gas extraction system are not considered a risk to the site, nor are they considered to impact the gas regime.

3.95 For completeness, Technical Note ref. GE22375-FG-TN01-250205 accompanies this submission in **Appendix 13**. The Applicant has no further comment on this matter.

Countryside Services

3.96 Countryside Services cited no objection on the application in their response in February 2025, subject to financial contributions to secure upgrade works of Public Rights of Way and footpath surfacing improvements.

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3.97 The Applicant is reviewing these measures and the suitability of such contributions alongside its wider commitment to off-site pedestrian and cycle improvements in the local vicinity in agreement with the Highways Authority and remains open to discussing these matters with the Local Planning Authority.

Education

3.98 HCC Children Services proposes no objection subject to the agreement of a financial contribution by way of planning obligation to secure the future expansion and/or improvement at Fair Oak Infant School and Junior School, as well as Wyvern College.

3.99 HCC Children Services reviewed the scheme and provided their comments in February 2025. For the proposed 245 dwellings, it was an estimated up 39 additional early years places will be needed (based on 0.3 children per dwelling).

3.100 The Applicant will continue to liaise with Hampshire County Council in its capacity of Education and Children Services to ensure any contribution meets the statutory tests for planning obligations and CIL 122 Regulation. An update will be provided to the LPA at the appropriate time to inform the planning obligation that will accompany the decision notice.

NHS Integrated Care Board

3.101 NHS Hampshire and Isle of Wight Integrated Care Board (ICB) submitted their response on the application on the 15 January 2025, recognising that a contribution of £150,340 towards increasing primary care infrastructure is necessary to make the application acceptable in planning terms.

3.102 The Applicant is willing to enter into appropriate planning obligations where they are justified with regard to Regulation 122(2) of the Community Infrastructure Levy Regulations (as amended). The Applicant will provide an update on this matter in due course.

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4. Representations from Other bodies

SUEZ

4.1 In response to the noise matters raised on behalf of SUEZ, the Applicant's Noise Consultant has engaged directly with the Environmental Health Team at EBC with written correspondence on 19 March 2025.

4.2 It has been acknowledged that the measured levels of gas engine activity from SUEZ activity are expected to be reasonably typical, and correspond broad to those measured by 24 Acoustics (their report R6749-3 Rev 1) that was prepared in support of the application for the residential and commercial development (ref. F/18/83954) that has since come forward to the south of our proposed development site. We expect therefore that typical noise from the gas engine installation would not be significant to the proposed development.

4.3 Further, the Applicant has undertaken indicative calculations of noise from the gas engines to a hypothetical nearest residential location on the boundary of the proposed development site. Taking into account distance attenuation over 66 metres and applying pessimistic acoustic feature correction of +3 dB leads to a predicted free field noise level of 55 dB LAr,Tr at the hypothetical receptor from the two gas engines running simultaneously.

4.4 At this noise level, the use of standard thermal double glazing and non-acoustic trickle vents would be suitable to reduce gas engine noise to an acceptable level within the proposed dwellings. Similarly noise to external amenity's is within the relevant threshold (as set out within the Suono report). It is noted that this is before the effects of any potential screening from dwellings or fencing/walls are taken into account. Therefore, while the noise from the gas engines are not significant, residents will be able to mitigate elevated levels of noise emissions if necessary.

4.5 The Applicant accepts that the layout has not been confirmed (in particular the specific layout and positioning of dwellings across the development). It is expected that detailed acoustic design work would be undertaken at the reserved matters to confirm the mitigation measures required subject to the layout proposals. The operating noise levels presented by SUEZ shall be considered as appropriate when considering the specification of mitigation to dwellings in due course.

4.6 The EHO Officer noted the comments above and found this acceptable. The Applicant acknowledges the above and has no further comment on this matter.

Southampton Airport

4.7 Southampton Airport submitted their comments from an aerodrome safeguarding perspective and we would make the following observations:

The outline proposals include options for landscaping and full details of soft and water landscaping works will need to be approved in writing by the Planning Authority in consultation with Southampton Airport. Details must comply with Advice Note 3 – Wildlife Hazards. These details shall include:

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- *any earthworks*
- *grassed areas*
- *the species, number and spacing of trees and shrubs*
- *details of any water features*
- *drainage details including SUDS*

Details of any proposed solar PV will need to be submitted as part of the full planning application.

Details of the heights of the proposed buildings will need to be submitted as part of the full planning application.

4.8 The Applicant reiterates that the proposals are submitted in outline form, with matters of layout, scale, massing, and landscape reserved for future determination. The Applicant is willing to accept a suitably worded informative attached to the outline consent to establish these details at the reserved matters stage and work the Local Planning Authority, and other consultees to address any material considerations at the appropriate stage.

Winchester City Council

4.9 Winchester City Council responded to the Application material with their comments on 29th January 2025.

4.10 Their response noted that the nearest residence to the proposed development within the Winchester District is Giles Farm and Greenwood Manor which are over 600 metres from the site. Given the distance and intervening treatment it was recognised there would be no adverse impact. The Applicant agrees with this assessment.

4.11 With regards to landscape, their comments noted that the site layout should aim to retain the significant hedgerows and woodland belts bordering the site and should avoid, as far as possible, residential properties 'turning their backs' on these features, which risks their damage or removal.

4.12 The Applicant acknowledges the above comments and will consider these during the detailed design and reserved matters stage.

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5. Other matters arising from public representation

5.1 Representations on the application allege that the proposed development would be contrary to specific policies in the Development Plan. The Applicant notes that the proposals should be determined, having regard to the Development Plan, taken as a whole, rather than specific policies.

5.2 The application material submitted to the LPA assesses the proposal against the relevant policies in the Development Plan.

Traffic Impact

5.3 This matter is considered in detail in the standalone response prepared by Glanville Highways regarding representations on highways, transport and access matters.

Social Infrastructure

5.4 Representations refer to the availability of local social infrastructure in Fair Oak to accommodate the proposed development. As identified above, the Applicant is willing enter suitably worded and proportionate planning obligation agreement that ensures the timely funding towards respective social infrastructure within Fair Oak and beyond to facilitate additional capacity and improvements in respect of education and NHS contributions.

5.5 As part of the application, the proposed development seeks to incorporate a potential multi-functional space, the details of which are reserved for future determination, as well as a mobility hub with respective electric vehicle charging facilities and covered cycle storage to facilitate and encourage sustainable transport modes and support a genuine choice in active travel measures for existing and future residents.

5.6 The original application material noted that the proposed development would provide approximately 40 FTE jobs, of which 25 will be net 'direct' jobs, and a further 15 indirect and induced job opportunities. This is notwithstanding an additional £6.5m in residential expenditure and wider public health benefits associated with high-quality, healthy housing and enhanced open space and dedicated play areas within the development, as advocated within Chapter 8 of the Framework.

5.7 The Applicant expects that the proposal would contribute towards measures to provide and mitigate its own impact on social infrastructure through respective planning obligations secured through a Section 106 Agreement.

Prematurity

5.8 A number of representations consider the prematurity of the application in respect of the emerging Local Plan Review. As identified in Section 2 above, the applicant is actively promoting the Site through the emerging Local Plan process and will continue to demonstrate the site's inherent suitability, availability, achievability and its delivery by a national housebuilder with extensive local experience within Eastleigh.

5.9 The Site, and Fair Oak, have been identified within successive Local Plans advocated by the Council, as being an appropriate are for strategic levels of growth, noting the inherent constraints that affect deliverability elsewhere across the Borough.

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5.10 As identified throughout the original application documentation, there is a pressing need for new homes in Eastleigh. The Applicant would like to take the opportunity to reiterate that the Council should be taking opportunity to support sustainable housing proposals, including that proposed through this planning application to address the national housing crisis[4] and shortfall of housing delivery present within Eastleigh Borough.

Agricultural Land

5.11 Some representations received refer to the loss of agricultural land.

5.12 Paragraph 5.25 of the Local Plan defines the best and most valuable agricultural land as agricultural Land Classification grades 1, 2 and 3A.

5.13 The majority of the site comprises agricultural land and is currently used for pastureland. The Agricultural Land Classification report from Reading Agricultural Consultants demonstrates that the majority of site (72%) should be considered as sub-grade 3b quality land and as such would not be classed as the Best and Most Versatile (BMV) agricultural land.

5.14 The Agricultural Land Classification Report prepared by Reading Agricultural Consultants Ltd confirms that only a small area of BMV land is used for built development (1.9ha), and that the proposed development would use proportionally less BMV land and more non-BMV land for built development compared to that proposed for public open space, where the soil resources would remain undisturbed.

Ecology

5.15 Representations refer to the impact of the proposed development on various forms of biodiversity. Such matters are considered in the suite of ecology based surveys and reports (including the Biodiversity Net Gain Metric) submitted with the application.

5.16 The Applicant is committed to ensuring 10% biodiversity net gain is delivered through the proposed development, which is to be secured through an appropriately worded planning condition or obligation. The site has been informed by a detailed Landscape Strategy that accompanied the original submission and outlines the retention and enhancement of existing ecological and landscape features where possible, and mitigating any loss through supplemental planting to be managed through the construction process and beyond.

Foul Water Capacity

5.17 A series of representations note the capacity of the foul water network to accommodate additional development. The response from Southern Water on the application acknowledges the increase in residential development that will arise from the proposals, with it being the responsibility of Southern Water to provide reinforcement within 24 months of planning consent.

5.18 It is possible to control the occupancy of the development in line with these reinforcement works to ensure there is no excess impact on the existing network. The

[4] Ibid 2.

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Applicant is willing to discuss and agree a suitably worded planning condition in agreement with all parties.

Construction

5.19 The Applicant notes that some comments made on the application via EBC's online planning portal have concerns over the implications of dust and associated issues that may arise during the construction phase of the development.

5.20 The application in its current form is seeking outline consent for the development with all matters reserved (other than access into the site). Accordingly, the Applicant is willing to agree to a suitably worded planning condition that may be attached to the consent of either this, or any subsequent Reserved Matters applications, regarding the provision of a Construction Management Plan which will require all construction details to be agreed in writing by the Local Planning Authority prior to the commencement of development.

Landscape

5.21 A number of representations received during the consultation process had concerns regarding the impact of the development on the surrounding landscape. The Application proposals demonstrate how a landscaped buffer, complemented by supplemental tree and hedgerow planting can help assimilate any built form with the existing built up edge of Fair Oak.

5.22 The accompanying Landscape Strategy for the site sets out how the scheme can include an area of landscaped open space which can include a variety of forms of strategic planting, whilst serving the existing landscape features such as the mature trees and create an area of public open space that includes the addition of new habitats such as hedges and grassland as part of a green buffer.

5.23 In this regard, the Applicant commits that any subsequent reserved matters details will ensure additional landscaping can be provided so as to effectively mitigate the impact of development in this location and retain the setting of the landscape and further integrate the development with the built up edge of Fair Oak.

5.24 In addition to this, through the Development Framework Plan and supporting DAS submitted alongside the original application two and three storey feature dwellings can be suitably integrated into the proposed development, to create landmark features and allow for a reduced urban form as the development extends towards the southern and eastern boundary line to create a soft development edge. Similarly, the exact height and location of dwellings will be confirmed at the reserved matters stage.

Specific Policies

5.25 Representations on the application allege that the proposed development would be contrary to specific policies in the Development Plan. The Applicant notes that the proposals should be determined, having regard to the Development Plan, taken as a whole, rather than specific policies. The application material submitted to the LPA assesses the proposal against the relevant policies in the Development Plan.

Flooding

5.26 Public representations on the proposed development have cited that the proposed site is liable to localised flooding during periods of heavy rainfall. The Applicant submitted a

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detailed Flood Risk Assessment to support the planning application that identifies that the Government's Flood Zone Map for Planning shows that the site lies in Flood Zone 1; land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). As such the site has little or no risk of fluvial flooding as defined within the Framework and Planning Practice Guidance.

5.27 As part of the application process, comments have been received from the Lead Local Flood Authority, Environment Agency, Thames Water and the Drainage team at the Local Planning Authority. The Applicant continues to work constructively with all of the above parties so as to resolve any outstanding technical issues regarding the deliverability of suitable infrastructure to serve the proposed development.

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6. Summary

6.1 We trust this addendum has provided you with a summary of the key areas of the resubmission. We would direct you to the appendices and individual reports for detailed responses to specific consultee comments and assessments to the revised development proposals.

6.2 This proposal is for a high quality, well designed and sustainable residential development of up to 245 dwellings potential multi-functional building, including mobility hub, and associated infrastructure and earthworks. This scheme has evolved in response to the characteristics of the site and seeks to deliver a residential proposal which makes efficient use of land at an appropriate density, in a highly accessible location and which provides a mix of housing types, tenures and sizes.

6.3 The site is located adjacent to the town of Fair Oak. This is the most sustainable settlement in Eastleigh Borough, behind the main service centre of Eastleigh, Chandlers Ford and Hedge End. The sustainability of Fair Oak is highlighted by its range of services and facilities and access to employment opportunities both within the town and the nearby areas.

6.4 It is clear that there exists support for strategic levels of growth at Fair Oak by the Council, exemplified by the continued identification of Strategic Growth Options within the submitted Local Plan (prior to their removal by the Inspector during examination) and again the emerging Local Plan that has recently concluded Reg. 18 Issues and Options consultation in January 2025.

6.5 There is a substantial shortfall of housing delivery in Eastleigh compared to the expectations of the Local Plan. Thus, the Council cannot continue to rely on sites which have long been allocated, but failed to deliver as expected. This proposal can help remedy the shortfall of housing within the Borough, at a sustainable location where there are no identified constraints or environmental designations that might otherwise preclude development on this site, such that they are present elsewhere in the Borough.

6.6 Eastleigh are a signatory to the Planning for South Hampshire that LPAs to consider whether they could accommodate some of these wider needs through their own local plan reviews, recognising that South Hampshire's housing markets operate across local authority boundaries. Eastleigh are identified as an authority "*more likely to be able to meet and potentially exceed standard method-based housing needs*" (based on NPPF 2021 predictions) in their respective local plan areas. As identified earlier in this addendum, the housing requirement for Eastleigh alone has increased and will need to be factored into both the plan-making and decision-making processes.

6.7 In light of all of the above considerations, and those discussed elsewhere, as well as the lack of policy conflict arising from this proposal, the Applicants consider that this proposal should be supported by the Local Planning Authority and planning permission granted.

6.8 The inability of Eastleigh to identify a five year supply of deliverable housing sites, required by the NPPF 2024 when considered against both its adopted requirement and

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standard method in preparation of its emerging Local Plan. The LPA acknowledged within the Statement of Common Ground to the Land off Cobbett Way, Botley appeal (appeal ref. 3350858) that the "*provisions set out in footnote 8 and paragraph 11(d) of the NPPF are engaged for the determination of the appea*l".

6.9 There is no material change in circumstance since this appeal was determined that would prohibit the application of the presumption in favour and '*tilted balance'* to the proposed development.

6.10 In this context, as demonstrated through the original application material, as well as the additional information forming part of this resubmission, the policies which are most important for determining the application are out-of-date, and there are no adverse impacts, either individually or in combination, that would significantly and demonstrably outweigh the benefits, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes.

6.11 It is evident that the Council will need to rely on the delivery of sites outside of settlement limits to meet its identified housing needs. This is notwithstanding the identified shortfall across the adopted plan period, increased housing requirement from the revised standard methodology, and likelihood of meeting unmet need from PfSH authorities that will only worsen the extent of the already significant shortfall in housing across the Borough.

6.12 In this context, the lack of policy conflict arising from this proposal, the Applicant considers that this proposal should be supported by the Local Planning Authority and planning permission granted. There are no technical matters identified that cannot otherwise be suitably mitigated and controlled by suitably worded planning condition attached to a consent.

6.13 The Applicant is a national housebuilder developer with proven track record of delivering sustainable development in Eastleigh. Bloor obtain both deliverable planning consents and deliver strategic infrastructure on sites, including high quality residential development alongside such as swathes of public open space, enhanced local centres, and sustainable urban drainage systems (SUDs). This proposal will go some way to remedy the worsening shortfall of housing in the Borough, at a highly sustainable settlement identified for growth in the emerging Local Plan.

6.14 It is in this context that permission should either be granted by virtue of the fact that there is no identified conflict with the Development Plan when read as whole, and the proposal can positively contribute towards achieving the objectives in the Local Plan which are not otherwise being achieved, or via the presumption in favour of sustainable development.

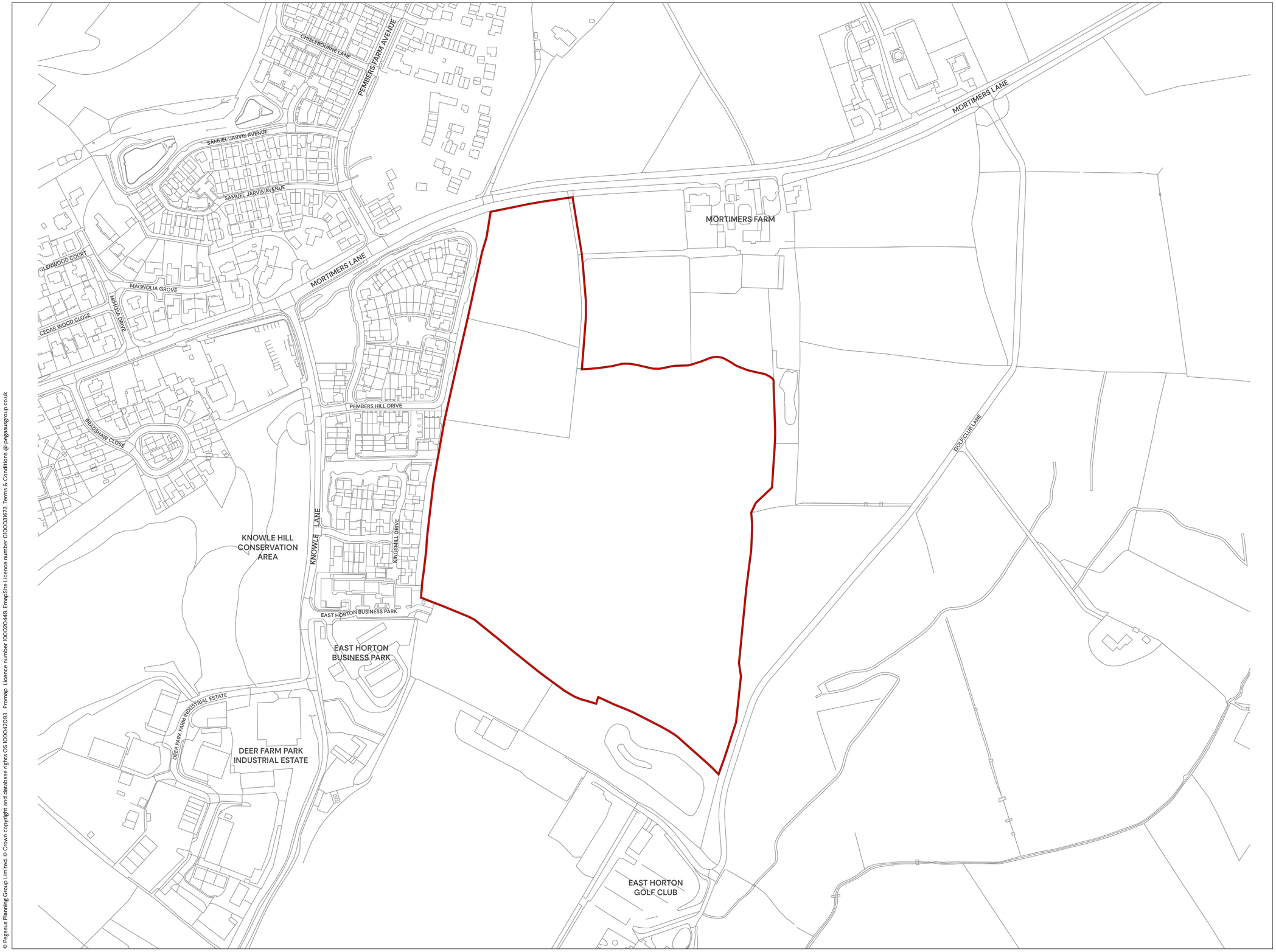
6.15 The applicant will continue to work with Officers to deliver an inclusive and sustainable scheme that provides genuine positive benefits to the local community and wider district. We look forward to receiving formal acknowledgement of the revised application material.

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6.16 The Applicant would welcome the opportunity to have a meeting with Officers to discuss the changes and wider proposals at the earliest opportunity.

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Appendix 1: Site Location Plan



KEY

SITE BOUNDARY

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0 50 100m
1:1250 (at A0)

LAND SOUTH OF MORTIMERS LANE, FAIR OAK – **SITE LOCATION PLAN**

PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: BA | APPROVED BY P.M: TB | DATE: 15.10.24 | SCALE: 1:1250@A0 | DRWG: P23-2261_DE_002_01_REVC | CLIENT: BLOOR HOMES

PEGASUS GROUP

.

Appendix 2: App ref. X/25/98908 – Revised Mortimer Farm Plans



Vesta Architects

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Client
Mortimers Farm Developments

Project
Mortimers Farm, Mortimers Lane, Fair Oak, Eastleigh, SO50 7EA

Drawing Title
Proposed Site Plan

Drawing No.
25-5008-P-03

Scale
1:250 @ A1

Rev
-

Drawn MB

Checked LF

Issued For
PLANNING

Rev	Note	Date
-	First issue	11/02/25

Scale Bar

1:50
0 1 2 3 4 5

1:100
0 1 2 3 4 5 10

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Appendix 3: Approved 1.8m Footway between Mortimer Farm and Knowle Lane (App. ref. F/22/94435)

ttage

MORTIMERS LANE

B 3037

MORTIMERS LANE

Footpath as
Bellamy Roberts
Dwg: 5880-001

Tactile
Crossing

1.8m Footway

ED Bdy

1.8m Footway

Sunnyside
Cottage
50.6m

Mortimer's
Farm

The
Lodge

Pond

Wildflower meadow

Frontage

Link to existing footpath on
Pembers Hill Drive. Exact location
to be determined at the detailed
design stage

24

31

44

PEMBERS HILL DRIVE

Track

Pond

N

0 25 50 75 100 M

REVISION	DATE	DESCRIPTION	P.M.
A	06.09.23	Redrawn	

HURRELL | ARCHITECTURE

Hurrell Architecture Limited
Alresford

t 01962 736 761
e mail@hurrellarchitecture.co.uk

CLIENT

PROJECT

Mortimers Farm

Mortimers Lane

DRAWING

Block Plan

DRAWING NO.	REVISION
991-D-007	**A**

WORKSTAGE	Planning	STATUS	
SCALE @A1	1:500	SCALE@ A3	1:1000
DATE	December 2022	DRAWN BY	SH

Dimensions to be checked on site.
All in millimetres unless stated
For construction purposes do not scale
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HURRELL ARCHITECTURE LIMITED

RIBA Chartered Practice

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Appendix 4: Turley Five Year Housing Land Supply Assessment (April 2025)

Stage 1 Five Year Supply Assessment – Eastleigh Borough Council

On behalf of Bloor Homes Southern

March 2025

Turley

Contents

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2.	Planning Policy Context and Relevant Appeals	5
3.	Assessment of Housing Land Supply	9
4.	Conclusions	18

Contact
Claire Hawkes
claire.hawkes@turley.co.uk

March 2025

1. Introduction

Introduction

1.1 This report has been prepared by Turley on behalf of Bloor Homes Southern in respect of their interests within the authority of Eastleigh Borough Council. This report provides a review and commentary of the Council's housing land supply position.

1.2 The latest formal position statement from the Council is set out in the Calculation of Five-Year Housing Land Supply report which is dated August 2022. The statement covers the five year supply period from 1 July 2022 to 30 June 2027. In this report the Council claim to have a supply of 5.1 years, with sites projected to deliver a total claimed deliverable supply of 3,943 homes. This is a surplus of only 116 homes.

1.3 However, in relation to an appeal in the Borough (ref. APP/W1715/W/24/3350858, Land off Cobbett Way, Botley) the Council prepared a Draft update (undated, but uploaded to the webpage in November 2024, and included as Appendix 1 to this report) to its supply position with a base date of 1 April 2024. This, based on the December 2024 NPPF method for calculating five year supply, revised the position to just 4.4 years, which is a shortfall of 418 homes for the period 2024/25 to 2028/29.

1.4 Having reviewed this update, and as set out in this report, Turley are of the opinion that the actual supply position is less than the 4.4 years claimed. Several sites are included in the projected supply that do not have detailed consent and where there is a lack of clear evidence that completions will begin within five years. In our view there is a serious and significant shortfall in the supply within the Borough and the Council should take positive action to address this both for the current monitoring period and to ensure a deliverable supply going forwards.

Scope of Stage 1 Assessment

1.5 This report comprises the findings of a desk based assessment of the Council's Calculation of Five-Year Housing Land Supply. This has involved consideration of the NPPF context, a review of the Local Plan position and housing requirement, and our professional experience in testing land supply.

1.6 Commentary is provided on the following;

- Determining the appropriate five year period for assessing five year supply;
- Determining the appropriate five year housing land supply requirement;
- The application of an appropriate buffer to the calculation;
- Identifying a realistic and deliverable supply in accordance with the NPPF definition of a deliverable site;
- Consideration of the Council's approach to lead in times and any local, regional or national evidence provided to support this; and

- Calculating Turley's assessment of the Council's housing land supply position using the steps above.

2. Planning Policy Context and Relevant Appeals

The Development Plan

2.1 At the time of writing, the Eastleigh Borough Council Development Plan comprises:

- Eastleigh Borough Local Plan 2016-2036 (adopted April 2022); and
- Hampshire Minerals and Waste Plan (adopted October 2013).

2.2 Local Plan Policy S2 (Approach to New Development) sets out that the Council will promote the delivery of a minimum of 14,580 new homes over the plan period 2016-2036. The pattern of delivery is expected to involve:

- 2,572 homes completed 1st April 2016 to 31st March 2019;
- 7,187 homes with planning permission or resolution to grant planning permission at 1st April 2019;
- 1,475 allowance for windfall development; and
- 732 homes on new sites allocated in the Local Plan.

2.3 Local Plan Policy S3 (Location of New Housing) states that the Council will focus as much new housing as possible within existing urban areas. It proposes the following:

- development of approximately 5,960 homes on strategic sites with planning permission;
- development of approximately 2,702 homes on other large sites which already have planning permission or resolution to grant planning permission;
- approximately 732 homes on new smaller greenfield and urban sites.

Other Material Considerations

National Planning Policy Framework (December 2024)

2.4 The National Planning Policy Framework was updated in December 2024, with the changes affecting the need to demonstrate a five year housing land supply. Relevant sections are summarised below.

2.5 **Paragraph 11** confirms that for decision taking, where there are no relevant development management plan policies, or the policies which are most important for determining the application are out-of-date, granting planning permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

(ii) any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as taken as a whole having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

2.6 **Footnote 8** (linked in paragraph 11) states that this includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five-year housing supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 78, or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75%) of the housing requirement over the previous three years.

2.7 The definition of a 'deliverable' site is included at Annex 2 to the NPPF and is as follows:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

(a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

(b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

2.8 **Paragraph 61** advises that to support objectives of **significantly boosting** the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The paragraph also advises that the overall aim should be to **meet an area's identified housing need**, including with an appropriate mix of housing types for the local community. This is change from the 2023 NPPF which sought for as much of an area's identified housing need to be met if possible. In our view, this last (amended) part of paragraph 61 confirms that, in Eastleigh Borough, housing need, as provided by the latest standard method calculation should be met by the Council.

2.9 **Paragraph 78** confirms that Planning Authorities should maintain and update annually a 5-year supply of deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. A buffer of 5% buffer or 20% should be applied to the calculation, with the appropriate buffer determined based on an authority's performance against the Housing Delivery Test (HDT).

2.10 **Footnote 39** associated with paragraph 78 states that the local housing need should be applied unless the strategic policies which are more than five years old have been

reviewed and found not to require updating. The local housing need should be calculated using the standard method set out in national planning guidance.

Planning Practice Guidance

2.11 The PPG provides further guidance on assessing a five-year housing supply including:

Housing Supply and Delivery:

- Paragraph 007 – What constitutes a 'deliverable' housing site in the context of plan-making and decision-taking?
- Paragraph 008 – What happens if an authority cannot demonstrate a 5 year housing land supply?
- Paragraph 009 – How can a 5 year housing land supply be confirmed as part of the examination of plan policies?
- Paragraph 013 – How should buffers be added to the 5 year housing land supply requirement?
- Paragraph 022 – How can past shortfall in housing completions against planned requirements be addressed?
- Paragraph 023 – How can past over-supply of housing completions against planned requirements be addressed?

2.12 **Paragraph 007** (under 'Housing Supply and Delivery'), mentioned above, sets out what evidence to demonstrate deliverability may include as the following:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects

2.13 Overall the NPPF and PPG are clear that the obligation is on the local planning authority to demonstrate a five year supply against the definition of "deliverable" set out in Annex 2 of the NPPF and that this should be position that the authority should update annually.

Land off Cobbett Way, Botley Appeal Decision, December 2024

2.14 The latest relevant appeal considering five year supply to be decided in Eastleigh was for an appeal at Land off Cobbett Way, Botley (3350858), heard via the Hearing procedure. This was decided in December 2024.Whilst the appeal was dismissed it was common ground between the Council and the Appellant that the Council was not able to demonstrate a five year supply. The Inspector briefly considered five year supply at paragraphs 30 and 31 of the decision but did not pass judgement on whether the Council or Appellant's figure was preferred.

2.15 For the purposes of this appeal the Council prepared a Draft update to its supply position with a base date of 1 April 2024 (this document is undated but was uploaded in November 2024, it is included as Appendix 1 to this report). This, based on the December 2024 NPPF method for calculating five year supply, revised the position to just 4.4 years, which is a shortfall of 418 homes for the period 2024/25 to 2028/29.

2.16 Whilst this supply position is labelled 'draft' in the document submitted to the appeal, and not posted on the five year supply pages of the Council website, it comprises a more up-to date position from the Council on its housing land supply (with its Five-Year Housing Land Supply report (August 2022) now being substantially out of date). We have, therefore, used this information when reviewing the supply position.

3. Assessment of Housing Land Supply

3.1 This section of the report provides our initial assessment of the strength of Eastleigh Borough Council's housing land supply position.

3.2 The Council's latest formal position statement is dated August 2022 and covers the period from 1 July 2022 to 30 June 2027. It claims a deliverable supply of 3,943 homes, against a requirement of 3,827 homes. This equates to a claimed supply of 5.1 years (a surplus of 116 homes).

3.3 However, there is more up to date information available in the form of a draft statement prepared in relation to an appeal in the Borough ref. APP/W1715/W/24/3350858, Land off Cobbett Way, Botley (this statement is undated but was uploaded in November 2024). For the purposes of this statement, it is clear that the Council has completions data for the 2023/24 monitoring year as the updated supply position with a 1 April 2024 base date is a more appropriate basis on which to test the Council's housing land supply.

3.4 When calculating it's 5 year housing land supply requirement, the Council use the adopted Local Plan requirement figure (from Policy S2) of **729 homes per annum** equating to a five year requirement of **3,645 homes**. Tables are then presented providing a breakdown of the projected supply from each site for the supply period. The tables list details including site status, completions to date, and planning permission expiry date.

3.5 The Council claim that **3,227 homes** should be considered deliverable in the period 2024/25 to 2028/29. A calculation is set out that this equates to a supply of only **4.4 years, a shortfall of 418 homes**.

The Appropriate Five Year Supply Period

3.6 The draft position statement does not expressly present any completions data up to the 2024/25 monitoring year. The formally published supply statement (published August 2022) only sets out completions to 1 July 2022. However, in the draft statement there is information on a site by site basis detailing completions for the 2023/24 monitoring year so it is assumed that the Council does have completions date up to 31 March 2024[1]. The Council does not include any adjustment to the requirement to account for over or under delivery to date.

3.7 We consider that the supply position should be based on the most recently available completions data and therefore, for the purposes of this assessment, we consider the appropriate supply period to be 1 April 2024 to 31 March 2029, despite this being set out in a 'draft' document.

The Housing Requirement

3.8 The Eastleigh Borough Council Local Plan (2016-2036) was adopted on 25 April 2022, meaning that it is less than five years old. Local Plan Policy S2 (Approach to New

[1] We also note that up to date completions data appears to have been provided to the Appellant at the Botley appeal.

Development) states that the Council will promote the delivery of a minimum of 14,580 new homes (equating to 729 per annum) between 2016-2036. As the adopted Local Plan is less than five years old, the adopted strategic policies set out the housing requirement (in accordance with paragraph 78 of the NPPF).

3.9 Once the plan reaches five years old, which for Eastleigh will be April 2027, the (current) NPPF states that five year supply should be tested against the Local Housing Need (LHN) figure derived by the Standard Method calculation, unless relevant strategic policies have been reviewed and found not to require updating. Of note, the current 2024 LHN for Eastleigh is 911 homes per annum[2], which is a significant increase in the annual adopted requirement and is a material consideration when considering applications that can deliver more homes.

3.10 However, at the present time, given the plan has not yet reached five years old we accept that the basic annual requirement should be 729 homes per annum, equating to 3,645 homes over 5 years.

Buffer and Shortfall

3.11 The Housing Delivery Test (HDT) was updated in December 2024 with 2023 based results. This new result for Eastleigh was 122% and, therefore a 5% buffer should be applied to any five year supply calculation.

3.12 However, the Council do not appear to apply any buffer to the supply calculation published in the latest draft statement. In line with the requirements at paragraph 78 of the NPPF, a 5% buffer should be applied to the requirement calculation to ensure choice and competition in the market for land.

3.13 This equates to a five year requirement of **3,827 homes**. Based on the Council's draft published supply position this would revise its own position to a supply of **4.22 years, a shortfall of 600 homes**.

Sources of Supply

3.14 The Council's claimed sources of supply are set out in the draft report as follows;

- Net Outstanding Permissions for small sites (1-9) units (discounted by 4% for Lapses) – 136 homes
- Net Outstanding planning permissions for large sites (10 or more units) - 2,083 homes
- Sites with a resolution to grant planning permission – 538 homes

[2] This is an up-to-date calculation as at 26 March 2025, following the publication of the latest figures on affordability ration. The LHN figures will be updated again in May 2025 when updates to dwelling stock numbers will also be updated, whereby the LHN for Eastleigh is expected to rise further.

- Housing for Older People (C2) (Equivalent of) – 96 homes
- Sites in Adopted Local Plan – 166 homes
- Sites In Eastleigh Borough Council's Housing Programme (Pre-planning) – 46 homes
- Windfall allowance for years 3, 4 and 5 – 162 homes
  - Total expected supply for the period 1 April 2024 – 31 March 2029 - **3,227 homes**

3.15 Having reviewed the components of the Council's supply, there are several categories where the Council are including projected completions from sites which do not yet have detailed planning permission, or in the case of the Sites In Eastleigh Borough Council's Housing Programme are 'pre-planning'. Sites for major development which do not have detailed permission should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years (as per the NPPF definition of deliverable). The onus is on the Council to provide this clear evidence, and it should be in place at the base date[3].

3.16 In terms of 'evidence' provided by the Council in the draft position statement there is some commentary on the major sites included in the supply set out in the tables within the report. However there are no accompanying pro-formas of links to additional information.

3.17 When reviewing the planning status of sites, we have come across some instances where updated information is available. As the relevant base date is 1st April 2024, clear evidence on deliverability should have been available at the base date. Nevertheless, we have also considered any updates this as part of the overall requirement for there to be 'clear evidence' that first homes will commence in the relevant 5 year period.

Lead in Times and Delivery Rates

3.18 The Council provides an annual breakdown of anticipated delivery within the tables in the draft supply position statement, and in some cases have explained the approach to lead in times and the delivery rates applied with reference to discussions with the relevant agent and/or landowner/developer of the sites.

3.19 However, in our view, some assumptions the Council have applied to delivery rates do appear overly optimistic. In addition, where relevant, we have considered the average annual build-out rates set out at Figure 4.1 of the Lichfields Start to Finish Report (third edition March 2024).

[3] As per the findings of the Inspector for the Woolpit, Suffolk appeal, (Ref. APP/W3520/W/18/3194926), paragraph 75.

Small Sites (1-9 Homes)

3.20 136 homes are included in the support from outstanding small site commitments. The Council apply a 4% discount to this source of supply at present. The nature of small scale development is that it is typically undertaken by small or medium developers, or even private individuals, rather than national housebuilders. It is not unusual or uncommon for consents to lapse before they are implemented, or for revised applications to be progressed.

3.21 We are aware of several local authorities who consider it appropriate to apply a non-implementation or lapse rate to certain components of supply, so as not to over estimate the number of units that are likely to come forward. This is particularly appropriate where an authority has some local data on historic lapse rates. Examples of deductions are as follows:

- Stroud apply a non-implementation rate of 22% to all un-allocated small sites (9 dwellings or less);
- Somerset West and Taunton apply a lapse rate of 10% to all small sites;
- Cornwall apply a 10% discount to all small sites;
- South Somerset apply a 10% non-implementation rate to small sites (1-9 dwellings) included in the Council's supply; and
- Malvern Hills District Council apply a 5% lapse rate to the total identified supply from all sources (large and small).

3.22 The Council have applied a 4% discount to account for any potential under delivery to reduce the outstanding small sites commitments from 142 to 136 homes, however, we consider this to be an underestimate of the number of permissions that may not be delivered from this category. We consider that a 10% discount is more realistic and have reduced the overall supply figure further to 128 homes.

3.23 The use of a lapse rate is considered a pragmatic approach, rather than an assessment of the deliverability of each site given that the NPPF definition of deliverable states that sites that do not involve major development and have planning permission should be considered deliverable until permission expires.

Windfall Sites

3.24 The NPPF sets out that a windfall allowance for sites not specifically identified within the development plan may be justified if a local planning authority has compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

3.25 The Council's draft statement identifies a windfall allowance of 162 homes between 2026 to 2029 (applicable to years 3, 4 and 5). There is no detail within the position statement of how this windfall allowance has been calculated. We do note (based on the latest formal position statement [August 2022]) that windfall delivery was considered

during the examination of the Local Plan and the Inspector appointed found there was sufficient evidence to allow them to include windfall delivery in their trajectory (see para 4.29-4.31 of the supply report). That being said, and for the purposes of this assessment; to avoid double counting small site commitments (1-9 homes) we have removed year 3 from the windfall allowance and reduced the figure to 108 homes between 2026 to 2029 (applicable to years 4 and 5).

Assessment of the Council's Supply

3.26 We have reviewed all of the sites listed within the Council's trajectory, with a more detailed review of the sites for major development. The results of this assessment are summarised in the table below where we have extracted a summary of all sites where we consider the projected delivery is either overly ambitious, or where there is a lack of clear evidence that the site meets the definition of deliverable. Our findings are provided in the commentary column.

Table 3.1: Disputed Sites

Site	Council Supply	Turley Supply	Difference in Delivery	Commentary
Land to the North and East of Winchester Street, Botley	26	0	-26	There is outline consent on this site for up to 375 homes, however the site is owned by the County Council and there is no record of any submission of reserved matters to date. It is not clear whether the site is yet controlled by a developer. The onus is on the Council to demonstrate clear evidence completions will begin on site within five years. With uncertainty around who will develop the site, and no submission, let alone approval, of reserved matters (noting that we are now nearly 12 months beyond the base date) there is a lack of clear evidence that completions will occur and the site should not be included in the supply at this time.
Land West of Woodhouse Lane	122	0	-122	Hybrid permission was granted in September 2019 for up to 605 homes under reference O/18/83634 (submitted by Hampshire County Council), however the residential element was all in outline form. We are now nearly 12 months beyond the 1st April 2024 base date and there is no detailed consent in place for any residential units on this site nor are there currently any applications for reserved matters for residential units pending determination (reserved matters applications have been submitted for noise bunds and acoustic fencing [reference RM/20/87347] and community sports provision and public open space [reference RM/20/89363]). Whilst the permission appears extant, the Council has identified issues marketing the site to a developer. It is not clear if a housebuilder is involved. The Council has not provided the necessary clear evidence that completions will be delivered in the five year period on this site.

Site	Council Supply	Turley Supply	Difference in Delivery	Commentary
Land West of Horton Heath	381	200	-181	Detailed consent was granted in December 2022 for 381 homes on this site (reference F/20/89500), the applicant was Eastleigh Council. The site is within the red line for a wider site subject to a pending outline application and considered as a separate row within the supply trajectory (pending determination for up to 2,500 homes under reference O/20/89498, also submitted by the Council), effectively this site is Phase 1. It is not disputed that this (Phase 1) part of the site that has detailed consent is deliverable (reference F/20/89500 for 381 homes). However the delivery rates the Council anticipate appear very high (up to 216 homes in a single year). This is a Council owned site, and Wates Development have been appointed to construct. The Lichfield Start to Finish report suggests that sites of this size typically delivery between 35 and 60 dwellings per annum. The Council anticipate first completions in year 2 of the supply period. In our view a reduced delivery rate of 50 dwellings per annum is much more likely to be achieved. The supply has therefore been reduced accordingly to 200 homes, a reduction of 181 homes.
Land West of Allbrook Way, Knowle Hill	52	49	-3	Outline planning permission was granted in June 2024 for up to 52 homes under reference O/19/86980. A reserved matters (RM/24/98388) was submitted by Bargate Homes in October 2024 for 49 homes and was approved in February 2025. Whilst the reserved matters application was submitted after the base date, we do not disagree that this is a deliverable site but the delivery should be reduced to reflect the number of homes with detailed consent.
Land West of Horton Heath	486	0	-486	An outline application is pending determination for up to 2,500 homes under reference O/20/89498. The site received a resolution to grant consent at committee in March 2025, however as yet there is no decision notice or permission in place. Phase 1 of the site has a separate detailed consent granted in December 2022 for 381 homes (reference F/20/89500), the applicant for both submissions was Eastleigh Council. The detailed site (Phase 1) is considered as a separate row within the supply trajectory. Outline permission was also previously granted on the site for up to 950 homes in December 2017 (reference O/14/75735), and up to 450 homes in November 2017 (reference O/16/79354). Both of these outline applications appear to be expired. Reserved matters were anticipated early 2025 (according to the draft statement), however without permission in place, this will not materialise. Even once detailed submissions are made it is not clear in what form they will be submitted (including how

Site	Council Supply	Turley Supply	Difference in Delivery	Commentary
				many homes) and how long these will take to be determined. There is no permission in place for the remaining residual units from the pending outline application (reference O/20/89498) and the Council has not provided the necessary clear evidence that completions will be delivered in the five year period. The supply has therefore been reduced accordingly.
Land south of Maddoxford Lane and east of Crows Nest Lane	30	0	-30	This site is allocated for development of 30 homes in the Local Plan, although pre-application enquiries have been made there is no record of any application for development having been submitted on the site to date. A detailed application for 92 homes (F/19/85178) was refused in November 2020 and an appeal dismissed in August 2021. There does not appear to be any revised submission for permission on this site, despite the Council indicating one would be expected in 2024. There is no clear evidence that homes will come forward on this site in the next 5 years.
Kings Copse Avenue, Botley	95	0	-95	This site is allocated for development of 120 homes in the Local Plan, however there is no record of any application being submitted for development on the site. Whilst a request for pre-application advice has been referenced in the draft supply statement, there is no certainty when an application will come forwards, nor is there any indication whether this will be outline or detailed and when it could be expected to be determined. At the base date, and at the time of writing, there is no clear evidence that homes will be delivered on this site in the next 5 years.
Land north of Myrtle Cottage, Winchester Road	22	0	-22	A full application is pending determination (F/24/97945) on this site for 53 retirement apartments. The site is allocated in the local plan for 22 residential units. The application remains undetermined and the response from the Policy Team (October 2024) objects to the proposals. It is not clear when this application will be determined, or whether it will be approved. Historically an application for 31 homes (F/19/85604) was refused and dismissed at appeal in October 2021, and a scheme for 25 units (F/21/89989) was refused in March 2023. There is no permission in place for development on this site and clear evidence that homes will come forward on this site in the next 5 years.
Land north of Providence Hill	19	0	-19	This site is allocated in the Local Plan for development of 19 homes. A detailed application (F/24/97312) for a 69 bed care home and care cottages was refused on the site in November 2024. There does not appear to have been an appeal submitted to date against this refusal. There is no permission in place and

Site	Council Supply	Turley Supply	Difference in Delivery	Commentary
				no clear evidence that homes will come forward on this site in the next 5 years.
Land at 237 Chamberlayne Road, Eastleigh	11	0	-11	A detailed application for 12 homes was refused in October 2023 (reference F/23/95574). There does not appear to be any revised planning application for development on this site. Whilst the Council suggest pre-application advice has been given there is no evidence on when an application may come forward and how long it would take to be determined. There is no explanation as to the suggested timings for any application coming forward. The Council has not provided any clear evidence to demonstrate that homes will be delivered on this site within 5 years. No homes should be included in the supply from this source.
Land at Station Road (Arch Theatre), Chandlers Ford	17	0	-17	There does not appear to be any planning application for development on this site. Whilst the Council suggest pre-application advice has been given there is no evidence as to when an application may come forward and how long it would take to be determined. The Council has not provided any clear evidence to demonstrate that homes will be delivered on this site within 5 years. No homes should be included in the supply from this source.
Small Sites Commitments	136	128	-8	The Council's small site commitments has been discounted by 4% to account for any potential under delivery. The nature of small scale development is that it is typically undertaken by small and medium developers, or even private individuals, rather than national housebuilders. It is not unusual or uncommon for consents to lapse before they are implemented, or for revised applications to be progressed. A 10% discount is more realistic and has been applied.
Windfall Sites	162	108	-54	Year 3 of the Council's windfall sites has been removed to avoid double counting with small sites commitments.
Total	**1559**	**485**	**-1074**	

3.27 The above reductions are based on our deskbased review and the best available evidence at the time of writing. Assumptions may vary in the future due to the planning status of sites changing over time and/or the Council's evidence on certain sites becoming more robust. However, in our view it is clear that there are several elements of the Council's supply which do not meet the definition of deliverable, or where unrealistic deliverability assumptions have been applied.

3.28 Based on the above reductions the Council's revised supply position would be as set out below.

Revised Five Year Supply Calculation

Step	Stage	Calculation
A	Annual Requirement	729dpa
B	Five Year Requirement (Ax5)	3,645
C	Requirement with 5% buffer	3,827
D	Turley Assessed Supply	2,153
E	5 Year Calculation	2.81 years
F	Shortfall	-1,674

4. Conclusions

4.1 The Council, based on its draft housing land supply statement (which is undated but was uploaded to the Council website as part of evidence for an appeal in November 2024) claim to have a supply of only 4.4 years, with sites projected to deliver a total claimed deliverable supply of 3,227 homes. This is a shortfall of 418 homes. However, this calculation does not include a 5% buffer to the calculation, which is now required under the December 2024 Framework. If this is included, which we consider it should be in line with paragraph 78 of the NPPF, the Council's own actual supply position would reduce to only **4.22 years, a shortfall of 600 homes.**

4.2 We have undertaken an assessment of the Council's latest position statement and in our view it is clear that there are several elements of the Council's supply which do not meet the definition of deliverable, or where unrealistic deliverability assumptions have been applied.

4.3 We consider that the actual deliverable supply is 1,074 homes less than claimed by the Council. These reductions are based on sites without detailed consent, a reduction where delivery rates appear unrealistic, a reduced windfall allowance, and the potential to apply a 10% non-implementation rate to small sites.

4.4 Based on our calculations the supply is reduced to **2.81 years**, with a deliverable supply of 2,153 homes. This is a shortfall of **1,674 homes**.

4.5 In our view there is a serious and significant shortfall in the supply within the Borough and the Council should take positive action to address this both for the current monitoring period and to ensure a deliverable supply going forwards.

Appendix 1: Eastleigh Borough Council draft five year housing land supply calculation – base date 1st April 2024

Turley

Eastleigh Borough Council draft five year housing land supply calculation – base date 1st April 2024

Draft

Source of Supply	Number of Dwellings
Net Outstanding Permissions for small sites (1-9) units (discounted by 4% for Lapses)	136
Net Outstanding planning permissions for large sites (10 or more units)	2,083
Sites with a resolution to grant planning permission	538
Housing for Older People (C2) (Equivalent of)	96
Sites in Adopted Local Plan	166
Sites In Eastleigh Borough Council's Housing Programme (Pre-planning)	46
Windfall allowance for years 3, 4 and 5	162
Total expected supply for the period 1st July 2022 – 30th June 2027	3,227

Housing Requirement Figure in Adopted Local Plan: Dwellings per annum	729
2024-29	3,645
undersupply	-418
Supply in Years	**4.4**

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Small Site Commitments 1st April 2024

APPLICATION REFERENCE	TYPE	DECISION DATE	EXPIRY DATE	ADDRESS	TOWN	STARTED	OUTSTANDING GAINS DWELLINGS	OUTSTANDING LOSSES DWELLINGS	NET OUTSTANDING DWELLINGS
F/08/63689	FULL	11-Dec-08	11-Dec-11	STEWART HOUSE SYCAMORE AVENUE	EASTLEIGH	Commenced	3	0	3
F/09/64869	FULL	17-Jul-09	17-Jul-12	1 ADJ HILL PLACE	BURSLEDON	Commenced	1	0	1
F/11/68419	FULL	03-Oct-12	03-Oct-15	GLEN FARM STROUDWOOD LANE	LOWER UPHAM	Commenced	1	0	1
R/13/72928	DETAILS	18-Sep-13	18-Sep-15	116 REAR OF PARK ROAD	CHANDLERS FORD	Commenced	1	0	1
F/13/73761	FULL	29-Dec-14	29-Dec-17	38 HUNT AVENUE	NETLEY ABBEY	Commenced	2	0	2
F/15/76637	FULL	05-Oct-16	05-Oct-19	1 OAKMOUNT AVENUE	CHANDLERS FORD	Commenced	1	1	0
F/16/78096	FULL	09-Feb-17	09-Feb-20	MIDLANDS ESTATE	WEST END	Commenced	2	0	2
F/17/80188	FULL	08-Dec-17	01-May-21	86 REAR OF EDWARD AVENUE (ROEBUCK CLOSE)	BISHOPSTOKE	Commenced	5	0	5
F/18/82759	FULL	11-May-18	11-May-21	35 FALCON SQUARE	EASTLEIGH	Commenced	1	0	1
F/19/85935	FULL	12-May-21	12-May-24	32 VALLEY ROAD	EASTLEIGH	Commenced	1	0	1
F/19/86015	FULL	07-May-21	07-May-24	27 REAR OF SEAVIEW ESTATE	NETLEY ABBEY	Not Started	1	0	1
PN/20/87616	PRIOR APPROVAL	13-May-20	13-May-23	FIRST FLOOR 91 BOURNEMOUTH ROAD	EASTLEIGH	Commenced	1	0	1
F/20/87926	FULL	11-Feb-21	11-Feb-24	OAK LODGE BRIDGE ROAD	SOUTHAMPTON	Commenced	6	0	6
F/20/88045	FULL	30-Sep-20	30-Sep-23	190 SOUTHAMPTON ROAD	EASTLEIGH	Commenced	2	1	1
F/20/88114	FULL	24-May-21	24-May-24	CHALCOT YORK ROAD	SOUTHAMPTON	Not Started	1	1	0
F/21/90716	FULL	22-Jul-21	22-Jul-24	HALL LANDS FARM HALL LANDS LANE	EASTLEIGH	Not Started	1	1	0
F/20/88124	FULL	11-Nov-20	11-Nov-23	ALLINGTON MANOR FARM HOUSE ALLINGTON MANOR ALLINGTON LANE	SOUTHAMPTON	Commenced	1	1	0
F/20/88620	FULL	20-May-21	20-May-24	9 NICHOL ROAD	EASTLEIGH	Commenced	1	0	1
F/20/88658	FULL	08-Mar-21	08-Mar-24	HOLME FARM DURLEY ROAD	EASTLEIGH	Commenced	1	0	1
RM/20/88841	DETAILS	18-Mar-22	18-Mar-24	PINEWOOD PARK LAND ADJOINING	SOUTHAMPTON	Commenced	6	0	6
F/21/89882	FULL	11-Aug-21	11-Aug-24	THORNEYDOWN FARM MOORHILL ROAD	SOUTHAMPTON	Not Started	1	1	0
F/20/89336	FULL	26-Feb-21	26-Feb-24	44 BUILDERS YARD TO REAR OF TWYFORD ROAD	EASTLEIGH	Commenced	2	0	2
F/21/91336	FULL	11-Oct-21	11-Oct-24	69 LAKEWOOD ROAD	EASTLEIGH	Not Started	1	1	0
F/21/91371	FULL	11-Oct-21	11-Oct-24	WINTON BOTLEY ROAD	SOUTHAMPTON	Not Started	1	1	0

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APPLICATION REFERENCE	TYPE	DECISION DATE	EXPIRY DATE	ADDRESS	TOWN	STARTED	OUTSTANDING GAINS DWELLINGS	OUTSTANDING LOSSES DWELLINGS	NET OUTSTANDING DWELLINGS
F/20/89254	FULL	13-Oct-21	13-Oct-24	ROMANY WAY HEATH HOUSE LANE	SOUTHAMPTON	Not Started	1	0	1
F/21/89959	FULL	14-Oct-21	14-Oct-24	11 DEAN COURT	SOUTHAMPTON	Not Started	1	1	0
F/21/91298	FULL	03-Nov-21	03-Nov-24	46 STATION ROAD	SOUTHAMPTON	Not Started	1	0	1
F/21/90176	FULL	04-Nov-21	04-Nov-24	CROFT FARM WINCHESTER ROAD	EASTLEIGH	Not Started	1	0	1
F/21/91322	FULL	04-Nov-21	04-Nov-24	14 NICHOL ROAD	EASTLEIGH	Not Started	1	1	0
F/21/90585	FULL	10-Nov-21	10-Nov-24	3 KEBLE ROAD	EASTLEIGH	Not Started	1	0	1
F/21/89986	FULL	22-Dec-21	22-Dec-24	OAKFIELD LAND TO THE REAR OF BOTLEY ROAD	EASTLEIGH	Not Started	1	0	1
F/20/88079	FULL	24-Jan-22	24-Jan-25	82 LAND TO THE REAR OF ST JOHN'S ROAD	SOUTHAMPTON	Not Started	1	0	1
O/22/92300	O/L	17-Mar-22	17-Mar-25	2 LAKEWOOD CLOSE	EASTLEIGH	Not Started	1	1	0
F/21/91367	FULL	10-Feb-22	10-Feb-25	44 TWYFORD ROAD	EASTLEIGH	Commenced	3	0	3
PN/22/92315	PRIOR APPROVAL	25-Mar-22	25-Mar-25	COCKPIT FARM KNOWLE LANE	HORTON HEATH	Not Started	5	0	5
F/21/91532	FULL	01-Nov-21	01-Nov-24	7 SHAFTESBURY AVENUE	EASTLEIGH	Commenced	1	0	1
F/21/91590	FULL	21-Jan-22	21-Jan-25	NETLEY HILL FARM LAND SOUTH OF ST JOHN'S ROAD	SOUTHAMPTON	Commenced	1	0	1
F/22/92492	FULL	07-Apr-22	07-Apr-25	LEEWAY BURNETTS LANE	EASTLEIGH	Not Started	1	1	0
F/21/90245	FULL	22-Jun-22	22-Jun-25	192-194 LEIGH ROAD	EASTLEIGH	Not Started	9	0	9
PN/22/93015	PRIOR APPROVAL	19-Jul-22	19-Jul-25	25 SHAFTESBURY AVENUE	EASTLEIGH	Not Started	1	0	1
F/21/91726	FULL	11-Aug-22	11-Aug-25	HILL HAVEN WINCHESTER ROAD	EASTLEIGH	Not Started	2	0	2
F/22/92177	FULL	23-Aug-22	23-Aug-25	45 NEW ROAD	SOUTHAMPTON	Not Started	1	0	1
F/22/93217	FULL	15-Sep-22	15-Sep-25	26 SATCHELL LANE	SOUTHAMPTON	Not Started	1	1	0
F/21/92172	FULL	26-Sep-22	26-Sep-25	56 NICHOL ROAD	EASTLEIGH	Not Started	1	1	0
F/22/92890	FULL	18-Oct-22	18-Oct-25	2A - 2B HIGH STREET	SOUTHAMPTON	Not Started	0	1	-1
F/22/93437	FULL	01-Nov-22	01-Nov-25	6 GROSVENOR ROAD	EASTLEIGH	Not Started	1	1	0
F/22/92482	FULL	09-Nov-22	09-Nov-25	SUNNYSIDE HEATH HOUSE LANE	SOUTHAMPTON	Not Started	1	1	0
F/22/93033	FULL	16-Aug-22	16-Aug-25	HILLSDALE HAMBLE LANE	SOUTHAMPTON	Commenced	1	0	1
PN/22/93927	PRIOR APPROVAL	24-Nov-22	24-Nov-25	22A SUMMERLANDS ROAD	EASTLEIGH	Not Started	1	0	1
C/22/92414	FULL	03-Jan-23	03-Jan-26	10 LAND ADJACENT TO CROWSPORT ESTATE	SOUTHAMPTON	Not Started	1	0	1

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APPLICATION REFERENCE	TYPE	DECISION DATE	EXPIRY DATE	ADDRESS	TOWN	STARTED	OUTSTANDING GAINS DWELLINGS	OUTSTANDING LOSSES DWELLINGS	NET OUTSTANDING DWELLINGS
F/22/93954	FULL	02-Feb-23	02-Feb-26	LONG GARDEN COTTAGE WINCHESTER ROAD	SOUTHAMPTON	Not Started	2	0	2
F/22/93758	FULL	08-Feb-23	08-Feb-26	ANTRIM BOTLEY ROAD	EASTLEIGH	Not Started	1	0	1
F/22/94204	FULL	15-Feb-23	15-Feb-26	THE BAYS UPPER NORTHAM DRIVE	SOUTHAMPTON	Not Started	2	1	1
F/22/94078	FULL	16-Feb-23	16-Feb-26	DROVES END 49 THE DROVE	SOUTHAMPTON	Not Started	2	1	1
F/21/90522	FULL	02-Mar-23	02-Mar-26	74 LEIGH ROAD	EASTLEIGH	Not Started	3	1	2
F/22/93356	FULL	04-May-23	04-May-26	59 POUND ROAD	SOUTHAMPTON	Not Started	1	0	1
F/23/94930	FULL	12-Jun-23	12-Jun-26	BARNCROFT FARM CLOSE	HAMBLE-LE-RICE	Not Started	1	0	1
F/23/95122	FULL	12-Jun-23	12-Jun-26	HANNS WAY CAR PARK LAND AT THE HANNS WAY	EASTLEIGH	Not Started	6	0	6
PN/23/94808	PRIOR APPROVAL	14-Jun-23	14-Jun-26	5A THE CENTRAL PRECINCT WINCHESTER ROAD	EASTLEIGH	Not Started	1	0	1
F/22/94044	FULL	21-Jun-23	21-Jun-26	242 LEIGH ROAD	EASTLEIGH	Not Started	1	0	1
F/23/94860	FULL	28-Jun-23	28-Jun-26	15 & 17 LAND AT LOWER NEW ROAD	EASTLEIGH	Not Started	2	0	2
F/23/95140	FULL	10-Jul-23	10-Jul-26	MONKS LAKE GRANGE ROAD	SOUTHAMPTON	Not Started	1	1	0
F/23/94918	FULL	03-Aug-23	03-Aug-26	VILLA CERVINO BOTLEY ROAD	EASTLEIGH	Not Started	1	1	0
F/22/93988	FULL	08-Aug-23	08-Aug-26	OAK LODGE BRIDGE ROAD	SOUTHAMPTON	Not Started	1	0	1
PN/23/95595	PRIOR APPROVAL	25-Aug-23	25-Aug-26	111 WINCHESTER ROAD	EASTLEIGH	Not Started	5	0	5
F/22/93781	FULL	31-Aug-23	31-Aug-26	HATTS COPSE FARM BROOK LANE	SOUTHAMPTON	Not Started	1	1	0
F/22/94435	FULL	11-Sep-23	11-Sep-26	MORTIMERS FARM MORTIMERS LANE	EASTLEIGH	Not Started	9	0	9
F/23/95151	FULL	19-Sep-23	19-Sep-26	THE BARN LAND REAR OF SAXON COURT BURNETTS LANE	HORTON HEATH	Not Started	1	0	1
F/23/94675	FULL	03-Oct-23	03-Oct-26	1 SOVEREIGN DRIVE	SOUTHAMPTON	Not Started	1	0	1
F/23/95155	FULL	05-Oct-23	05-Oct-26	52 LAND ADJACENT TO THE CROSSWAYS	EASTLEIGH	Not Started	1	0	1
F/23/94934	FULL	26-Oct-23	26-Oct-26	20 LAND ADJACENT TO STEELE CLOSE	CHANDLERS FORD	Not Started	1	0	1
PN/23/96241	PRIOR APPROVAL	23-Nov-23	23-Nov-26	33-34 VICTORIA ROAD	SOUTHAMPTON	Not Started	2	0	2
F/23/95415	FULL	07-Nov-23	07-Nov-26	107-109 LEIGH ROAD	EASTLEIGH	Commenced	2	0	2
F/23/95453	FULL	14-Dec-23	14-Dec-26	SITE OF RAMCREST LOWFORD HILL	BURSLEDON	Commenced	1	0	1
F/23/95753	FULL	08-Dec-23	08-Dec-26	KYPE VIEW 5 ALLINGTON LANE	EASTLEIGH	Not Started	1	0	1
F/23/96357	FULL	21-Dec-23	21-Dec-26	3 WHALESMEAD ROAD	EASTLEIGH	Not Started	1	0	1

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APPLICATION REFERENCE	TYPE	DECISION DATE	EXPIRY DATE	ADDRESS	TOWN	STARTED	OUTSTANDING GAINS DWELLINGS	OUTSTANDING LOSSES DWELLINGS	NET OUTSTANDING DWELLINGS
F/23/96301	FULL	04-Jan-24	04-Jan-27	18 CROWSPORT	SOUTHAMPTON	Not Started	1	1	0
F/23/95608	FULL	11-Jan-24	11-Jan-27	7 VALLEY ROAD	EASTLEIGH	Not Started	1	0	1
LDC/23/95675	CERT OF LAWFULNESS	03-Oct-23		420 SOUTHAMPTON ROAD	EASTLEIGH	Commenced	1	1	0
F/23/95592	FULL	17-Jan-24	17-Jan-27	54 LEIGH ROAD	EASTLEIGH	Not Started	3	1	2
F/23/96103	FULL	18-Jan-24	18-Jan-27	OAKFIELDS PARCEL OF LAND REAR OF	FAIR OAK	Not Started	8	0	8
F/23/96117	FULL	25-Jan-24	25-Jan-27	71 HIGH STREET	SOUTHAMPTON	Not Started	1	0	1
F/23/96266	FULL	05-Feb-24	05-Feb-27	NETLEY HILL FARM LAND TO THE SOUTH OF ST JOHNS ROAD	SOUTHAMPTON	Not Started	1	0	1
F/23/96419	FULL	08-Feb-24	08-Feb-27	WEST END COTTAGE SWAYTHLING ROAD	SOUTHAMPTON	Not Started	1	0	1
F/23/95242	FULL	16-Feb-24	16-Feb-27	10 FLAT CORONATION PARADE	SOUTHAMPTON	Not Started	0	1	-1
F/23/95533	FULL	16-Feb-24	16-Feb-27	17 SWAYTHLING ROAD	SOUTHAMPTON	Not Started	4	0	4
PN/23/96575	PRIOR APPROVAL	05-Mar-24	05-Mar-27	62 HIGH STREET	SOUTHAMPTON	Not Started	1	0	1
F/23/96022	FULL	07-Mar-24	07-Mar-27	25 HIGH STREET	SOUTHAMPTON	Not Started	1	0	1
F/22/93935	FULL	08-Mar-24	08-Mar-27	HILLTOP PINEWOOD PARK	SOUTHAMPTON	Not Started	0	1	-1
F/23/96368	FULL	13-Mar-24	13-Mar-27	59 LEIGH ROAD	EASTLEIGH	Not Started	3	0	3
F/24/96738	FULL	14-Mar-24	14-Mar-27	11 ST JOHNS CENTRE THE FLAT ST JOHNS ROAD	SOUTHAMPTON	Not Started	0	1	-1
F/24/96785	FULL	21-Mar-24	21-Mar-27	418 SOUTHAMPTON ROAD	EASTLEIGH	Not Started	1	1	0
F/24/96741	FULL	22-Mar-24	22-Mar-27	33-34 VICTORIA ROAD	SOUTHAMPTON	Not Started	2	1	1
PN/23/96620	PRIOR APPROVAL	28-Mar-24	28-Mar-27	111 WINCHESTER ROAD	EASTLEIGH	Not Started	6	0	6
LDC/23/95183	CERT OF LAWFULNESS	14-Jun-23		83A HIGH STREET	SOUTHAMPTON	Not Started	1	1	0
LDC/23/95186	CERT OF LAWFULNESS	03-Aug-23		25 OAK VALE	SOUTHAMPTON	Not Started	1	1	0
LDC/24/96745	CERT OF LAWFULNESS	06-Mar-24		380 SOUTHAMPTON ROAD	EASTLEIGH	Not Started	1	1	0
26357/005	FULL	19-Jan-05	19-Jan-10	NIGHTINGALE HOUSE VICTORIA ROAD	NETLEY ABBEY	Commenced	4	1	3
							177	35	142

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Large Site Commitments 1st April 2024

Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	Botley													
	Land north and east of Boorley Green, Winchester Road, Botley	O/12/71514 R/15/77595 R/16/79470 X/18/83548	1330	115	Reserved Matters	Under Construction	22	60	55	0	0	0	115	The site known as Boorley Park received Outline Planning Permission for 1,400 dwellings in November 2013. 70 of the 1,400 were originally for C2 sheltered elderly accommodation. An application for 67 dwellings replacing the C2 element has now been permitted and is shown separately in the next row (F/19/86233). There is a consortium of three developers for the site which comprises Bloor Homes, Bovis Homes and Linden Homes (Bovis Home and Linden Homes are now known as Vistry). The site has received Reserved Matters approval for (a) spine road and associated infrastructure (b) 441 dwellings and (c) 889 dwellings, with the most recent approved in October 2017. There were 91 dwellings under construction as of 1st April 2024, and the developer expects the outstanding 115 dwellings to be completed by December 2025.
	Land north and east of Boorley Green, Winchester Road, Botley	F/19/86233	67	67	Full Permission	Under Construction	0	50	17	0	0	0	67	The site forms the local centre of the wider Boorley Park development (Land north and east of Boorley Green, Winchester Road, Botley, see row above). The application is for mixed use retail and residential and is known as 'The Gateway' site. With Abri/Vistry delivering the residential element which will be all open market dwellings with a mixture of houses and flats. Full planning permission was granted on 27th May 2021. The site came forward in January 2023 and the developer is expecting the site to be completed by the end of March 2025. All 67 dwellings are currently under construction. A slightly more cautious approach has been taken, with 17 units moved into 2025/26. The existing dwelling on site along with employment units have all been demolished as part of this scheme.
	Land at Crows Nest Lane, Botley	O/16/78389 RM/18/83875	50	9	Reserved Matters	Under Construction	31	9	0	0	0	0	9	The site received Outline Planning Permission on 28th July 2017. The housebuilder is Foreman Homes. A reserved matters application was approved on 25th November 2019. The site is currently under construction with 41 completed dwellings, the remaining 9 are expected to be delivered in 2024/25.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	Land north west of Boorley Green, Winchester Road, Botley	O/15/75953RM/17/81628RM/18/84466X/19/84943RM/19/86658X/21/91994X/23/94736	680	487	Reserved Matters	Under Construction	168	100	100	100	100	87	487	The site received Outline Planning Permission following an appeal which was allowed in November 2016. The applicants were Gleeson Developments, Miller Homes & Welbeck Land. A Reserved Matters Application for 301 dwellings was approved on 16th January 2019 (RM/17/81628). Phase 2 (RM/18/84466) for 143 dwellings, was permitted on 9th April 2021, with a further Reserved Matters application approved on the 5th April 2022 for a further 236 dwellings in Phase 3 (RM/19/86658). The development called Boorley Gardens is being delivered by Miller Homes and Bellway Homes Wessex. With the site commencing in December 2020, with 25 dwellings having been recorded as completed in 2022/23, and 168 dwellings having been recorded as completed in 2023/24. With a further 156 dwellings recorded as under construction at the 1st April 2024.
	Land south of Maddoxford Lane, Boorley Green	O/16/79600 RM/19/84879 F/19/84937	73	73	Reserved Matters	Under Construction	0	44	29	0	0	0	73	The site received Outline Planning Permission on 29th March 2018 for 50 homes. The site was sold to Foreman Homes and a Reserved Matters Application was permitted on 2nd March 2021. Foreman Homes have subsequently gained Full permission (F/19/84937) for 73 dwellings on this site on 27th May 2022. The site commenced early 2024 with 28 dwellings currently under construction, and the developer is expecting the site to be completed by 2025/26.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
BO2	Land to the North and East of Winchester Street, Botley	O/18/83698	375	375	Outline Permission	24-Mar-26	0	0	0	0	0	26	26	The site is known as Botley Fields and is owned by Hampshire County Council and is allocated in Eastleigh Borough Council's Adopted Local Plan 2016- 2036. Outline permission was granted on 24th March 2022 following the signing of the Section 106 agreement. There are two discharge of conditions applications pending (DC/24/97105 and DC/24/97107). There is also a reserved matters application pending for the delivery of the biodiversity enhancement phase (RM/24/97106). The County Council has now purchased the previous third-party landowners' interest and is looking to present to the market an assembled site in a single (County Council) ownership. Design details for the remaining sections of the bypass and associated infrastructure – including noise bunds – is being progressed, along with negotiations with SSE in respect of the overhead power lines. Marketing for the entirety of the site is currently planned for late 2025/ early 2026. The Council is aware of two housing developers who are looking to purchase this site are currently in communication with the County Council. As a result, completions on site could begin in 2028/29.
	Bursledon													
	Land at Providence Hill, (rear of Oakeley Vale) Bursledon	O/17/81166R M/21/91772	92	92	Reserved Matters	Under construction	0	42	50	0	0	0	92	Outline planning permission was granted for 92 dwellings on 17th September 2021. Subsequently a reserved matters application for 92 dwellings was permitted on 14th March 2022, and the developer is expecting completions to begin on site in 2024/25, and for the site to be completed by the end of the following year.
	Bursledon Hall, Blundell Lane, Bursledon	PN/21/91216	16	16	Prior Approval	24-Sep-24	0	0	16	0	0	0	16	Prior approval was granted on 24th September 2021 for change of use from offices to 16 residential flats. 13 of the flats are within the main building (Bursledon Hall) whilst the remaining 3 flats are within outbuildings known as the 'Annexe' and 'Pavilion'.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	Eastleigh													
	North Stoneham Park, Chestnut Avenue, Eastleigh	O/15/76023 R/17/79892 RM/17/81168	1074	236	Reserved Matters	Under Construction	76	50	75	75	36	0	236	The site received Outline Planning Permission in January 2016 for 1,100 dwellings. The main developer is Highwood. Reserved Matters approval has subsequently been approved for two phases: Phase 1 - 560 dwellings Phase 2 - 514 dwellings. 109 units were completed in 2018/19, and a further 322 units have been completed in 2019/20. In 2020/21 a further 174 dwellings were completed. Followed by a further 123 dwellings in 2021/22. 2022/23 had 125 completions and 2023/24 had 76 completions. The area of the site known as 'Avenue Park' was completed in March 2023. With the final area of the site known as 'Heritage Place' being delivered by Bargate Homes, currently expected to complete in 2027/28.
	Former Eastleigh Post Office, 14 High Street, Eastleigh	F/20/89125	28	28	Full Permission	Under construction	0	28	0	0	0	0	28	The site is within Eastleigh Town Centre and is therefore within a sustainably located area. The site is being brought forward by Eastleigh Borough Council and involves promoting regeneration and change of a partly vacant brownfield site. The application was permitted on the 20th October 2022. With the site having commenced, and expectations that all flats to be completed in 2024/25.
	land at Toynbee Road	F/21/91686	105	105	Full Permission	Under construction	0	0	49	56	0	0	105	The site lies inside the urban edge in a highly accessible and sustainable location and has been identified as being suitable for redevelopment as part of the previous Local Plan and the latest Adopted Local Plan. Vivid and Foreman Homes are bringing forward this site for 105 dwellings. The site gained full planning permission on the 6th October 2022. The site has commenced, with first dwelling completions expected in 2025/26.
	Regal Buildings, Market Street	F/22/92939	18	18	Full Permission	Under construction	0	0	18	0	0	0	18	The site gained permission on 14th September 2023. Work is well underway on the scheme which is for a mixed use of 4 commercial units and 18 residential flats. The site is expected to complete in 2025/26.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	Fair Oak													
	Pembers Hill Farm, Mortimers Lane, Fair Oak	O/15/77190 RM/18/83278	242	8	Reserved Matters	Under Construction	35	8	0	0	0	0	8	The site received reserved matters on 28th November 2018 and work commenced on site in June 2019. The site has recorded 234 completions by 1st April 2024. The site is near completion, and the remaining 8 units are expected to complete in 2024/25.
	Treetops, Allington Lane, Fair Oak	F/21/91132	35	35	Full Permission	Under Construction	0	5	30	0	0	0	35	The application was permitted on 27th October 2022. Construction began on the site in 2024, with the developer expecting 5 completions by 31st of March 2025 and the remainder to be built out in 2025/26.
	Hedge End													
HE1	Land west of Woodhouse Lane	O/18/83634	605	605	Outline Permission	Material Start	0	0	0	0	44	78	122	The site known as Woodhouse Meadows is owned by Hampshire County Council and is allocated in Eastleigh Borough Council's Adopted Local Plan 2016- 2036. Application submitted 17th July (ref O/18/83634) with permission granted on 6th September 2019. Alongside the housing element significant infrastructure and servicing has now all been constructed. The first phase of the Botley bypass works has provided a widened carriageway as well as a shared footway/cycleway along Woodhouse Lane and support the Woodhouse Lane development to the west and provide improved access to the new Deer Park School which opened in September 2021. The site was previously withdrawn from the market due to prevailing market conditions but is now being brought to market with an updated marketing strategy. Looking to bring phases 1&2 to the market together in the Spring of 2025. With first completions estimated for 2027/28.
HE2	Land west and north of Waylands Place and Peewit Hill Close	F/17/80651	106	106	Full Permission	Material Start	0	0	25	52	29	0	106	The site received Full Planning Permission on 13th October 2017 and sits alongside Land at St Johns Road/Foord Road for 110 dwellings which has now been completed. The developer is Foreman Homes. The site is also known as St. Johns Phase 2. There have been a number of conditions discharged (DC/18/82328, DC/18/82434, DC/18/82751 and DC/21/89845). Works on site commenced in March 2021 and were signed off in April 2021. The application is now deemed to have been implemented, and the developer is expecting completions on site in 2025/26 with the site to be built out by 2027/28.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
BU2	Serenity, Heath House Lane, Hedge End	F/19/86829	122	40	Full Permission	Under Construction	67	40	0	0	0	0	40	An application was submitted on 11th November 2019 which was given a resolution to grant planning permission at Bursledon, Hamble and Hound Local Area Committee on 24th September 2020. Subsequently permission was granted on 8th September 2021. The development known as 'Hamblewood' had 67 completions in 2023/24 with the remaining 40 dwellings expected to complete in 2024/25.There is an existing house which has been demolished as part of the development, giving an overall net figure of 122 dwellings. The applicants are Bargate Homes and Vivid Homes.
	Horton Heath													
HH1	Land West of Horton Heath	F/20/89500	381	381	Full Permission	Under Construction	0	0	48	117	216	0	381	The site known as One Horton Heath gained a resolution to support in principle at Horton Heath Development Committee on 30th September 2021. The scheme is for a phased mixed-use development comprising up to 2,500 residential units; Local Centre comprising retail, leisure, community and employment uses. Plus, a Primary School and key infrastructure and utilities uses. This scheme looks to combine the two previous outline permissions, which were for a mixed-use development including up to 1,400 homes (O/14/75735 and O/16/79354) as well as including other areas. The outline application O/20/89498 for 2,500 dwellings is being brought forward at the same time as a Full application for the first 381 dwellings which was granted in December 2022 (F/20/89500). This part of the site is known as 'Lower Acre' and work has commenced on this area of the site with the Council expecting dwelling completions to begin on site in 2025/26, and for the site to be built out during 2027/28. This part of the site is separate to the resolution to permit element of the site O/20/89498.
	Netley													
	Land North of Grange Road, Netley Abbey	O/16/78014 RM/19/86186	89	89	Reserved Matters	Under construction	0	60	29	0	0	0	89	The site received Outline Planning Permission 8th January 2018. Reserved Matters has been submitted and were approved on 10th February 2020. Work commenced on this site in March 2023, and the developer is expecting 60 dwellings to be built by the end of March 2025, with the remaining 29 dwellings being completed in 2025/26.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	West End													
	Land at Botley Road, West End (Phase 2)	F/19/85439	29	30	Full Permission	Under construction	0	30	0	0	0	0	30	The application was initially submitted for 58 dwellings on a larger parcel of land. this has subsequently been amended to ensure a reptile area and reduce the number of dwellings to 30. The application for this site went to Hedge end, West End and Botley Local Area Committee on 28th September 2020. At the meeting, a resolution to grant full permission was given. The application was subsequently granted on 15th December 2021. The site commenced in January 2024 (along with the demolition of the existing dwelling) and the developer is expecting the site to be completed by the end of March 2025.
				2,915			399	526	541	400	425	191	2,083	

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Permissions Subject to Agreement 1st April 2024

Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Planning Status	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April Commentary
AL2	Land West of Allbrook Way, Knowle Hill	O/19/86980	52	Resolution to grant Outline permission	0	0	10	42	0	52	The application was subsequently considered at the meeting of the Eastleigh Local Area Committee on Tuesday 8th June 2021, after being deferred in March. At this meeting a resolution to grant outline planning permission was given. Due to the provision of a play area, minor changes to the proposed indicative layout have been required with the total number of units reducing from 53 to 52 and, whilst remaining at 35% provision, the number of affordable units has also reduced from 19 to 17. Permission is expected to be granted in the summer of 2024/25. With the reserved matters expected to be submitted soon after. The developer is expecting first housing delivery in 2026/27, subject to achieving the reserved matters consent, water monitoring, GCN clearance and archaeology.
HH1	Land West of Horton Heath	O/20/89498	2119	Resolution to support in principle outline permission	0	0	99	211	176	486	The site known as One Horton Heath gained a resolution to support in principle at Horton Heath Development Committee on 30th September 2021. The scheme is for a phased mixed-use development comprising up to 2,500 residential units; Local Centre comprising retail, leisure, community and employment uses. Plus, a Primary School and key infrastructure and utilities uses. This scheme looks to combine the two previous outline permissions, which were for a mixed-use development including up to 1,400 homes (O/14/75735 and O/16/79354) as well as including other areas. The outline application O/20/89498 for 2,500 dwellings is being brought forward at the same time as a Full application for the first 381 dwellings which was granted in December 2022 (F/20/89500) and known as 'Lower Acre' Under the existing permissions for the site, the delivery of part of the distributor road site has commenced with the construction of the Bubb Lane to Burnetts Lane stretch. The reserved matters application for the Quobleigh Breach phase for an expected 267 dwelling is expected in early 2025 following the expected granting of outline permission in early 2025. A reserved matters is also expected in 2025 for the Upper Acre phase for an expected 430 dwellings. This part of the site is separate to the Full planning permission part of the site F/20/89500.
			2171		0	0	109	253	176	538	

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C2 Commitments 1st April 2024

Local Plan Site Reference	Address	Application Reference	Total Net C2 Bedrooms	Equivalent Number of Dwellings	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April commentary
	North Stoneham Park, Chestnut Avenue	F/19/86946	114	60	Full Permission	Material Start	0	0	0	0	60	0	60	The site - which is linked to other developments in Stoneham Park - received permission on 14th September 2020. This part of the site is a joint application with Test Valley Borough Council for a Continuing Care Retirement Community (CCRC) Class C2 development consisting of 40 care bedrooms, providing both nursing and dementia care, 41 Care Suites offering fully supported living, 91 close care apartments. However, the total number of C2 units falling within Eastleigh Borough Council is 114 bedrooms which equates to 60 equivalent dwellings. Work has been delayed on this site due to a fire and the subsequent need for a further planning permission for a replacement coach house. However, it is still deemed reasonable that this site will be fully built out within five years.
	Moorhill, Moorhill Road	F/22/94034	70	36	Full Permission	Under Construction	0	0	36	0	0	0	36	This brownfield site was formally occupied by a large, detached dwelling. The dwelling was demolished following a fire in 2018. This full application (F/22/94034) for a 70-bed care home was granted permission on 3rd August 2023, with commencement happening soon after. The developer expects the site to be completed in 2025/26.
			184	96				0	36	0	60	0	96	

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Allocation Sites 1st April 2024

Local Plan Site Reference	Address	Total Net Dwellings	Planning Status	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April commentary
BO1	Land south of Maddoxford Lane and east of Crows Nest Lane	30	Allocated in Adopted Local Plan	0	0	0	30	0	30	The site is allocated in the Adopted Local Plan 2016-2036 for an estimated 30 dwellings. Pre-app enquiries have taken place and there is an expectation of a planning application being submitted towards the end of 2024.
BO3	Kings Copse Avenue, Botley	120	Allocated in Adopted Local Plan	0	0	0	15	80	95	The site is owned by Eastleigh Borough Council and is allocated in the Adopted Local Plan 2016- 2036. A pre-app is currently being worked on by the borough council and submission of an application is proposed for mid-2025. The site is expected to deliver 95 dwellings within the next 5 years.
BO4	Land north of Myrtle Cottage, Winchester Road	22	Allocated in Adopted Local Plan	0	0	0	22	0	22	The site is allocated in the Adopted Local Plan 2016-2036 for an estimated 22 dwellings.
BU1	Land north of Providence Hill	19	Allocated in Adopted Local Plan	0	0	0	19	0	19	The site is allocated in the Adopted Local Plan 2016-2036 for an estimated 19 dwellings. Pre-application discussions relating to proposed development of the site were completed in January 2024. With an application expected to be submitted during the Spring of 2024.
		191		0	0	0	86	80	166	

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EBC Housing Programme 1st April 2024

Address	Application Reference	Total Net Dwellings	Planning Status	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April Commentary
Land at 30-32 Queens View, Netley	Q/22/92640 - F/23/96224	18	Pre-application advice received	0	0	18	0	0	18	This site is in full EBC ownership with emerging redevelopment plans for an 18-unit residential scheme, subject to planning. This scheme has been approved for progress by the EBC Housing Programme Board (July 2022), with the planning application becoming valid in October 2023 and expectation for a decision to be made in October/November 2024. Assuming that permission is granted then the borough council are looking to appoint a principal contractor as soon as the decision has been determined and are aiming to commence the site in mid-February. With completions expected in the Summer of 2026.
Land at 237 Chamberlayne Road, Eastleigh	Q/21/90499	11	Pre-application advice received	0	0	0	11	0	11	This site is currently in full EBC ownership, but the Council are expected to take the site to auction. The site lies in the urban edge with policy support for redevelopment.
Land at Station Road (Arch Theatre), Chandlers Ford	Q/21/90496	17	Pre-application advice received	0	0	0	0	17	17	This site is in full EBC ownership with the expectation of the project being brought forward towards the end of 2026/27. With a two-year planning /build programme, based on the previous plans for 17 units. However, a conservative approach has been taken with completions being expected in 2028/29.
		46		0	0	18	11	17	46	

Draft

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Appendix 5: LPA Housing Land Supply Evidence – Botley Appeal (ref. O/23/96432 / PINS ref, 3350858)

Eastleigh Borough Council draft five year housing land supply calculation – base date 1st April 2024

Draft

Source of Supply	Number of Dwellings
Net Outstanding Permissions for small sites (1-9) units (discounted by 4% for Lapses)	136
Net Outstanding planning permissions for large sites (10 or more units)	2,083
Sites with a resolution to grant planning permission	538
Housing for Older People (C2) (Equivalent of)	96
Sites in Adopted Local Plan	166
Sites In Eastleigh Borough Council's Housing Programme (Pre-planning)	46
Windfall allowance for years 3, 4 and 5	162
Total expected supply for the period 1st July 2022 – 30th June 2027	3,227

Housing Requirement Figure in Adopted Local Plan: Dwellings per annum	729
2024-29	3,645
undersupply	-418
Supply in Years	**4.4**

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Small Site Commitments 1st April 2024

APPLICATION REFERENCE	TYPE	DECISION DATE	EXPIRY DATE	ADDRESS	TOWN	STARTED	OUTSTANDING GAINS DWELLINGS	OUTSTANDING LOSSES DWELLINGS	NET OUTSTANDING DWELLINGS
F/08/63689	FULL	11-Dec-08	11-Dec-11	STEWART HOUSE SYCAMORE AVENUE	EASTLEIGH	Commenced	3	0	3
F/09/64869	FULL	17-Jul-09	17-Jul-12	1 ADJ HILL PLACE	BURSLEDON	Commenced	1	0	1
F/11/68419	FULL	03-Oct-12	03-Oct-15	GLEN FARM STROUDWOOD LANE	LOWER UPHAM	Commenced	1	0	1
R/13/72928	DETAILS	18-Sep-13	18-Sep-15	116 REAR OF PARK ROAD	CHANDLERS FORD	Commenced	1	0	1
F/13/73761	FULL	29-Dec-14	29-Dec-17	38 HUNT AVENUE	NETLEY ABBEY	Commenced	2	0	2
F/15/76637	FULL	05-Oct-16	05-Oct-19	1 OAKMOUNT AVENUE	CHANDLERS FORD	Commenced	1	1	0
F/16/78096	FULL	09-Feb-17	09-Feb-20	MIDLANDS ESTATE	WEST END	Commenced	2	0	2
F/17/80188	FULL	08-Dec-17	01-May-21	86 REAR OF EDWARD AVENUE (ROEBUCK CLOSE)	BISHOPSTOKE	Commenced	5	0	5
F/18/82759	FULL	11-May-18	11-May-21	35 FALCON SQUARE	EASTLEIGH	Commenced	1	0	1
F/19/85935	FULL	12-May-21	12-May-24	32 VALLEY ROAD	EASTLEIGH	Commenced	1	0	1
F/19/86015	FULL	07-May-21	07-May-24	27 REAR OF SEAVIEW ESTATE	NETLEY ABBEY	Not Started	1	0	1
PN/20/87616	PRIOR APPROVAL	13-May-20	13-May-23	FIRST FLOOR 91 BOURNEMOUTH ROAD	EASTLEIGH	Commenced	1	0	1
F/20/87926	FULL	11-Feb-21	11-Feb-24	OAK LODGE BRIDGE ROAD	SOUTHAMPTON	Commenced	6	0	6
F/20/88045	FULL	30-Sep-20	30-Sep-23	190 SOUTHAMPTON ROAD	EASTLEIGH	Commenced	2	1	1
F/20/88114	FULL	24-May-21	24-May-24	CHALCOT YORK ROAD	SOUTHAMPTON	Not Started	1	1	0
F/21/90716	FULL	22-Jul-21	22-Jul-24	HALL LANDS FARM HALL LANDS LANE	EASTLEIGH	Not Started	1	1	0
F/20/88124	FULL	11-Nov-20	11-Nov-23	ALLINGTON MANOR FARM HOUSE ALLINGTON MANOR ALLINGTON LANE	SOUTHAMPTON	Commenced	1	1	0
F/20/88620	FULL	20-May-21	20-May-24	9 NICHOL ROAD	EASTLEIGH	Commenced	1	0	1
F/20/88658	FULL	08-Mar-21	08-Mar-24	HOLME FARM DURLEY ROAD	EASTLEIGH	Commenced	1	0	1
RM/20/88841	DETAILS	18-Mar-22	18-Mar-24	PINEWOOD PARK LAND ADJOINING	SOUTHAMPTON	Commenced	6	0	6
F/21/89882	FULL	11-Aug-21	11-Aug-24	THORNEYDOWN FARM MOORHILL ROAD	SOUTHAMPTON	Not Started	1	1	0
F/20/89336	FULL	26-Feb-21	26-Feb-24	44 BUILDERS YARD TO REAR OF TWYFORD ROAD	EASTLEIGH	Commenced	2	0	2
F/21/91336	FULL	11-Oct-21	11-Oct-24	69 LAKEWOOD ROAD	EASTLEIGH	Not Started	1	1	0
F/21/91371	FULL	11-Oct-21	11-Oct-24	WINTON BOTLEY ROAD	SOUTHAMPTON	Not Started	1	1	0

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APPLICATION REFERENCE	TYPE	DECISION DATE	EXPIRY DATE	ADDRESS	TOWN	STARTED	OUTSTANDING GAINS DWELLINGS	OUTSTANDING LOSSES DWELLINGS	NET OUTSTANDING DWELLINGS
F/20/89254	FULL	13-Oct-21	13-Oct-24	ROMANY WAY HEATH HOUSE LANE	SOUTHAMPTON	Not Started	1	0	1
F/21/89959	FULL	14-Oct-21	14-Oct-24	11 DEAN COURT	SOUTHAMPTON	Not Started	1	1	0
F/21/91298	FULL	03-Nov-21	03-Nov-24	46 STATION ROAD	SOUTHAMPTON	Not Started	1	0	1
F/21/90176	FULL	04-Nov-21	04-Nov-24	CROFT FARM WINCHESTER ROAD	EASTLEIGH	Not Started	1	0	1
F/21/91322	FULL	04-Nov-21	04-Nov-24	14 NICHOL ROAD	EASTLEIGH	Not Started	1	1	0
F/21/90585	FULL	10-Nov-21	10-Nov-24	3 KEBLE ROAD	EASTLEIGH	Not Started	1	0	1
F/21/89986	FULL	22-Dec-21	22-Dec-24	OAKFIELD LAND TO THE REAR OF BOTLEY ROAD	EASTLEIGH	Not Started	1	0	1
F/20/88079	FULL	24-Jan-22	24-Jan-25	82 LAND TO THE REAR OF ST JOHN'S ROAD	SOUTHAMPTON	Not Started	1	0	1
O/22/92300	O/L	17-Mar-22	17-Mar-25	2 LAKEWOOD CLOSE	EASTLEIGH	Not Started	1	1	0
F/21/91367	FULL	10-Feb-22	10-Feb-25	44 TWYFORD ROAD	EASTLEIGH	Commenced	3	0	3
PN/22/92315	PRIOR APPROVAL	25-Mar-22	25-Mar-25	COCKPIT FARM KNOWLE LANE	HORTON HEATH	Not Started	5	0	5
F/21/91532	FULL	01-Nov-21	01-Nov-24	7 SHAFTESBURY AVENUE	EASTLEIGH	Commenced	1	0	1
F/21/91590	FULL	21-Jan-22	21-Jan-25	NETLEY HILL FARM LAND SOUTH OF ST JOHN'S ROAD	SOUTHAMPTON	Commenced	1	0	1
F/22/92492	FULL	07-Apr-22	07-Apr-25	LEEWAY BURNETTS LANE	EASTLEIGH	Not Started	1	1	0
F/21/90245	FULL	22-Jun-22	22-Jun-25	192-194 LEIGH ROAD	EASTLEIGH	Not Started	9	0	9
PN/22/93015	PRIOR APPROVAL	19-Jul-22	19-Jul-25	25 SHAFTESBURY AVENUE	EASTLEIGH	Not Started	1	0	1
F/21/91726	FULL	11-Aug-22	11-Aug-25	HILL HAVEN WINCHESTER ROAD	EASTLEIGH	Not Started	2	0	2
F/22/92177	FULL	23-Aug-22	23-Aug-25	45 NEW ROAD	SOUTHAMPTON	Not Started	1	0	1
F/22/93217	FULL	15-Sep-22	15-Sep-25	26 SATCHELL LANE	SOUTHAMPTON	Not Started	1	1	0
F/21/92172	FULL	26-Sep-22	26-Sep-25	56 NICHOL ROAD	EASTLEIGH	Not Started	1	1	0
F/22/92890	FULL	18-Oct-22	18-Oct-25	2A - 2B HIGH STREET	SOUTHAMPTON	Not Started	0	1	-1
F/22/93437	FULL	01-Nov-22	01-Nov-25	6 GROSVENOR ROAD	EASTLEIGH	Not Started	1	1	0
F/22/92482	FULL	09-Nov-22	09-Nov-25	SUNNYSIDE HEATH HOUSE LANE	SOUTHAMPTON	Not Started	1	1	0
F/22/93033	FULL	16-Aug-22	16-Aug-25	HILLSDALE HAMBLE LANE	SOUTHAMPTON	Commenced	1	0	1
PN/22/93927	PRIOR APPROVAL	24-Nov-22	24-Nov-25	22A SUMMERLANDS ROAD	EASTLEIGH	Not Started	1	0	1
C/22/92414	FULL	03-Jan-23	03-Jan-26	10 LAND ADJACENT TO CROWSPORT ESTATE	SOUTHAMPTON	Not Started	1	0	1

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APPLICATION REFERENCE	TYPE	DECISION DATE	EXPIRY DATE	ADDRESS	TOWN	STARTED	OUTSTANDING GAINS DWELLINGS	OUTSTANDING LOSSES DWELLINGS	NET OUTSTANDING DWELLINGS
F/22/93954	FULL	02-Feb-23	02-Feb-26	LONG GARDEN COTTAGE WINCHESTER ROAD	SOUTHAMPTON	Not Started	2	0	2
F/22/93758	FULL	08-Feb-23	08-Feb-26	ANTRIM BOTLEY ROAD	EASTLEIGH	Not Started	1	0	1
F/22/94204	FULL	15-Feb-23	15-Feb-26	THE BAYS UPPER NORTHAM DRIVE	SOUTHAMPTON	Not Started	2	1	1
F/22/94078	FULL	16-Feb-23	16-Feb-26	DROVES END 49 THE DROVE	SOUTHAMPTON	Not Started	2	1	1
F/21/90522	FULL	02-Mar-23	02-Mar-26	74 LEIGH ROAD	EASTLEIGH	Not Started	3	1	2
F/22/93356	FULL	04-May-23	04-May-26	59 POUND ROAD	SOUTHAMPTON	Not Started	1	0	1
F/23/94930	FULL	12-Jun-23	12-Jun-26	BARNCROFT FARM CLOSE	HAMBLE-LE-RICE	Not Started	1	0	1
F/23/95122	FULL	12-Jun-23	12-Jun-26	HANNS WAY CAR PARK LAND AT THE HANNS WAY	EASTLEIGH	Not Started	6	0	6
PN/23/94808	PRIOR APPROVAL	14-Jun-23	14-Jun-26	5A THE CENTRAL PRECINCT WINCHESTER ROAD	EASTLEIGH	Not Started	1	0	1
F/22/94044	FULL	21-Jun-23	21-Jun-26	242 LEIGH ROAD	EASTLEIGH	Not Started	1	0	1
F/23/94860	FULL	28-Jun-23	28-Jun-26	15 & 17 LAND AT LOWER NEW ROAD	EASTLEIGH	Not Started	2	0	2
F/23/95140	FULL	10-Jul-23	10-Jul-26	MONKS LAKE GRANGE ROAD	SOUTHAMPTON	Not Started	1	1	0
F/23/94918	FULL	03-Aug-23	03-Aug-26	VILLA CERVINO BOTLEY ROAD	EASTLEIGH	Not Started	1	1	0
F/22/93988	FULL	08-Aug-23	08-Aug-26	OAK LODGE BRIDGE ROAD	SOUTHAMPTON	Not Started	1	0	1
PN/23/95595	PRIOR APPROVAL	25-Aug-23	25-Aug-26	111 WINCHESTER ROAD	EASTLEIGH	Not Started	5	0	5
F/22/93781	FULL	31-Aug-23	31-Aug-26	HATTS COPSE FARM BROOK LANE	SOUTHAMPTON	Not Started	1	1	0
F/22/94435	FULL	11-Sep-23	11-Sep-26	MORTIMERS FARM MORTIMERS LANE	EASTLEIGH	Not Started	9	0	9
F/23/95151	FULL	19-Sep-23	19-Sep-26	THE BARN LAND REAR OF SAXON COURT BURNETTS LANE	HORTON HEATH	Not Started	1	0	1
F/23/94675	FULL	03-Oct-23	03-Oct-26	1 SOVEREIGN DRIVE	SOUTHAMPTON	Not Started	1	0	1
F/23/95155	FULL	05-Oct-23	05-Oct-26	52 LAND ADJACENT TO THE CROSSWAYS	EASTLEIGH	Not Started	1	0	1
F/23/94934	FULL	26-Oct-23	26-Oct-26	20 LAND ADJACENT TO STEELE CLOSE	CHANDLERS FORD	Not Started	1	0	1
PN/23/96241	PRIOR APPROVAL	23-Nov-23	23-Nov-26	33-34 VICTORIA ROAD	SOUTHAMPTON	Not Started	2	0	2
F/23/95415	FULL	07-Nov-23	07-Nov-26	107-109 LEIGH ROAD	EASTLEIGH	Commenced	2	0	2
F/23/95453	FULL	14-Dec-23	14-Dec-26	SITE OF RAMCREST LOWFORD HILL	BURSLEDON	Commenced	1	0	1
F/23/95753	FULL	08-Dec-23	08-Dec-26	KYPE VIEW 5 ALLINGTON LANE	EASTLEIGH	Not Started	1	0	1
F/23/96357	FULL	21-Dec-23	21-Dec-26	3 WHALESMEAD ROAD	EASTLEIGH	Not Started	1	0	1

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APPLICATION REFERENCE	TYPE	DECISION DATE	EXPIRY DATE	ADDRESS	TOWN	STARTED	OUTSTANDING GAINS DWELLINGS	OUTSTANDING LOSSES DWELLINGS	NET OUTSTANDING DWELLINGS
F/23/96301	FULL	04-Jan-24	04-Jan-27	18 CROWSPORT	SOUTHAMPTON	Not Started	1	1	0
F/23/95608	FULL	11-Jan-24	11-Jan-27	7 VALLEY ROAD	EASTLEIGH	Not Started	1	0	1
LDC/23/95675	CERT OF LAWFULNESS	03-Oct-23		420 SOUTHAMPTON ROAD	EASTLEIGH	Commenced	1	1	0
F/23/95592	FULL	17-Jan-24	17-Jan-27	54 LEIGH ROAD	EASTLEIGH	Not Started	3	1	2
F/23/96103	FULL	18-Jan-24	18-Jan-27	OAKFIELDS PARCEL OF LAND REAR OF	FAIR OAK	Not Started	8	0	8
F/23/96117	FULL	25-Jan-24	25-Jan-27	71 HIGH STREET	SOUTHAMPTON	Not Started	1	0	1
F/23/96266	FULL	05-Feb-24	05-Feb-27	NETLEY HILL FARM LAND TO THE SOUTH OF ST JOHNS ROAD	SOUTHAMPTON	Not Started	1	0	1
F/23/96419	FULL	08-Feb-24	08-Feb-27	WEST END COTTAGE SWAYTHLING ROAD	SOUTHAMPTON	Not Started	1	0	1
F/23/95242	FULL	16-Feb-24	16-Feb-27	10 FLAT CORONATION PARADE	SOUTHAMPTON	Not Started	0	1	-1
F/23/95533	FULL	16-Feb-24	16-Feb-27	17 SWAYTHLING ROAD	SOUTHAMPTON	Not Started	4	0	4
PN/23/96575	PRIOR APPROVAL	05-Mar-24	05-Mar-27	62 HIGH STREET	SOUTHAMPTON	Not Started	1	0	1
F/23/96022	FULL	07-Mar-24	07-Mar-27	25 HIGH STREET	SOUTHAMPTON	Not Started	1	0	1
F/22/93935	FULL	08-Mar-24	08-Mar-27	HILLTOP PINEWOOD PARK	SOUTHAMPTON	Not Started	0	1	-1
F/23/96368	FULL	13-Mar-24	13-Mar-27	59 LEIGH ROAD	EASTLEIGH	Not Started	3	0	3
F/24/96738	FULL	14-Mar-24	14-Mar-27	11 ST JOHNS CENTRE THE FLAT ST JOHNS ROAD	SOUTHAMPTON	Not Started	0	1	-1
F/24/96785	FULL	21-Mar-24	21-Mar-27	418 SOUTHAMPTON ROAD	EASTLEIGH	Not Started	1	1	0
F/24/96741	FULL	22-Mar-24	22-Mar-27	33-34 VICTORIA ROAD	SOUTHAMPTON	Not Started	2	1	1
PN/23/96620	PRIOR APPROVAL	28-Mar-24	28-Mar-27	111 WINCHESTER ROAD	EASTLEIGH	Not Started	6	0	6
LDC/23/95183	CERT OF LAWFULNESS	14-Jun-23		83A HIGH STREET	SOUTHAMPTON	Not Started	1	1	0
LDC/23/95186	CERT OF LAWFULNESS	03-Aug-23		25 OAK VALE	SOUTHAMPTON	Not Started	1	1	0
LDC/24/96745	CERT OF LAWFULNESS	06-Mar-24		380 SOUTHAMPTON ROAD	EASTLEIGH	Not Started	1	1	0
26357/005	FULL	19-Jan-05	19-Jan-10	NIGHTINGALE HOUSE VICTORIA ROAD	NETLEY ABBEY	Commenced	4	1	3
							177	35	142

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Large Site Commitments 1st April 2024

Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	Botley													
	Land north and east of Boorley Green, Winchester Road, Botley	O/12/71514 R/15/77595 R/16/79470 X/18/83548	1330	115	Reserved Matters	Under Construction	22	60	55	0	0	0	115	The site known as Boorley Park received Outline Planning Permission for 1,400 dwellings in November 2013. 70 of the 1,400 were originally for C2 sheltered elderly accommodation. An application for 67 dwellings replacing the C2 element has now been permitted and is shown separately in the next row (F/19/86233). There is a consortium of three developers for the site which comprises Bloor Homes, Bovis Homes and Linden Homes (Bovis Home and Linden Homes are now known as Vistry). The site has received Reserved Matters approval for (a) spine road and associated infrastructure (b) 441 dwellings and (c) 889 dwellings, with the most recent approved in October 2017. There were 91 dwellings under construction as of 1st April 2024, and the developer expects the outstanding 115 dwellings to be completed by December 2025.
	Land north and east of Boorley Green, Winchester Road, Botley	F/19/86233	67	67	Full Permission	Under Construction	0	50	17	0	0	0	67	The site forms the local centre of the wider Boorley Park development (Land north and east of Boorley Green, Winchester Road, Botley, see row above). The application is for mixed use retail and residential and is known as 'The Gateway' site. With Abri/Vistry delivering the residential element which will be all open market dwellings with a mixture of houses and flats. Full planning permission was granted on 27th May 2021. The site came forward in January 2023 and the developer is expecting the site to be completed by the end of March 2025. All 67 dwellings are currently under construction. A slightly more cautious approach has been taken, with 17 units moved into 2025/26. The existing dwelling on site along with employment units have all been demolished as part of this scheme.
	Land at Crows Nest Lane, Botley	O/16/78389 RM/18/83875	50	9	Reserved Matters	Under Construction	31	9	0	0	0	0	9	The site received Outline Planning Permission on 28th July 2017. The housebuilder is Foreman Homes. A reserved matters application was approved on 25th November 2019. The site is currently under construction with 41 completed dwellings, the remaining 9 are expected to be delivered in 2024/25.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	Land north west of Boorley Green, Winchester Road, Botley	O/15/75953RM/17/81628RM/18/84466X/19/84943RM/19/86658X/21/91994X/23/94736	680	487	Reserved Matters	Under Construction	168	100	100	100	100	87	487	The site received Outline Planning Permission following an appeal which was allowed in November 2016. The applicants were Gleeson Developments, Miller Homes & Welbeck Land. A Reserved Matters Application for 301 dwellings was approved on 16th January 2019 (RM/17/81628). Phase 2 (RM/18/84466) for 143 dwellings, was permitted on 9th April 2021, with a further Reserved Matters application approved on the 5th April 2022 for a further 236 dwellings in Phase 3 (RM/19/86658). The development called Boorley Gardens is being delivered by Miller Homes and Bellway Homes Wessex. With the site commencing in December 2020, with 25 dwellings having been recorded as completed in 2022/23, and 168 dwellings having been recorded as completed in 2023/24. With a further 156 dwellings recorded as under construction at the 1st April 2024.
	Land south of Maddoxford Lane, Boorley Green	O/16/79600 RM/19/84879 F/19/84937	73	73	Reserved Matters	Under Construction	0	44	29	0	0	0	73	The site received Outline Planning Permission on 29th March 2018 for 50 homes. The site was sold to Foreman Homes and a Reserved Matters Application was permitted on 2nd March 2021. Foreman Homes have subsequently gained Full permission (F/19/84937) for 73 dwellings on this site on 27th May 2022. The site commenced early 2024 with 28 dwellings currently under construction, and the developer is expecting the site to be completed by 2025/26.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
BO2	Land to the North and East of Winchester Street, Botley	O/18/83698	375	375	Outline Permission	24-Mar-26	0	0	0	0	0	26	26	The site is known as Botley Fields and is owned by Hampshire County Council and is allocated in Eastleigh Borough Council's Adopted Local Plan 2016- 2036. Outline permission was granted on 24th March 2022 following the signing of the Section 106 agreement. There are two discharge of conditions applications pending (DC/24/97105 and DC/24/97107). There is also a reserved matters application pending for the delivery of the biodiversity enhancement phase (RM/24/97106). The County Council has now purchased the previous third-party landowners' interest and is looking to present to the market an assembled site in a single (County Council) ownership. Design details for the remaining sections of the bypass and associated infrastructure – including noise bunds – is being progressed, along with negotiations with SSE in respect of the overhead power lines. Marketing for the entirety of the site is currently planned for late 2025/ early 2026. The Council is aware of two housing developers who are looking to purchase this site are currently in communication with the County Council. As a result, completions on site could begin in 2028/29.
	Bursledon													
	Land at Providence Hill, (rear of Oakeley Vale) Bursledon	O/17/81166R M/21/91772	92	92	Reserved Matters	Under construction	0	42	50	0	0	0	92	Outline planning permission was granted for 92 dwellings on 17th September 2021. Subsequently a reserved matters application for 92 dwellings was permitted on 14th March 2022, and the developer is expecting completions to begin on site in 2024/25, and for the site to be completed by the end of the following year.
	Bursledon Hall, Blundell Lane, Bursledon	PN/21/91216	16	16	Prior Approval	24-Sep-24	0	0	16	0	0	0	16	Prior approval was granted on 24th September 2021 for change of use from offices to 16 residential flats. 13 of the flats are within the main building (Bursledon Hall) whilst the remaining 3 flats are within outbuildings known as the 'Annexe' and 'Pavilion'.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	Eastleigh													
	North Stoneham Park, Chestnut Avenue, Eastleigh	O/15/76023 R/17/79892 RM/17/81168	1074	236	Reserved Matters	Under Construction	76	50	75	75	36	0	236	The site received Outline Planning Permission in January 2016 for 1,100 dwellings. The main developer is Highwood. Reserved Matters approval has subsequently been approved for two phases: Phase 1 - 560 dwellings Phase 2 - 514 dwellings. 109 units were completed in 2018/19, and a further 322 units have been completed in 2019/20. In 2020/21 a further 174 dwellings were completed. Followed by a further 123 dwellings in 2021/22. 2022/23 had 125 completions and 2023/24 had 76 completions. The area of the site known as 'Avenue Park' was completed in March 2023. With the final area of the site known as 'Heritage Place' being delivered by Bargate Homes, currently expected to complete in 2027/28.
	Former Eastleigh Post Office, 14 High Street, Eastleigh	F/20/89125	28	28	Full Permission	Under construction	0	28	0	0	0	0	28	The site is within Eastleigh Town Centre and is therefore within a sustainably located area. The site is being brought forward by Eastleigh Borough Council and involves promoting regeneration and change of a partly vacant brownfield site. The application was permitted on the 20th October 2022. With the site having commenced, and expectations that all flats to be completed in 2024/25.
	land at Toynbee Road	F/21/91686	105	105	Full Permission	Under construction	0	0	49	56	0	0	105	The site lies inside the urban edge in a highly accessible and sustainable location and has been identified as being suitable for redevelopment as part of the previous Local Plan and the latest Adopted Local Plan. Vivid and Foreman Homes are bringing forward this site for 105 dwellings. The site gained full planning permission on the 6th October 2022. The site has commenced, with first dwelling completions expected in 2025/26.
	Regal Buildings, Market Street	F/22/92939	18	18	Full Permission	Under construction	0	0	18	0	0	0	18	The site gained permission on 14th September 2023. Work is well underway on the scheme which is for a mixed use of 4 commercial units and 18 residential flats. The site is expected to complete in 2025/26.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	Fair Oak													
	Pembers Hill Farm, Mortimers Lane, Fair Oak	O/15/77190 RM/18/83278	242	8	Reserved Matters	Under Construction	35	8	0	0	0	0	8	The site received reserved matters on 28th November 2018 and work commenced on site in June 2019. The site has recorded 234 completions by 1st April 2024. The site is near completion, and the remaining 8 units are expected to complete in 2024/25.
	Treetops, Allington Lane, Fair Oak	F/21/91132	35	35	Full Permission	Under Construction	0	5	30	0	0	0	35	The application was permitted on 27th October 2022. Construction began on the site in 2024, with the developer expecting 5 completions by 31st of March 2025 and the remainder to be built out in 2025/26.
	Hedge End													
HE1	Land west of Woodhouse Lane	O/18/83634	605	605	Outline Permission	Material Start	0	0	0	0	44	78	122	The site known as Woodhouse Meadows is owned by Hampshire County Council and is allocated in Eastleigh Borough Council's Adopted Local Plan 2016- 2036. Application submitted 17th July (ref O/18/83634) with permission granted on 6th September 2019. Alongside the housing element significant infrastructure and servicing has now all been constructed. The first phase of the Botley bypass works has provided a widened carriageway as well as a shared footway/cycleway along Woodhouse Lane and support the Woodhouse Lane development to the west and provide improved access to the new Deer Park School which opened in September 2021. The site was previously withdrawn from the market due to prevailing market conditions but is now being brought to market with an updated marketing strategy. Looking to bring phases 1&2 to the market together in the Spring of 2025. With first completions estimated for 2027/28.
HE2	Land west and north of Waylands Place and Peewit Hill Close	F/17/80651	106	106	Full Permission	Material Start	0	0	25	52	29	0	106	The site received Full Planning Permission on 13th October 2017 and sits alongside Land at St Johns Road/Foord Road for 110 dwellings which has now been completed. The developer is Foreman Homes. The site is also known as St. Johns Phase 2. There have been a number of conditions discharged (DC/18/82328, DC/18/82434, DC/18/82751 and DC/21/89845). Works on site commenced in March 2021 and were signed off in April 2021. The application is now deemed to have been implemented, and the developer is expecting completions on site in 2025/26 with the site to be built out by 2027/28.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
BU2	Serenity, Heath House Lane, Hedge End	F/19/86829	122	40	Full Permission	Under Construction	67	40	0	0	0	0	40	An application was submitted on 11th November 2019 which was given a resolution to grant planning permission at Bursledon, Hamble and Hound Local Area Committee on 24th September 2020. Subsequently permission was granted on 8th September 2021. The development known as 'Hamblewood' had 67 completions in 2023/24 with the remaining 40 dwellings expected to complete in 2024/25.There is an existing house which has been demolished as part of the development, giving an overall net figure of 122 dwellings. The applicants are Bargate Homes and Vivid Homes.
	Horton Heath													
HH1	Land West of Horton Heath	F/20/89500	381	381	Full Permission	Under Construction	0	0	48	117	216	0	381	The site known as One Horton Heath gained a resolution to support in principle at Horton Heath Development Committee on 30th September 2021. The scheme is for a phased mixed-use development comprising up to 2,500 residential units; Local Centre comprising retail, leisure, community and employment uses. Plus, a Primary School and key infrastructure and utilities uses. This scheme looks to combine the two previous outline permissions, which were for a mixed-use development including up to 1,400 homes (O/14/75735 and O/16/79354) as well as including other areas. The outline application O/20/89498 for 2,500 dwellings is being brought forward at the same time as a Full application for the first 381 dwellings which was granted in December 2022 (F/20/89500). This part of the site is known as 'Lower Acre' and work has commenced on this area of the site with the Council expecting dwelling completions to begin on site in 2025/26, and for the site to be built out during 2027/28. This part of the site is separate to the resolution to permit element of the site O/20/89498.
	Netley													
	Land North of Grange Road, Netley Abbey	O/16/78014 RM/19/86186	89	89	Reserved Matters	Under construction	0	60	29	0	0	0	89	The site received Outline Planning Permission 8th January 2018. Reserved Matters has been submitted and were approved on 10th February 2020. Work commenced on this site in March 2023, and the developer is expecting 60 dwellings to be built by the end of March 2025, with the remaining 29 dwellings being completed in 2025/26.

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Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Net Outstanding April 2024	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April 2024 Commentary
	West End													
	Land at Botley Road, West End (Phase 2)	F/19/85439	29	30	Full Permission	Under construction	0	30	0	0	0	0	30	The application was initially submitted for 58 dwellings on a larger parcel of land. this has subsequently been amended to ensure a reptile area and reduce the number of dwellings to 30. The application for this site went to Hedge end, West End and Botley Local Area Committee on 28th September 2020. At the meeting, a resolution to grant full permission was given. The application was subsequently granted on 15th December 2021. The site commenced in January 2024 (along with the demolition of the existing dwelling) and the developer is expecting the site to be completed by the end of March 2025.
				2,915			399	526	541	400	425	191	2,083	

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Permissions Subject to Agreement 1st April 2024

Local Plan Site Reference	Address	Application Reference	Total Net Dwellings	Planning Status	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April Commentary
AL2	Land West of Allbrook Way, Knowle Hill	O/19/86980	52	Resolution to grant Outline permission	0	0	10	42	0	52	The application was subsequently considered at the meeting of the Eastleigh Local Area Committee on Tuesday 8th June 2021, after being deferred in March. At this meeting a resolution to grant outline planning permission was given. Due to the provision of a play area, minor changes to the proposed indicative layout have been required with the total number of units reducing from 53 to 52 and, whilst remaining at 35% provision, the number of affordable units has also reduced from 19 to 17. Permission is expected to be granted in the summer of 2024/25. With the reserved matters expected to be submitted soon after. The developer is expecting first housing delivery in 2026/27, subject to achieving the reserved matters consent, water monitoring, GCN clearance and archaeology.
HH1	Land West of Horton Heath	O/20/89498	2119	Resolution to support in principle outline permission	0	0	99	211	176	486	The site known as One Horton Heath gained a resolution to support in principle at Horton Heath Development Committee on 30th September 2021. The scheme is for a phased mixed-use development comprising up to 2,500 residential units; Local Centre comprising retail, leisure, community and employment uses. Plus, a Primary School and key infrastructure and utilities uses. This scheme looks to combine the two previous outline permissions, which were for a mixed-use development including up to 1,400 homes (O/14/75735 and O/16/79354) as well as including other areas. The outline application O/20/89498 for 2,500 dwellings is being brought forward at the same time as a Full application for the first 381 dwellings which was granted in December 2022 (F/20/89500) and known as 'Lower Acre' Under the existing permissions for the site, the delivery of part of the distributor road site has commenced with the construction of the Bubb Lane to Burnetts Lane stretch. The reserved matters application for the Quobleigh Breach phase for an expected 267 dwelling is expected in early 2025 following the expected granting of outline permission in early 2025. A reserved matters is also expected in 2025 for the Upper Acre phase for an expected 430 dwellings. This part of the site is separate to the Full planning permission part of the site F/20/89500.
			2171		0	0	109	253	176	538	

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C2 Commitments 1st April 2024

Local Plan Site Reference	Address	Application Reference	Total Net C2 Bedrooms	Equivalent Number of Dwellings	Planning Status	Planning Permission Expiry	Completions April 2023-March 2024	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April commentary
	North Stoneham Park, Chestnut Avenue	F/19/86946	114	60	Full Permission	Material Start	0	0	0	0	60	0	60	The site - which is linked to other developments in Stoneham Park - received permission on 14th September 2020. This part of the site is a joint application with Test Valley Borough Council for a Continuing Care Retirement Community (CCRC) Class C2 development consisting of 40 care bedrooms, providing both nursing and dementia care, 41 Care Suites offering fully supported living, 91 close care apartments. However, the total number of C2 units falling within Eastleigh Borough Council is 114 bedrooms which equates to 60 equivalent dwellings. Work has been delayed on this site due to a fire and the subsequent need for a further planning permission for a replacement coach house. However, it is still deemed reasonable that this site will be fully built out within five years.
	Moorhill, Moorhill Road	F/22/94034	70	36	Full Permission	Under Construction	0	0	36	0	0	0	36	This brownfield site was formally occupied by a large, detached dwelling. The dwelling was demolished following a fire in 2018. This full application (F/22/94034) for a 70-bed care home was granted permission on 3rd August 2023, with commencement happening soon after. The developer expects the site to be completed in 2025/26.
			184	96				0	36	0	60	0	96	

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Allocation Sites 1st April 2024

Local Plan Site Reference	Address	Total Net Dwellings	Planning Status	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April commentary
BO1	Land south of Maddoxford Lane and east of Crows Nest Lane	30	Allocated in Adopted Local Plan	0	0	0	30	0	30	The site is allocated in the Adopted Local Plan 2016-2036 for an estimated 30 dwellings. Pre-app enquiries have taken place and there is an expectation of a planning application being submitted towards the end of 2024.
BO3	Kings Copse Avenue, Botley	120	Allocated in Adopted Local Plan	0	0	0	15	80	95	The site is owned by Eastleigh Borough Council and is allocated in the Adopted Local Plan 2016- 2036. A pre-app is currently being worked on by the borough council and submission of an application is proposed for mid-2025. The site is expected to deliver 95 dwellings within the next 5 years.
BO4	Land north of Myrtle Cottage, Winchester Road	22	Allocated in Adopted Local Plan	0	0	0	22	0	22	The site is allocated in the Adopted Local Plan 2016-2036 for an estimated 22 dwellings.
BU1	Land north of Providence Hill	19	Allocated in Adopted Local Plan	0	0	0	19	0	19	The site is allocated in the Adopted Local Plan 2016-2036 for an estimated 19 dwellings. Pre-application discussions relating to proposed development of the site were completed in January 2024. With an application expected to be submitted during the Spring of 2024.
		191		0	0	0	86	80	166	

Draft

EBC Housing Programme 1st April 2024

Address	Application Reference	Total Net Dwellings	Planning Status	24/25	25/26	26/27	27/28	28/29	5 Year Supply	1st April Commentary
Land at 30-32 Queens View, Netley	Q/22/92640 - F/23/96224	18	Pre-application advice received	0	0	18	0	0	18	This site is in full EBC ownership with emerging redevelopment plans for an 18-unit residential scheme, subject to planning. This scheme has been approved for progress by the EBC Housing Programme Board (July 2022), with the planning application becoming valid in October 2023 and expectation for a decision to be made in October/November 2024. Assuming that permission is granted then the borough council are looking to appoint a principal contractor as soon as the decision has been determined and are aiming to commence the site in mid-February. With completions expected in the Summer of 2026.
Land at 237 Chamberlayne Road, Eastleigh	Q/21/90499	11	Pre-application advice received	0	0	0	11	0	11	This site is currently in full EBC ownership, but the Council are expected to take the site to auction. The site lies in the urban edge with policy support for redevelopment.
Land at Station Road (Arch Theatre), Chandlers Ford	Q/21/90496	17	Pre-application advice received	0	0	0	0	17	17	This site is in full EBC ownership with the expectation of the project being brought forward towards the end of 2026/27. With a two-year planning /build programme, based on the previous plans for 17 units. However, a conservative approach has been taken with completions being expected in 2028/29.
		46		0	0	18	11	17	46	

Draft

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Appendix 6: Botley Appeal (ref. O/23/96432 / PINS ref. 3350858) - Statement of Common Ground (Housing Land Supply)

The Planning Inspectorate

STATEMENT OF COMMON GROUND - Housing Land Supply

APPEAL REFERENCE: APP/W1715/W/24/3350858

DATE OF HEARING: 11th December 2024

SITE ADDRESS AND DESCRIPTION OF THE DEVELOPMENT

ADDRESS: Land off Cobbett Way, Botley, SO30 2ET (the 'Appeal Site')

Outline application for residential development of up to 34 dwellings and associated infrastructure (access only to be considered).

APPELLANT: Mulberry Investment Pension Scheme (the 'Appellant')

LOCAL PLANNING AUTHORITY: Eastleigh Borough Council (the 'Council' / 'LPA' / 'EBC')

PLANNING APPLICATION REFERENCE: O/23/96432 (the 'Application')
This statement addresses the following areas of common ground:

1. Matters In Agreement
2. Matters of Disagreement - Disputed Sites
3. Parties' Cases for the Extent of Deliverable Supply
4. Affordable Housing
5. Proposed Changes to National Policy and Inclusion of 5% Buffer

This final version of the SoCG is jointly agreed by:

Signed [redacted] **Date** 5 December 2024

Nick Parker
Planning Manager for Eastleigh Borough Council Planning Department

Signed [redacted] **Date** 5 December 2024

Jonathan Goodall
Director (SPRU), DLP Planning Limited On behalf of the Appellant

1. Matters In Agreement

1.1 This SoCG refers only to matters concerned with the housing requirement and Five Year housing land supply position ('the 5YHLS'). A separate SoCG covering all other planning matters was submitted on 21 October 2024. This included a summary of the background, site location and proposal.

Base Date and Five-Year Period

1.2 The Council's most recent assessment of the 5YHLS is provided in evidence exchanged with the Appellant and Inspector on 21 November 2024. This has been updated and submitted as additional evidence applicable to this Appeal and the base date of the 5YHLS assessment is confirmed as 1st April 2024, and the five-year period runs to 31st March 2029.

1.3 This is agreed between parties.

The Housing Requirement and Provision in Adopted Strategic Policies

1.4 It is agreed that the Eastleigh Local Plan (adopted April 2022) sets the housing requirement for 729 dwellings per annum for the period 2016-2036 (14,580 dwellings), which is the basis for calculating the 5YHLS. The parties agree that, for this appeal, this figure applies for the purposes of the NPPF(Dec)2023 paragraph 77 and footnote 42 with the adopted plan being less than 5 years old.

1.5 The parties further agree that the adopted Local Plan identifies provision for only 11,966 dwellings (ave. 598dpa), comprising a forecast shortfall of -2,614 dwellings against the adopted housing requirement in 2036. The parties agree that paragraph 4.12 of the adopted Local Plan commits the Council to commence an update of the Local Plan within 1 year of its adoption and this reflects that shortfall against Local Plan expectations should not occur until later in the plan period.

1.6 The parties agree that the Council's Cabinet confirmed commencement of the Review in its Committee Meeting of 15 June 2023 and that the Local Development Scheme adopted June 2023 anticipates consultation on Issues and Options in Autumn 2024 (which subsequently commenced on 4 December 2024) and adoption of the new Local Plan in Spring 2029. The parties further agree that no weight can currently be given to the contents of the emerging Local Plan Review.

Housing Delivery Test

1.7 It is agreed that the latest (2022) Housing Delivery Test (HDT) result for Eastleigh (published on 19 December 2023) is 156%.

1.8 It is agreed that the published HDT calculates the number of homes required and number of homes delivered for Eastleigh as the relevant plan-making authority in accordance with the HDT Rule Book.

	Number of Homes Required				Number of Homes Delivered				HDT %
	2019-20	2020-21	2021-22	Total	2019-20	2020-21	2021-22	Total	
Eastleigh	658	462	675	1,795	1,223	865	707	2,795	156%

The Requirement to Assess Deliverable Supply

1.9 The parties agree that the most recent version of the National Planning Policy Framework was published in December 2023 (19 December amended 20 December) ('NPPF(Dec)2023').

1.10 The parties agree that the provisions of paragraph 76 of the NPPF (December 2023) are not engaged for the purposes of this appeal, and that in accordance with the requirements of paragraph 77, the local authority is required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years worth of housing.

Buffer Requirement

1.11 It is agreed that no buffer applies under paragraph 77 of the December 2023 version of the NPPF, as the HDT results indicate that housing delivery has exceeded 85% over the previous three years.

Measurement of Performance Against the Adopted Requirement

1.12 The parties agree that the housing requirement in adopted strategic policies is an annual average. The parties further agree that performance against the expectations of the local plan is measured annually against the adopted housing requirement.

1.13 The parties agree that additional supply can be used to offset any shortfalls against requirements from previous years (ID: 68-032-20190722). The parties further agree that the minimum five-year requirement is not adjusted for any 'oversupply' calculated against the cumulative requirement in the plan period to date.

Relevance to the Parties' Cases for Decision-Taking

1.14 The parties agree that in accordance with the draft calculations provided for the Appeal and submitted by the LPA on 21 November 2024, the local planning authority cannot demonstrate a sufficient supply of deliverable sites to satisfy the minimum five-year requirement at 1 April 2024. While the extent of the shortfall is not agreed, the provisions set out in footnote 8 and paragraph 11(d) of the NPPF are engaged for the determination of the appeal.

1.15 While the list of policies most important for determining the Appeal is not agreed, it is agreed that strategic policies relating to the supply of housing (specifically Policy S2 (Approach to new development) and Policy S3 (Location of New Housing)) are rendered out-of-date as a result of the failure to satisfy the minimum five-year requirement. While the resultant weight to be applied to out of date policies is not agreed, it is agreed that the weight to be applied to them is reduced.

2. Matters of Disagreement

Disputed Sites

2.1 Further to the information exchanged and relied upon by the Council the assessment of deliverable supply from the following sites as shown in **Table SOCG 2.1** is disputed.

2.2 The Council's evidence for these sites is contained in the documents provided and relied upon for the Appeal by the LPA on 21 November 2024, comprising the Draft 5 Year Housing Land Supply calculation, the letter in response to the Appellant's Case, and the letter responding to queries about One Horton Heath.

2.3 The Appellant's position on these sites will be provided in its Addendum Land Supply Hearing Statement dated 6 December 2024.

Table SOCG 2.1 Disputed Sites

	Component	LPA ref:	Address	Capacity (Net)	LPA 5YHLS	Appellants' 5YHLS	Diff.
A	FULL	F/17/80651	Land west and north of Waylands Place and Peewit Hill Close	106	106	53	-53
B	FULL	F/20/89500	Land West of Horton Heath	381	381	147	-234
C	OUTLINE	O/18/83698	Land to the North and East of Winchester Street, Botley	375	26	0	-26
D	OUTLINE	O/18/83634	Land west of Woodhouse Lane	605	122	0	-122
E	RESOLUTION	O/19/86980	Land West of Allbrook Way, Knowle Hill	52	52	35	-17
F	RESOLUTION	O/20/89498	Land West of Horton Heath	2119	486	0	-486
G	PRIOR APPROVAL	PN/21/91216	Bursledon Hall, Blundell Lane, Bursledon	16	16	0	-16
H	ALLOCATIONS	0	Land south of Maddoxford Lane and east of Crows Nest Lane	30	30	0	-30
I	ALLOCATIONS	0	Kings Copse Avenue, Botley	120	95	0	-95

	Component	LPA ref:	Address	Capacity (Net)	LPA 5YHLS	Appellants' 5YHLS	Diff.
J	ALLOCATIONS	0	Land north of Myrtle Cottage, Winchester Road	22	22	0	-22
K	ALLOCATIONS	0	Land north of Providence Hill	19	19	0	-19
L	EBC HOUSING	Q/22/92640 - F/23/96224	Land at 30-32 Queens View, Netley	18	18	0	-18
M	EBC HOUSING	Q/21/90499	Land at 237 Chamberlayne Road, Eastleigh	11	11	0	-11
N	EBC HOUSING	Q/21/90496	Land at Station Road (Arch Theatre), Chandlers Ford	17	17	0	-17
O			Small Sites		134	120	14
		Total = Disputed Sites			**1,535**	**415**	**-1,120**
		Total			**3,225**	**2,045**	**-1,180**

3. The Extent of Deliverable Supply

The Council's Case

3.1 The Council's case is that it can demonstrate a deliverable 5YHLS of 3,225 dwellings at 1st April 2024. Against the agreed calculation of the five-year requirement in adopted strategic policies this equates to 4.42 years. This is summarised in **SOCG Table 3.1** below.

3.2 A summary of the Council's forecast of supply by component and summary trajectory for the five-year period is shown in **SOCG Table 3.3**

The Appellant's Case

3.3 The Appellant's case is that while the calculation of the five-year requirement is agreed, a deliverable 5YHLS of only 2,045 dwellings can be demonstrated at 1st April 2024. This equates to 2.81 years' supply (-1,600 dwellings shortfall). This is summarised in **SOCG Table 3.1** below.

3.4 The Appellant's case using the cumulative Local Plan trajectory (forecast shortfall of -1,471 dwellings at 31 March 2029) and cumulative average annual requirement (forecast shortfall of -687 dwellings at 31 March 2029) is summarised in **SoCG Table 3.3**

3.5 A summary of the Appellant's forecast of supply by component and summary trajectory for the five-year period is shown in **SOCG Table 3.4**

Table SOCG 3.1 Deliverable Supply versus Five-Year Requirement

		Council Supply	Appellant Supply
A	Annual housing requirement	729	729
B	Five year requirement (A X 5)	3,645	3,645
C	Plus 5% buffer	N/A	N/A
D	Five year requirement (B + C)	3,645	3,645
E	Annual requirement (rounded)	729	729
F	5YHLS supply at 1st April 2024	3,225	2,045
G	Supply in years (F / E)	**4.42**	**2.81**
H	Over / under supply (F – D)	-420	-1,600

Table SOCG 3.2 Actual and Forecast Performance vs Local Plan – Appellant's Case

Year	Local Plan Trajectory (ED101)	Cumulative Local Plan Trajectory	Cumulative Local Plan Annual Requirement (729dpa)	Actual and Forecast Supply - Appellant	Cumulative Supply - Appellant	Difference Appellant Supply versus Local Plan Trajectory	Difference Appellant Supply versus Cumulative Annual Requirement
2016/17	517	517	729	517	517	0	-212
2017/18	893	1410	1458	893	1410	0	-48
2018/19	1162	2572	2187	1250	2660	88	473
2019/20	1330	3902	2916	1223	3883	-19	967
2020/21	1194	5096	3645	864	4747	-349	1102
2021/22	784	5880	4374	707	5454	-426	1080
2022/23	665	6545	5103	725	6179	-366	1076
2023/24	663	7208	5832	566	6745	-463	913
2024/25	719	7927	6561	566	7311	-616	750
2025/26	653	8580	7290	528	7839	-741	549
2026/27	784	9364	8019	387	8226	-1138	207
2027/28	522	9886	8748	334	8560	-1326	-188
2028/29	375	10261	9477	230	8790	-1471	-687
2029/30	345	10606	10206				
2030/31	325	10931	10935				

Table SOCG 3.3 Components of Supply and Forecast Five Year Trajectory – Council's Case

	24/25	25/26	26/27	27/28	28/29	5-year Total
Large Sites						
Full permission not started / under construction	153	187	225	245	0	810
Outline permission not started / under construction	0	0	0	44	104	148
Resolution to support in principle outline permission	0	0	109	253	176	538
Reserved Matters	373	338	175	136	87	1109
Prior approval not started / under construction	0	16	0	0	0	16
Elderly Persons Housing	0	36	0	60	0	96
Local Plan Allocations	0	0	0	86	80	166
Pre planning / EBC Housing	0	0	18	11	17	46
Small Sites						
Small Sites						134
Windfall						162
Total Supply	526	577	527	835	464	**3225**

Table SOCG 3.3 Components of Supply and Forecast Five Year Trajectory – Appellant's Case

	24/25	25/26	26/27	27/28	28/29	5-year Total
Large Sites						
Full permission not started / under construction	153	114	118	69	69	523
Outline permission not started / under construction	0	0	0	0	0	0
Resolution to support in principle outline permission	0	0	0	15	20	35
Reserved Matters	373	338	175	136	87	1109
Prior approval not started / under construction	0	0	0	0	0	0
Elderly Persons Housing	0	36	0	60	0	96
Local Plan Allocations	0	0	0	0	0	0
Pre planning	0	0	0	0	0	0
Small Sites						
Small Sites						120
Windfall						162
Total Supply	566	528	387	334	230	**2045**

4. Affordable Housing

Matters Agreed

The Appeal Scheme

4.1 The parties agree that the Appeal proposal makes provision for policy-compliant contributions towards affordable housing in accordance with Policy DM28 which requires 35% provision of Affordable Housing. This is equivalent to 12 of 34 dwellings. The parties further agree that this provision will be secured via the S106.

Adopted Local Plan Requirements and Policy for Minimum Affordable Housing Needs

4.2 It is agreed that, under Policy S2, the Local Plan is required to support the provision of 200 net new affordable homes per annum within the plan period from 2016 to 2036 (a total of 4,000 dwellings). It is further agreed that the evidence base for minimum affordable housing needs identified in the Plan comprises the ORS Affordable Housing Assessment 2017 and the ORS Assessment of Affordable Housing Update 2020 (ED102).

4.3 The parties agree that the Council's evidence base is clear that the need for affordable dwellings is 4,000 units comprising a net addition to existing stock. Paragraph 2.43 of the Council's evidence base states *"Any losses from the current stock (such as demolition or clearance, or sales through Right to Buy) would increase the number of affordable dwellings needed by an equivalent amount."*

4.4 It is agreed that Policy DM28 seeks that 35% affordable housing will be required as part of new housing developments, unless justified by evidence.

4.5 It is agreed that based on the overall housing requirement set at 729 net additional dwellings per annum the proportion of net additional affordable housing achieved should be approximately 27% of the total housing requirement.

4.6 It is further agreed that the Local Plan only makes provision for a forecast 11,966 units in the period 2016-2036, generating a total shortfall of -2,614 dwellings (LP paragraph 4.12) against the minimum housing requirement. Accordingly, net annual affordable housing needs are equivalent to over 33% of the provision identified in the Plan. It is agreed that the minimum provision identified includes allowances for small sites and windfall that will not be subject to Policy DM28.

Housing Register Entrants and Waiting Times

4.7 The parties agree that paragraph 2.11 of the Local Plan refers to a 2016 total of 1,890 households registered who could not afford to buy or rent a property in the private sector, of which 1,690 households (90%) were in the 'reasonable preference' category as they fall into a specific category of housing need.

4.8 The Local Plan refers to details of the register remaining consistent with previous years. The parties further agree that the total number of households on the register has increased year on year since 2016. Based on the Local Plan figure of 1,890 (as per para. 4.8), the number of households on the register has increased by 655, totaling 2,545 in 2023/24 (as detailed in Table SoCG 4.1).

4.9 The parties agree that the most recent 2024 Hampshire Home Choice Report provides insight into the distribution of households across these band categories.

The findings are as follows:

Table SoCG 4.1 Proportion of Housing Register Households in each band

	Count	Percentage
Band 1	5	0.2%
Band 2	166	6.5%
Band 3	2,264	89.0%
Band 4	110	4.3%

Hampshire Home Choice Report (2024)

4.10 While the magnitude is not agreed the parties further agree that Hampshire Home Choice Reporting confirms an increase in the average waiting time on the register for households bidding for properties in either Band 2 or Band 3, particularly for 3+ bedroom affordable family homes. The 2020 and 2024 Reports are compared below by bedroom number.

Table SoCG 4.2 Average Waiting Time by Band and Bedroom Requirements, 2020 and 2024

	2020		2024	
	Band 2	Band 3	Band 2	Band 3
1-bed	1 year	3yr 5 months	1yr 10 months	5yr 2 months
2-bed flat	8 months	1yr 2 months	7 months	1yr 11 months
2-bed house	6 months	3 years	1 year	3yr 2 months
3-bed	1yr 5 months	3 years	1yr 10 months	4yr 8 months
4+ bed house	1yr 8 months	3yr 9 months	2yr 2 months	No data

Hampshire Home Choice Report (2024)

Matters Not Agreed

Gross and Net Affordable Housing Completions

The Council's Case

4.11 The Council's case is that 2,305 net affordable housing completions have been recorded for the period 2016/17 to 2023/24 (ave. 288dpa), inclusive of demolitions but excluding any other changes in affordable housing stock. This equates to around 35% of total net completions recorded over the same period as shown in Table SoCG 4.3 below.

Table SoCG 4.3 Net Affordable Housing Completions – Council Reporting

Year	Completions Less Demolitions
2016/17	181
2017/18	204
2018/19	468
2019/20	475
2020/21	247
2021/22	304
2022/23	210
2023/24	216
2016-2024	2,305

The Appellant's Case

4.12 While the Council's net monitoring of completions and demolitions is agreed the Appellant considers that other net changes in stock through sales are required to be reported against the Local Plan requirements. In the absence of reporting by the Council the Appellant applies Social Housing Sales open data (available to 2022/23) to the Council's AMR series as shown in Table SoCG 4.4 below. This generates a reduced total of 1,856 net completions net of sales for the period 2016-2023 (ave. 265dpa).

Table SoCG 4.4 Net Affordable Housing Completions Less Sales

AMR Year	SHSD Open Data - LCHO Sales	SHSD Open Data - Other Sales	SHSD Open Data - Sale to Sitting Tenants	AMR Net of Sales
2016/17	-31		-13	137
2017/18	-34	-1	-3	166
2018/19	-25		-7	436
2019/20	-15		-9	451
2020/21	-15	-6	-1	225
2021/22	-34	-2	-11	257
2022/23	-20	-3	-3	184
2016-2023	-174	-12	-47	1,856

Committed Affordable Housing

The Council's Case

4.13 The Council's case is that it can demonstrate 1,025 units' committed supply of affordable housing at 1 April 2024.

The Appellant's Case

4.14 The Appellant disputes the inclusion of commitments for affordable housing from the following sites were deliverability within the five year period is also in dispute. As such, the Appellant considers that the Council can only currently demonstrate 548 units' committed supply towards affordable housing. This is summarised in Table SoCG 4.5.

Table SoCG 4.5 Deliverability of Committed Affordable Housing (AH) by Disputed Sites

	Component	LPA ref:	Address	Capacity (Net)	LPA 5YHLS	LPA AH	Appellants' AH
B	FULL	F/20/89500	Land West of Horton Heath	381	381	134	0
C	OUTLINE	O/18/83698	Land to the North and East of Winchester Street, Botley	375	26	131	0
D	OUTLINE	O/18/83634	Land west of Woodhouse Lane	605	122	212	0
	Affordable Housing Commitments – Not Disputed					548	548
		Total = Disputed Sites				**477**	**0**
		Total				**1,025**	**548**

5. Proposed changes to the Framework and Calculation of the Five Year Requirement

5.1 Both parties agree that this appeal will be determined against the policies of the extant Framework at the decision date; at present this remains the December 2023 NPPF.

5.2 The parties agree that if published in a revised version of the NPPF prior to determination of the Appeal the proposed changes consulted upon in draft in July 2024 would mean:

- While it is not engaged for the determination of this Appeal Paragraph 76 of the December 2023 would be deleted and a minimum five year supply of deliverable sites against the relevant would need to be demonstrated in all cases
- The 5% buffer would be reinstated and would apply to the five year requirement

5.3 The position of the parties' respective cases on supply versus the five-year requirement inclusive of the proposed reintroduction of the 5% buffer for flexibility and choice would be as follows in **Table SoCG 5.1**:

Table SOCG 5.1 Inclusion of the 5% Buffer

		Council Supply	Appellant Supply
A	Annual housing requirement	729	729
B	Five year requirement (A X 5)	3,645	3,645
C	Plus 5% buffer	182	182
D	Five year requirement (B + C)	3,827	3,827
E	Annual requirement (rounded)	765	765
F	5YHLS supply at 1st April 2024	3,225	2,045
G	Supply in years (F / E)	**4.22**	**2.67**
H	Over / under supply (F – D)	-602	-1,782

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Appendix 7: Planning for South Hampshire – Statement of Common Ground (June 2023)

Report to the Partnership for South Hampshire Overview and Scrutiny Committee

Date: **28 June 2023**

Report of: **Graham Tuck, Chairman PfSH Planning Officers Group**

Subject: **STATEMENT OF COMMON GROUND 2023 – REVISIONS AND UPDATE**

SUMMARY

This report sets out proposed updates and revisions to the Statement of Common Ground (SoCG), first formally agreed in September 2020, to enable it to be signed as a formal SoCG by the PfSH authorities.

RECOMMENDATION

It is RECOMMENDED that the Overview and Scrutiny Committee:-

a) NOTES the contents of this report;

b) NOTES that the Joint Committee will be asked to APPROVE the content of the Statement of Common Ground, attached at Appendix 1 to the report, that will lead to the production of a PfSH Spatial Position Statement (SPS); and

c) consider any comments to be passed to the Joint Committee for consideration.

INTRODUCTION

1. The Joint Committee agreed a draft framework for the Statement of Common Ground (SoCG) at its meeting in October 2019. The Joint Committee subsequently agreed a formal SoCG in September 2020 and updated versions in October 2021 and December 2022. The SoCG sets out the key strategic cross-boundary planning issues and the programme of work that will lead to the preparation of a new Spatial Position Statement.

PROGESS MADE ON STATEMENT OF COMMON GROUND

2. Consultants were appointed in June 2020 to undertake potential Strategic Development Opportunity Area (SDOA) comparative assessments, transport impact assessments and modelling, sustainability appraisal and Habitat Regulations Assessment. However, further consideration of the comparative assessment work has established that options for the scale of development needed to fully address unmet need would not be achievable without breaching constraints in the sub-region, including transport constraints. At the same time, government consultations on the Levelling Up and Regeneration Bill and proposed revisions to the National Planning Policy Framework have given an indication that there is likely to be a strong case for not meeting housing need (calculated using the standard method) in full, particularly in relation to the urban uplift for Southampton.

3. The Planning Officers Group (POG) has continued to consider a range of evidence that will support the strategic approach to development in South Hampshire and this set out in the revised SoCG. The SoCG has undergone significant revision to reflect the change in approach. The main changes are set out below. It should be noted that the SoCG has been revised a number of times since the first draft was considered in 2019 but the currently proposed changes are more substantial and represent a thorough revision rather than a minor update. The POG has been mindful of the need to avoid any potential prejudice for the constituent authorities' local plan process. The revised SoCG will still help Local Planning Authorities in demonstrating constructive and positive cooperation on strategic matters at local plan examinations.

4. Progress has been made with the 'Green and Blue Infrastructure Needs and Protection of Landscape and Settlement Gaps' workstream. Land Use Consultants (LUC) were appointed in November 2021 and this work has made substantial progress.

REVISIONS AND UPDATES TO THE STATEMENT OF COMMON GROUND

5. The main changes to the SoCG 2022 are set out below:

- Removal of references to a ‘new Joint Strategy’ and replacement with references to a ‘new Spatial Position Statement (SPS)’.
- Removal of text which it is considered would be more appropriate to include in the SPS.
- Removal of references to ‘Strategic Development Opportunity Areas (SDOAs) and Broad Areas of Search for Growth’ and replacement with ‘Broad Areas of Search for Growth’.
- Change of title of ‘Strategic Development Opportunity Area (SDOA) and broad areas of search for growth assessments (including traffic modelling and transport impact assessments for the SDOAs and broad areas of search for growth)’ to ‘Identification of Broad Areas of Search for Growth assessments’.
- Removal of the workstream ‘Joint Strategy Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA), Habitat Regulations Assessment (HRA) and Appropriate Assessment (AA)’.
- Addition of the workstream ‘Planning for Biodiversity Net Gain and other environmental initiatives to address the climate and biodiversity emergencies’.
- The addition of the workstream ‘Securing environmental mitigation land for nutrient neutrality’.
- Changes to the membership of the Joint Committee (signatories).

Spatial Position Statement reference

6. The POG is of the view that the shift in emphasis of the work under the SoCG means that it is now more appropriate to seek to prepare a Spatial Position Statement, rather than a Joint Strategy. References to the preparation of the Joint Strategy have now been replaced with references to the preparation of a Spatial Position Statement.

Removal of text

7. The SoCG has undergone significant revision since the draft framework SoCG was first agreed in 2019. These amendments have usually resulted in additions to the document, and it has grown in length. Following a thorough review of the SoCG the POG has determined that some text is more policy orientated and it would be more appropriate to include this text in the SPS to leave the SoCG more focused on the process to lead to the SPS.

Removal of references to SDOAs

8. All references to the assessment and comparative analysis of SDOAs as the method that would be utilised to determine the strategic approach to development to include in the Joint Strategy have now been removed. The workstream has been renamed ‘Identification of Broad Areas of Search for Growth assessments’. The revised approach will still give a clear sense of

strategic direction, whilst enabling Local Planning Authorities to test options in more detail through their Local Plan process.

Removal of SEA/SA/HRA/AA workstream

9. Following the steer to move away from analysis of SDOAs the POG has determined that the formal assessments required for statutory plan-making would no longer be appropriate given the lack of geographical specificity to enable effective assessments.

The addition of two new workstreams

10. The POG considers it appropriate to include two additional workstreams in the SoCG to reflect other planning-related work that PfSH is undertaking, albeit not directly related to the evidence base leading to the preparation of the SPS. These are environment related workstreams focusing on biodiversity net gain and nutrient mitigation.

NEXT STEPS

11. There has been substantial technical work carried out under the SoCG since it was first agreed in 2019. This has helped to inform the PfSH authorities about options for new development that can be taken forward in local plans. However, in terms of progressing the approach to the development strategy at a sub-regional level, the revised SoCG now more clearly reflects how the PfSH authorities envisage the role for the SPS.

12. Subject to the Joint Committee agreeing the recommendation to approve the content of the SoCG, each individual Local Planning Authority and the County Council will be will be asked to sign the document (subject to their own governance or delegation arrangements) and it can be published on the PfSH website. This will ensure that an up-to-date SoCG is available to help Local Planning Authorities in demonstrating constructive and positive cooperation on strategic matters at local plan examinations.

13. The PfSH Planning Officers Group will continue to finalise the evidence base and draft the Spatial Position Statement which is scheduled to be considered at the meeting of Joint Committee in December.

RECOMMENDATION

It is RECOMMENDED that the Overview and Scrutiny Committee:-

a) NOTES the contents of this report;

b) NOTES that the Joint Committee will be asked to APPROVE the content of the Statement of Common Ground, attached at Appendix 1 to the report, that will lead to the production of a PfSH Spatial Position Statement (SPS); and

c) consider any comments to be passed to the Joint Committee for consideration.

Appendices
Appendix 1 – Partnership for South Hampshire Statement of Common Ground 2023

Background Papers:
None

Reference Papers:
None

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APPENDIX 1

Partnership for South Hampshire – Statement of Common Ground

1. Introduction

2. Background

3. Content

   a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);

   b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;

   c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);

   d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;

   e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;

   f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;

   g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and

   h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

4. Signatories

1. Introduction

1.1. The Partnership for South Hampshire (PfSH) – formerly the Partnership for Urban South Hampshire (PUSH) – was originally formed in 2003. It is a partnership of district and unitary authorities, together with a county council and national park authority, working together to support the sustainable growth of the South Hampshire sub-region. Whilst the membership has altered slightly over the years, the core membership has remained broadly consistent.

1.2. The Partnership has a strong track record in collaborative working to achieve common goals in South Hampshire. The Partnership was heavily involved in the production of a sub-regional strategy for development that formed part of the South East Plan. This strategy was tested through public examination and when adopted by the Secretary of State, formed part of the development plan at that time, which subsequently informed the production of local plans.

1.3. The ethos of collaborative cross boundary working has continued, and the Partnership has a successful track record in providing effective strategies for sub-regional planning. As well as joint working between member authorities, PfSH works with partner agencies in the sub-region as well as key Government departments to deliver joint strategies and pool resources. PfSH has successfully worked to develop innovative solutions to recreational disturbance (through Bird Aware Solent) and the need for nutrient neutrality in the Solent to deliver new residential development while protecting the integrity of the internationally designated sites.

1.4. Local planning authorities are being required to resolve cross-boundary strategic planning issues through their local plans. Whilst complying with the 'Duty to Cooperate' (National Planning Policy Framework (NPPF) para 24) is a fundamental requirement for local plans to successfully be found sound and legally compliant through public examination, recent indications from government in both the Levelling Up and Regeneration Bill (LURB) and proposed changes to the NPPF are that the Duty to Cooperate is likely to be abolished. The PfSH authorities will continue to work together on strategic cross-boundary issues and will review this Statement of Common Ground (SoCG) in the light of any new statutory or policy requirements in the LURB and revised NPPF.

1.5. The Spatial Position Statement is being prepared at a time of reform in the English planning system with the Levelling Up and Regeneration Bill still progressing through Parliament. In addition, changes to the NPPF are proposed which may fundamentally change the approach to planning at a sub-regional scale. Given the scale and nature of the changes the PfSH authorities acknowledge that there will need to be further updates and evolution of the Spatial Position Statement as the reforms are implemented.

1.6. In 2016 the PfSH authorities produced a framework, namely the PUSH Spatial Position Statement, to guide future local plans and housebuilding and development in the sub-region. However, since then much has changed. Notably all authorities in PfSH have followed the Government lead and signed up

to be carbon neutral by at least 2050. The NPPF has been significantly revised and further revisions are currently being considered.

1.7. PfSH remains committed to the need for its constituent authorities to work together to seek to produce a new Spatial Position Statement, keep the SoCG up to date and to explore the production of an Infrastructure Investment Plan. In October 2019 PfSH agreed a draft framework SoCG. This document was subsequently revised and updated to form an initial Statement of Common Ground in September 2020. It has been further revised and updated in 2021 and 2022 and by this version, and sets out the work that will be undertaken and will be updated again as the evidence workstreams progress.

1.8. This Statement of Common Ground sets out the workstreams for which PfSH has commissioned, or is preparing, evidence to help lead towards the production of a new Spatial Position Statement. The remaining workstreams are:

- Identification of Broad Areas of Search for Growth assessments
- Planning for Biodiversity Net Gain and other environmental initiatives to address the climate and biodiversity emergencies
- Green and Blue Infrastructure Needs and Protection of Landscape and Settlement Gaps
- Securing environmental mitigation land for nutrient neutrality.

1.9. The SoCG has been prepared against the headings set out in national planning practice guidance (Paragraph: 011 Reference ID: 61-011-20190315).

1.10. It should be noted that the SoCG is intended to deal with strategic cross-boundary matters at a sub-regional scale and it does not negate or supersede any existing SoCG either between the PfSH and individual authorities or between individual authorities, within or outside the PfSH area.

1.11. The Spatial Position Statement will again be both non-statutory and high-level / strategic, and will inform and guide emerging Local Plans and assist the Local Planning Authorities in meeting the Duty to Cooperate, and its potential successor.

2. Background

1.12. In 2016 PUSH published a Spatial Position Statement to help inform Local Plans and assist individual Councils in meeting the Duty to Cooperate. It was developed as a non-statutory document to inform long-term decisions about the level and distribution of development across South Hampshire. The Position Statement resulted in all needs being met to 2026 and the majority of needs being met through to 2034, with the rate of delivery for new homes being increased by approximately 34%.

1.13. The Position Statement included a number of spatial principles that underpinned its development, a series of key principles that were applied through the evolution of the spatial approach and a suite of policies that form the spatial approach. These include housing distribution; strategic development locations; distribution of additional employment floorspace; strategic employment locations; waterfront sites of sub-regional significance; retailing and town centres; green infrastructure; strategic countryside gaps; environment; encouraging modal shift; highway improvements; social infrastructure; and utilities infrastructure.

1.14. Time has moved on since the production of the Spatial Position Statement and there is a clear need to review and update it. There is a need to find additional land for housing provision, and extend the period covered by the Position Statement beyond 2034. The Spatial Position Statement needs to address cross-boundary environmental issues such as the impact of development on water and air quality, the impact of development on protected sites of international nature conservation importance, getting Biodiversity Net Gain ready and driving forward Local Nature Recovery Strategies. In planning for major development, it is important to maintain and enhance a coherent pattern of town and countryside, to protect towns and villages with a distinct identity and appropriate settlement gaps.

3. Content

a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s)

1.15. The PfSH boundary has changed over the years, although the core membership, including the County Council and unitary authorities, has remained constant. The Partnership for Urban South Hampshire was formed in 2003 and evidence secured to inform preparation of the South East Plan helped to establish it as an appropriate sub-region for the purpose of strategic planning.

1.16. The following local authority areas are fully within the PfSH boundary:

- Eastleigh Borough Council
- Fareham Borough Council
- Gosport Borough Council
- Havant Borough Council
- New Forest District Council
- Portsmouth City Council
- Southampton City Council.

1.17. The following local authority areas are partly within the PfSH boundary:

- East Hampshire District Council
- Hampshire County Council
- New Forest National Park Authority[1]
- Test Valley Borough Council[2]
- Winchester City Council.

1.18. PfSH is a mature partnership with a lengthy track record of cooperation and collaboration on strategic planning issues and can work with flexible boundaries where necessary (e.g. Bird Aware Solent). PfSH has continued to secure evidence and propose solutions to meeting the need for development and investment in infrastructure.

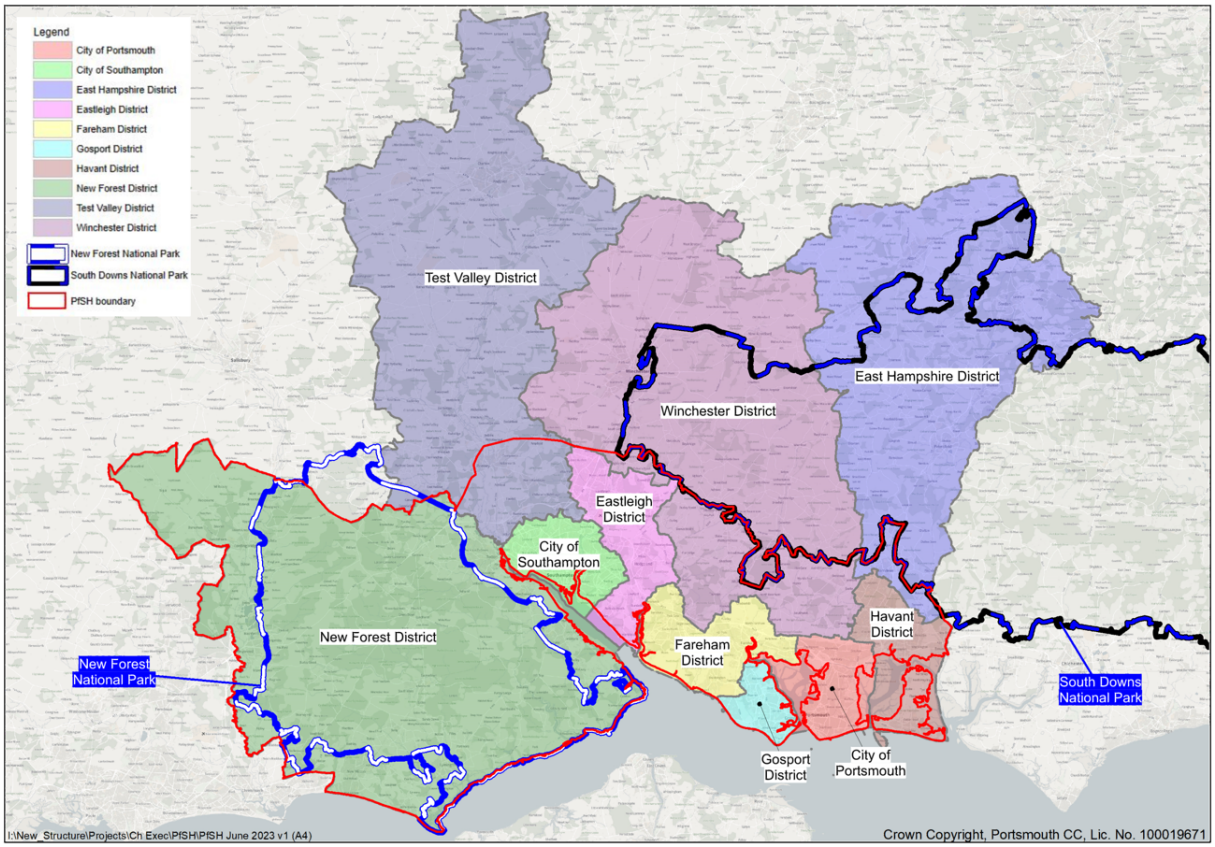
1.19. The evidence base collated over recent years supports the definition of the South Hampshire sub-region for strategic planning purposes, whether it relates to the two closely linked housing markets around Portsmouth and Southampton, the functional economic market area or the physical geography of an area located between the South Downs and New Forest National Parks and the Solent with islands and peninsulas interspersed with harbours and rivers.

[1] The New Forest National Park Authority is not a local authority but is a local planning authority with full planning responsibilities (including plan-making). A small part of the New Forest National Park is in Wiltshire.

[2] Please note that whilst only part of Test Valley Borough Council area falls within the PfSH boundary, the evidence base studies referenced in this report will cover the whole Borough, unless the Council determines otherwise.

1.20. There is common agreement amongst partner authorities that the PfSH area is an appropriate geography on which to prepare a Spatial Position Statement to address cross-boundary strategic planning matters and support the production of local plans. An extensive evidence base has identified the housing market areas and the need to plan at the South Hampshire scale has previously been considered. Significant information is included within the 2014 GL Hearn Strategic Housing Market Assessment and previous evidence base work related to the physical environment has demonstrated the synergies for collaborative planning in South Hampshire. It is not intended to revisit the definition of the sub-region as part of the work identified in this SoCG. However, it is acknowledged that there will be some strategic issues that need to be considered in the context of a wider geographical area than that within the PfSH boundary.

1.21. The map below shows the extent of the Partnership for South Hampshire.



b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.

1.22. The NPPF (para 20) states that,

'S*trategic policies should set out the overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

a) Housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.'

1.23. Regard has been had to advice in the NPPF in defining the strategic matters to be addressed as set out below:

- Housing
- Employment and other commercial development
- Infrastructure (both grey and green/blue)
- Nature recovery and greening the sub-region
- Addressing the climate emergency.

1.24. The PfSH Spatial Position Statement is currently being prepared and will be considered by the Joint Committee in December 2023. It will seek to address the strategic matters, set out above, in South Hampshire as follows:

'***to deliver sustainable, economic-led growth and regeneration to create a more prosperous and greener South Hampshire offering a better quality of life for everyone who lives, works and spends their leisure time here***'.

c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory)

1.25. The authorities responsible for the joint working detailed in this SoCG are:

- East Hampshire District Council
- Eastleigh Borough Council
- Fareham Borough Council
- Gosport Borough Council
- Hampshire County Council
- Havant Borough Council
- New Forest District Council
- New Forest National Park Authority
- Portsmouth City Council
- Southampton City Council
- Test Valley Borough Council
- Winchester City Council.

1.26. In addition, the joint working will be undertaken in conjunction with:

- Environment Agency
- Hampshire and Isle of Wight Local Nature Partnership
- Homes England
- National Highways
- Natural England.

At this stage it is not anticipated that these organisations would be formal signatories to the SoCG. Other key infrastructure providers will also be involved, for example public transport providers and water companies, although again, not as formal signatories.

d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date

1.27. PfSH has long established governance arrangements, the full details of which are on the website. The PfSH Joint Committee members are the leaders or cabinet members of the constituent local authorities, supported by chief executives. The Solent LEP, Environment Agency and Homes England are represented on the Committee as observers and Natural England regularly attends the meetings.

1.28. Alongside the Joint Committee, an Overview and Scrutiny Committee has been established to complement and, where necessary, make recommendations to the Joint Committee with regards to PfSH business. The Joint Committee comprises a nominated councillor and chief executive from each of the PfSH authorities.

1.29. The technical work that will be undertaken to lead to the new Spatial Position Statement will be overseen by the PfSH Planning Officers Group, a working group of planning officers from each of the partner authorities, including the county council, together with Natural England and the Environment Agency. PfSH has appointed a consultant Project Manager to coordinate the work on behalf of the Planning Officers Group.

1.30. The PfSH Joint Committee will make decisions on strategic planning matters referenced in this SoCG, based on officer recommendations. Each local planning authority will decide how to use its own decision-making mechanisms to consider its own approach to the decisions being made at the PfSH Joint Committee.

1.31. This SoCG sets out the process and workstreams that will lead to the review of the Spatial Position Statement and the production of an updated Spatial Position Statement. Once the Spatial Position Statement has been agreed the PfSH Joint Committee will consider how frequently this SoCG needs to be updated.

e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement

1.32. A previous assessment of housing need within the PfSH area established an overall level of need to 2036 of approximately 85,000 homes (PfSH Statement of Common Ground Update 2022). This was based on the standard method of calculating housing need and contains a 35% uplift applied by the Government to the twenty largest cities in England including Southampton. In line with emerging national policy, the Spatial Position Statement will not seek to apportion any unmet need from this uplift to neighbouring areas.

1.33. The specific housing requirements for each PfSH local authority will be determined in the individual Local Plans with the appropriate housing figures and locations for development tested in local plan examinations. Within the PfSH area, there are eleven local planning authorities (in whole or part) with Local Plans at various stages of preparation. Housing need and supply will therefore change over time as plans progress from Regulation 19 to submission and adoption or become out of date. The level of housing need will also change annually as data inputs into the standard method are refreshed, presuming that some form of standard method will remain following proposed changes by the Government. The current assessment of housing need and supply is set out in the table below.

Table 1: Comparison of housing need and supply 2022 - 36

Local Authority	Annual Housing Need using Standard Method (dpa)	Total housing need 2022 – 2036	Supply = Commitments, local plan allocations + windfall estimate	Shortfall/ surplus
East Hants (part)	113	1,582	1,236	-346
Eastleigh	671	9,394	6,663	-2,731
Fareham	541	7,574	9,646	+2,072
Gosport	328	4,592	2,786	-1,806
Havant	516	7,224	5,755	-1,469
New Forest	1,097	15,358	8,276	-7,082
Portsmouth	906	12,684	10,203	-2,481
Southampton	1,090	15,260	14,464	-796[3]
Test Valley (part)	182	2,548	2,656	+108
Winchester (part)	243	3,402	3,402[4]	0
Total	5,687	79,618	65,087	-14,531

1.34. The government has recently consulted on reforms to the NPPF standard method, in two stages, stating the intention to implement them in 2023 and 2024 respectively. The first stage is set out as proposed NPPF wording changes that would more strongly emphasise that the standard method is an advisory starting

[3] The shortfall within the city excluding the 35% urban uplift (i.e. the shortfall to be considered across the wider PfSH area). The shortfall within the city including the 35% uplift is 6,130 dwellings.
[4] The actual supply within the PfSH part of the District is higher than 3,402. This is because Winchester does not have a split in its adopted Local Plan between PfSH and the rest of the District, meaning that the figures for need and supply are estimated to be the same in this table. This may change as Winchester's local plan progresses.

point. It is also proposed to clarify that the main urban area 35% need uplift (that currently applies in the PfSH area to Southampton) would only be required to be met to the extent that it is possible to do so within Southampton's planning area i.e. if it cannot fully be met therein the shortfall would no longer constitute unmet need that the wider PfSH area would be required to meet. In the second stage of Government consultation a fuller review of the standard method is proposed, including to rebase to 2021 census-based data. Unspecified changes are also proposed to the duty to cooperate process to replace it with an 'alignment' policy, that it is proposed would no longer be a pass/fail legal test that precedes the testing of Local Plan soundness at examination stage.

f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area

Housing

1.35. With national policy in flux, for this iteration of the SOCG there is considerable uncertainty around addressing housing need in the PfSH area. Depending on government timelines for NPPF review this uncertainty may not be resolved in time to inform the new Spatial Position Statement.

1.36. Referenced against the NPPF 2021 standard method, in quantitative terms the majority of need for housing up to 2036 is already planned to be met through existing commitments including planning permissions, allocations in local plans and neighbourhood plans, and allowances for future small-scale windfall development. A current shortfall of housing provision is acknowledged. In terms of scale the shortfall is likely to represent a significant fraction of total combined need to 2036 based on the NPPF approach extant on the date of this SoCG.

1.37. At the PfSH level the shortfall is best defined as need that is not yet planned for, rather than need that is definitively unmet. The shortfall would diminish over time as local plan reviews get underway or pending plans are progressed, not least because some currently adopted local plans in the PfSH area do not extend to 2036 and government requires plans to be updated every five years. For the same reasons the shortfall would increase if a planning horizon beyond 2036 is considered – the appropriate timeframe is a matter to consider in updating the 2016 Spatial Position Statement.

1.38. At Local Planning Authority (LPA) level within PfSH the following authorities are less likely/unlikely to be able to fully meet NPPF 2021 standard method-based housing needs in their respective local plan areas, due to the extent of various significant national and international designations and/or lack of available land (for example, in existing built up areas). These areas will continue to consider through their local plan reviews whether they can increase their supply. However, if the standard method and duty to cooperate are retained in their current form, or if any update takes a broadly similar approach, these areas may have housing needs they cannot fully meet. In this case the other PfSH LPAs would need to consider whether they could accommodate some of these wider needs through their own local plan reviews, recognising that South Hampshire's housing markets operate across local authority boundaries.

- Gosport
- Havant
- New Forest District
- New Forest National Park
- Portsmouth
- Southampton.

1.39. Whilst the fact and extent of any unmet need remains to be confirmed through Local Plan reviews, this is a matter that the new PfSH Spatial Position Statement

will address in broad terms (see below). Periodic updates to this SoCG will set out the latest PfSH position, to be complemented as necessary by bilateral SoCG between LPAs and PfSH as individual local plans progress.

1.40. In the context of these uncertainties PfSH authorities are taking a two-stage approach to addressing the needs of those authorities that may demonstrate that they are unable to meet their housing needs in full. Stage one: in the short to medium term, the following authorities are more likely to be able to meet and potentially exceed NPPF 2021 standard method-based housing needs in their respective local plan areas:

- East Hampshire
- Eastleigh
- Fareham
- Test Valley
- Winchester.

The recently adopted Fareham Local Plan makes a contribution of 900 homes to PfSH unmet need. The emerging Winchester Local Plan has not specified a contribution towards to unmet needs in other local authority areas, but includes proposals for 1,450 homes over and above the standard method (Regulation 18 draft Local Plan). For Winchester, the final housing numbers will be determined as the plan progresses to adoption, at which point the extent to which Winchester may be able to contribute towards unmet needs will be known. But at present, these authorities are planning to make provision of some 2,350 homes over and above their own standard method-based needs and the other authorities listed above are encouraged to consider the contributions that can be made through their Local Plans, as these progress. This provision, in addition to existing commitments and planned development, will help to meet housing needs based on the current standard method in full over a substantial part of the Spatial Position Statement period.

1.41. Stage two: In the longer term, Broad Areas of Search for Growth will be identified in the Spatial Position Statement. These will be identified by considering the combination of a relative absence of strategic constraints, relative proximity to opportunities and services, and their scope in principle for good public and active travel connectivity.

1.42. The broad areas would require further investigation and technical work to determine their suitability as specific locations for development, and to test their capacity, deliverability, infrastructure and mitigation needs to achieve allocations in Local Plans. A preliminary assessment suggests that the areas of search may have a combined capacity for around 7,500 dwellings, subject to deliverability, infrastructure and mitigation.

1.43. Across South Hampshire there is a significant need for new homes as outlined above. There are also a range of characteristics important to the quality of life in the area. It is bounded by two national parks, the coast/estuaries, a range of international, national and local biodiversity designations and needs to

accommodate land for biodiversity mitigation and net gain. It is already heavily built up in places, with areas of valued countryside often important in landscape terms or as settlement gaps protecting the identity of individual towns and villages. Some areas are less accessible by public transport. The need to accommodate significantly more homes for people in the medium and longer term, including in the areas of search, will need to be carefully tested through local plans against all of these important characteristics to achieve the optimum solution.

Employment

1.44. PfSH has commissioned and published the Economic, Employment and Commercial Needs (including logistics) Study which establishes the need for employment development in South Hampshire. It should be noted that the figures for office need are 'aspirational' in recognition of the time it may take before the market starts to deliver new development. The results of the Study are set out in Tables 1 and 2 below, alongside the estimated current supply of office floorspace and industrial land. This demonstrates that there is currently sufficient land allocated within South Hampshire to meet the need for employment development and there is no need to address this issue at the sub-regional level.

Table 2 Comparison of office floorspace need and supply

Local Authority	Office need (sqm) (2019 – 40)	Office supply(sqm) (2022 – 40)	Balance (sqm)
East Hants (part)	1,919	0	-1,919
Eastleigh	95,805	92,662	-3,143
Fareham	38,595	45,667	7,072
Gosport	14,616	10,258	-4,358
Havant	38,477	0	-38,477
New Forest	11,236	767	-10,469
Portsmouth	74,217	113,500	39,283
Southampton	60,959	111,851	50,892
Test Valley (part)	20,176	30,961	10,785
Winchester (part)	36,468[5]	0	-36,468
Total	392,468	405,666	13,198

Table 3 Comparison of industrial land need and supply

Local Authority	Industrial need (ha) (2019 – 40)	Industrial supply (ha) (2022 – 40)	Balance (ha)
East Hants (part)	1.4	1.7	0.3

[5] Winchester City Council covers a mainly rural area where significant office provision would not be suitable. The identified need will be met in suitable town and city centres in the PfSH area, or in Winchester City where demand is stronger and development more viable.

Eastleigh	9.9	45.1	35.2
Fareham	25.5	50.5	25
Gosport	15.5	17.4	1.9
Havant	9.1	19.9	10.8
New Forest	-10.3	7.6	17.9
Portsmouth	52.6	38.2	-14.4
Southampton	-7.8	7.9	15.7
Test Valley (part)	52.6	21.8	-30.8
Winchester (part)	19.2	21.4	2.2
Total	167.7	231.5	63.8

1.45. It should be noted that Tables 2 and 3 present a general picture and probably slightly underestimate the need/supply balance given that the need calculation is from 2019 – 2040 and the supply figure is from 2022. Adding in completions from 2019 to the supply figure would likely increase it. Also, the need figures are for a net increase in space, whereas the supply figures do not take account of any losses of office or industrial sites. Individual local planning authorities will need to consider this further, although it can be noted that the surplus of office and industrial sites would enable further losses without the need to allocate new sites. Some of the industrial need figures for individual local planning authorities indicate a negative need. This should not be taken in itself as a policy requirement to reduce the stock of industrial sites in these areas, as industrial vacancy rates are low and sites are meeting the needs of local businesses. Again, individual Local Planning Authorities can consider this issue further.

1.46. The Study also makes recommendations with regard to the need to find up to five sites to meet the need for strategic warehousing. The PfSH Planning Officers Group has considered how this need could be met, although initial work indicates a lack of suitable sites.

Nature and Landscape

1.47. The need to mitigate potential adverse impacts of new development on the environment is apparent through the evidence base from previous local plans and current issues relating to water and air quality and recreational pressure and potential harm to protected habitats. It is a major priority for the PfSH authorities to ensure that the natural environment is not diminished through new development and where possible, is enhanced. Furthermore, government policy now requires development to provide a net gain for biodiversity.

1.48. Given the sub-region's location between two National Parks (the South Downs and the New Forest), the 'duty of regard' set out in Section 62(2) of the Environment Act 1995 is also relevant. This duty (which is cross-referenced in the national planning practice guidance section on 'Landscape') ensures that any decisions that could affect National Parks must have regard to the two statutory purposes of National Parks. The National Planning Policy Framework was revised in July 2021 (paragraph 176) to recognise the importance of ensuring development within the setting of National Parks and Areas of Outstanding

Natural Beauty is sensitively located and designed to avoid and minimise adverse impacts development may have on those designated areas.

1.49. There are legal requirements for carrying out strategic environmental assessment (incorporated within sustainability appraisal) and habitat regulations assessments (including appropriate assessments) when considering the location of new development in local plans. Given issues around recreational disturbance and the potential need to mitigate the impact of nutrient deposition from wastewater outputs and traffic emissions as a result of additional dwellings, there will be a requirement to allocate land to provide sustainable alternative natural greenspace and to reduce nitrate and phosphate levels in the water environment (through nutrient neutral development). Consideration will need to be given to incorporating accessible natural green spaces within or close to broad areas of search for growth to ensure that they are accessible to residents and assist with the delivery of appropriate environmental mitigation.

Climate Emergency, Flood Risk and Air Quality

1.50. The climate emergency is an overarching theme that will be at the forefront of the strategy for new development. Matters such as flood risk and policy approaches to resilience can be explored through the broad areas of search for growth assessments. Any opportunities to reduce potential environmental impact through the location of development will be considered alongside mitigation measures that need to be addressed through planning policy.

1.51. PfSH has commissioned a new level one Strategic Flood Risk Assessment (SFRA) for the majority of the PfSH region (except East Hampshire, which completed an SFRA for its planning area in 2018 and is currently updating it), along with the whole local planning authority areas of Test Valley, Winchester and the New Forest National Park. This takes account of changes in legislation and policy, as well as emerging updates to evidence, modelling and mapping of flood risk, since the previous SFRA and interim updates were published. It is expected that the SFRA will be published later in 2023.

1.52. Dealing with climate emergency issues can have a long-term beneficial impact on the health and wellbeing of the new communities now being planned. Other issues, such as access to green spaces and opportunities for active travel can also be addressed through the strategy for new development.

1.53. Impacts on health caused by poor air quality will be considered in individual local plans. Impacts on the natural environment (European and Ramsar sites) will be considered through Habitat Regulations Assessments. Development should be located so as to minimise adding to air quality problems and regard should be had to designated Air Quality Management Areas when determining strategic approaches to development.

Updating the 2016 Spatial Position Statement

1.54. PfSH has previously agreed a programme of work to update the 2016 Spatial Position Statement, also referred to as a Joint Strategy. The workstreams are

referenced at paragraph 1.8. This section of the SoCG describes how they are being progressed to a conclusion. A further workstream on 'grey' infrastructure needs will be progressed separately after the SPS is published.

1.55. In updating the 2016 PfSH Spatial Position Statement (SPS) the emphasis will be on place shaping and achieving sustainable growth in the PfSH area in a manner that contributes positively to meeting housing and economic needs in a manner consistent with climate change, zero carbon and nature recovery objectives. The updated SPS will be prepared on the basis of the existing SPS vision which seeks to:

'deliver sustainable, economic-led growth and regeneration to create a more prosperous, attractive South Hampshire offering a better quality of life for everyone who lives, works and spends their leisure time here.'

1.56. The updated SPS will indicate strategic-level areas of search for the most sustainable locations to accommodate future growth within the sub-region. It will provide a broad indication of their future development potential and how that relates to future needs for housing and other development, but it will not seek to definitively quantify unmet housing needs or how they might all be met. Periodic updates to this SoCG will set out the latest position on need and supply as local plans in the area progress and national policy evolves.

g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these

1.57. PfSH published a Spatial Position Statement in 2016. This SoCG, agreed by the PfSH authorities, sets out the scope of the Spatial Position Statement which will update and replace that 2016 document. It is anticipated that the new Spatial Position Statement will set out in broad terms the need for and distribution of development between the respective Local Planning Authorities. This will demonstrate how PfSH is addressing the need for development collaboratively across the sub-region amongst other strategic spatial policies, reflecting the need for development to contribute to place making through, for example, providing a net gain in biodiversity, ensuring opportunities for active travel and conserving settlement identity.

1.58. The new Spatial Position Statement will be a clear representation of how, as a partnership of local authorities, the PfSH authorities are actively cooperating and collaborating to plan for development across the sub-region. It will be a fundamental part of demonstrating alignment between the authorities and a starting point for the development of sound local plans.

1.59. Nonetheless, there are likely to be instances where bilateral agreement remains necessary between individual PfSH authorities and local plan matters specific to those authorities, such as infrastructure provision or sites which span borders.

<u>Housing need</u>

1.60. National planning policy provided through the latest NPPF, published in July 2021, prioritises meeting housing need as part of the national target to significantly boost the supply of new homes. Nonetheless, proposed reforms in the most recent Government consultation clarify and reinforce that the standard method would represent the advisory starting point for the provision of new homes and the uplift applied to the needs of the largest urban areas (including Southampton) are met within those areas. It has, however, always been the case that local plans should meet the need for housing as well as any needs that cannot be met within neighbouring areas unless there are strong reasons to restrict the growth in the plan's area (as set out in para 11 of the NPPF and the accompanying footnote).

1.61. Each local authority currently calculates its housing need using the government's standard method for assessing local housing need. The identified objectively assessed housing need is accepted as the correct level to test and to plan for strategically in accordance with government policy, to inform housing targets to be set in local plans. However, it is recognised that the way housing needs are calculated may change in the near future (see paragraph 1.4 in the Introduction).

Employment need

1.62. Whilst the application of the standard method for assessing local housing need is now established in the NPPF (para 61) (albeit with the potential to change as a result of census data being released in 2024), the sub-regional need for other forms of development and the opportunities to meet those needs were still to be established. PfSH has commissioned and published the Economic, Employment & Commercial Needs (including logistics) Study and further information on the need for, and supply of, employment land is set out in paras 3.30 – 3.32 of this SoCG.

1.63. PfSH has commissioned evidence with regard to employment land needs. The Economic, Employment and Commercial Needs (including logistics) Study sets out the overall need for industrial land and office floorspace for South Hampshire and each local authority area within the South Hampshire Functional Economic Market Area (FEMA). It should be noted that need identified for each local authority area could be met across South Hampshire, given the interconnected nature of the FEMA. In particular, it should be noted that the need for industrial floorspace reflects where provision has previously been made rather than any geographically specific demand led factors. Furthermore, it is considered that the need for office development would be more likely to be met within the city or town centres as part of comprehensive mixed-use schemes, especially where there is good accessibility to public transport.

Infrastructure investment

1.64. Infrastructure investment is a major priority for PfSH, both in terms of identifying the infrastructure needed to deliver development that represents 'good planning' and working together to secure investment in the sub-region. The PfSH authorities and the Solent LEP have a good track record in successfully obtaining funding and investment for South Hampshire. PfSH considers that the commensurate and timely provision of infrastructure is an essential component to achieving sustainable development. Infrastructure will be funded and provided by a combination of private and public sector partners including Hampshire County Council and Portsmouth and Southampton City Councils (particularly transport, social services and education), transport operators, health providers and the utility companies. Whilst the use of Community Infrastructure Levy receipts and delivery through planning obligations are essential in the management of development and infrastructure provision, it is likely that additional funding will be required from government, particularly if there is to be a step-change away from the most carbon intensive transport modes, and strategic flood risk protection is to be put in place. Further details will be set out in Infrastructure Delivery Plans which are prepared to support each local plan.

Green Infrastructure

1.65. PfSH has commissioned evidence to draw together a range of strategic green and blue infrastructure issues. The work will focus on:

- Identification of areas of landscape value
- Review of settlement gaps
- Identification of key strategic opportunities for green and blue infrastructure protection and enhancement
- Review of potential delivery mechanisms such as a Regional Park.

The outcome of this work will be reflected in the Spatial Position Statement.

1.66. PfSH will continue its role in facilitating environmental solutions to allow development to take place whilst protecting the sensitive protected species and habitats in South Hampshire. Bird Aware Solent is a well established partnership that avoids and mitigates the impact of recreational disturbance on internationally important habitats. PfSH also funds and manages a strategic resource to provide opportunities to enable nutrient neutral development. There are further challenges that will need addressing in the near future, such as biodiversity net gain.

Green Belt

1.67. In December 2018 PUSH agreed that the rationale and justification for a possible Green Belt designation be included as part of any joint work taken forward under the Duty to Cooperate initiative. Potential Green Belt designation has been considered alongside the role for green infrastructure, both to serve recreational needs of residents and provide environmental mitigation and enhancement, especially for likely adverse impacts on the integrity of European Nature Conservation sites, and in the context of protection for high value landscape and settlement gaps. A new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular the requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed. However, routes to delivering cross-boundary (e.g. catchment-wide) mitigation measures may need land to be allocated to deal with recreation pressures and water and air quality issues. This could also help meet some of the policy aims around the climate emergency (a number of local authorities have declared climate emergencies), nature recovery and health and wellbeing. Therefore alternatives to a new Green Belt should be investigated and delivered through local plans.

Transport and connectivity

1.68. The three Local Transport Authorities (LTAs) within the PfSH area have played a full and active role in the development of the Spatial Position Statement. The LTAs have provided advice on the transport implications of potential options for growth and PfSH will take account of this advice in formulating the Spatial Position Statement. Of key importance to the LTAs is the need to provide for development that can be accessed by sustainable modes and that choices made

at this stage do not lead to development that is predominantly reliant on use of the private car to meet travel needs.

1.69. The LTAs have updated (or are in the process of updating) their transport policies through Local Transport Plan 4. They are also jointly preparing the Solent Transport Strategy, in line with the Transport Strategy for the South East produced by Transport for the South East. The Spatial Position Statement will need to be consistent with the principles set out in these transport policy documents.

h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the

statement relates to any other statement of common ground covering all or part of the same area

1.70. The SoCG sets out a process by which the PfSH authorities will review and update the Spatial Position Statement (2016). It is not intended to replace or supersede any existing SoCG that exists between PfSH and individual local planning authorities or bilateral agreements between local planning authorities.

1.71. There are no other strategic matters to be addressed by the SoCG that have not been referenced earlier in the SoCG.

Signatories

David Evans
East Hampshire District Council

Keith House
Leader
Eastleigh Borough Council

Seán Woodward
Leader
Fareham Borough Council

Peter Chegwyn
Leader
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Southampton City Council

Nick Adams-King
Deputy Leader
Test Valley Borough Council

Martin Tod
Leader
Winchester City Council

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Appendix 8: Revised Development Framework Plan (ref. P23-2261_DE_007_01_D)



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KEY

- Site Boundary
- **Gross Development Area:** Including Residential, Mobility Hub, Multi-functional Space, Incidental Public Open Space, Play Facilities, Drainage Features, Landscaping & Ancillary Infrastructure.
- **Strategic Public Open Space:** Including Play Facilities, Drainage Features, Pedestrian/ Cycle Links, Landscaping, Retained Vegetation (inc. Root Protection Areas) & Ancillary Infrastructure.
- Access Infrastructure & Roads Through Open Space
- Vehicular, Pedestrian & Cycle Access Point.
- Potential Agricultural, Pedestrian & Cycle Access Point
- Potential Pedestrian & Cycle Access Point
- Potential Pedestrian Connections to Site Boundary
- Existing Trees & Hedgerows to be retained
- Root Protection Areas (for the retained trees & hedgerows)
- Existing Trees & Hedgerows to be removed
- New Site Boundary Planting
- Indicative Locations of Play
- Indicative Location of Mobility Hub & Multi-functional Space

Notes:
- All Features & Areas Subject to a tolerance of +/- 5m.
- Utility and/or access infrastructure may need to be located in POS areas.

0 50 100m
1:1250 (at A1)

LAND SOUTH OF MORTIMERS LANE, FAIR OAK – **DEVELOPMENT FRAMEWORK**

PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: TB | APPROVED BY P.M: TB | DATE: 28.03.25 | SCALE: 1:1250@A1 | DRWG: P23-2261_DE_007_01_D | CLIENT: BLOOR HOMES

PEGASUS GROUP

.

Appendix 9: Additional Winter Views (March 2025) – To accompany LVA (EDP)

VISTA 3D
VERIFIED VIEWS

✉: RS@vista3d.co.uk | ☎: 07939 594 309 | W: Vista3d.co.uk | 🖃: 21 Graham Street, Birmingham B1 3JR

Land south of Mortimers Lane Fair Oak

Winter Baseline

Document Reference No. V3D 250402

March 2025

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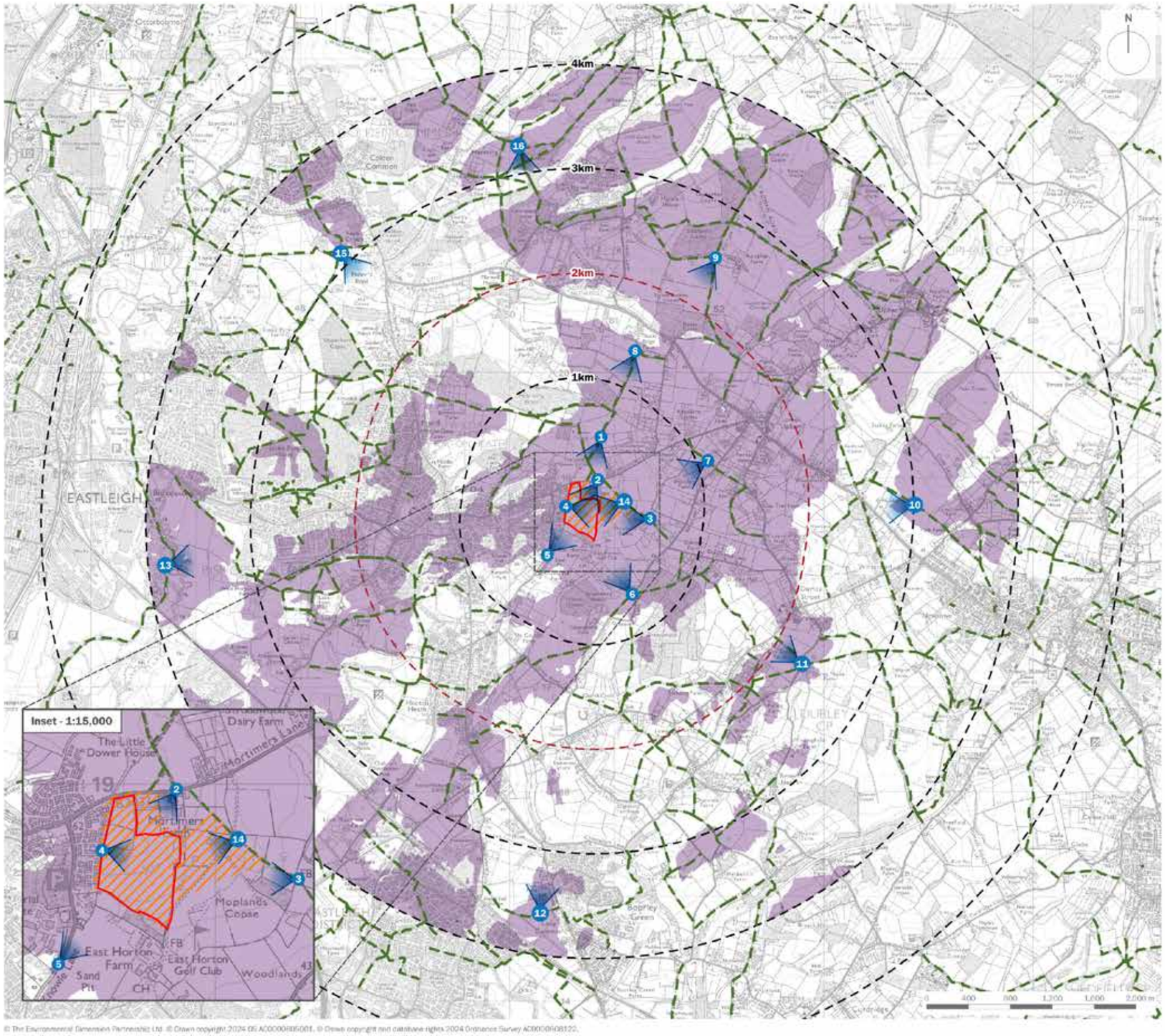
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Viewpoint Location Plan



Site Boundary

Range Rings (at 1km intervals)

2km Detailed Study Area

Photoviewpoint Location

Public Rights of Way (PRoW)

Zone of Theoretical Visibility (ZTV)

Zone of Primary Visibility (ZPV)

Note:
Zone of Theoretical Visibility (ZTV) was calculated using a spatial modelling algorithm which considers the following parameters:
-1.6m Receptor Elevation (Observer Height)
-9m Proposed Development Locations (Ridge Height)
-360 Degree Field of View
-OS Terrain 5m Digital Terrain Model (DTM) (vertical accuracy of +/- 2.5m)

client

Bloor Homes Limited

project title

Land south of Mortimers Lane, Fair Oak

drawing title

Findings of Visual Appraisal

date	**02 DECEMBER 2024**	drawn by	**DJo**
drawing number	**edp7852_d004e**	checked	**WGa**
scale	**1:35,000 @ A3**	QA	**RBa**

the environmental dimension partnership

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1.0 Viewpoint 1 - Along Footpath HP/085/21/1



National Grid Reference:
450849.605, 119356.846

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
49.29 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
11.01



Existing extended panorama

1.1. Viewpoint 1 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

2.0 Viewpoint 2 - Meeting point of Footpath HP/085/17/1 and Mortimers Lane



National Grid Reference:
450897.788, 118980.808

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
53.55 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
09.43



Existing extended panorama

2.1. Viewpoint 2 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

3.0 Viewpoint 3 - Along Footpath HP/085/17/1 within East Horton Golf Course



National Grid Reference:
451187.035, 118678.536

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
47.72 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
11.48



Existing extended panorama

3.1. Viewpoint 3 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

4.0 Viewpoint 4 - Along Pembers Hill Drive



National Grid Reference:
450538.798, 118771.246

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
60.82 AOD

Horizontal Field of View:
90 °

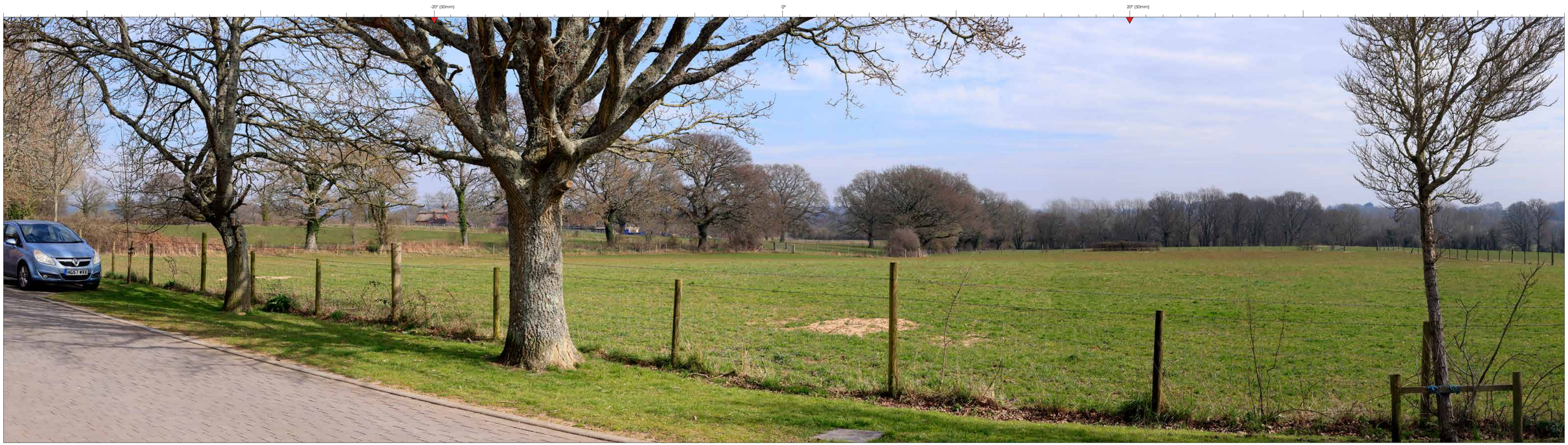
Date:
19.03.25

Time:
12.17



Existing extended panorama

4.1. Viewpoint 4 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

5.0 Viewpoint 5 - Along Knowle Lane



National Grid Reference:
450214.039, 118039.599

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
47.17 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
12.47



Existing extended panorama

5.1. Viewpoint 5 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

6.0 Viewpoint 6 - Along HP/069/17/3



National Grid Reference:
451079.260, 117798.887

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
54.01 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
15.59



Existing extended panorama

6.1. Viewpoint 6 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

7.0 Viewpoint 7 - Along ProW Footpath HP/235/21/2



National Grid Reference:
450214.039, 118039.599

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
47.17 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
13.23



Existing extended panorama

7.1. Viewpoint 7 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

8.0 Viewpoint 8 - Along Bridleway HP/085/23/1



National Grid Reference:
451196.407, 120206.768

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
46.85 AOD

Horizontal Field of View:
90 °

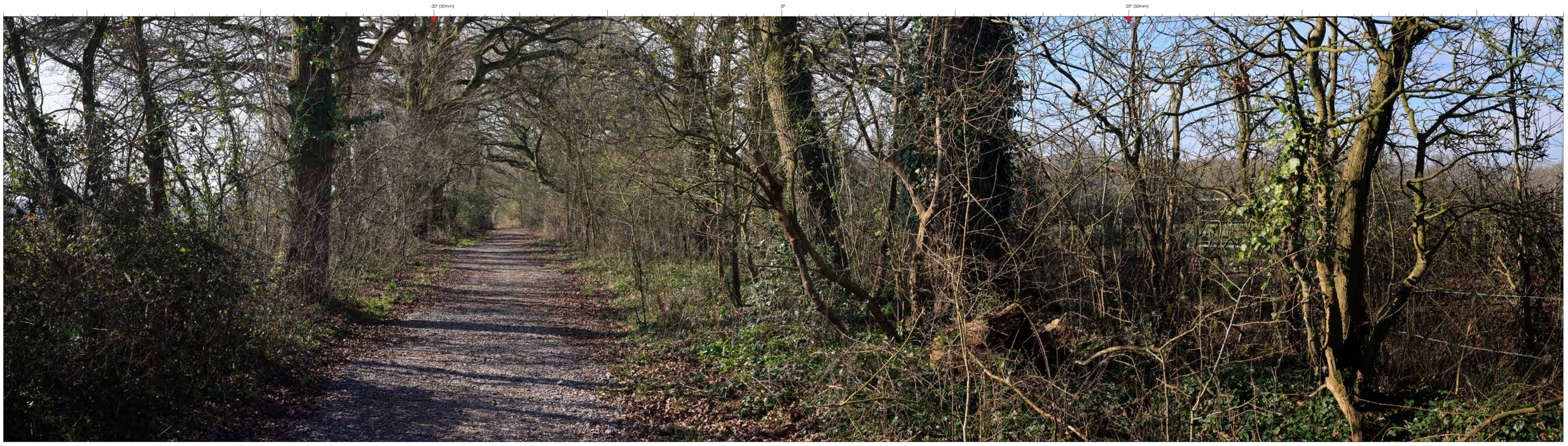
Date:
19.03.25

Time:
09.07



Existing extended panorama

8.1. Viewpoint 8 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

9.0 Viewpoint 9 - Along Footpath HP/185/35b/1



National Grid Reference:
451955.682, 121143.460

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
61.09 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
08.36



Existing extended panorama

9.1. Viewpoint 9 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

10.0 Viewpoint 10 - Along Footpath HP/185/35b/1



National Grid Reference:
454000.257, 118652.651

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
50.97 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
14.18



Existing extended panorama

10.1. Viewpoint 10 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

11.0 Viewpoint 11 - Along HP/069/24/1



National Grid Reference:
452900.483, 117242.132

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
71.39 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
15.02



Existing extended panorama

11.1. Viewpoint 11 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

12.0 Viewpoint 12 - Footpath HP/026/1/1



National Grid Reference:
450115.378, 114815.699

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
25.29 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
16.32



Existing extended panorama

12.1. Viewpoint 12 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

13.0 Viewpoint 13 - Along Itchen Way Promoted Route



National Grid Reference:
446549.440, 118805.325

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
11.47 AOD

Horizontal Field of View:
90 °

Date:
20.03.25

Time:
11.15



Existing extended panorama

13.1. Viewpoint 13 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

14.0 Viewpoint 14 - Along Footpath HP/085/17/1, within fifield parcel adjacent to site



National Grid Reference:
451046.311, 118826.262

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
49.49 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
11.23



Existing extended panorama

14.1. Viewpoint 14 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

15.0 Viewpoint 15 - Along HP/054/22/2



National Grid Reference:
448376.335, 121303.045

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
37.96 AOD

Horizontal Field of View:
90 °

Date:
20.03.25

Time:
12.10



Existing extended panorama

15.1. Viewpoint 15 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

16.0 Viewpoint 16 - Along HP/054/18/3



National Grid Reference:
450068.441, 122196.006

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
62.72 AOD

Horizontal Field of View:
90 °

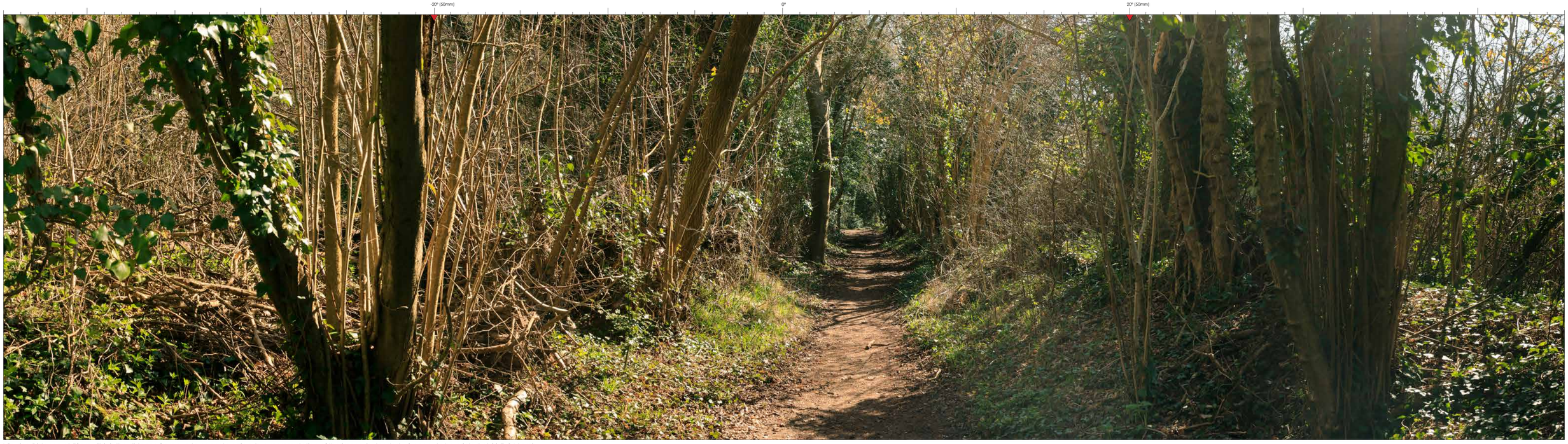
Date:
20.03.25

Time:
12.44



Existing extended panorama

16.1. Viewpoint 16 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

17.0 Viewpoint 17 - Mortimers Lane



National Grid Reference:
450670.629, 118969.331

Camera:
Canon EOS R5

Lens:
Fixed 50mm

Height of Camera Lens:
60.44 AOD

Horizontal Field of View:
90 °

Date:
19.03.25

Time:
09.58



Existing extended panorama

17.1. Viewpoint 17 - Existing baseline view.



Viewing Distance at **50cm** - This is the distance from eye to paper to gain a true representation of the image (extended A3 pages to be printed at 29.7x84.1cm)

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Appendix 10: sHRA (EDP, April 2025)

Land south of Mortimers Lane, Fair Oak

DRAFT

Shadow Habitats Regulations Assessment

Prepared by:
The Environmental Dimension Partnership Ltd

On behalf of:
Bloor Homes Limited

April 2025

Report Reference
edp7852_r018

Document Control

DOCUMENT INFORMATION

Client	Bloor Homes Limited
Report Title	Shadow Habitats Regulations Assessment
Document Reference	edp7852_r018_DRAFT

VERSION INFORMATION

	Author	**Formatted**	**Peer Review**	**Proofed by/Date**
018_DRAFT	MNe	FMi	IBo	-

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APPENDICES

Appendix EDP 1 Development Proposals

Appendix EDP 2 Vulnerabilities of European Sites

Appendix EDP 3 Biodiversity Air Quality Screening Assessment, AQC (October 2024)

PLANS

Plan EDP 1: Statutory Designated Sites
(edp7852_d012b 08 November 2024 DJo/MNe)

Section 1
Introduction, Context, Purpose

1.1 This Shadow Habitats Regulations Assessment (sHRA) has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Bloor Homes (hereafter referred to as 'the Applicant'). It details the HRA process in relation to Proposed Development at Land South of Mortimers Lane (hereafter referred to as 'the Project') and considered the impacts of the proposed development on relevant European and internationally designated sites.

1.2 The project site is agricultural land located immediately east of Fair Oak, within the administrative area of Eastleigh Borough Council (EBC), the local planning authority.

1.3 The Project is not currently identified within the Local Plan HRA[1], however the site formed part of the proposed allocation at 'land north and east of Fair Oak' in the submitted Eastleigh Local Plan (2016-2036)[2] under then Policy S5 as one of two strategic growth options[3] to support the then proposed housing strategy for Eastleigh.

1.4 The Site also is identified within the latest Settlement Gaps Background Paper[4] which forms the evidence base for the Local Plan Review. The Project site forms part of Strategic Development Option A for the Issues and Options (SDO A - North east of Fair Oak) in the Eastleigh Local Plan Review Issues and Options Consultation Document (December 2024). The current Local Plan HRA does not take account of this option. However, the submission HRA for the Local Plan[5] and Preliminary Screening Report[6] for the Local Plan review has been undertaken which includes the Site as part of the broader SDO A option.

1.5 Consideration has been given for development to result in significant effects associated with the following impacts:

- Physical loss of/damage to European Sites;
- Physical effects on functionally linked habitats (loss of supporting habitat);
- Non-physical disturbance effects;
- Air pollution effects;
- Recreational pressure; and

[1] Urban Edge Environmental Consulting (2019) Habitats Regulations Assessment for the Eastleigh Borough Local Plan (Main Modifications)2016-2036: HRA Report for the Submission Plan. Report for Eastleigh Borough Council
[2] https://www.eastleigh.gov.uk/media/3484/final-local-plan-document-june-2018-print.pdf
[3] 6 https://www.eastleigh.gov.uk/media/4142/sgo-001-part-1-sgo-paper.pdf
[4] https://www.eastleigh.gov.uk/media/15028/settlement-gaps-background-paper.pdf
[5] Urban Edge Environmental Consulting (2021) HRA for the Eastleigh Borough Local Plan: Proposed Submission Stage
[6] https://www.eastleigh.gov.uk/media/15017/hra-preliminary-screening-report.pdf

- Water quality/hydrology effects including nutrient enrichment, surface water and abstraction.

PURPOSE OF THIS REPORT

1.6 This sHRA aims to provide relevant technical information to enable competent authorities to discharge their functions under Regulations 7 (competent authorities) and 63 (requirement to carry out an Appropriate Assessment (AA)) of the *Conservation of Habitats and Species Regulations* 2017 in relation to the Project.

1.7 Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) states that:

"A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives."

1.8 Regulation 63 (2) further states that: "*a person applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required".*

1.9 Regulation 63 (3) states that: *"the competent authority must for the purposes of the assessment consult the appropriate nature conservation body and have regards to any representations made by that body within such reasonable time as the authority specifies".*

1.10 Regulation 63 (5) goes on to state that: "*in the light of the conclusions of the assessment, and subject to regulation 64, the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European Site or the European offshore marine site (as the case may be)".*

1.11 Regulation 63 (6) concludes that *"in considering whether a plan or project will adversely affect the integrity of the site, the competent authority must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which it proposes that the consent, permission or other authorisation should be given".*

1.12 This sHRA considers the potential for Likely Significant Effects (LSEs) on European sites to arise as a result of the Proposed Development at each stage of the HRA process. European sites include Special Protection Areas (SPAs) classified under the European Commission Directive on the Conservation of Wild Birds and SACs designated under the Conservation of Habitats and Species 2017 (as amended). This report will also consider sites designated under the Ramsar Convention on Wetlands of International Importance (1971, Ramsar Sites) as per UK Government Policy (set out in paragraph 194 of the National Planning Policy Framework (NPPF 2024)). This policy also brings candidate SACs (cSACs) and potential

SPAs (pSPAs) within the requirement for HRA. For ease of reference, all such designated sites will hereafter be referred to as 'European sites'.

1.13 It is noted that s6(3) of the European Union (EU) (Withdrawal) Act 2018 (as amended) requires retained EU law (such as the Conservation of Habitats and Species Regulations 2017 (as amended)) to be interpreted in line with 'retained case law' which includes retained EU case law.

1.14 Details pertaining to the methodology and approach taken in preparing this sHRA are detailed in Section 2.

LOCATION AND CONTEXT

1.15 The Project is located at the east of the built-up area of Fair Oak, and currently comprises two pastured fields extending across 11.06ha (combined) which are divided and bounded by mature hedgerows, scattered trees, and post and wire fencing.

1.16 The Project is bound to the north by Mortimers Lane, beyond which lies the recently completed development known as 'Pembers Hill Park' (app ref. O/15/77190 / 7RM/18/83278). The outline and subsequent reserved matters application sought consent for the construction of 242 new homes comprising 1 and 2 bed apartments and 2, 3, 4, 5 bed family sized homes ranging between 2 – 3 storeys on the edge of Fair Oak.

1.17 To the west, the Project abuts residential development known as 'Knowle Lane' (app. ref. O/13/72490/R/15/77751) for 73 new homes and southwest at 'East Knowle' (F/17/80640/RM/18/83737) for 34 new 2, 3 and 4 bed homes. These developments extend the built-up edge of Fair Oak further east and up to the boundary of the Project.

1.18 The land adjacent to the southwest corner of the site was granted planning permission for the development off five general industrial buildings (Use Class B2) in July 2023 (ref. F/20/87889) and is largely completed.

1.19 East Horton Golf Club abuts the east of the site and has been sculpted, heavily managed, and landscaping maintained in accordance with its current use.

PROJECT SUMMARY

1.20 This document forms part of an Outline Planning Application (OPA) for the Project, with all matters reserved baring principal access. The Project has a tested provision of up to 245 new residential homes, multi-functional space, including a mobility hub, and swathes of public open space and additional landscape planting. Details of the Project are shown on in **Appendix EDP 1.**

Section 2
Methodology

GUIDANCE AND COMMON STANDARDS FOLLOWED

2.1 This assessment has been undertaken with reference to established guidance, as follows:

- Guidance set out by Natural England[7];
- The outcome of the 'People Over Wind' case[8];
- Natural England's Operational Standard for HRA[9];
- Guidance for Ecological Impact Assessment published by the Chartered Institute of Ecology and Environmental Management[10,11]; and
- The DTA handbook[12].

ASSESSMENT PROCESS

2.2 European Sites considered within this sHRA are detailed within **Section 3** of this report. Each Habitats Site within the Project's Zone of Influence (ZoI) will be considered sequentially through up to four stages, as follows.

2.3 The HRA assessment process follows four sequential stages, with guidance having been published to aid competent authorities to fulfil their responsibilities:

- Stage 1: Habitat Screening;
- Stage 2: Appropriate Assessment;
- Stage 3: Alternative Solutions; and
- Stage 4: Interests of Overriding Public Interest and Compensatory Measures.

Stage 1: Screening

2.4 This considers the possibility for LSE to occur based on a high-level analysis of risks, taking into account the spatial relationship between impact sources and designated sites (and functionally linked habitats and species), the magnitude of changes predicted with regard

[7]Appropriate assessment - GOV.UK accessed 30.01.25.
[8] CJEU, 12 April 2018. *People Over Wind and Sweetman v Coillte Teoranta* (C-323/17).
[9] Natural England Standard: HRA Habitats Regulations Assessment (HRA) (NESTND026) V1.4. April 2019.
[10] CIEEM (2024). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal, Version 1.3. Chartered Institute of Ecology and Environmental Management, Winchester.
[11] CIEEM (2010). *Guidelines for Ecological Impact Assessment in Britain and Ireland: Marine and Coastal*. Chartered Institute of Ecology and Environmental Management, Winchester.
[12] Tyldesley, D., and Chapman C., (2013) The Habitats Regulations Assessment Handbook, DTA Publications Ltd. Accessed 10.02.2025

to atmospheric and hydrological receptor pathways (with reference to relevant evidence), and any physical or other relationships between the Project and each Habitats Site. Stage 1 screening for LSE considers the project both alone and in-combination with other projects.

2.5 If it can be confidently predicted, on the basis of objective information, that no LSE are identified for all the European Sites considered, then HRA stages 2-4 are not required, and the report would take the form of a screening assessment.

2.6 The April 2018 judgment of 'People over Wind and Sweetman' ruled that mitigation measures intended to avoid or reduce the harmful effects of the plan or project on a European Site could not be considered at the Stage 1 screening stage. Therefore, in this sHRA report, such measures will only be taken into account as part of Stage 2: Appropriate Assessment.

Stage 2: Appropriate Assessment

2.7 Those LSEs screened in will then be subject to progression to Stage 2: Appropriate Assessment. Under the Habitats Regulations, the Competent Authority is required to carry out an Appropriate Assessment if there are deemed to be LSEs on European sites when considered alone or in combination with other projects, and where those LSEs arise from a plan or project not directly connected with, or necessary to the management of, that site or sites.

2.8 If Stage 1 identifies LSE upon a Habitats Site, an assessment of the effects of the Project upon the site(s)'s conservation objectives/interest features is carried out either from the project alone or in combination with other plans or projects, which cannot be discounted. Conservation objectives for European Sites are defined and published by Natural England and assessments will refer to relevant objectives as necessary. The assessment will include sufficient information to enable an AA to be undertaken by the competent authority and will detail mitigation designed to reduce or eliminate identified LSE upon those European Sites screened into the assessment. LSE screened in are set out and assessed against proposed mitigation measures in **Section 5** and residual effects identified where applicable.

2.9 HRA Stages 3 and 4 will be required if Stage 2 concludes that the Project adversely affects the integrity of European Site(s), or when adverse effects on integrity cannot be ruled out based on the evidence available, either from the project alone or in combination with other plans or projects, which cannot be discounted.

Stage 3: Consideration of Alternative Solutions

2.10 Stage 3 requires the consideration of alternatives, which may include locating the Project at an alternative location or changes to the design to eliminate residual LSE or not constructing the Project at all.

Stage 4: Imperative Reasons of Overriding Public Interest

2.11 Stage 4 is engaged where measures to avoid LSE are not possible/viable, to assess whether the Project is justified by Imperative Reasons of Overriding Public Interest (IROPI). If the

competent authority is satisfied that the Project must be carried out for IROPI, it may still be carried out.

Stage 5: Compensatory Measures

2.12 After progression through Stages 1-4, the HRA must include an assessment of the Project against any proposed compensatory measures.

2.13 In this case, owing to the nature of potential LSE identified, and that proposed mitigation is deemed to successfully negate any effects, it was deemed not necessary to take the assessment of the Proposed Development to Stage 3 or Stage 4.

2.14 Further detailed pertaining to the methodology and approach taken with regards to Stage 1 and Stage 2 are provided below, with details relating to European sites considered within this sHRA provided in **Section 3**.

Section 3
Baseline Information and Relevant European Sites

DEFINING MAXIMUM ZONES OF INFLUENCE FOR EFFECTS ARISING FROM THE PROJECT

3.1 A distance of 15km has been used as a starting point to identify European Sites with potential to be affected by impacts relating to this Project. In addition, consideration has been given to each potential impact pathway arising from the Project to determine if assessment of a wider ZoI is necessary. These pathways are listed below, and discussed in turn within this section:

- Physical loss of/damage to European Sites;
- Physical effects on functionally linked habitats (loss of supporting habitat);
- Non-physical disturbance effects;
- Air pollution effects;
- Recreational pressure; and
- Water quality/hydrology effects.

SITES CONSIDERED IN STAGE 1 SCREENING

3.2 Based on the potential maximum range at which identified effects have the potential to be significant, taking account of the modelled outputs and assessments, the need to consider the potential for LSE has been identified for the following European Sites:

- The River Itchen Special Area of Conservation (SAC) is located 3.3km east;
- Solent and Southampton Water Special Protection Area (SPA) and Ramsar are located 6km south;
- Solent Maritime SAC is located 6km south;
- Emer Bog SAC is located 10.7km west; and
- Portsmouth Harbour SPA and Ramsar are located 14.6km south-east.

3.3 These European Sites are presented on **Plan EDP 1**.

3.4 The Solent SAC is made up of several component sites. Although falling inside the catchment map for The Solent[13], both Portsmouth Harbour SPA/Ramsar and Chichester and Langstone Harbours SPA/Ramsar are not considered to be within the potential ZoI of the Project or need to be detailed in this screening assessment. This is because of their

[13] https://publications.naturalengland.org.uk/publication/6522945605468160

geographical remoteness from the Project (more than 15km distant) as well as their hydrological remoteness e.g. they fall within an adjacent hydrological catchment to the others e.g. only the Solent European Sites, associated with the Test and Itchen catchment require further consideration and these are listed above.

3.5 A summary of the qualifying features of each designation being considered at the screening stage are set out below.

River Itchen SAC

3.6 The River Itchen is situated 2km east of the Project and is designated for the following reasons:

- The site qualifies under Article 4(4) of the Habitats Directive as it hosts Annex I habitat that is a primary reason for site selection: water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Brachion* vegetation (Habitat Code 3260); and
- The site qualifies under Article 4(4) of the Habitats Directive as it hosts the following species listed in Annex II:
  - Southern damselfly. Primary reason for site selection. (Species Code 1044);
  - Bullhead. Primary reason for site selection (Species Code 1163);
  - White-clawed crayfish. Qualifying feature only (Species Code 1092);
  - Brook lamprey. Qualifying feature only (Species Code 1096);
  - Atlantic salmon. Qualifying feature only (Species Code 1106); and
  - Otter. Qualifying feature only (Species Code 1355).

3.7 The conservation objectives for this SAC are to:

"ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring[14]*;*

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species;*
- *The structure and function (including typical species) of qualifying natural habitats;*
- *The structure and function of the habitats of qualifying species;*

[14] European Site Conservation Objectives for River Itchen Special Area of Conservation Site Code: UK0012599. Available at: https://publications.naturalengland.org.uk/publication/5130124110331904

- *The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;*
- *The populations of qualifying species; and,*
- *The distribution of qualifying species within the site."*

Solent and Southampton Water Ramsar and SPA

3.8 The Solent and Southampton Water Ramsar and SPA is situated 13.8km to the south of the Project. The designated site comprises a series of estuaries and harbours with extensive mudflats and saltmarshes as well as coastal habitats including saline lagoons, shingle beaches, reedbeds, damp woodland and grazing marsh. Mudflats have a rich invertebrate fauna that forms the food resource for estuarine birds.

3.9 The site is designated under Ramsar criterion 1 ("A wetland should be considered internationally important if it contains a representative, rare, or unique example of a natural or near-natural wetland type found within the appropriate biogeographic region."), 2 ("A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities."), 5 ("A wetland should be considered internationally important if it regularly supports 20,000 or more waterbirds") and 6 ("a wetland should be considered internationally important if it regularly supports 1% of the individuals in a population of one species or subspecies of waterbird"). The Site has the following interest features:

- Criterion 1 – *"The site is one of the few major sheltered channels between a substantial island and mainland in European waters, exhibiting an unusual strong double tidal flow and has long periods of slack water at high and low tide. It includes many wetland habitats characteristic of the biogeographic region: saline lagoons, saltmarshes, estuaries, intertidal flats, shallow coastal waters, grazing marshes, reedbeds, coastal woodland and rocky boulder reefs";*
- Criterion 2 – *"The site supports an important assemblage of rare plants and invertebrates. At least 33 British Red Data Book invertebrates and at least eight British Red Data Book plants are represented on site";*
- Criterion 5 – The site supports species with peak counts in winter of 51,343 waterfowl; and
- Criterion 6 – The site supports species/populations occurring at levels of international importance over winter including:
  - Black-tailed godwit (2.6% of the population);
  - Dark-bellied brent goose (3.2% of the population); and
  - Eurasian teal (1.1% of the population).

3.10 It is designated as an SPA for the following reasons:

- Importance for breeding seabirds, including gulls and four species of terms (common term *(Sterna hirundo*), little tern (*Sterna albifrons*), Mediterranean gull (*Larus melanocephalus*), roseate tern (*Sterna dougallii*) and sandwich tern (*Sterna sandvicensis*)); and

- Importance for overwintering seabirds with a large (at least 20,000) and diverse assemblage. Important overwintering species include black-tailed godwit (*Limosa limosa islandica*), dark-bellied brent goose (*Branta bernicla bernicla*), ringed plover (*Charadrius hiaticula*) and teal (*Anas crecca*).

3.11 The conservation objectives for this SPA are to:

"ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring[15]*;*

- *The extent and distribution of the habitats of the qualifying features;*
- *The structure and function of the habitats of the qualifying features;*
- *The supporting processes on which the habitats of the qualifying features rely;*
- *The population of each of the qualifying features; and,*
- *The distribution of the qualifying features within the site."*

Solent Maritime SAC

3.12 The Solent Maritime SAC is situated 14.7km south-west of the Project and is a composite site comprising separate areas of saltmarsh and including four coastal plain estuaries and four bar-built estuaries.

3.13 The site qualifies under Article 4(4) of the Habitats Directive as it hosts Annex I habitats that are a primary reason for site selection: Estuaries (Habitat Code 1130) with a unique hydrographic regime and complex marine and estuarine habitats including extensive estuarine flats, mudflats and rare sponges; Spartine swards (Habitat Code 1320) with the site being the only one to support smooth cord-grass (*Spartina alterniflora*) in the UK; and Atlantic salt meadows (Habitat Code 1130) with the site containing the second largest aggregation of this habitat in south and south-west England.

3.14 Annex I habitats which are not a primary reason for site selection include:

- Sandbanks which are slightly covered by sea water all the time (Habitat Code 1110);

[15] European Site Conservation Objectives for Solent and Southampton water Special Protection Area Site Code: UK9011061. Available at: https://publications.naturalengland.org.uk/publication/6567218288525312

- Mudflats and sandflats not covered by seawater at low tide (Habitat Code 1140);
- Coastal lagoons (Habitat Code 1150);
- Annual vegetation of drift lines (Habitat Code 1210);
- Perennial vegetation on stony banks (Habitat Code 1220);
- Salicornia and other annuals colonising mud and sand (Habitat Code 1310); and
- Shifting dunes along the shoreline with Ammophilia arenaria (Habitat Code 2120).

3.15 There is an Annex II species present as a qualifying feature, but this is not a primary reason for site selection:

- Desmoulin's whorl snail (*Vertigo moulinsiana*) (Species Code 1016).

3.16 The conservation objectives of this SAC are to:

"ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring[16]*;*

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species;*
- *The structure and function (including typical species) of qualifying natural habitats;*
- *The structure and function of the habitats of qualifying species;*
- *The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;*
- *The populations of qualifying species; and,*
- *The distribution of qualifying species within the site."*

Emer Bog SAC

3.17 The Emer Bog SAC is situated 7.4km south-west of the Project. The site qualifies under Article 4(4) of the Habitats Directive as it hosts Annex I habitat that is a primary reason for site selection: Transition Mires and Quaking Bogs (Habitat Code 7140).

[16] European Site Conservation Objectives for Solent Maritime Area of Conservation Site Code: UK0030059. https://publications.naturalengland.org.uk/publication/5762436174970880

3.18 The conservation objectives for this Site are to:

"ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring[17]*;*

- *The extent and distribution of the qualifying natural habitat;*
- *The structure and function (including typical species) of the qualifying natural habitat; and,*
- *The supporting processes on which the qualifying natural habitat rely."*

Portsmouth Harbour SPA and Ramsar

3.19 Portsmouth Hamour SPA and Ramsar are located 14.6km south-east of the Site and consist of a large, industrialised estuary with one of the largest expanses of mudflats and tidal creeks on the south coast of Britain.

3.20 The site is designated under the following Ramsar Criterion:

- Criterion 3 – *"The intertidal mudflat areas possess extensive beds of eelgrass (Zostera angustifolia and Zostera noltei) which support the grazing dark-bellied brent geese populations. The mud-snail (Hydrobia ulvae) is found at extremely high densities, which helps to support the wading bird interest of the site. Common cord-grass (Spartina anglica) dominates large areas of the saltmarsh and there are also extensive areas of green algae (Enteromorpha spp.) and sea lettuce (Ulva Lactuca). More locally the saltmarsh is dominated by sea purslane (Halimione portulacoides) which gradates to more varied communities at the higher shore levels. The site also includes a number of saline lagoons hosting nationally important species"; and*
- Criterion 6 – The site supports wintering populations occurring at internationally important levels of dark-bellied Brent goose (2.1% of the GB population).

3.21 The site is designated as an SPA for regularly supporting overwintering populations of:

- Dark-belied brent goose (0.5% of the GB population);
- Dunlin (*Calidris alpina*) (1% of the GB population);
- Black-tailed godwit (*Limosa limosa islandica*) (0.4% of the GB population); and
- Red-breasted merganser (*Mergus serrator)* (0.9% of the GB population).

[17] European Site Conservation Objectives for Emer Bog Special Area of Conservation Site Code: UK0030147. Available at: https://publications.naturalengland.org.uk/publication/4900551749795840

VULNERABILITIES OF EUROPEAN SITES

3.22 Throughout this assessment the relevant threats/pressures to which the SAC, SPA and Ramsar sites are vulnerable has been considered. This information has been identified through Natural England's 'Site Improvement Plan' (SIP) for the relevant sites. The details of these threats/pressures for each Site are set out in **Appendix EDP 2**. The threats/pressures identified have been assessed based on the residential nature of the Project, and given the type and location of development, the Project will not require the modifying of management of any European sites, nor is there considered to be potential risks of introducing invasive species, increasing fishing, pest control or climate change risks. Relevant threats/pressures to the European sites have been identified to include public access and disturbance, water pollution and hydrological changes and air pollution.

3.23 It is recognised that the Project will not have any potential influence on some of these vulnerabilities. In addition, there may be other potential impact pathways from the Project Development which are not listed as a vulnerability on the relevant SIPs.

BASELINE INFORMATION

3.24 To inform the assessment of ecological impacts of the Project, an extensive suite of desk and field-based investigation has been completed for the Project site. The methodology, results and conclusion of these investigations are presented within the Project Ecological Appraisal (report reference: edp8752_r011).

3.25 Pertinent data collated and surveys completed to inform this sHRA include:

- Desk studies undertaken in November 2022 and August 2024 with information obtained from Hampshire Biological Records Centre (HBIC) and Multi-Agency Geographic Information for the Countryside (MAGIC) website;
- Habitat surveys undertaken in November 2022 and June 2023, with condition assessments undertaken in August 2023;
- Breeding bird surveys undertaken in 2023; and
- A wintering bird survey undertaken in January 2023.

3.26 The key findings that are applicable to the HRA are summarised below:

3.27 The Project does not include or lie directly adjacent to any European Sites. However, there are several European Sites within the potential ZoI of the Project.

3.28 The Project site does not support any of the qualifying habitats of the European Sites. Habitats across the Project consist largely of dry modified grassland, with boundary hedgerows and an occasionally wet ditch running along the southern boundary of the Site.

3.29 The Project site does not support any of the species that are qualifying features of the European sites. Breeding and wintering bird surveys did not identify any of the qualifying bird species of the Solent designated sites, and the habitats on Site are of limited suitability

to support the wintering and wading birds. The habitats on Site are also considered unsuitable to support the qualifying species of the River Itchen as assessed in detailed below.

3.30 This sHRA has also been informed by the traffic modelling and air quality assessment which assisted in identifying the appropriate ZoI and European Sites potentially affected by changes in air pollutants. These included European Sites within 200m of the affected road network in line with DMRB guidance[18] which states that beyond 200m of the affected road network, the contribution of vehicle emissions is not significant.

3.31 A review of the HRA undertaken for both the adopted local plan and the emerging local plan identified key pathways for impacts on designated sites, which, where relevant have been considered for the Project within this HRA. The HRA undertaken for the adopted local plan was amended in 2022[5] as the Strategic Growth Options (SGO) were removed from the Local Plan. The original HRA[1] which was prepared for the Local Plan submission included the Strategic Growth Options, one of which covered the Project site. As part of the amended Local Plan HRA, the SGOs were removed from consideration. Both the submission HRA and adopted main modifications HRA are considered further within the relevant screening in Stage 4.

[18] Highways England (2019). Design Manual for Roads and Bridges.. LA 105.

Section 4
Stage 1: Screening of Likely Significant Effects

4.1 This section considers the potential for LSEs to occur on the European sites identified in **Section 3** as a result of the implementation of the Proposed Development. In accordance with best practice, this discussion is focused on the potential of the development to impact upon the conservation objectives of these designations.

4.2 All potential effects discussed within this Section are considered in the absence of mitigation, as required in accordance with CJEU judgment C-323/17 in 2018 (People Over Wind and Sweetman v. Coillte Teoranta).

IMPACT PATHWAYS THAT HAVE THE POTENTIAL TO GIVE RISE TO EFFECTS WITHIN EUROPEAN/RAMSAR SITES

Physical Loss of/Damage to European Sites

4.3 The Project is not within or adjacent to any European Site, therefore has no potential to directly damage habitats within them. The intervening distance between the Project and identified European or Ramsar sites described negates the potential for any direct effects. Development will have no bearing on any of identified pressures with relate to physical modification. As such, direct adverse effects to the named European Sites/Ramsar are consequently screened out as the Project will have no effect on any qualifying feature's conservation objectives.

Physical Effects on Functionally Linked Habitats (Loss of Supporting Habitat)

4.4 With reference to Natural England guidance set out in NECR207 and the Local Plan HRA, there is a need to consider 'functionally linked' populations where they have been identified beyond the boundaries of European Sites, in addition to populations of species occurring within the boundaries of the European Sites themselves.

4.5 Consideration for those European Sites with mobile qualifying species is required. The ZoI defined in the WCC Local Plan HRA is 15km and this same ZoI is applied in this sHRA. Given the nature, size and location of the Project, there is no potential for LSEs to occur on mobile species supported by European Sites beyond this distance.

4.6 Relevant European Sites within the ZoI include:

- River Itchen SAC;
- Solent and Southampton Water Ramsar and SPA; and
- Portsmouth Harbour Ramsar and SPA.

4.7 Emer Bog SAC and Solent Maritime SAC do not have any qualifying mobile species which could rely on FLL within the Project site, and as such LSEs due to FLL on these sites has been screened out from further assessment.

River Itchen SAC

4.8 The likelihood of the Project being functionally linked to the River Itchen SAC and supporting mobile species such as otter (*Lutra Lutra*) which is a qualifying feature at this SAC is considered highly unlikely. While a small ditch runs along the southern boundary of the Project, the ditch was dry throughout the majority of the survey period, with only occasional low levels of water. As such, it was considered to be largely unsuitable for otter and they are presumed to be absent from the Site. The ditch itself has connectivity to a tributary of the River Hamble and as such does not drain to the River Itchen. Given the lack of hydrological connectivity, the Project is not considered to provide functionally linked habitat for otter.

4.9 Southern blue damselfly is also a qualifying feature of the SAC. The species is specialised in its habitat requirements, localised to shallow, well-vegetated, base-rich runnels and flushes[19]. Permanent continuous water flow is also noted as an important feature of habitats supporting the species[20]. Given the lack of hydrological connectivity to the River Itchen and habitat on site, there no functionally linkage to the SAC.

4.10 White-clawed crayfish (*Austropotamobius pallipes*) are also qualifying feature of the River Itchen SAC and make use of freshwater habitats adjacent to the waterbodies they exist within. Given the nature of the ditches and the lack of connectivity to the River Itchen, the habitats within the Project could not be relied upon by any population of crayfish associated with the SAC.

4.11 Brook lamprey (*Lampetra planeri*) and bullhead (*Cottus gobio*), additional qualifying features are not migratory and rely solely on habitats within the SAC and whilst Atlantic Salmon (*Salmo salar*) is migratory, again it relies solely on habitats that are within designation boundaries. Given the lack of connectivity to the River Itchen and the drainage nature of the ditches, the habitats within the Project will not support the populations associated within the SAC.

4.12 Given the Project is not likely to provide functionally linked land for any of the qualifying species of the River Itchen, there is no potential for effects on FLL and as such no pathway for LSEs on the SAC as a result. This pathway is therefore screened out from further assessment.

Solent and Southampton Water Ramsar and SPA

4.13 The likelihood of the Project being functionally linked to the Solent and Southampton Water SPA/Ramsar and supporting significant populations of breeding/over-wintering qualifying bird species is considered highly unlikely. The Project site consists largely of dry modified grassland, unsuitable to support the wading waterbird species of the SPA/Ramsar. This is supported within the Solent Waders and Brent Goose Strategy[21] which does not identify any

[19] JNCC (no date) 1044 Southern Damselfly *Coenagrion mercurial.* Available: (https://sac.jncc.gov.uk/species/S1044/#:~:text=The%20southern%20damselfly%20Coenagrion%20mercuriale%20has%20very%20specialised,chalk%20rivers.%20Most%20sites%20are%20on%20wet%20heath. Accessed: 02/04/2025

[20] Thompson DJ, Rouquette JR & Purse BV (2003). Ecology of the Southern Damselfly. Conserving Natura 2000 Rivers Ecology Series No. 8. English Nature, Peterborough.

[21] Solent Waders and Brent Goose Steering Group (2020) Solent Waders and Brent Goose Strategy https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b

core, primary or secondary support areas beyond 2km inland and does not include the Site as supporting habitat.

4.14 Breeding and wintering bird surveys undertaken in 2023 also support this, as none of the qualifying species were identified during the survey visits.

4.15 Due to the distances involved and lack of suitable supporting habitat, the Project is not functionally linked to this designation. Full details of the Project's ecological baseline, including the breeding bird survey, can be found in the Ecological Appraisal (report reference: edp7852_r011). As such, LSEs on the Solent and Southampton Water Ramsar and SPA as a result of FLL effects are screened out from further consideration.

Portsmouth Harbour Ramsar and SPA

4.16 The Project site is considered highly unlikely to support the wintering bird qualifying species of the Ramsar and SPA. The Project site consists largely of dry modified grassland, unsuitable for the qualifying species. Portsmouth Harbour forms part of the wider Solent network covered by the Solent Waders and Brent Goose Strategy. The strategy which does not identify any core, primary or secondary support areas beyond 2km inland and does not include the Site as supporting habitat.

4.17 Breeding and wintering bird surveys undertaken in 2023 also support this, as none of the qualifying species were identified during the survey visits.

4.18 Due to the distances involved and lack of suitable supporting habitat, the Project is not functionally linked to this designation. Full details of the Project's ecological baseline, including the breeding bird survey, can be found in the Ecological Appraisal (report reference: edp8752_r011). As such, LSEs on the Solent and Southampton Water Ramsar and SPA as a result of FLL effects are screened out from further consideration.

Non-physical Disturbance Effects

4.19 During construction and operation, disturbance effects on qualifying species of the European Sites may occur as a result of increased noise, vibration or lighting. River Itchen SAC, Solent and Southampton Water Ramsar and SPA and Portsmouth Harbour Ramsar and SPA have qualifying species identified to be sensitive to disturbance via these pathways. Emer Bog SAC and Solent Maritime SAC do not have qualifying specie sensitive to noise, vibration or light disturbance and as such are not considered further below.

River Itchen SAC

4.20 The most recent preliminary HRA[6] undertaken for the Local Plan review identified a precautionary 100m screening zone for otter for potential noise and vibration effects based on otter hearing thresholds and research into construction activity disturbance. This same threshold has been considered suitable here. Given that the Project is located over 3.3km from the SAC, and does not lie within 100m of any watercourses with connectivity to the River Itchen, no LSEs on otter as a qualifying species are anticipated as a result of noise or vibration effects during construction or operation.

4.21 The Local Plan HRA and the most recent preliminary HRA undertaken for the Local Plan review also identified a potential screening distance of 70m for noise and vibration effects on Atlantic Salmon based on Environment Agency criteria for watercourse disturbance and research on piling operations. Given that the Project is located over 3.3km from the SAC, and does not lie within 70m of any watercourses with connectivity to the River Itchen, no LSEs on Atlantic salmon as a qualifying species are anticipated as a result of noise or vibration effects during construction or operation.

4.22 White clawed crayfish and southern damselfly are not considered to be sensitive to noise and vibration. However, as a precautionary approach, the larger 100m screening zone identified for otter has also been applied to both species.

4.23 As the Project is located outside of the identified screening Zones of Influence identified above for noise and vibration disturbance, LSEs as a result of disturbance of the qualifying species are considered highly unlikely to occur and as such are screened out from further assessment.

4.24 Of the qualifying species detailed above, otter is the only species considered likely to be sensitive to lighting disturbance. A screening zone for light impacts was not identified as part of the local plan HRA. Levels of light disturbance are highly dependent on the individual project lighting levels and local topography. However, given the Project is over 3.3km from the SAC and does not contain any functionally linked land for otter (or any of the other qualifying species), it is considered highly unlikely that LSEs would occur as a result of the Project and lighting effects are screened out from further assessment.

Solent and Southampton Water Ramsar and SPA

4.25 Construction and operational noise, vibration or lighting effects during construction or operation may result in disturbance to the qualifying water birds for which the European Sites are designated. While disturbance distances vary based on species and type of disturbance, the Local Plan Review HRA references research which identified Brent goose and other wading bird species to generally respond to disturbance through changes in behaviour or displacement from suitable habitats within 80-100m of the source of the disturbance. The HRA has used this distance as a screening zone, and for the purposes of this assessment 100m has been taken to be an acceptable distance to screen disturbance effects on.

4.26 The Ramsar/SPA is located over 6km south of the Project and as identified above does not contain any supporting habitat or functionally linked land for the qualifying bird species of the European Site. As the Ramsar/SPA does not sit within the identified 100m screening zone, no LSEs as a result of noise, vibration or lighting disturbance of qualifying species are anticipated and this pathway is screened out from further assessment.

Portsmouth Harbour Ramsar and SPA

4.27 Construction and operational noise, vibration or lighting effects during construction or operation may result in disturbance to the qualifying water birds for which the European Sites are designated. While disturbance distances vary based on species and type of disturbance, the Local Plan Review HRA references research which identified Brent goose and other wading bird species to generally respond to disturbance through changes in

behaviour or displacement from suitable habitats within 80-100m of the source of the disturbance. The HRA has used this distance as a screening zone, and for the purposes of this assessment 100m has been taken to be an acceptable distance to screen disturbance effects on.

4.28 The Ramsar/SPA is located over 14.6km south of the Project and as identified above does not contain any supporting habitat or functionally linked land for the qualifying bird species of the European Site. As the Ramsar/SPA does not sit within the identified 100m screening zone, no LSEs as a result of noise, vibration or lighting disturbance of qualifying species are anticipated and this pathway is screened out from further assessment.

Air Pollution Effects

4.29 The maximum ZoI for air quality effects arising from the Project has been defined with reference to the Eastleigh Local Plan HRA[1,5] and the Local Plan Review HRA[6] and informed by the Air Quality Assessment (**Appendix EDP 3**) undertaken for the Project.

4.30 In line with relevant guidance from DMRB which states that beyond 200m of the affected road network, the contribution of vehicle emissions is not significant, and JNCC guidance[23] on air quality thresholds, the below screening zones have been identified:

- Road impacts - 200m of any road that experiences a 1000 Average Annual Daily Traffic (AADT) or more increase from the Project; and
- Construction impacts - 50m of the routes used by construction vehicles up to 250m from site exits and 250m of the site boundary.

4.31 There are no designated sites within 50m of the construction vehicle routes up to 250m from site exits and 250m of the Site Boundary. As such, LSEs as a result of construction stage impacts have been screened out for all European Sites.

4.32 The HRA undertaken for the Local Plan Review identified potential LSEs as a result of air pollution on the River Itchen SAC, the Solent Maritime SAC and the Solent and Southampton Water Ramsar and SPA.

4.33 JNCC guidance highlights that impacts on road traffics from development schemes should only take into account impacts within 10km of the Project unless it consists of a road infrastructure Scheme. As the development is for residential development, LSEs as a result of air quality impacts have been screened out for the following sites:

- Emer Bog SAC (10.7km from the Project); and
- Portsmouth Harbour SPA and Ramsar (14.6km from the Project).

4.34 Whilst the Solent Maritime SAC and the Solent and Southampton Water Ramsar/SPA are located within 10km of the Project, the transport assessment for the Project has identified that the European Sites are not located within 200m of a road which experiences an increase of over 1000 AADT. Additional assessment based on in-combination traffic flows

[23] Main Report: Guidance on Decision-making Thresholds for Air Pollution

which are <1000 AADT do not required further assessment and consequently, air quality impacts of which have the potential to be significant can be scoped out. Air quality effects are not carried forward to AA for these European Sites.

4.35 As detailed within the Air Quality Assessment[22] The traffic modelling indicates that by 2029 with the completion of the Project in-combination with other plans and projects, the AADT on roads within 200m of the River Itchen SAC will increase by over 1000 AADT on the B3037 (west of Sandy Lane), the B3037 (east of Chickenhall Lane) and B3037 (west of Chickenhall Lane).

4.36 The Environment Agency has published guidance[24] which allows air quality impacts from development to be screened out as insignificant if they fall below set thresholds. A threshold change of 1% of the critical levels and critical loads of air pollutants. Exceedance of these thresholds does not in itself lead to a LSE but requires further assessment of the potential impacts.

4.37 Air quality modelling for the River Itchen SAC was undertaken both considering the Project alone and in-combination with other plans and known projects. When considering the project alone the annual mean ammonia, NOx and nitrogen deposition levels all remain below the 1% threshold. However, when considered in-combination, these thresholds are exceeded for all pollutants with a 5%, 6% and 7% increase for ammonia, NOx and nitrogen deposition respectively.

4.38 Effects within 200m of the affected roads (B3037) have been modelled as part of the air quality assessment to identify the worst-case emissions and deposition levels. In line with this assessment, an assessment of impacts and habitats within 200m of the road have been considered.

4.39 Given the River Itchen is a freshwater system, phosphorus is the key limiting nutrient in the system, and nitrogen is already present in excess (as a result of agricultural practices). On that basis, the SAC itself is unlikely to be significantly impacted directly by nitrogen deposition as a result of increased traffic.

4.40 The qualifying habitat of the River Itchen is watercourse of plain to montane levels with *Rannunculs fluitans.* The River Itchen is currently in an unfavourable condition due to the phosphorous nutrient pressures, rather than nitrogen deposition pressures. Given the River Itchen is a freshwater system, phosphorus is the key limiting nutrient in the system, and nitrogen is already present in excess (as a result of agricultural practices). On that basis, the SAC itself is unlikely to be significantly impacted directly by nitrogen deposition as a result of increased traffic.

4.41 However, a qualifying feature of the SAC is the southern damselfly (*Coenagrion mercuriale*) which can be sensitive to nitrogen deposition. Southern damselflies are dependent on shallow, well vegetated base-rich runnels and flushes or small side channels of chalk rivers. Suitable habitat for the species may be adversely affected by nitrogen deposition leading to

[24] Environment Agency (2021a) Air emissions risk assessment for your environmental permit, https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit edition, Available: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit.

the fringe and emergent vegetation species used by the species for egg laying to be overtaken by more coarse species typical of enriched habitats. The affected road crosses four channels of the River Itchen, and Units 92 and 93 of the associated River Itchen SSSI lies immediately south of the Road and includes areas of rank fen and swamp, as well as ditches which may provide suitable habitat for southern damselfly. While surveys of this habitat have not been undertaken as part of this assessment, transect surveys undertaken as part of the Local Plan HRA in the area close to the road found southern damselfly to be present. As such, there is potential for LSEs due to deterioration of the species supporting habitat and this pathway has been taken forward to the Appropriate Assessment Stage.

4.42 The River Itchen located within 200m of the affected road network provides suitable habitat to support freshwater (white clawed) crayfish, otter, brook lamprey, Atlantic salmon and bullhead. However, the species are not vulnerable to atmospheric increases in air pollutants, and impacts on these species and their supporting habitats were screened out as part of the Local Plan HRA due to a lack of pathway for LSEs. In line with the Local Plan HRA approach, LSEs on these qualifying species has also been screened out for this Project.

RECREATIONAL PRESSURE

4.43 Eastleigh Borough Council has adopted the Bird Aware Solent Recreation Mitigation Strategy[25] which sets out the appropriate buffer zones within which residential development has the potential to result in recreational impacts to the Solent SAC, SPA and Ramsar network. The Solent and Southampton Water Ramsar and SPA, Solent Maritime SAC and Portsmouth Harbour Ramsar and SPA are all considered to form part of the Solent Sites network. The majority of recreational pressures on the Solent sites network have been identified to be from within this zone. Given that the Project is located outside of the 5.6km buffer of all of the Solent Sites including both the Solent and South Hampton Water Ramsar and SPA, Solent Maritime SAC and Portsmouth Harbour SPA and Ramsar, no LSEs due to recreational pressure on these sites are anticipated and this pathway has been screened out from further consideration.

4.44 The River Itchen SAC Site Improvement Plan[26] prepared by Natural England has not identified recreational pressure as a significant threat/pressure to the site. However, the Local Plan HRA identified a potential pathway for recreational impacts on the River Itchen SAC as a result of trampling and erosion of river banks and marginal vegetation leading to increased siltation and plant nutrients in the watercourse which may damage spawning habitat for the SAC qualifying fish species. In addition, otter are known to be sensitive to dogs. However, the HRA of the Local Plan identified that no LSEs on the River Itchen SAC are anticipated as a result of the Local Plan. While the Local Plan Review HRA which found potential for LSEs from the closest strategic sites and local development sites to the River, given the distance of the SAC from the Project, no LSEs as a result of increased recreational pressure are anticipated. As such, this pathway is screened out from further assessment.

4.45 Emer Bog SAC identified public access and disturbance as a potential threat for the Site. However, both the Local Plan HRA and the Local Plan Review HRA found that given the

[25] https://www.eastleigh.gov.uk/media/12025/52-solent-recreation-mitigation-strategy.pdf
[26] https://publications.naturalengland.org.uk/publication/5404054607888384

distances from the allocated sites and the SAC, recreational and other impacts on the SAC were not considered likely. While no specific buffer zones for recreational impacts on Emer Bog SAC have been identified by Eastleigh Borough Council, in line with buffer zones for other designated sites, and buffer zones adopted by adjacent councils for Emer Bog SAC[27], a 5-6km zone of influence is likely appropriate. Given the 10.7km distance of the Project from Emer Bog SAC, no recreational pressures on the European Site are considered likely. As such, no LSEs are anticipated, and this pathway has been screened out from further assessment.

Water Quality/Hydrology Effects

4.46 Water and hydrology related effects and the ZoI considered comprise the following:

- Surface water pollution effects – direct runoff and pollution to watercourses within 500m from of the boundary draining into European Sites;
- Hydrological effects - Increases of nitrogen and phosphorous load – from the connected Wastewater Treatment Works (WwTW) within catchment. The currently proposed WwTW (Chickenhall WwTW) connected to the Project is associated with the Test and Itchen Catchment which is hydrologically connected to The Solent ; and
- Hydrological effects from increases in abstraction from the River Itchen. Southern Water's Waste Resource Management Plan takes 1/3 of its water from groundwater and 2/3 from the River Test and River Itchen.

4.47 Relevant European Sites within the ZoI include:

- River Itchen SAC;
- Solent and Southampton Water Ramsar and SPA;
- Solent Maritime SAC; and
- Portsmouth Harbour Ramsar and SPA.

4.48 Emer bog SAC, whilst hydrologically sensitive, is located 10.7km west of the Project. Given the lack of hydrological connectivity and the distance from the Project, there is no water quality/hydrology effect pathway for the SAC.

Nutrient Enrichment

4.49 The Project sits within the Test and Itchen catchment, of which the River Itchen SAC is located. A major chalk aquifer underlies the River Itchen which flows into Southampton Water and the Solent. Effects on quality, particularly nutrient enrichment requires consideration in the HRA. Future housing developments could exacerbate the impact eutrophication is having on marine ecology and associated protected habitats and species. The Project is expected to be connected to either Chickenhall WwTW which discharges into the Test and Itchen Catchment, or the St Johns Crowborough WwTW which discharges into

[27] South Downs Local Plan Regulation 18 HRA

the Medway Catchment. The Site itself sits in the East Hampshire Rivers Catchment which flows into the Solent Marine sites. Given the WwTW is not confirmed at this stage, operational effects arising from increased nutrient loading into the Solent and Southampton Water Ramsar and SPA, Solent Maritime SAC and Portsmouth Harbour SPA and Ramsar from both nitrogen and phosphorus cannot be ruled out, and are brought forward to AA for all European Sites listed above.

4.50 As the Site sits outside of Itchen operational catchment, no LSEs as a result of nutrient loading on the River Itchen SAC are anticipated, and no further assessment of nutrient enrichment on the SAC is considered to be required.

Surface Water

4.51 No European Sites or supporting habitats fall within the ZoI for predicted surface run off effects as a result of the Project.

4.52 The ditch which runs along the southern edge of the Project site is largely dry, and when wet has connectivity to a tributary of the River Hamble. While the River Hamble drains into the Solent Sites, given the distance from the Solent (over 6km) and the very limited hydrological connectivity, surface runoff during construction into connecting watercourses leading to LSEs on the European Sites is considered very unlikely. However, as a precaution, this effect is considered further at AA stage for the Solent Sites.

Abstraction

4.53 The Local Plan, following advice from Southern Water will ensure that all Source Protection Zones (SPZ's) are protected through existing mitigation measures[28]. These measures will ensure that there are no adverse effects on the River Itchen SAC, which is an abstraction source.

4.54 Increased abstraction, to facilitate the Project (construction and operational phases) is not considered to cause a potential effect on the River Itchen SAC. The River Itchen is subject to strict control via abstraction licences which are designed to be sustainable and protect the River Itchen SAC[29]. Conditions imposed to abstraction licenses ensure that if any river/aquifer drops below what's needed to protect the environment, abstraction must cease. Therefore, it is concluded that any abstraction related to the Project could not affect the integrity of qualifying features in the SAC and therefore this hydrological effect does not need to be considered for the River Itchen SAC and will not be brought forward to AA. Abstraction from the other named European Sites is not anticipated because of the Project and therefore the Solent and Southampton Water Ramsar/SPA, Solent Maritime SAC, Portsmouth Harbour Ramsar/SPA and Emer Bog SAC can also be screened out from further consideration.

[28] Statement of Common Ground Between Winchester City Council and Southern Water (2024)
[29] Environment Agency (March 2019) Test and Itchen Abstraction Licensing Strategy Version 3

IN-COMBINATION REQUIREMENTS

4.55 No appreciable effects are anticipated from the Project on the Emer Bog SAC via any of the potential impact pathways described above. These European Sites do not require an in-combination assessment.

4.56 As LSE are predicted for the River Itchen SAC, Solent and Southampton Water Ramsar/SPA, Solent Maritime SAC and the Portsmouth Harbour Ramsar/SPA from the Project alone, these do not need to be assessed in-combination with other Plans or Projects at this stage either as any assessment is taken forward to AA.

4.57 Natural England's guidance on advising competent authorities states that[30]: "*It is Natural England's view that care should be taken to avoid unnecessarily combining the insignificant effects of the subject plan or project with the effects of other plans or projects which can be considered significant in their own right. The latter should always be dealt with by its own individual HRA alone. In other words, it is only the appreciable effects of those other plans and projects that are not themselves significant alone which are added into an in-combination assessment with the subject proposal".* Therefore, as the Project has the potential to cause a significant (adverse) effect regarding water quality, namely nutrient enrichment, no in-combination assessment is required.

Summary of Sites taken to Appropriate Assessment

4.58 Based on the potential maximum range at which identified effects have the potential to be significant, taking account of the modelled outputs and assessments, the need to consider the potential for LSE has been identified for the following European Sites:

- River Itchen SAC (3.3km east) in relation to air quality;
- Solent and Southampton Water Ramsar and SPA (6km south) in relation to air quality, water quality and nutrient neutrality;
- Solent Maritime SAC (6km south) in relation to air quality, water quality and nutrient neutrality; and
- Portsmouth Harbour Ramsar and SPA (14.6km south-east) in relation to air quality, water quality and nutrient neutrality.

4.59 It should be noted that no significant effects are considered to be likely in respect of European Sites in devolved administrations, or within other European Economic Area (EEA) states.

[30] Natural England Internal Guidance (June 2018). Approach to advising competent authorities on Road Traffic Emissions and HRAs V1.4 Final.

Section 5
Stage 2: Appropriate Assessment

5.1 The HRA Screening Assessment undertaken in Section 4 concluded that as a precaution in the context of case law, LSE on the conservation objectives of the following European sites cannot be completely discounted as a result of the Project with respect to air quality and nutrient neutrality. Accordingly, an assessment of these potential effects resulting from the Project alone and in combination with other plans or projects is undertaken in this section.

AIR QUALITY

5.2 No adverse effects on European Sites are anticipated as a result of air quality during construction. In addition, for the Project alone, the 1% critical levels and loads for ammonia, NOx and nitrogen deposition are not exceeded. However, as detailed within the Air Quality Assessment (**Appendix EDP 3**), the Project in-combination with future development is anticipated to lead to exceedances of the 1% thresholds of critical loads and critical levels for ammonia, NOx and nitrogen deposition for the River Itchen as a result of increased traffic levels during operation. The relevant qualifying features with potential for LSEs include:

- Southern damselfly.

5.3 The proposed development is located within the area formerly identified as a Strategic Growth Option (SGO) in the original draft of the Eastleigh Local Plan. This area was removed from the adopted Local Plan, which was finalised in April 2022. The HRA supporting the Local Plan included a detailed air quality assessment, accounting for ~11,000 new dwellings and associated traffic across Eastleigh. This included both an 'in isolation' assessment (Local Plan alone) and an 'in combination' assessment (with other plans and projects). The HRA found no adverse effects on the integrity of the River Itchen SAC from air quality, even when the SGOs were included.

5.4 A qualifying feature of the River Itchen SAC is the southern damselfly, which is sensitive to nitrogen deposition. Increased traffic can adversely affect the breeding habitats of this species. As such, the Local Plan HRA took a precautionary approach, undertaking dispersion modelling for NOx, ammonia, and nutrient nitrogen, and used this to inform Appropriate Assessment.

5.5 There is a critical load for Southern damselfly which is found in flood plain habitats, best described as rich fens rather than dwarf shrub heaths this species is typically associated with. Natural England accepted this conclusion within the Eastleigh Local Plan HRA and subsequently the effects of acid deposition on habitats used by Southern Damselfly are scoped out as rich fens are not limited by acid deposition. Southern damselfly has a CL for nutrient nitrogen of 15-30kgN/ha-year and is not considered to be sensitive to acid deposition.

5.6 The air quality modelling identified areas where nutrient nitrogen deposition was predicted to increase by more than 1% over the critical load of 15 kgN/ha/year. In total, approximately 1,900m of supporting watercourses within the SAC and 850m outside the SAC were

identified as potentially affected. However, the maximum increase in deposition was 1.33% (0.2 kgN/ha/year), which the HRA described as 'not substantial'.

5.7 Importantly, the HRA concluded that this level of change, alongside prevailing habitat conditions, would not lead to an adverse effect on the integrity of the SAC or the southern damselfly population. Natural England accepted this conclusion, and the air quality pathways were considered to have been adequately assessed.

5.8 The assessment noted that ammonia exceedances were only predicted adjacent to the M27 and were not considered significant. It also concluded that the key impact pathway was via deposition of nutrient nitrogen, rather than direct NOx exposure, given uncertainties around NOx impacts on aquatic and semi-aquatic vegetation.

5.9 The project site now proposed forms a small fraction (~7%) of the SGO area removed from the Local Plan. Since September 2022, only eight major planning applications (totalling around 250 residential units) have been submitted in the area. This represents a small portion of the 3,350 dwellings once allocated to the SGO. Consequently, there remains significant headroom between what was assessed and what is now proposed.

5.10 During the Local Plan HRA, transect surveys for southern damselfly and their habitats were undertaken, including at Ashtrim Nursery—highlighted in the Project's air quality modelling as an area where critical thresholds are exceeded. Ashtrim Nursery is an important location for southern damselfly populations, but surveys found no evidence of nutrient enrichment or eutrophication related to road traffic.

5.11 The southern damselfly is primarily found in rich fen habitats along floodplains. These habitats obtain most of their nutrients from fluvial sources rather than atmospheric deposition. Studies in the River Itchen catchment found nitrate to be in excess, while phosphate was identified as the limiting nutrient.

5.12 The APIS database confirms that nutrient nitrogen is the key air pollutant of concern for southern damselfly habitat. Current nitrogen deposition at the SAC ranges from 13.3 to 15.7 kg/ha/year, with a site average of 14.1 kg/ha/year. The in-combination modelling for the proposed Project predicts a nitrogen deposition of 22.65 kg/ha/year, which exceeds the lower range of the critical load for nutrient nitrogen (15–30 kg N/ha/year) but remains below the upper threshold.

5.13 Nevertheless, the Local Plan HRA determined that the predicted changes in deposition would not lead to significant impacts, largely because nutrient inputs to southern damselfly habitats are dominated by catchment-derived sources, not air quality. Acid deposition was also scoped out, as rich fen habitats are not sensitive to acidity, and southern damselfly is not considered sensitive to acid deposition.

5.14 Given the conservative approach taken in the Local Plan HRA and the removal of the SGOs from the final plan, the effects of the current Project—being significantly smaller in scale—are considered to fall within the scope of the previous assessment. As such, an adverse effect on the integrity of the River Itchen SAC or its qualifying features is unlikely.

5.15 It is also noted that the Project site lies outside of the River Itchen hydrological catchment. Therefore, increased phosphate inputs to the SAC are not anticipated.

NUTRIENT NEUTRALITY

5.16 In line with the Natural England Advice on Achieving Nutrient Neutrality for New Development in The Solent Region and the requirements of Eastleigh Borough Council to demonstrate nutrient neutrality, the nutrient budget has been calculated using the Solent Nutrient Calculator for the Solent Area.

5.17 The calculator has been submitted separately (report reference: edp8752_r017), and a summary has been provided below in **Table EDP 5.1.**

Table EDP 5.1: Total Nutrient Budget Calculations

Total Nutrient Budget Calculations	
Description of Values Generated	**Values Generated**
Wastewater TN load (kg TN/year):	185.56
Net land use TN change (kg TN/year):	-43.79
TN budget:	141.77
TN budget +20% buffer:	170.12
Annual Nutrient Budget	
The total annual nitrogen load to mitigate is (kg TN/yr):	170.12
Pre-2030 nutrient budget	
The total annual nitrogen load to mitigate is (kg):	720.61

5.18 Based on the development delivering 245 units, the development will generate approximately 142kg per year of additional nitrogen. With the required 20% buffer, the total nitrogen budget is 170.12kg TN/yr. The pre-2030 nutrient budget for Chickenhall WwTW is 720.61kg and represents the total amount of nutrient mitigation required before the changing permit date for WwTW.

5.19 Furthermore, the nutrient budget does not fully consider enhancements to retained habitats and how improved habitats have an increased capacity to store nutrients, particularly enhancements to scrub, tree planting, SUDs and grassland.

5.20 Consultation with Eastleigh Borough Council has identified that nutrient credits are available for purchase through the council 'nutrient offset scheme[32]' and are specifically available for purchase within the Fair Oak area. Any such measures will be detailed within a Nutrient Mitigation Strategy which can be secured via Condition and appropriate s106 or other legal agreement, such that no likely significant effects on Solent sites are anticipated. The sHRA

[32] https://www.eastleigh.gov.uk/business/developers-how-to-unlock-your-development

submitted during determination will also detail any mitigation necessary to ensure no LSE on Solent Sites.

5.21 As such, no adverse effects due to nutrient enrichment of the Solent sites including Solent and Southampton Water Ramsar and SPA, Solent Maritime SAC, and Portsmouth Harbour SPA and Ramsar are anticipated as a result of the Project.

WATER QUALITY

Effects during Construction

5.22 A Construction and Environmental Management Plan (CEMP) will be provided to include a range of measures to ensure impacts on off-site habitats and features are avoided, not least measures to ensure that any surface waters are appropriately dealt with during the construction phase. This will be sufficient to ensure that any potential adverse impacts may be fully avoided on the adjacent drain and connecting watercourses, to avoid downstream impacts on the Solent Marine Sites in terms of construction related pollution incidents. Whilst the underlying geology/soil conditions at the Project are permeable, meaning that the majority of water will soak into the soil and filter through the soil, any pollutants will be contained and extremely unlikely to enter the Solent Marine Sites given the distance from the Project.

5.23 For the avoidance of doubt, measures secured by way of the CEMP would include the provision of spill kits to machine operators, use of interceptors/bunds where appropriate and agreed safe storage protocols for any chemicals on-site. The CEMP will also secure a scheme for any disposal of contaminated waters (including run-off and contaminated drainage) that avoids potential adverse impacts arising.

5.24 The Project will incorporate Sustainable Drainage Systems (SuDS) which will control runoff from the Project for discharge via infiltration. As a minimum this is currently anticipated to include ponds, swales and SUDs such as infiltration basins throughout the Site. The Project is also potentially suitable for the inclusion of additional SuDS including water butts; filter drains along access roads; tree pits along access roads, commercial, community and sports areas; and green roof provision. The infiltration basins will have a soil filter medium to ensure they are effective at removing most nutrients and are to be designed to be dry outside major rainfall events. As part of the SuDS strategy, infiltration basins will be created in advance of the relevant phase.

5.25 The SuDS strategy and CEMP will completely neutralise any adverse effects arising during construction and operation. Additional mitigation is not required to ensure no LSEs and no adverse effects as a result of water quality impacts during construction or operation are anticipated on the River Itchen SAC, Solent and Southampton Water Ramsar and SPA, Solent Maritime SAC or Portsmouth Harbour Ramsar and SPA.

Section 6
HRA Stage 2: Overall Conclusion

6.1 As detailed within this sHRA, a screening assessment of the effects of the Project on European Sites has been undertaken. The European Sites that have been considered are:

- The River Itchen SAC;
- Solent and Southampton Water Ramsar and SPA;
- Solent Maritime SAC;
- Emer Bog SAC; and
- Portsmouth Harbour Ramsar and SPA.

6.2 Given the distance from the Proposed Development to the European sites and the lack of direct ecological pathways, the majority of impact pathways were screened out due to no LSEs from the project alone. However, LSEs in the absence of mitigation were identified for a number of European sites as a result of air pollution, nutrient pollution and water quality. As such, these pathways were taken forward to Appropriate Assessment.

6.3 Mitigation measures as set out in **Section 5** include both onsite mitigation measures and financial contributions to nutrient neutrality schemes endorsed by the LPA and Natural England. With the implementation of the mitigation measures, it is considered there would be no adverse effects alone or in-combination on the European Sites. These measures will be secured both via planning conditions and s106 agreements. As such, it can be concluded that there will be no adverse effects on the integrity of the European sites as a result of the Project

6.4 The findings of this work are set out within this document such that the competent authority, in exercising their duties under the Habitats Regulations, has all the necessary information before them in considering the Proposals.

Appendix EDP 1
Development Proposals



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KEY

- Site Boundary
- **Gross Development Area:** Including Residential, Mobility Hub, Multi-functional Space, Incidental Public Open Space, Play Facilities, Drainage Features, Landscaping & Ancillary Infrastructure.
- **Strategic Public Open Space:** Including Play Facilities, Drainage Features, Pedestrian/ Cycle Links, Landscaping, Retained Vegetation (inc. Root Protection Areas) & Ancillary Infrastructure.
- Access Infrastructure & Roads Through Open Space
- Vehicular, Pedestrian & Cycle Access Point.
- Agricultural, Pedestrian & Cycle Access Point
- Pedestrian & Cycle Access Point
- Pedestrian Connections to Site Boundary
- Existing Trees & Hedgerows to be retained
- Root Protection Areas (for the retained trees & hedgerows)
- Existing Trees & Hedgerows to be removed
- New Site Boundary Planting
- Indicative Locations of Play
- Indicative Location of Mobility Hub & Multi-functional Space

Notes:
- All Features & Areas Subject to a tolerance of +/- 5m.
- Utility and/or access infrastructure may need to be located in POS areas.

0 50 100m
1:1250 (at A1)

LAND SOUTH OF MORTIMERS LANE, FAIR OAK – **DEVELOPMENT FRAMEWORK**

PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: TB | APPROVED BY P.M: TB | DATE: 15.10.24 | SCALE: 1:1250@A1 | DRWG: P23-2261_DE_007_01_C | CLIENT: BLOOR HOMES

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Appendix EDP 2
Vulnerabilities of European Sites

A2.1 The vulnerabilities of the European Sites as identified on Natural England's Site Improvement Plans are detailed in **Table EDP A2.1** below.

Table EDP A2.1: European Site Vulnerabilities.

European Sites	Vulnerabilities
River Itchen SAC[33]	• Water pollution – pressure; • Physical modification – pressure; • Siltation – pressure; • Overgrazing – pressure; • Water abstraction – pressure; • Inappropriate weed control – pressure; • Hydrological changes – threat; • Inappropriate water levels – pressure; • Change in land management – threat; • Inappropriate cutting/mowing; • Invasive species – pressure; • Undergrazing – pressure; • Inappropriate ditch management – pressure; • Inappropriate scrub control – pressure; and • Forestry and woodland management – pressure.

[33] https://publications.naturalengland.org.uk/publication/5404054607888384

European Sites	Vulnerabilities
Solent and Southampton Water SPA[34]	• Public access and disturbance - threat; • Coastal squeeze - threat; • Fisheries: commercial marine and estuarine - threat; • Water Pollution - threat; • Changes in species distributions - threat; • Climate change - threat; • Change to site conditions - threat; • Invasive species - threat; • Direct land take from development - threat; • Biological resource use - threat; • Change in land management - threat; • Inappropriate pest control - threat; • Air pollution: impact of atmospheric nitrogen - pressure; • Hydrological changes - threat; • Direct impact from 3rd party - threat; • Extraction: non-living resources - threat; • Other - threat.
Solent and Southampton Water Ramsar[35]	No site improvement plan is available for the Ramsar, but the vulnerabilities identified for the SPA remain relevant for the Ramsar. The Information Sheet for the site identifies the following factors as adversely affecting the sites ecological character: • Erosion – onsite.
Solent Maritime SAC	• Public access and disturbance – threat; • Coastal squeeze – threat; • Fisheries: commercial marine and estuarine – threat; • Water Pollution – threat; • Changes in species distributions – threat; • Climate change – threat; • Change to site conditions – threat; • Invasive species – threat; • Direct land take from development – threat; • Biological resource use – threat; • Change in land management – threat; • Inappropriate pest control – threat; • Air pollution: impact of atmospheric nitrogen – pressure; • Hydrological changes – threat; • Direct impact from 3rd party – threat; • Extraction: non-living resources – threat; • Other – threat.

[34] https://publications.naturalengland.org.uk/publication/4692013588938752
[35] https://rsis.ramsar.org/ris/965

European Sites	Vulnerabilities
Emer Bog SAC[36]	• Public access and disturbance – threat; • Hydrological changes – pressure/threat; and • Air pollution: impact of atmospheric nitrogen deposition – pressure.
Portsmouth Harbour SPAError! Bookmark not defined.	• Public access and disturbance – threat; • Coastal squeeze – threat; • Fisheries: commercial marine and estuarine – threat; • Water Pollution – threat; • Changes in species distributions – threat; • Climate change – threat; • Change to site conditions – threat; • Invasive species – threat; • Direct land take from development – threat; • Biological resource use – threat; • Change in land management – threat; • Inappropriate pest control – threat; • Air pollution: impact of atmospheric nitrogen – pressure; • Hydrological changes – threat; • Direct impact from 3rd party – threat; • Extraction: non-living resources – threat; and • Other – threat.
Portsmouth Harbour Ramsar[37]	No site improvement plan is available for the Ramsar, but the vulnerabilities identified for the SPA remain relevant for the Ramsar. The Information Sheet for the site identifies the following factors as adversely affecting the sites ecological character: • Eutrophication – onsite; • Unspecified development: urban use – on- and offsite; and • Coastal engineering, e.g. construction of sea defences for coastal protection – onsite.

[36] https://publications.naturalengland.org.uk/publication/6367668705689600
[37] Portsmouth Harbour | Ramsar Sites Information Service

Appendix EDP 3
Biodiversity Air Quality Screening Assessment, AQC (October 2024)

Report

Land South of Mortimers Lane, Fair Oak

Biodiversity Air Quality Screening Assessment

For Bloor Homes

25 October 2024

Air Quality CONSULTANTS | PART OF Logika Group

Document Control

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Executive Summary

The air quality impacts associated with the proposed residential development on land south of Mortimers Lane in Eastleigh have been assessed. The proposals are to construct up to 245 residential dwellings, up to 350 m^2 multi-functional space and mobility infrastructure.

The assessment has considered the impacts of road traffic generated by the proposed development on the River Itchen Special Area of Conservation and considers the changes in pollutant concentrations and fluxes in the context of published screening criteria.

When considered in isolation, the assessment demonstrates that the change in pollutant concentrations and fluxes are below screening criteria, and thus the impacts can be discounted as 'not significant'. The in-combination changes in pollutant concentrations and fluxes are, however, greater than the screening criteria.

This report should be read in conjunction with the air quality assessment for human health effects and the Shadow Habitats Regulation Assessment prepared by the Project Ecologist.

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1 Introduction

1.1 This report describes a screening assessment for air quality effects on biodiversity associated with the operation of the proposed residential development on land south of Mortimers Lane in Eastleigh. It accompanies the report prepared by Air Quality Consultants (AQC) which describes the air quality effects on human health (2024). The proposed development is described as:

"Outline application for up to 245 dwellings (Use Class C3), up to 350sqm multi-functional space, mobility infrastructure (Use Class Sui Generis), with associated open space, landscaping, infrastructure, and vehicular access off Mortimers Lane, Fair Oak; All matters reserved except for vehicular access off Mortimers Lane and pedestrian / cycle connections to the site boundary)".

1.2 The designated habitat of concern relevant to this assessment is the River Itchen Special Area of Conservation (SAC). At its closest point, the River Itchen SAC is approximately 3.3 km west of the proposed development; the location of the SAC relative to the application site is shown in Figure 1.

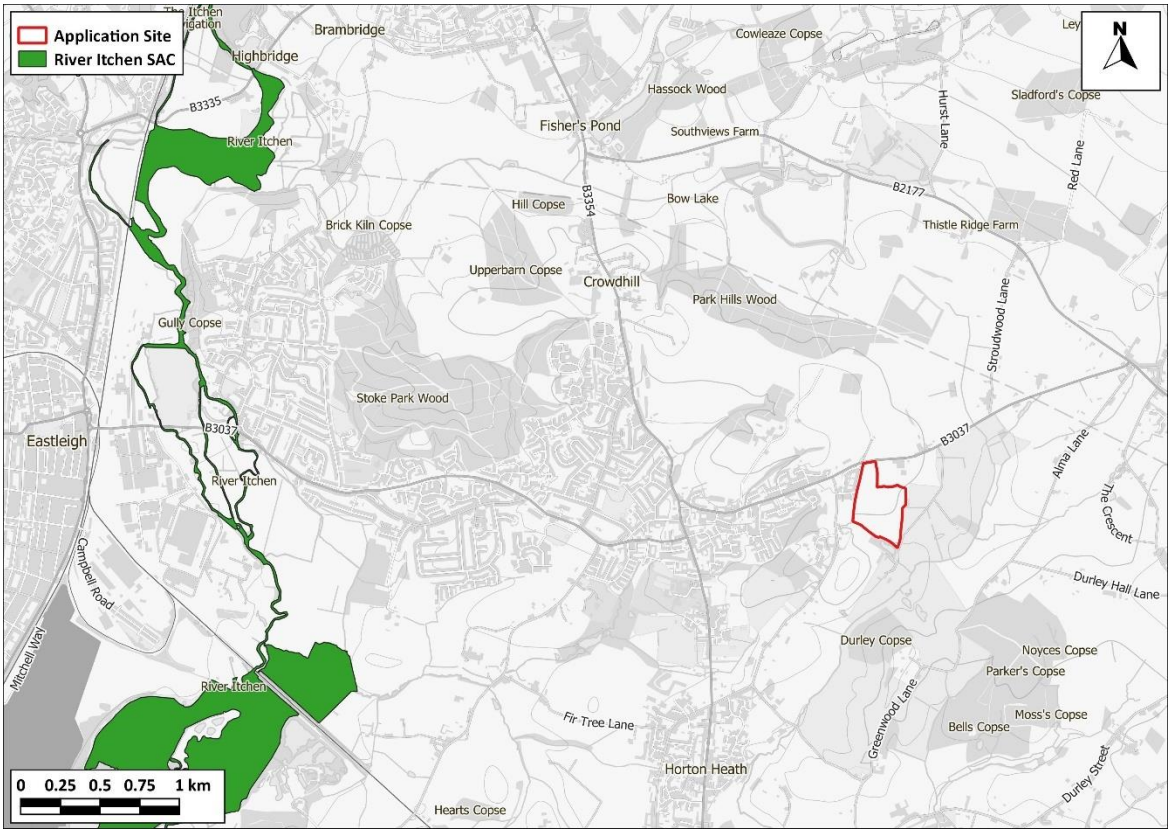


Figure 1: Application Site Relative to the River Itchen SAC

Additional data sourced from third parties, including public sector information licensed under the Open Government Licence v3.0.

1.3 With respect to notified features, the SAC is designated for its '*water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation*' habitat, which supports a number of species, including white-clawed crayfish, Southern damselfly, bullhead, brook, river and sea lamprey, otter, Atlantic salmon and Desmoulin's whorl snail. Following discussions with the Project Ecologist (The Environmental Dimension Partnership Ltd (EDP)), the assessment has focussed on the potential impacts with respect to the Southern damselfly.

1.4 The proposed development will lead to changes in traffic flows on roads which pass within 200 m of the SAC. Road traffic can emit nitrogen oxides (NOx) and ammonia (NH_3), and some sensitive vegetation may be affected by elevated concentrations of these pollutants. Furthermore, the deposition of both NOx and ammonia can alter the nutrient balance of some ecosystems, causing changes to their composition and health. This assessment has quantified the changes to NOx and ammonia concentrations that would be caused by the proposed development, as well as the changes to nitrogen deposition fluxes. It is understood that the River Itchen SAC is not sensitive to changes in acid deposition fluxes, thus these are not considered further.

1.5 In this report, the term 'impact' refers to a change to concentrations or deposition fluxes, while the term 'effect' refers to the consequence of that change. Because this is a screening report, the approach has been to consider changes to air quality and deposition in the context of *potential* effects on ecosystem health. This has relied on published and commonly accepted screening criteria which make worst-case assumptions regarding the sensitivity of any given habitat to air pollution effects. This assessment does not extend to defining the specific sensitivity of the habitats in practice, which has been completed by the Project Ecologist in the accompanying Shadow Habitats Regulation Assessment.

1.6 This report describes existing local air quality conditions (base year 2023), and the predicted air quality in the future assuming that the proposed development does, or does not, proceed. The assessment of traffic-related impacts focuses on 2029, which is the anticipated year of first occupation of any of the new homes.

1.7 This report has been prepared taking into account all relevant local and national guidance and regulations. The professional experience of the consultants involved in the assessment is summarised in Appendix A1.

2 Policy Context

2.1 Protection of nature conservation sites is provided by an array of different local, national, and international policies. This effectively provides different levels of protection to different types of sites, as outlined below.

European Sites

2.2 The Habitats Directive (European Council Directive 92/43/EEC, 1992) requires all European member states to introduce a range of measures for the protection of habitats and species. The Conservation of Habitats and Species Regulations (2017) ('the Habitats Regulations') transpose the Directive into UK law. Changes to the Habitats Regulations in 2021 (Defra, 2021) transferred functions from the European Commission to the appropriate UK authorities.

2.3 The following European sites are protected by the Habitats Regulations and any proposals that could affect them will require a Habitats Regulations Assessment ('HRA'):

- Special Areas of Conservation (SACs), which are designated because of their importance for specific habitats or species listed in the Directive;
- Special Protection Areas (SPAs), which are designated for the protection of birds under the "Birds Directive" (Directive 2009/147/EC, 2009), implemented in UK law through the Conservation of Habitats and Species Regulations (2010);
- Ramsar Sites. Originally intended to protect waterfowl habitat, the Ramsar Convention has broadened its scope to cover all aspects of wetland conservation;
- proposed SACs and SPAs (often termed cSAC and cSPA); and
- areas secured as sites compensating for damage to a European Site.

2.4 In practice, it is not uncommon for the same area of land to be covered by more than one designation.

2.5 The Habitats Regulations, require competent authorities (in this case Eastleigh Borough Council) to only allow new projects (e.g. individual developments seeking planning permission) or plans (e.g. local plans) having first ascertained that they will not adversely affect the integrity of a European site either alone or 'in-combination' with other projects and plans.

2.6 HRA refers to the process of assessment required under the Regulations, which is commonly described as four distinct stages (e.g. the Planning Inspectorate (2017)):

- Stage 1 - screening;
- Stage 2 - Appropriate Assessment ('AA'),
- Stage 3 - assessment of alternatives, and
- Stage 4 - assessment of Imperative Reasons of Overriding Public Interest ('IROPI').

2.7 Not all stages are required for most projects or plans. In particular, if the screening stage can show that the project will not have a Likely Significant Effect ('LSE') on the interest features either alone or in-combination with other plans and projects then an AA is not required. This report considers the screening stage only but also contains information which may be used in subsequent stages of the assessment where needed.

2.8 An effect is 'significant' if it undermines the conservation objectives. Before granting planning permission, decision makers must be satisfied that no reasonable scientific doubt remains as to the absence of adverse effects to site integrity.

2.9 Interpretation of the Habitats Regulations with respect to air quality impacts and effects has been shaped by judgements and opinions of European and UK courts, and a brief summary of some relevant case law is provided in Appendix A2. These Judgements and Opinions have highlighted the extent to which the Directive, and therefore Regulations, require a precautionary approach. However, the Courts have also recognised that there is no such thing as absolute certainty. This is particularly important with air quality modelling, which is always uncertain, with this uncertainty impossible to quantify precisely. Decision makers must identify reasonably foreseeable risks based on information that can readily be obtained. The courts have also established that, whilst a risk is sufficient to constrain development under the Habitats Regulations, there must be credible evidence that this risk is real, rather hypothetical (see Paragraph A2.3).

2.10 UK interpretation of the Habitats Regulations has also been shaped by guidance given by Natural England (NE) to local planning authorities and the Planning Inspectorate. A key area where this prior advice is important is the reliance which should be placed on forecast reductions in emissions from road traffic and other sectors over time. Measures which are expected to improve air quality in the future which are unrelated to a plan or project being determined are described as 'autonomous measures', and the forecast improvements resulting from these measures are termed 'autonomous reductions'. Paragraphs A2.9 to A2.14 in Appendix A2 explain that there are significant risks to local planning authorities if they do not adequately take account of the ability of autonomous reductions to offset and negate adverse changes caused by new plans and projects.

Planning Policy

National Policies

2.11 The National Planning Policy Framework (NPPF) (2023) sets out planning policy for England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the planning system has three overarching objectives, one of which (Paragraph 8c) is an environmental objective:

"to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".

2.12 With respect to protecting biodiversity, the NPPF places a heavy reliance on the designation status of sites (for example if they are designated as a SSSI), explaining that planning policies and decisions should contribute to and enhance the natural environment by:

"protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)" (Para 180).

Furthermore, "Plans should: distinguish between the hierarchy of international, national and locally designated sites" (Para 181).

2.13 The NPPF provides specific guidance on determining planning applications with respect to protecting habitats and biodiversity, explaining that local planning authorities should apply the following principles:

a) "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate" (Para 186).

2.14 In Paragraph 187, the NPPF explains that European sites, candidate or proposed European 2000 sites, and sites required as compensatory measures for effects on designated sites should be afforded the same planning protection as those with a statutory UK designation.

2.15 The NPPF is supported by Planning Practice Guidance (PPG) (Ministry of Housing, Communities & Local Government, 2019), which includes guiding principles on how planning can take account of the impacts of new development on air quality. Within the section on air quality, the PPG states that:

"Air quality considerations may … be relevant to obligations and policies relating to the conservation of nationally and internationally important habitats and species".

"Where air quality is a relevant consideration the local planning authority may need to establish:

…whether the proposed development could significantly change air quality during the construction and operational phases (and the consequences of this for public health and biodiversity)".

2.16 The PPG sets out the information that may be required in an air quality assessment, making clear that:

"Assessments need to be proportionate to the nature and scale of development proposed and the potential impacts (taking into account existing air quality conditions), and because of this are likely to be locationally specific".

Local Policies

2.17 Eastleigh Borough Council adopted its new Local Plan, which covers the period 2016-2036, in April 2022 (Eastleigh Borough Council, 2022). Policy DM11, 'Nature Conservation', states:

"…International Designations:

2. Development which is likely (either individually or in combination with other developments) to adversely affect the integrity of an international or European nature conservation site will not be permitted subject only to imperative reasons of overriding public interest and securing any necessary compensatory measures in the absence of alternative solutions. A 'project level' Habitat Regulations Assessment will be required where there are likely significant effects or uncertainty. Any mitigation measures required to ensure no adverse impact must be implemented at the appropriate time.

3. The Council will work with PfSH, Natural England, the Environment Agency and other wildlife organisations to develop and implement with developers a strategic approach to the protection and enhancement of international and European sites from the direct and indirect effects of development. Within Eastleigh Borough this will include:

a. implementing:

i. the Solent Recreation Mitigation Strategy (requiring contributions from residential developments within 5.6 kilometres of the Solent Special Protection Area to the Strategy); and

ii. the interim and any future New Forest Recreation Mitigation Strategy if required; or alternative agreed site specific measures to address recreational disturbance;

b. preserving the water quality and flows within the Itchen and Hamble, Southampton Water and Solent;

c. protecting the River Itchen SAC, in particular the maintenance and where appropriate restoration of habitats and qualifying species to favourable conservation status (as defined by article 1 of the Habitats Directive); and

d. seek contributions towards measures set out in the Southern Damselfly Conservation Strategy (or other strategy) specifically to deliver biodiversity net gain."

3 Critical Levels and Critical Loads

3.1 European Union (EU) Directive 2008/50/EC (The European Parliament and the Council of the European Union, 2008) sets a limit value for annual mean concentrations of nitrogen oxides[1]. The same value has been set as a domestic objective within the Air Quality (England) Regulations (2000) and the Air Quality (England) (Amendment) Regulations (2002). The limit value and objective only apply a) more than 20 km from an agglomeration (about 250,000 people), and b) more than 5 km from Part A industrial sources, motorways and built up areas of more than 5,000 people.

3.2 Critical levels (CL_es) and critical loads (CL_os) are the ambient concentrations and deposition fluxes below which significant harmful effects to sensitive ecosystems are unlikely to occur. Some of the CL_es are set at the same concentrations as the objectives but do not have the same spatial constraints on where they apply. Exceedances of the CL_es and CL_os are considered in the context of preventing harm to sites which are protected under the various designation frameworks outlined in Section 2.

3.3 The CL_es relevant to this assessment are set out in Table 1. In discussion with the Project Ecologist, a CL_e of 3 µg/m^3 for ammonia has been applied; this is consistent with the CL_e applied in Eastleigh Borough Council's Local Plan Habitats Regulation Assessment.

Table 1: Vegetation and Ecosystem CL_es (µg/m^3) [a]

Pollutant	Time Period	CL_e (µg/m^3)
Nitrogen Oxides (expressed as NO_2)	Annual Mean [a,b]	30
Ammonia	Annual Mean	3

[a] The CL_es are defined by the World Health Organisation (WHO, 2000).

[b] Away from major sources (see Paragraph 3.1), this CL_e is set as an objective (Defra, 2007) and a limit value (The European Parliament and the Council of the European Union, 2008).

3.4 The CL_os are specific to different habitat types, and the CL_o which is most relevant to this assessment, and agreed with the Project Ecologist is provided in Table 2.

3.5 Southern damselfly is the only feature at the River Itchen on the Air Pollution Information Service (APIS) website with a CL_o; however, this is assigned to the broad habitat Dwarf Shrub Heath. Within the River Itchen, the Southern damselfly is found in a managed chalk-river floor plain, which is better described as the Rich Fens habitat. This approach is consistent with the Eastleigh, Fareham and Winchester Local Plan Habitat Regulation Assessments.

Table 2: Vegetation and Ecosystem CL_os

Habitat Type [a]	Nutrient Nitrogen (kgN/ha/yr) [b]
Rich Fens (D4.1) [b]	15

[a] The European Nature Information System. (European Environment Agency, 2021).

[b] CL_o agreed with the Project Ecologist, EDP.

[1] There are also limit values set for sulphur dioxide, however these are not relevant to the proposed development as sulphur dioxide is not a pollutant of concern from road traffic.

4 Relevant Guidance

4.1 Different organisations have issued assessment guidance and screening criteria for different types of emissions source and different site designations. This has resulted in different levels of protection being provided with respect to effects of the same pollutants on the same sites. There is no single official guidance document which fully covers the impacts assessed in this report and so it is helpful to consider the protection provided with respect to different development types.

Environment Agency

4.2 The Environment Agency has published criteria which allow impacts from developments requiring environmental permits to be rapidly screened out as insignificant (Environment Agency, 2021a; 2021b). These are applied to the impacts from developments in isolation (i.e. not in combination with other plans or projects). Exceeding these criteria does not mean that there is an LSE, it simply means that further consideration is required of the potential changes to air quality or deposition. No further assessment is required if the changes caused by the proposed development (termed the Process Contributions 'PC' by the Environment Agency) are all less than the relevant criteria in Table 3.

Table 3: Environment Agency Screening Criteria (% of CL_e or CL_o)

Site Type	Averaging Period [a]	Impacts of Ammonia Emissions from Intensive Pig and Poultry Farms	Impacts from Other Emissions
European Sites	LT	4% to 20% [b]	1%
	ST	- [c]	10%
SSSIs	LT	20% to 50% [b]	1%
	ST	- [c]	10%
NNRs, LNRs, LWS, and AW	LT or ST	100%	100%

[a] LT = Long Term (annual mean or 1-week mean), ST = Short-term (15-minute, 1-hour and 24-hour).

[b] The upper thresholds apply where there are no other intensive farms which might affect the same receptors. Internally, the Environment Agency has begun requiring detailed modelling wherever the PC exceeds 4% of a CL_e or CL_o and the 20% criterion is not supported, but is still recommended in the Environment Agency's published guidance.

[c] There is no short-term CL_e for ammonia and no short-term CL_o.

4.3 The Environment Agency (2021a) also notes that there is no need for further consideration of changes to concentrations or deposition fluxes if:

- the annual mean concentration or flux is less than 70% of the CL_e or CL_o; and
- the short-term Process Contribution is less than 20% of the short-term CL_e minus twice the long-term background concentration.

4.4 These criteria have been widely applied to the results from detailed dispersion modelling but are principally intended by the Environment Agency to guide a decision as to whether detailed modelling is required, with changes below the criteria not requiring such modelling.

National Highways

4.5 National Highways (then Highways England) issued guidance on the assessment of air quality impacts caused by Highways England road schemes as part of its Design Manual for Roads and Bridges (DMRB). The current version of this guidance is LA 105 (Highways England, 2019). This states that the air quality impacts of each individual project should be scoped out from any further assessment where the changes caused by the project in isolation (i.e. not in combination with other plans or projects) do not meet any of the following criteria within 200 m of a designated site:

- Annual Average Daily Traffic (AADT) flow >=1,000; or
- Heavy Duty Vehicle (HDV) AADT flow >=200; or
- a change in speed band; or
- a change in carriageway alignment by >=5m.

4.6 As with the Environment Agency criteria, National Highways uses these values to define when a more detailed consideration of air quality impacts is required and not to define an LSE.

4.7 Where detailed air quality modelling has been carried out, guidance from National Highways is that there will be no significant effect wherever:

- the total nitrogen deposition is less than the relevant CL_o; OR
- the change to nitrogen deposition caused by the proposed development (alone) is <1% of the CL_o.

4.8 Changes with respect to a CL_e are also considered to be not significant where one of the above criteria is met.

4.9 Where the potential for an LSE cannot be discounted using the above criteria, National Highways refers to Table 21 of Natural England Report 210 (Caporn et al., 2016), which is reproduced in Appendix A3 of this current report. This table estimates the increase to nitrogen deposition which would reduce species richness by one species. National Highways states that the effects will be not significant (i.e. no LSE) if the increases to nitrogen deposition caused by the project alone (i.e. not in combination with other projects or plans) are smaller than those in Appendix A3. This approach is described here in order to add context to the more robust approach which has been followed in the current assessment.

Natural England

4.10 Natural England's guidance on advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (Natural England, 2018) recommends the use of the DMRB criteria (see Paragraph 4.5) for changes to traffic caused by all types of plans or projects, and not just for highways schemes. In the same way, irrespective of their original derivation, Natural England (2018) adopts the 1% change criterion from the Environment Agency (Table 3) as a basis for screening out the need for more detailed assessment. It explains:

"the AADT thresholds and 1% of critical load/level are considered by Natural England's air quality specialists … to be suitably precautionary, as any emissions below this level are … considered to be imperceptible". It goes on: "There can therefore be a high degree of confidence in [the use of these criteria] to screen for risks of an effect".

4.11 Natural England (2018) further explains that the AADT criteria have "*been adopted here to simply help trigger when to look further where traffic projection data is the sole means of assessment* – [triggering the criteria] *does not immediately mean there will be an effect*".

4.12 A key difference between how these criteria are applied by Natural England (2018) when compared with both National Highways and the Environment Agency is that Natural England suggests that they should be applied first to the change caused by each individual project and then to the changes caused by relevant plans and projects in combination with one another.

4.13 Natural England provides guidance on which plans and projects should be considered within an in combination assessment for European sites. It explains that this "*is restricted to plans and projects which are 'live' at the same time as the assessment being undertaken. These can potentially include:*

- *The incomplete or non-implemented parts of plans or projects that have already commenced;*
- *Plans or projects given consent or given effect but not yet started;*
- *Plans or projects currently subject to an application for consent or proposed to be given effect;*
- *Projects that are the subject of an outstanding appeal;*
- *Ongoing plans or projects that are the subject of regular review and renewal;*
- *Any draft plans being prepared by any public body;*
- *Any proposed plans or projects that are reasonably foreseeable and/or published for consultation prior to application."*

4.14 Natural England also explains that an exhaustive search for live plans or projects which could potentially fall within the scope of an 'in-combination' assessment is not necessary:

"it is Natural England's view that staff in a competent authority can apply their professional judgment when considering this. It might be that a pragmatic approach to identifying the most pertinent ones may be required from the competent authority. It might be reasonable to initially limit a search to those plans and projects which are of most direct relevance to the subject plan or project under HRA (i.e. the likelihood of that plan or project's effects impacting upon the same site in-combination with the proposed plan or project). This may be those which are simply the closest to the site or within a certain distance from it, or the most influential in nature."

4.15 Natural England also stresses that, at the screening stage, the competent authority must "*remember that the subject plan or project remains the focus of any in-combination assessment. Therefore, it is Natural England's view that care should be taken to avoid unnecessarily combining the insignificant effects of the subject plan or project with the effects of other plans or projects which can be considered significant in their own right… it is only the appreciable effects of those other plans and projects that are not themselves significant alone which are added into an in-combination assessment with the subject proposal."*

The Institute of Air Quality Management

4.16 The Institute of Air Quality Management (IAQM) issued a guide to the assessment of air quality impacts on designated nature conservation sites in 2019, which was then amended in 2020 (Holman et al, 2020). This summarises the other guidance referred to above, but does not definitively recommend any one complete assessment approach. The limited areas where the IAQM guidance adds to, or unambiguously supports, that contained within other guidance documents are:

- on traffic screening criteria:
    - if the DMRB criteria (Paragraph 4.5) are used, they should be applied to changes in traffic caused by the development alone as well as in combination with other projects and plans;
- on the Environment Agency screening criteria:
    - the Environment Agency criteria (Paragraph 4.2) are suitable for screening the need for further assessment from all types of emissions sources where detailed air quality modelling has been carried out and not just those requiring environmental permits. The criteria should, though, "*be used in the context of an in-combination assessment*". The guidance also hints that the 100% criterion used by the Environment Agency for local site designations should not be used and that the 1% criterion should be used instead. The 100% criterion is not used in this assessment.
    - the 1% criterion should not be used rigidly, or with more precision than the modelling can justify (for example emphasising the difference between 0.9% and 1.1%);
    - that exceeding the 1% criterion is simply an indication that further investigation is needed and does not necessarily indicate an LSE;
- on defining in combination projects:
    - projects and plans to be considered include those that may have been approved but are, as yet, incomplete, the subject of an outstanding appeal, or ongoing review;
- on receptor siting:
    - it is recommended that the predictions are not made closer than 2 m from the edge of the road; and
- on designation types:
    - the IAQM document covers all site designation types and thus suggests that the same overall assessment method should be applied regardless of the designation.

Chartered Institute of Ecology and Environmental Management

4.17 The Chartered Institute of Ecology and Environmental Management (CIEEM) has published advice on the Ecological Assessment of Air Quality Impacts (CIEEM, 2021), which is intended for use by both ecologists and air quality specialists. This provides six steps to exploring potential effects:

1) identifying the baseline ecological features and air quality;

2) assessing confounding factors, background pollution trends, the relative importance of each sector, and the sensitivity of the receptor;

3) determining if the CL_es or CL_os are exceeded?

4) applying the CL_es and CL_os with expert judgement;

5) considering the project duration and seasonal effects; and

6) considering the relative importance of ambient concentrations versus deposition fluxes.

Joint Nature Conservation Committee

4.18 The Joint Nature Conservation Committee (JNCC) has published Decision-Making Thresholds (DMTs) and Site-Relevant Thresholds (SRTs) for air pollution (Chapman and Kite, 2021), which were developed for JNCC by AQC (AQC, 2021). The thresholds define changes caused by individual projects (i.e. not in combination with other projects and plans) which can be discounted as not significant without additional work. Where the appropriate thresholds are exceeded, then further assessment will be needed. The SRTs are for emissions from industry and agriculture and take account of the overall development pressure in an area. The DMT for road traffic takes account of the scale of each development within the context of overall traffic growth but is ultimately expressed as a proportion of the baseline traffic flow. The thresholds are set out in Table 4, with additional guidance on defining development density given in Table 5.

4.19 The JNCC guidance makes clear that an air quality assessment is only necessary if the effects of a project have not already been assessed. This is particularly relevant with respect to development sites which are allocated in strategic development plans which have themselves been considered through a HRA. For example, there is no need to consider impacts on a European site from a development site which is allocated within a Local Plan if those impacts have already been considered when developing that Plan. The guidance also makes clear that the study area for the assessment of impacts from road traffic should not extend more than 10 km from a plan boundary, and that impacts alongside the Strategic Road Network[2] only require consideration for road infrastructure schemes.

4.20 Where the DMT for road traffic in Table 4 is exceeded, a "road-relevant" approach may be taken based on the distance between the affected road and the nearest boundary of a designated site. The JNCC guidance recommends that professional judgement is used, taking account of the predicted reduction with distance away from the road, and a view as to whether other plans and projects are likely to cause a combined exceedance of the 1% criterion described in paragraph 4.10 (Chapman and Kite, 2021).

4.21 There are specific exceptions where the JNCC criteria should not be used. These are summarised as:

- 'clean' or 'pristine' sites (i.e. those with very low existing levels of air pollution) where there is reason to doubt the improving background trend;
- sites with sensitive epiphytic or epilithic components that are, or form an important part of, a qualifying feature of the site and which are at or just below their CL_o or CL_e;
- sites with sensitive epiphytic or epilithic components that are, or form an important part of, a qualifying feature of the site and which are at or just below their CL_o or CL_e;
- sites with a highly localised and sensitive qualifying feature(s) that may coincide spatially with maxima of nitrogen deposition / ammonia concentrations from clusters of emission sources; and
- situations where it may be inappropriate to rely on DMTs because the assumptions which underpin them do not reflect the particular circumstances which apply (Chapman and Kite, 2021).

4.22 The development of these criteria included widespread consultation with ecology specialists and UK nature conservation agencies, as well as extensive legal review. The criteria are thus considered appropriate for use in this assessment.

[2] Our roads - Highways England, Official list of trunk roads (transport.gov.scot), Welsh Government strategic road network map | Traffic Wales, Link Corridors and Trunk Roads brochure | Department for Infrastructure (infrastructure-ni.gov.uk).

Table 4: Site-Relevant and Decision-Making Thresholds for Application to Individual Plans and Projects (AQC, 2021)

Development Density	Very Low	Low	Medium	High
Site-Relevant Thresholds for On-site Emissions				
Annual Mean NH_3 (lichens/bryophytes) ($\mu g/m^3$)	0.0075	0.0034	0.0020	0.00079
Annual Mean NH_3 (higher plants) ($\mu g/m^3$)	0.022	0.010	0.0060	0.0024
Annual Mean NOx ($\mu g/m^3$)	0.087	0.046	0.030	0.014
Annual Mean N dep (woodland (kgN/ha/yr)	0.13	0.057	0.034	0.013
Annual Mean N dep (grassland) (kgN/ha/yr)	0.088	0.040	0.024	0.0093
Decision-Making Threshold for Road Traffic				
Increase in Traffic Flow	0.15% of AADT in the year that the assessment is carried out			

Table 5: Guidance on Defining Development Density for On-site Emissions (AQC, 2021)

Development Density	Very Low	Low	Medium	High
Description [a]	Remote area which sees very little development	Area which sees small amounts of development	Typical agriculture / industrial area	Area experiencing intensive growth (e.g. Powys or Immingham docks)
Example Number of additional new projects below the thresholds within 5 km of proposed development over 13 yrs [a]	1	5	10	30

[a] These might be either industrial or agricultural projects, or both.

5 Assessment Approach

Study Area

5.1 The study area for the assessment has been determined in discussion with the Project Ecologist (EDP) and the Project Transport Consultant (Glanville Group).

5.2 Based on the available traffic data, the assessment focuses on Bishopstoke Road, which travels over the River Itchen SAC. The Transport Consultants have advised that this is the location within the SAC where the traffic generated by the proposed development will be greatest. Consideration has, therefore, been given to potential effects on the River Itchen SAC within 200 m of Bishopstoke Road. This is the distance used in guidance from National Highways (Highways England, 2019) and Natural England (2018).

Receptors

5.3 Impacts have been predicted at transects of receptors within the River Itchen SAC running perpendicular to Bishopstoke Road[3]. Following guidance from the IAQM (Paragraph 4.16), impacts have not been predicted within 2 m of roads. These transects of receptors, which extend to 200 m from the road edge are shown in Figure 2.

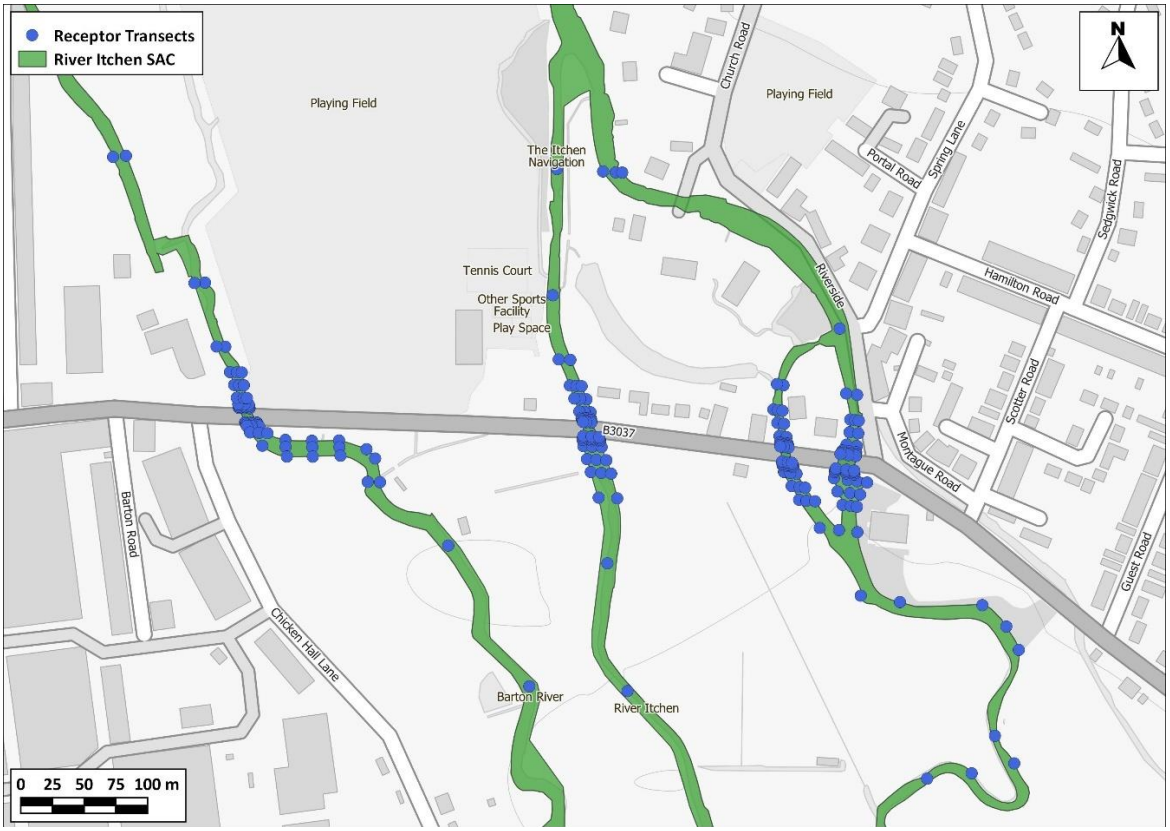


Figure 2: Transect Locations

Additional data sourced from third parties, including public sector information licensed under the Open Government Licence v3.0.

[3] Receptors have been modelled at the following distances from the road edge: 2 m, 3 m, 4 m, 5 m, 10 m, 20 m, 30 m, 50 m, 100 m and 200 m.

5.4 All receptors have been modelled at a height of 1.5 m to ensure consistency with the national background deposition modelling carried out on behalf of Defra and used within this assessment.

5.5 At the locations where Bishopstoke Road crosses the River Itchen, the road is elevated relative to the river. However, these areas have not been modelled as bridges or elevated sections. This may have resulted in the degree of pollutant dispersion in these areas being under-predicted, with a resultant over-prediction in concentrations. The result is that the assessment will be worst-case for these areas.

Monitoring Data

5.6 Information on existing nitrogen dioxide concentrations has been obtained by collating the results of monitoring carried out by Eastleigh Borough Council; the Council operates two diffusion tubes on Bishopstoke Road, which are within 100 m of the River Itchen SAC boundary.

5.7 Information on existing background ammonia concentrations has been obtained by collating results of monitoring carried out on behalf of Defra as part of the National Ammonia Monitoring Network (NAMN); this consists of 95 sites across the UK.

Background Concentrations and Fluxes

5.8 Background concentrations of NOx and ammonia, and nutrient nitrogen deposition fluxes, have been taken from the Air Pollution Information System (APIS) website (2024). The concentrations and deposition fluxes represent 1 km x 1 km averages. APIS currently presents three-year mean values centred on the calendar year of 2021. These have been adjusted to represent three-year averages centred on 2023 and 2029 using the rate of change predicted for this area using the Business-as-Usual assumptions of JNCC's Nitrogen Futures project[4].

Assessment Scenarios

5.9 NOx and ammonia concentrations, and nutrient nitrogen deposition fluxes, have been predicted for the following scenarios:

A) base year 2023;

B) 2029 without any increase in traffic from 2023 (including future-year emissions factors and future-year background concentrations and fluxes but base-year traffic within the dispersion model);

C) 2029 without the development but with the forecast background increase in traffic between from 2023 (also including future-year emissions factors and background concentrations and fluxes); and

D) 2029 with both the proposed development and background traffic growth (also including future-year emissions factors and background concentrations and fluxes).

5.10 The three 2029 scenarios have been compared to derive the impacts of the proposed development alone and in-combination with other projects and plans:

[4] https://jncc.gov.uk/our-work/nitrogen-futures/. A linear rate of change has been assumed between 2017 and the 2030 Business as Usual scenario, with the APIS 2021 data scaled based on the location-specific predicted changes.

- the difference between scenarios C and D represents the change caused by the proposed development which, for consistency with other regimes, is termed the Process Contribution ('PC');
- the difference between scenarios B and D represents the In-Combination Change ('ICC').

Modelling Methodology

5.11 Concentrations have been predicted using the ADMS-Roads dispersion model, with emissions of NOx derived using Defra's Emission Factor Toolkit (EFT) (v12.1) (Defra, 2024), and emissions of ammonia derived using AQC's Calculator for Road Emissions of Ammonia (CREAM) (v1A) model.

5.12 Traffic flows have been provided by Glanville Group, who are the Project Transport Consultants.

5.13 The model results have been verified against local measurements; full details are described in the human health assessment (AQC, 2024), and are briefly summarised in Appendix A4. Nitrogen dioxide has been calculated from NOx using the calculator provided by Defra (2024). Deposition fluxes have been calculated from the predicted concentrations of nitrogen dioxide and ammonia. Details on the method for calculating the deposition are provided in Appendix A4.

Uncertainty

5.14 There are many components that contribute to the uncertainty of modelling predictions. The road traffic emissions dispersion model used in this assessment is dependent upon the traffic data that have been input, which will have inherent uncertainties associated with them. There are then additional uncertainties, as models are required to simplify real-world conditions into a series of algorithms.

5.15 An important stage in the process of modelling road traffic emissions of is model verification, which involves comparing the model output with measured concentrations. The level of confidence in the verification process is necessarily enhanced when data from an automatic analyser have been used, as has been the case for this assessment. Because the model has been verified and adjusted, there can be reasonable confidence in the prediction of base year (2023) concentrations. Full details are available in the human health assessment (AQC, 2024).

5.16 There are no suitable roadside ammonia monitoring sites in the area which can be used to verify the modelled ammonia concentrations. Development of the CREAM model, which has been used in this assessment, included verifying the emissions model, combined with the ADMS-Roads dispersion model, against measurements from the most dense roadside ammonia monitoring network in Europe. The modelling has thus been verified as far as is possible.

5.17 Predicting pollutant concentrations in a future year will always be subject to greater uncertainty. For obvious reasons, the model cannot be verified in the future, and it is necessary to rely on a series of projections provided by DfT and Defra as to what will happen to traffic volumes, background pollutant concentrations and vehicle emissions. Historic versions of Defra's EFT tended to over-state emissions reductions into the future. However, analyses of the more recent versions of Defra's EFT carried out by AQC (2020a; 2020b) suggest that, on balance, these versions are unlikely to over-state the rate at which NOx emissions decline in the future at an 'average' site in the UK. In practice, the balance of evidence suggests that NOx concentrations are most likely to decline more quickly in the future, on average, than predicted by previous versions of the EFT, especially against a base year of 2016 or later. Whilst such an analysis has not been undertaken by AQC for EFT v12.1, it is considered that using EFT v12.1 for future-year forecasts in this report provides a robust assessment, given that the model has been verified against measurements made in 2023.

5.18 Historically, less attention has been given to calculating emissions of ammonia from road traffic than to calculating emissions of NOx. Future forecasts of traffic-related ammonia are thus quite uncertain.

However, the CREAM model takes a deliberately conservative approach regarding these future uncertainties and can thus be considered robust.

Assumptions

5.19 It is necessary to make a number of assumptions when carrying out an air quality assessment. Key assumptions made in carrying out this assessment include:

- the proposed development is complete and fully operational in 2029. This may overestimate the traffic emissions and hence the 2029 "With Scheme" concentrations and impacts as the development is unlikely to be completely built out by 2029;
- the Middle Wallop meteorological monitoring station appropriately represents conditions in the study area;
- emissions from Bishopstoke Road are likely to be included in the background maps, and therefore there will be an element of double counting baseline concentrations and deposition fluxes, since the road component has not been removed;
- the deposition velocities which have been used for ammonia may be particularly conservative. There is strong evidence that where ammonia concentrations are high, the deposition of ammonia can be significantly inhibited (Cape et al, 2008). The deposition velocity for ammonia used in this assessment was developed by the AQTAG to be precautionary in most settings. Thus, close to emissions sources it is likely to have caused the deposition of ammonia to have been over-predicted; and
- the River Itchen travels under Bishopstoke Road, however, it is not possible to include structures such as bridges within the model. This may have under-predicted the degree of pollutant dispersion in these areas, with a resultant over-prediction in concentrations and fluxes.

6 Background Information and Context

6.1 The proposed development is located in Fair Oak, approximately 6 km to the east of Eastleigh. The site comprises two pasture fields, and is bound to the north by Mortimers Lane, by agricultural land to the east, a small woodland to the south, and residential properties to the west. The wider area is principally a mix of residential properties and agricultural fields and grassland, including East Horton Golf Club.

Air Quality Monitoring

6.2 Eastleigh Borough Council operates a number of nitrogen dioxide monitoring sites using diffusion tubes prepared and analysed by Gradko (using the 20% TEA in water method), two of which are adjacent to Bishopstoke Road, and within 100 m of the River Itchen SAC. Annual mean results for the years 2019 to 2023 are summarised in Table 6, and their locations are shown in Figure 3. The monitoring data have been taken from Eastleigh Borough Council's 2024 Annual Status Report (2024).

Table 6: Summary of Annual Mean Nitrogen Dioxide Monitoring (µg/m^3) [a]

Site ID	Site Type	Location	2019	2020	2021	2022	2023
BR	Roadside	Bishopstoke Road	33.8	29.6	29.0	30.5	25.4
BR2	Roadside	Bishopstoke Road 2	31.3	26.8	26.6	27.2	24.7

[a] There is no CL_e for nitrogen dioxide, but nitrogen dioxide concentrations provide an indication of total NOx concentrations and are thus included for context.

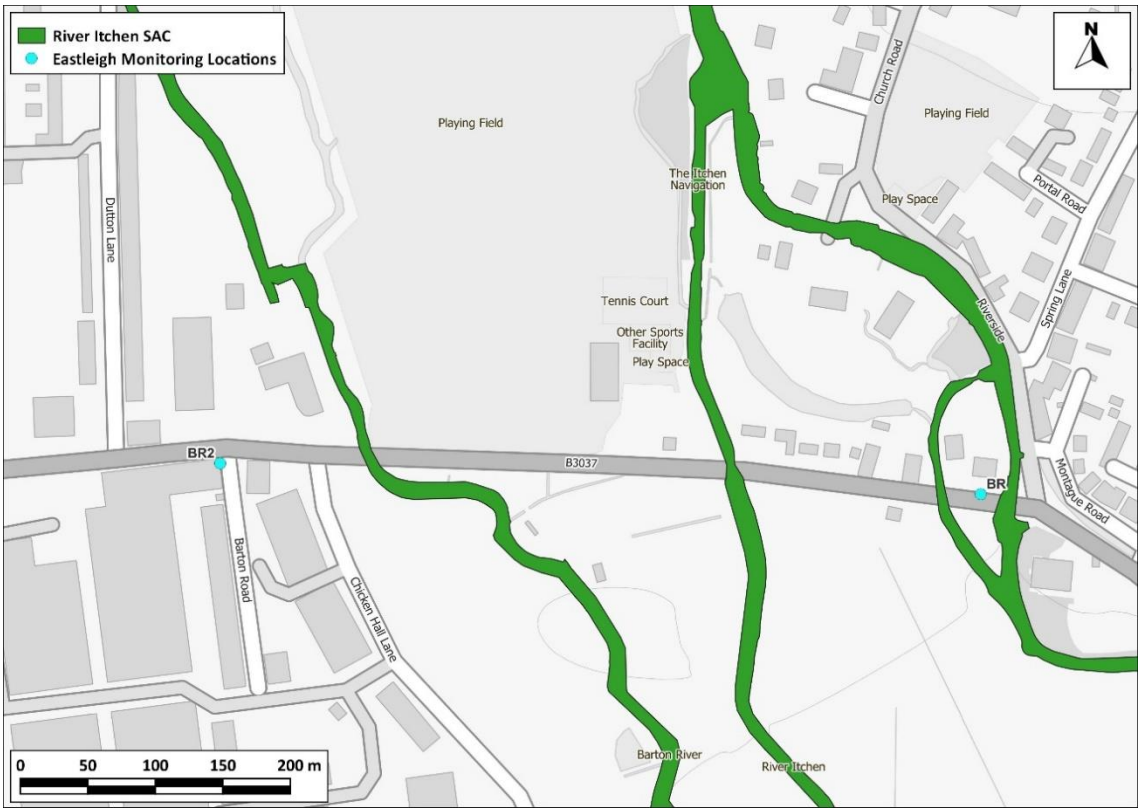


Figure 3: Monitoring Locations

Additional data sourced from third parties, including public sector information licensed under the Open Government Licence v3.0.

6.3 At both sites, concentrations of nitrogen dioxide have reduced since 2019; it is, therefore, reasonable to assume that a similar trend would be observed for direct measurements of NOx. Given the proximity of the two sites to the assessed receptor locations, and that both sites are approximately 2 m from the edge of Bishopstoke Road, the sites are considered representative of conditions within the River Itchen SAC.

6.4 Eastleigh Borough Council does not monitor concentrations of ammonia, however, there is a rural background site operated by Defra as part of its NAMN located at Old Winchester Hill. This site was commissioned in April 2023; however, data capture was low (<60%).

Background Concentrations and Fluxes

6.5 Estimated background concentrations of NOx and ammonia, and nutrient nitrogen deposition fluxes are set out in Table 7.

6.6 The background concentrations of NOx and ammonia are predicted to be well below the CL_e in both 2023 and 2029. Background nutrient nitrogen deposition fluxes are below the CL_o in both 2023 and 2029.

Table 7: Estimated Annual Mean Background Pollutant Concentrations (µg/m³) and Fluxes (kgN/ha/yr) in 2023 and 2029

Year	NOx	NH_3	Nutrient Nitrogen Deposition
2023	12.5	1.2	13.5
2029	9.3	1.3	13.1
CL_e / CL_o	**30**	**3**	**15**

7 Impact Assessment

7.1 Air quality conditions at the worst-case locations within the River Itchen SAC are set out in Table 8. Predictions are presented for three separate locations:

- the receptor with the highest predicted concentrations and fluxes;
- the receptor with the maximum PC; and
- the receptor with the maximum ICC.

7.2 Whilst the locations may correspond to different transect locations, all occur at 2 m from the road edge. Results are provided for all four assessment scenarios described in Paragraph 5.9. The CL_es for annual mean NOx and ammonia concentrations are achieved in all future year scenarios, although concentrations are greater than 70% of the CL_es. The CL_o for nitrogen deposition is exceeded at all of these worst-case locations in all scenarios.

Table 8: Air Quality Conditions at Worst-case Locations in the River Itchen SAC

Year	2023	2029			
Pollutant/Averaging Period	Existing Baseline	No Growth [a]	Without Development [b]	With Development [c]	CL_e / CL_o
At Location with Maximum Concentration or Flux					
Annual Mean NH_3 (µg/m³)	2.36	2.53	2.67	2.69	**3**
Annual Mean NOx (µg/m³)	44.97	24.07	25.65	25.87	**30**
Nitrogen Deposition (kgN/ha/yr)	22.61	21.60	22.52	22.65	**15**
At Location with Maximum PC					
Annual Mean NH_3 (µg/m³)	2.30	2.47	2.61	2.63	**3**
Annual Mean NOx (µg/m³)	44.97	24.07	25.65	25.87	**30**
Nitrogen Deposition (kgN/ha/yr)	22.61	21.60	22.52	22.65	**15**
At Location with Maximum ICC					
Annual Mean NH_3 (µg/m³)	2.35	2.52	2.66	2.68	**3**
Annual Mean NOx (µg/m³)	44.97	24.07	25.65	25.87	**30**
Nitrogen Deposition (kgN/ha/yr)	22.51	21.54	22.47	22.60	**15**

[a] Assuming future-year emissions factors and background concentrations/fluxes, but excluding any increase in traffic on local roads between 2023 and 2029. The predicted changes to background implicitly include increases to traffic on a UK level.

[b] Assuming future-year emissions factors and background concentrations/fluxes and forecast increase to traffic on local roads (excluding the proposed development) between 2023 and 2029.

[c] Assuming future-year emissions factors and background concentrations/fluxes, forecast increases to traffic and the proposed development.

Changes to Air Quality at Worst-case Locations

7.3 Table 9 summarises the changes to concentrations and deposition fluxes at the worst-case identified locations and expresses these changes in relation to the CL_es (Table 1) and CL_o (Table 2).

7.4 The PCs (when rounded) are no greater than 1% of the CL_o and CL_e, respectively for all pollutants. Thus, according to the guidance summarised in Section 4, the effects of the proposed development, when viewed in isolation, will be not significant and not give rise to an LSE.

7.5 All of the ICCs are greater than 1% of the CL_o and CL_es. Guidance from Natural England and the IAQM (see Section 4) does not, therefore, allow the effects in-combination with other relevant projects to be immediately discounted.

7.6 Further consideration of potential effects from the Project Ecologist is provided in the Shadow Habitats Regulation Assessment.

Table 9: Summary of Worst-case Changes to Air Quality Conditions at River Itchen SAC

Pollutant/Averaging Period	Change in Concentration or Flux [a]		As % of CL_e/CL_o [b]	
	PC	ICC	PC	ICC
At Location with Maximum Concentration or Flux				
Annual Mean NH_3 (µg/m^3)	0.02	0.16	1	5
Annual Mean NOx (µg/m^3)	0.22	1.79	1	6
Nitrogen Deposition (kgN/ha/yr)	0.14	1.06	1	7
At Location with Maximum PC				
Annual Mean NH_3 (µg/m^3)	0.02	0.16	1	5
Annual Mean NOx (µg/m^3)	0.22	1.79	1	6
Nitrogen Deposition (kgN/ha/yr)	0.14	1.06	1	7
At Location with Maximum ICC				
Annual Mean NH_3 (µg/m^3)	0.02	0.16	1	5
Annual Mean NOx (µg/m^3)	0.22	1.79	1	6
Nitrogen Deposition (kgN/ha/yr)	0.13	1.06	1	7

[a] i.e. with and without forecast increases to traffic which are unrelated to the proposed development.

[b] Following guidance from the IAQM (Paragraph 4.16) percentage values have been rounded to the nearest whole number.

8 Summary

8.1 A screening assessment has been provided for air quality effects on biodiversity associated with operation of the proposed development. The emissions which have been considered are emissions from road traffic generated by the completed and occupied development. The proposed development will increase concentrations of NOx and ammonia, and nitrogen deposition fluxes within the River Itchen SAC.

8.2 The increase to concentrations and deposition fluxes at the assessed transect locations within each site, both alone and in-combination with other relevant projects, have been compared with relevant CL_es and CL_o. When viewed in isolation, the changes in concentrations and fluxes are less than 1%. The changes when viewed in combination are all greater than 1% of the relevant CL_es and CL_o.

8.3 As such, further consideration of the effects of the proposed development on the River Itchen SAC is provided by the Project Ecologist in the Shadow Habitats Regulation Assessment.

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WHO (2000) *Air Quality Guidelines for Europe; 2nd Edition. http://www.euro.who.int/__data/assets/pdf_file/0005/74732/E71922.pdf*.

10 Glossary

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
ADMS-Roads	Atmospheric Dispersion Modelling System model for Roads
APIS	Air Pollution Information System
AQC	Air Quality Consultants
Autonomous Measures	Measures which are unrelated to a plan or project which is being determined
Autonomous Reductions	Forecast improvements resulting from autonomous measures.
CL_e	Critical Level - "*concentrations of pollutants in the atmosphere above which direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge*" (APIS, 2024)
CL_o	Critical Load – "*a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge*" (APIS, 2024)
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
EFT	Emission Factor Toolkit
EU	European Union
EUNIS	European Nature Information System
Exceedance	A period of time when the concentration of a pollutant is greater than the appropriate air quality objective. This applies to specified locations with relevant exposure
HDV	Heavy Duty Vehicles (> 3.5 tonnes)
HMSO	His Majesty's Stationery Office
IAQM	Institute of Air Quality Management
kph	Kilometres Per hour
LAQM	Local Air Quality Management
LSE	Likely Significant Effect. An effect is 'likely' if it cannot be excluded on the basis of objective information. An effect is 'significant' if it undermines the conservation objectives.
µg/m^3	Microgrammes per cubic metre
NAMN	National Ammonia Monitoring Network

NE	Natural England
NO_2	Nitrogen dioxide
NOx	Nitrogen oxides (taken to be NO_2 + NO)
NPPF	National Planning Policy Framework
Objectives	A nationally defined set of health-based concentrations for nine pollutants, seven of which are incorporated in Regulations, setting out the extent to which the standards should be achieved by a defined date. There are also vegetation-based objectives for sulphur dioxide and nitrogen oxides
PC	Process Contribution
PPG	Planning Practice Guidance
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
Standards	A nationally defined set of concentrations for nine pollutants below which health effects do not occur or are minimal
TEA	Triethanolamine – used to absorb nitrogen dioxide
WHO	World Health Organisation

11 Appendices

A1 Professional Experience

Penny Wilson, BSc (Hons) CSci MIEnvSc MIAQM

Ms Wilson is a Technical Director with AQC, with more than 20 years' relevant experience in the field of air quality. She has been responsible for numerous assessments for a range of infrastructure developments including power stations, road schemes, ports, airports and residential/commercial developments. The assessments have covered operational and construction impacts, including dust and odour nuisance. She also provides services to local authorities in support of their LAQM duties, including the preparation of Review and Assessment and Action Plan reports, as well as audits of Air Quality Assessments submitted with planning and DCO applications. She has provided expert evidence to a number of Public Inquiries and civil court, and is a Member of the Institute of Air Quality Management and a Chartered Scientist.

Dr Frances Marshall, MSci PhD MIEnvSc MIAQM

Dr Marshall is a Principal Consultant with AQC with ten years' relevant experience. Prior to joining AQC, she spent four years carrying out postgraduate research into atmospheric aerosols at the University of Bristol. Dr Marshall has experience preparing air quality assessments for a range of projects, including residential and commercial developments, road traffic schemes, energy centres, energy from waste schemes and numerous power generation schemes. She has experience in producing air quality assessments for EIA schemes, and has also assessed the impacts of Local Plans on designated ecological areas, prepared Annual Status Reports for Local Authorities, and undertaken diffusion tube monitoring studies. She is a Member of both the Institute of Air Quality Management and the Institution of Environmental Sciences.

A2 Relevant Case Law

A2.1 Interpretation of the Habitats Regulations with respect to air quality impacts and effects has been shaped by judgements and opinions of European and UK courts. Published findings of the Planning Inspectorate for England and Wales, and the advice given to this Inspectorate by Natural England, has also proven seminal in defining how air quality impacts on European sites should be assessed. A brief summary of some key cases, in chronological order, is given below.

2004 - Waddenzee[5]

A2.2 This case in the Court of Justice of the European Union (CJEU) explained the extent to which the precautionary principal must be followed in HRA. In particular, the judgement (para 61) notes: "*the competent national authorities …. are to authorise such an activity only if they have made certain that it will not adversely affect the integrity of that site. That is the case where no reasonable scientific doubt remains as to the absence of such effects*".

2009 - Boggis[6]

A2.3 This judgement explained that a breach of Article 6.3 does not occur solely because of a hypothetical risk of harm to a designated site. There must be credible evidence that the risk is real for this to require consideration (para 37).

2011 Sweetman[7]

A2.4 This judgement from the CJEU also emphasised the need for the precautionary principal. In particularly, it highlighted that the word "Likely" in LSE is unique to the English language interpretation of the Habitats Directive and should not be seen as synonymous with 'probable'. The judgement explained that an AA "*cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned*".

2013 – Lough Corrib[8]

A2.5 This case in the CJEU explained that the entirety of each European site is protected by the Habitats Directive: if a "plan or project will lead to the lasting and irreparable loss of the whole or part of a priority natural habitat type whose conservation was the objective that justified the designation of the site concerned …, the view should be taken that such a plan or project will adversely affect the integrity of that site." (para 46).

2017 - Wealden 1[9]

A2.6 This case in the UK High Court concerned the approach to in-combination assessments pursuant to the Habitats Regulations. The principal issue was whether it was appropriate to apply a screening criterion published by Highways England (in which changes of less than 1,000 vehicles per day could be discounted as not significant) to consider the impacts of individual plans. The overall conclusion in this respect was that the criterion should have been applied to the aggregated change caused by two plans and not to each plan in isolation. This has changed the approach taken at the screening

[5] Case C-127/02. https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:62002CJ0127:EN:PDF
[6] [2009] EWCA Civ 1061. Boggis & Anor v Natural England & Anor [2009] EWCA Civ 1061 (20 October 2009) (bailii.org)
[7] Case C-258/11 (Sweetman) Judgement para 44, 46 and 47
[8] Case C-258/11. CURIA - Documents (europa.eu)
[9] Judgment in Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority) [2017]

stage of HRA, which now routinely considers the effects of plans and projects in combination as well as on their own.

2018 People over Wind[10]

A2.7 The judgement of the CJEU was that it was more appropriate to consider the effects of mitigation at the AA stage rather than at the screening stage: "*it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site*". This is particularly challenging to reconcile with the concepts of 'better by design' and 'air quality positive' which expect consideration of air quality improvement to run throughout the design of a project. Since the People over Wind judgement, most assessments consider that on-site measures to reduce emissions which are not required solely to avoid an LSE can form part of the assessment considered at the screening stage.

2018 Dutch Nitrogen Cases[11]

A2.8 These two cases highlighted several interesting points. The most relevant in terms of air quality assessment in the UK are:

1) that an AA may not take into account the existence of 'autonomous' measures[12] (i.e. measures not part of that programme), if the expected benefits of those measures are not certain;

2) that screening thresholds may only be used to discount an LSE from a project if there is no reasonable scientific doubt that that project will not affect the integrity of a designated site in combination with other plans and projects; and

3) that recurring activities such as grazing and fertilizer use may be classified as a 'project' in the context of the Habitats Directive.

2019 - Examination of the Submission Wealden Local Plan

A2.9 This does not relate to a court case, but the judgements expressed by NE and the planning inspectorate have had significant implications for the way in which air quality impacts on nature conservation sites are assessed in the UK. In particular, they form the basis of the approach which was taken to derive the DMTs and SRTs (see Paragraph 4.18). Furthermore, the political implications for Wealden District Council (WDC) of not following NE's advice on this matter have provided a clear signal to other local planning authorities regarding the treatment of autonomous measures in planning decisions.

A2.10 In the evidence supporting its 2018 Submission Local Plan, Wealden District Council showed the impact of its Submission Plan on air quality conditions within the Ashdown Forest SAC. It quantified the PC and ICC, and also showed the net effect of forecast changes to national and international emissions (i.e. autonomous measures). These emissions were forecast using three alternative approaches, each of which assumed a different level of efficacy of the autonomous measures.

[10] C-323/17 Judgement of the Court 12 April 2018, Request for a preliminary ruling under Article 247 TFEU from the High Court (Ireland), made by decision on 10 May 2017, received at the Court on 30 May 2017, in the proceedings of People Over Wind and Peter Sweetman v Coillte Teoranta, curia.europa.eu/juris/document/document.jsf?text=&docid=200970&pageIndex=0&doclang=en&mode=req&dir=&occ=first&part=1&cid=619449.

[11] Coöperatie Mobilisation for the Environment UA and Vereniging Leefmilieu v College van gedeputeerde staten van Limburg and College van gedeputeerde staten van Gelderland. Requests for a preliminary ruling from the Raad van State Joined Cases C-293/17 and C-294/17

[12] i.e. measures which are not being delivered as part of the plan, project, or programme being assessed.

A2.11 NE advised WDC that it should base its plan-making solely on the scenario that used AQC's CURED model[13], but instead the Council took account of all three emissions scenarios, including one in which autonomous measures were assumed to have no effect[14] .

A2.12 Under NE's preferred scenario[13], improvements caused by autonomous measures were predicted to be greater than the adverse effects of the Submission Local Plan, both alone and in-combination with other predicted traffic growth (i.e. the effect of autonomous measures was greater than both the PC and ICC). Detailed habitats surveys had identified the distribution of the protected feature, and at the worst relevant location, the PC was predicted to remove 53% of the autonomous improvements, while the ICC was predicted to remove 74% of the autonomous improvements[15]. These predictions were used by NE to inform its supplementary conservation objectives for Ashdown Forest (Natural England, 2019). Making specific reference to the modelling published by WDC, NE stated:

"*Assessment of improvements in vehicular technology and in particular Euro6/VI standards that all vehicles are currently being manufactured to, will outweigh impacts from new development. The improvements will be marginally retarded by additional development but future nitrogen deposition and concentration will continue to decline with the existing trend.*" (Natural England, 2019).

A2.13 This statement relates to the entire SAC and thus takes account of the large area where the ICC was predicted to remove less than 74% of the autonomous improvements, as well as these worst-case impacts. NE also explained the importance of this net downward trend in its representations to the planning inspector[16,17]. The predicted improving trend related only to NOx and nitrogen deposition. The modelling published by WDC, to which NE referred, did not predict any reductions to ammonia concentrations, only adverse impacts. NE's advice took a holistic view of ambient concentrations in general in its advice relating to air quality.

A2.14 It is important to note that NE's position regarding the importance of autonomous emissions reductions at Ashdown Forest did not refer to specific habitat features, their sensitivity, or any other ecological context. The statement which is quoted in Paragraph A2.12, relates solely to air quality forecasts. A key disagreement between WDC and NE was whether the autonomous measures included in the air quality forecasts were sufficiently certain for decision making in the context of the Habitats Regulations[18]. The Submission Plan ultimately had to be withdrawn, partly because of WDC's failure to take account of NE's advice on the significance of the PC and ICC when viewed in the context of the benefits provided by autonomous measures[19].

[13] This was termed 'Scenario B'. AQC's CURED model has since been withdrawn but the modelling presented in this report is consistent with the level of precaution which was inherent in this model scenario.
[14] This was termed 'Scenario A'.
[15] As documented in the executive summary of the air quality modelling report cited by Natural England (2019) which shows the maximum deposition to heath predicted using the most detailed modelling would fall from 22.7 kgN/ha/yr in 2015 to: 19.3 kgN/ha/yr in 2028 without any 'in-combination' traffic; 20.8 kgN/ha/yr in 2028 without the Submission Plan, and 21.8 kgN/ha/yr with the Plan..
[16] e.g. Paragraphs 19 to 25, and Paragraphs 37 to 46 of Annex 1 to Natural England Comments on Proposed Submission Document 05/08/18 – Natural England ref 255168 (available on request).
[17] It is important to note that the examination in public followed shortly after the judgement from the Dutch Nitrogen Cases, which were discussed at length and thus fully accounted for in advice from both Natural England and the planning inspector.
[18] In particular, WDC noted that measurements showed that traffic-related nitrogen deposition had, on average, been increasing for many years despite the same forecasts showing concurrent reductions.
[19] Wealden District Council concluded that the PC and ICC were both potentially significant without mitigation, while for the reasons given in Paragraph 1)a)i)(1)(a)(i)A2.12, Natural England determined that mitigation was not required.

A3 Data from (Caporn et al., 2016) Cited by National Highways

Table A3-1: Values from Table 21 of Caporn et al (2016) Relied on in National Highways' Assessment Method

Habitat	Nitrogen Deposition kgN/ha/yr						
	CL_o	Background deposition					
		5	10	15	20	25	30
		Increase required to reduce measured species richness by 1					
Upland heath [a]	10-20	0.4	0.8	1.3	1.7	2.0	2.4
Upland heath [a]	10-20	1.7	2.0	2.5	3.3	5.0	20.0
Lowland heath	10-20	0.4	0.8	1.3	1.7	2.0	2.4
Bog	5-10	-	-	-	3.3	-	-
Sand dunes [a]	8-15	0.1	0.5	1.1	2.0	-	-
Sand dunes [a]	8-15	0.3	0.6	0.9	1.3	-	-
Sand dunes [a]	8-15	0.3	0.6	0.9	1.3	-	-
Acid grasslands	10-15	1.7	1.7	2.0	2.0	2.5	2.5

[a] Based on two separate studies using different quadrat sizes.

A4 Modelling Methodology

A4.1 The full details of the modelling methodology are provided in the AQC report which describes the operational air quality effects on human health (document reference J10/15952A/10/1/F1, dated October 2024) (2024). Nonetheless, pertinent details to this assessment have been reproduced in this section.

Model Inputs

A4.2 Predictions have been carried out using the ADMS-Roads dispersion model (v5). The model requires the user to provide various input data, including emissions from each section of road and the road characteristics (including road width). All of the roads entered into the model have been assumed to have no elevation above the surrounding ground level.

A4.3 Vehicle NOx emissions have been calculated based on vehicle flow, composition and speed data using the EFT (Version 12.1) published by Defra (2024), whilst emissions of ammonia have been derived using AQC's CREAM (v1A) model.

A4.4 AADT flows and the proportions of HDVs have been provided by Glanville Group, who have undertaken the transport assessment work for the proposed development. Traffic speeds have been estimated based on professional judgement, taking account of the road layout, speed limits and the proximity to a junction. The traffic data of relevance to this assessment (i.e., data for those roads within 200 m of the River Itchen) are summarised in Table A4-1[20]. Diurnal and monthly flow profiles for the traffic have been derived from the national profiles published by DfT (2023).

Table A4-1: Summary of Traffic Data for Roads within 200 m of the River Itchen SAC

Road Link	2023		2029 (Without Scheme)		2029 (With Scheme)	
	AADT	%HDV	AADT	%HDV	AADT	%HDV
B3037 (West of Sandy Lane)	16,000	2.5	18,095	2.3	18,454	2.2
B3037 (East of Chickenhall Lane)	20,282	1.9	22,687	1.8	23,048	1.8
ABRI	387	0.0	407	0.0	407	0.0
Chickenhall Lane	5,596	17.5	5,889	17.5	5,889	17.5
B3037 (West of Chickenhall Lane)	19,207	5.4	21,470	5.0	21,831	5.0

A4.5 Figure A4-1 shows the modelled roads within 200 m of the River Itchen SAC, along with the speed at which each link was modelled.

[20] The full extent of the modelled road network is presented in the human health assessment.

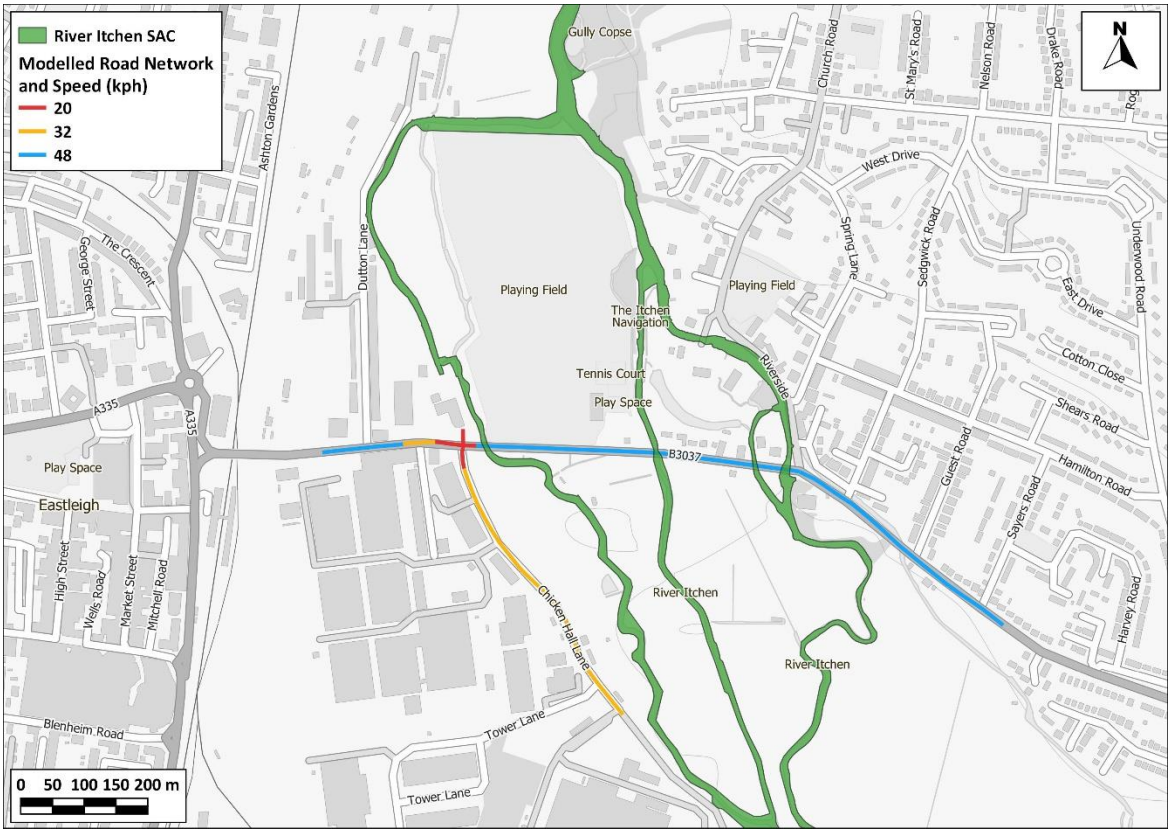


Figure A4-1: Modelled Road Network & Speed

Additional data sourced from third parties, including public sector information licensed under the Open Government Licence v3.0.

A4.6 Hourly sequential meteorological data in sectors of 10 degrees from Middle Wallop for 2023 have been used in the model. The Middle Wallop meteorological monitoring station is located approximately 29 km to the northwest of the proposed development. It is deemed to be the nearest monitoring station representative of meteorological conditions in the vicinity of the proposed development; both the application site and the Middle Wallop meteorological monitoring station are located in Hampshire where they will be influenced by the effects of inland meteorology over relatively flat-lying, predominantly agricultural, topography.

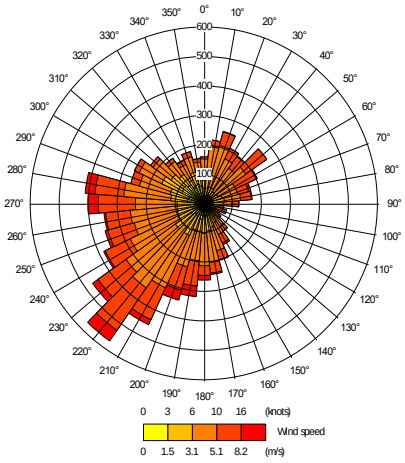


Figure A4-2: Wind Rose

Model Verification

Nitrogen Dioxide

A4.7 Evidence collected over many years has shown that, in most urban areas, dispersion modelling relying upon Defra's EFT has tended to systematically under-predict roadside nitrogen dioxide concentrations. To account for this, it is necessary to adjust the model against local measurements.

A4.8 Appendix A3 of the human health assessment (AQC, 2024) demonstrates that the unadjusted model has under predicted the road-NOx contribution; this is a common experience with this and most other road traffic emissions dispersion models. An adjustment factor of 2.2135 has therefore been applied to the modelled road-NOx concentration for each receptor to provide adjusted modelled road-NOx concentrations.

Ammonia

A4.9 There are no local roadside ammonia monitoring sites which can be used to verify the model results for traffic-related ammonia emissions. Development of the CREAM emissions model (AQC, 2020c) included verification of concentrations predicted using the ADMS-Roads dispersion model and measured traffic data against ambient measurements from the most detailed network of roadside monitoring sites which has ever been run in the UK. No further adjustment to the model predictions is considered appropriate.

Post-processing

A4.10 The model predicts road-NOx concentrations at each receptor location. These concentrations have been adjusted using the adjustment factor set out above, which, along with the background NO_2, has been processed through the NOx to NO_2 calculator available on the Defra LAQM Support website (Defra, 2024). The traffic mix within the calculator has been set to "All other urban UK traffic", which is considered suitable for the study area. The calculator predicts the component of NO_2 based on the adjusted road-NOx and the background NO_2.

Deposition Rates

A4.11 Deposition has not been included within the dispersion model because the principal depositing component of concern is nitrogen dioxide and this is calculated from nitrogen oxides outside of the model. Instead, deposition has been calculated from the predicted ambient concentrations using the deposition velocities set out in Table A4-2.

A4.12 Deposition velocities refer to a height above ground, typically 1 or 2 m, although in practice the precise height makes little difference and here, they have been applied to concentrations predicted at a height of 1.5 m above ground. The velocities are applied simply by multiplying a concentration ($\mu g/m^3$) by the velocity (m/s) to predict a deposition flux ($\mu g/m^2/s$) and then scaling by time and area to represent kg/ha/yr of the nitrogen component of the molecule.

Table A4-2: Deposition Velocities Used in This Assessment

Pollutant	Deposition Velocity (m/s)	Reference
Nitrogen Dioxide	0.0015 m/s (Grassland)	AQTAG06 (2011)
Ammonia	0.02 m/s (Grassland)	

A4.13 Wet deposition of the emitted pollutants close to the emission source will be restricted to wash-out, or below cloud scavenging. For this to occur, rain droplets must come into contact with the gas

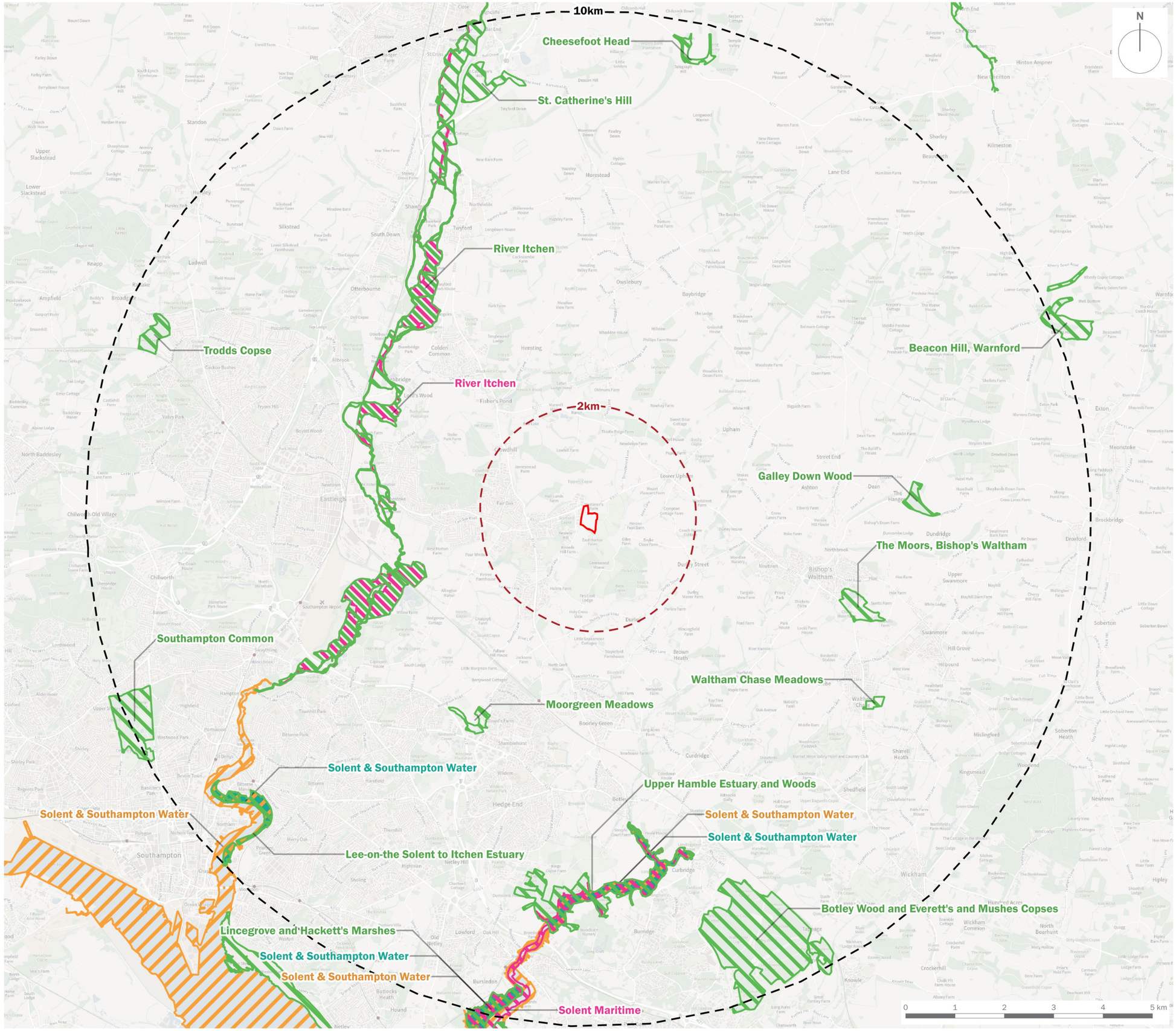
molecules before they hit the ground. Falling raindrops displace the air around them, effectively pushing gasses away. AQTAG06 guidance (2011) is that the wet deposition of sulphur dioxide, nitrogen dioxide and ammonia is not significant within a short range. It has thus not been included.



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Plans

Plan EDP 1: Statutory Designated Sites
(edp7852_d012b 08 November 2024 DJo/MNe)



Site Boundary

10km Range Ring

2km Range Ring

Site of Special Scientific Interest (SSSI)

Special Protection Area (SPA)

Special Area Conservation (SAC)

RAMSAR Wetland

client

Bloor Homes Limited

project title

Land south of Mortimers Lane, Fair Oak

drawing title

Statutory Designated Sites

date	**08 NOVEMBER 2024**	drawn by	**DJo**
drawing number	**edp7852_d012b**	checked	**MNe**
scale	**1:75,000 @ A3**	QA	**RBa**

the environmental dimension partnership

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.

Appendix 11: Arboricultural Impact Assessment (Highways Access) (EDP, April 2025)

Land south of Mortimers Lane, Fair Oak

DRAFT

Arboricultural Impact Assessment (Highways Access)

Prepared by:
The Environmental Dimension Partnership Ltd

On behalf of:
Bloor Homes Limited

April 2025

Report Reference
edp7852_r020

Document Control

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APPENDICES

Appendix EDP 1 Site Access General Arrangement Plan Drawing Number 8230679/6110

Appendix EDP 2 Tree Protection Barrier on Scaffold 2.0m High (Extract from BS 5837:2012, Figure 2 'Protective Barrier')

PLANS

Plan EDP 1: Tree Protection Plan
(edp7852_d041 10 April 2025 PDr/DGa)

Section 1
Introduction

1.1 This Arboricultural Impact Assessment (AIA) has been prepared by the Environmental Dimension Partnership Ltd (EDP) on behalf of Bloor Homes Limited (the Applicant) in relation to the proposed Highways Access for Land south of Mortimers Lane, Fair Oak, (hereafter referred to as 'the Site').

1.2 This AIA has been produced to directly respond to the Tree Officer comments dated 11/02/2025 and addresses the 3m shared footway/cycleway that is proposed to run from the new site entrance westwards.

1.3 It sets out the nature and extent of tree losses and provides mitigation and protection measures to ensure the viable long-term retention of retained trees in the context of the development proposals.

SITE CONTEXT

1.4 The Site is located to the east of the town of Fair Oak and currently comprises two pasture fields extending across 11.05ha (combined) which are divided and bounded by mature hedgerows, scattered trees and post and wire fencing. The Site is bound to the north by Mortimers Lane (B3037).

1.5 The Site lies within the administrative boundary of Eastleigh Borough Council (EBC).

DEVELOPMENT PROPOSALS

1.6 The development proposals are for an outline application for up to 245 dwellings (Use Class C3), up to 350sqm multi-functional space, mobility infrastructure (Use Class Sui Generis), with associated open space, landscaping, infrastructure, and vehicular access off Mortimers Lane, Fair Oak. All matters reserved except for vehicular access off Mortimers Lane and pedestrian/cycle connections to the site boundary.

1.7 This AIA has been prepared using EDP's arboricultural constraints information contained within the Arboricultural Baseline Note (edp7852_r001), with the Tree Constraints Plan included. This baseline survey data was collected by EDP in December 2022, with additional survey data along the highway collected in March 2023.

AIMS AND OBJECTIVES

1.8 The purpose of this AIA is to assess the impacts upon the tree stock from the proposed Highways Access and demonstrate which trees can be retained and which will require removal. In addition, it will provide mitigation measures, such as protective fencing, to ensure the safe, long-term retention of any retained tree should the development be permitted.

RELEVANT BASELINE DOCUMENTS

1.9 EDP's Arboricultural Baseline Note (**edp7852_r001**), is relevant to the provisions of this AIA and this AIA should be read in conjunction with it where applicable.

1.10 The following best practice guidance and informative standards are relevant to the provisions of the AIA and should be read in conjunction with the AIA where applicable:

- BS 5837:2012 *Trees in Relation to Design, Demolition and Construction – Recommendations*. BSI 2012; and
- BS 3998:2010 *Tree Work – Recommendations*. BSI 2010.

Section 2
Arboricultural Impact Assessment

2.1 This Arboricultural Impact Assessment (AIA) has been prepared following Site-based observations, a desktop study of the baseline survey data and consideration of the Site Access General Arrangement Plan (**Appendix EDP 1**). In particular, it relates to the Tree Constraints Plan contained within the Arboricultural Baseline Note (edp7852_r001), which is overlaid onto the proposed Site Access General Arrangement Plan. The resulting drawing is a Tree Protection Plan (**Plan EDP 1**).

2.2 This AIA recognises that construction activities pose a threat to subject trees if treated inappropriately and assesses the likely impacts of the proposals on the tree stock and, where appropriate, provides mitigation with the view of achieving a harmonious relationship between the trees and the built form.

2.3 Assessment of the impact of the proposals has been determined following consideration of the constraints each surveyed item poses by virtue of its position, branch spread and designated root protection area (RPA).

2.4 Consideration should be given to retaining all trees where possible. However, ultimately the removal of any tree is dependent on its proximity to the footprint of any proposal and associated landscaping.

ITEMS IMPACTED BY DEVELOPMENT PROPOSALS

2.5 Assessment of the Site Access General Arrangement Plan (**Appendix EDP 1**) determines that 10 items are impacted by the development proposals; these are detailed within **Table EDP 2.2**. one item is category B of moderate quality, seven items are category C, of low quality and two items are category U of poor quality.

Table EDP 2.1: Items Impacted by Development Proposals

Ref. Number	Species	Impact	Category Grading
T3	Ash sp. (*Fraxinus sp.*)	Complete removal.	U
G4	Sycamore (*Acer pseudoplatanus*), Willow sp. (*Salix sp.*)	Crown lift to 2.5m for footway/cycleway.	C
H6	Blackthorn (*Prunus spinosa*), Bramble sp. (*Rubus sp.*), Common hawthorn (*Crataegus monogyna*)	Partial removal.	C
G76	Goat willow (*Salix caprea*)	Complete removal.	C
T77	Douglas fir (*Pseudotsuga menziesii*)	Complete removal.	U
G78	Common hawthorn	Encroachment into RPA by footway/cycleway. Crown lift to 2.5m.	C

Ref. Number	Species	Impact	Category Grading
T80	Lawson's cypress (*Chamaecyparis lawsoniana*)	Encroachment into RPA by footway/cycleway. Crown lift to 2.5m.	C
G81	Willow sp.	Encroachment into RPA by footway/cycleway. Crown lift to 2.5m.	C
G82	Willow sp.	Encroachment into RPA by footway/cycleway. Crown lift to 2.5m.	C
G83	Oak sp. (*Quercus sp.*)	Encroachment into RPA by footway/cycleway. Crown lift to 2.5m.	B

MITIGATION

2.6 There is a minor encroachment into the RPA of **G78**, **T80**, **G81**, **G82** and **G83**. However, to prevent any inadvertent damage to the RPAs of these items the footway/cycleway should be constructed using no-dig methodology. A suitably worded condition can secure this mitigation in order to minimise harm and ensure safe, long-term retention to trees.

2.7 Existing trees identified for retention on the appended Tree Protection Plan (**Plan EDP 1**) will continue to be managed in accordance with BS 5837:2012. Critically this requires the implementation of physical protection measures to safeguard the retained trees, including robust protection in the form of a barrier to BS 5837:2012 (**Appendix EDP 2**), during the construction phases. The importance of such matters cannot be overlooked if a successful outcome is to be ensured.

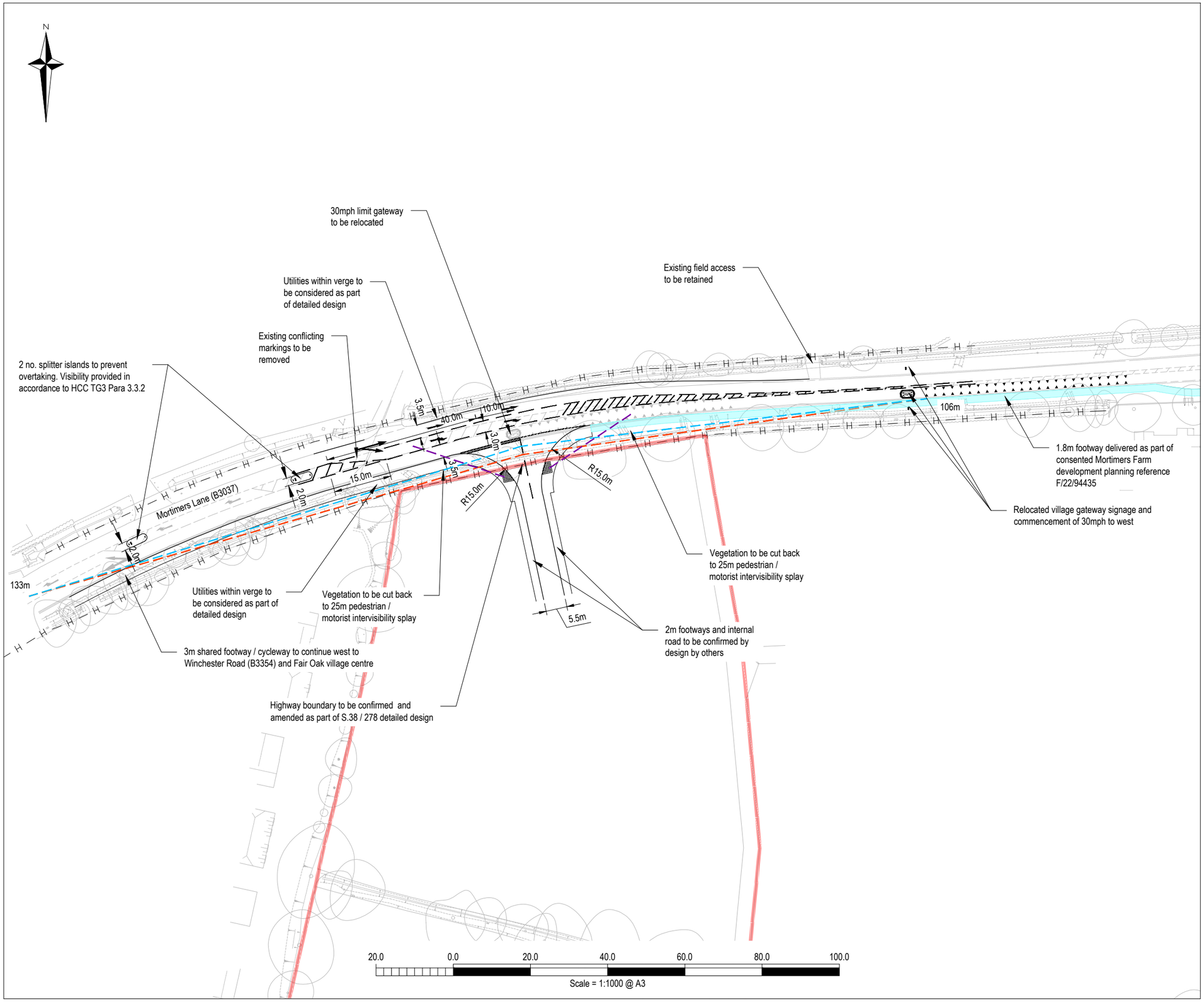
Section 3
Conclusions

3.1 Masterplanning of the development has been informed by arboricultural recommendations throughout and resulted in the loss of one category C item, two category U items and the partial loss of one category C item. To ensure succession to the existing tree stock new planting is recommended. The new planting has potential for longevity within the landscape and will enhance the species diversity for the Site, whilst also contributing to the green infrastructure for the area.

3.2 Existing trees identified for retention on the appended Tree Protection Plan (**Plan EDP 1**) will continue to be managed in accordance with BS 5837:2012. Critically, this requires the implementation of physical protection measures to safeguard the retained trees, including robust protection in the form of a barrier to BS 5837:2012, during the demolition and construction phases. The importance of such matters cannot be overlooked if a successful outcome is to be ensured.

3.3 A suitably worded condition can secure any mitigation measures which would be required to minimise harm and ensure safe, long-term retention to trees.

Appendix EDP 1
Site Access General Arrangement Plan
Drawing Number 8230679/6110



NOTES

1. This drawing is to be read in conjunction with all relevant documents and specifications.
2. Dimensions are not to be scaled.

Source: Site Line's drawing number 01MK001 1 to 6

KEY

- 4.5m x 'y'm (HCC TG3) visibility splays
- 2.4m x 'y'm (HCC TG3) visibility splays
- 25.0m pedestrian / motorist intervisibility
- Site boundary
- highway boundary interpreted from Hampshire CC records to be confirmed by HCC during detailed design stage
- 1.8m footway delivered as part of consented Mortimers Farm development planning reference F/22/94435

Rev.	Description	Date	By	Chkd

Glanville
Survey > Plan > Engineer

Civil Engineering | Highways Engineering
Structural Engineering | Building Surveying
Transport Planning | Geomatics

Hertfordshire | Oxfordshire | Cambridgeshire | Bristol

Client :
Bloor Homes Southern

Project :
Land South of Mortimers Lane, Fair Oak, Eastleigh

Title :
Site Access General Arrangement

Engineer : A. Harper
Date : August 2024

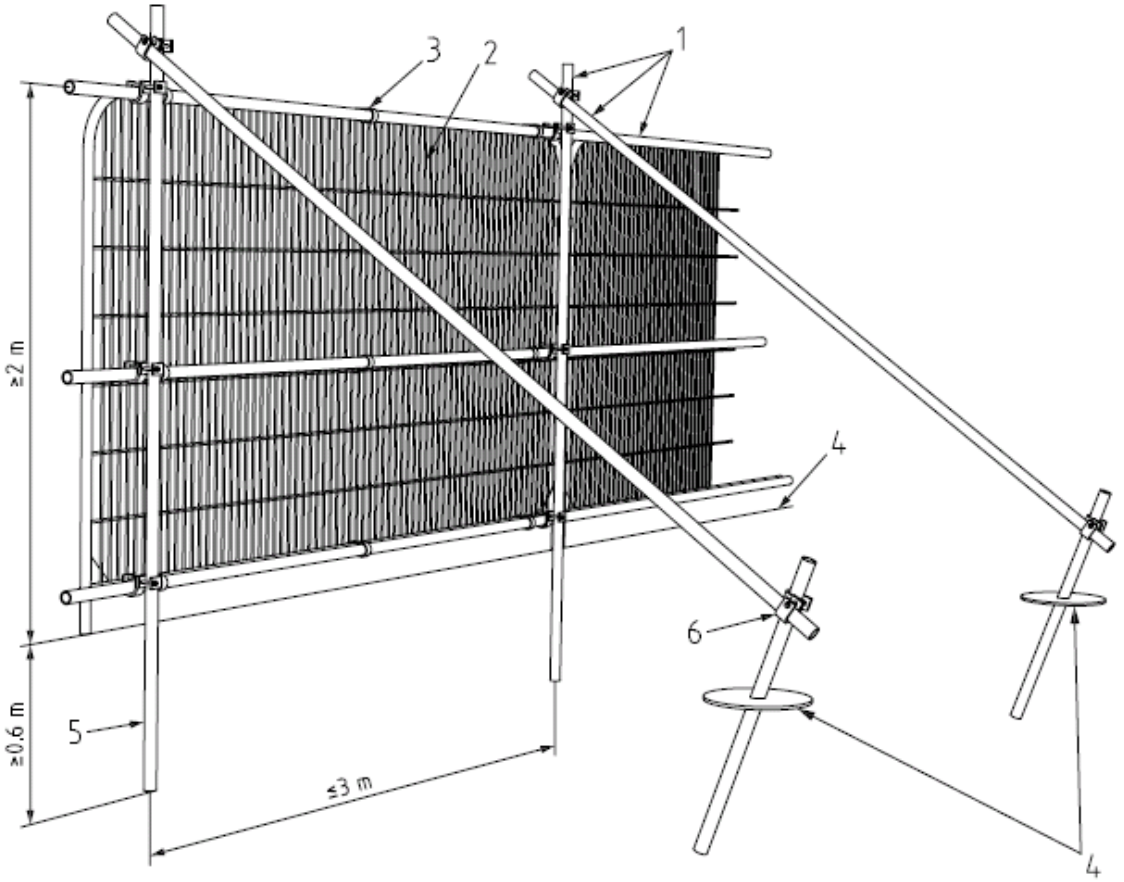
Director : A. Jones
Scale : 1:1000 @ A3

Status : PRELIMINARY

Drawing No.
8230679/6110

Rev

Appendix EDP 2
Tree Protection Barrier on Scaffold 2.0m High
(Extract from BS 5837:2012, Figure 2 'Protective Barrier')

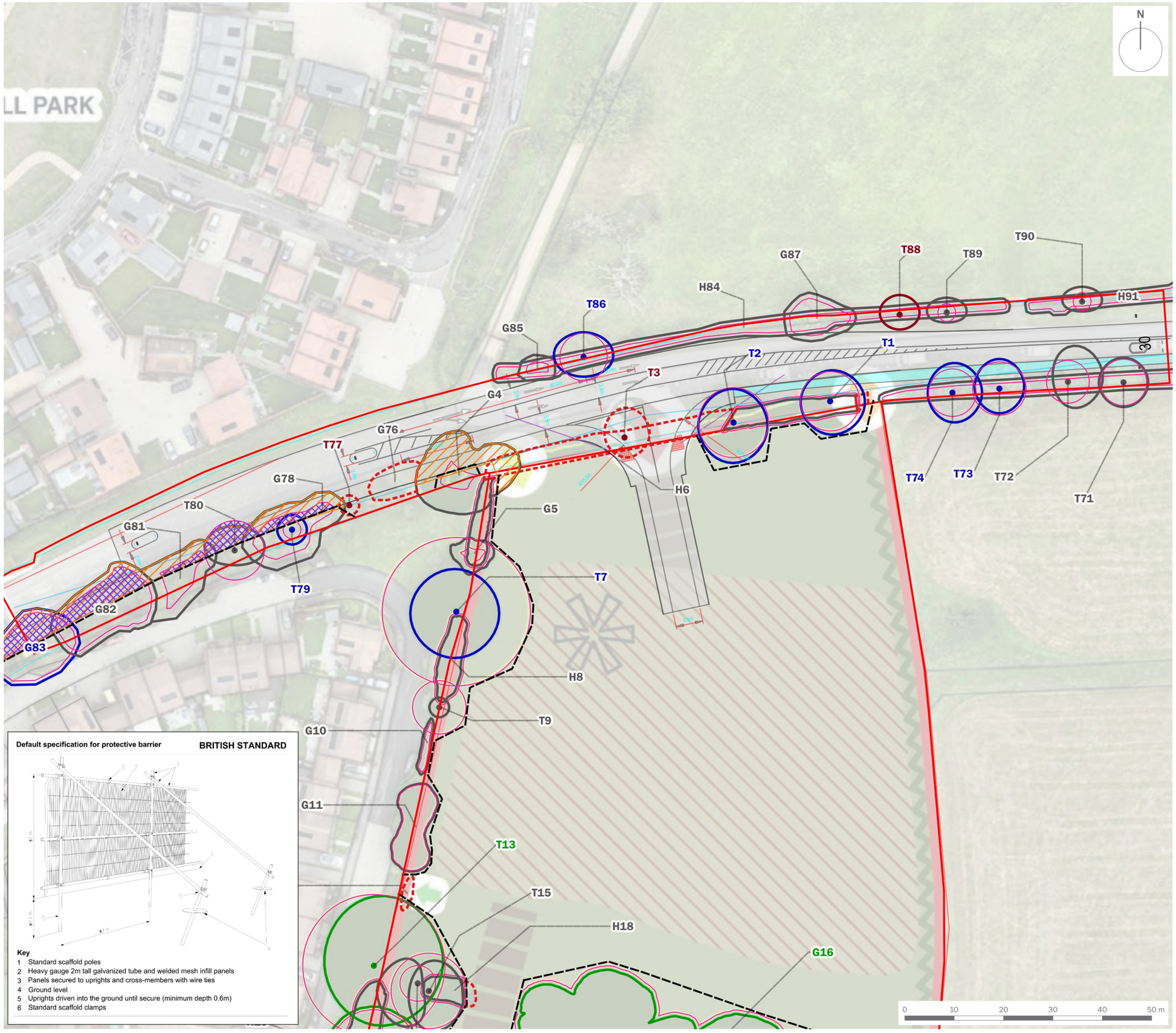


Key

1 Standard scaffold poles
2 Heavy gauge 2 m tall galvanized tube and welded mesh infill panels
3 Panels secured to uprights and cross-members with wire ties
4 Ground level
5 Uprights driven into the ground until secure (minimum depth 0.6 m)
6 Standard scaffold clamps

Plans

Plan EDP 1: Tree Protection Plan
(edp7852_d041 10 April 2025 PDr/DGa)



Default specification for protective barrier **BRITISH STANDARD**

Key

1 Standard scaffold poles
2 Heavy gauge 2m tall galvanized tube and welded mesh infill panels
3 Panels secured to uprights and cross-members with wire ties
4 Ground level
5 Uprights driven into the ground until secure (minimum depth 0.6m)
6 Standard scaffold clamps

Site Boundary

DRAFT

T1 Tree/Group Number
Tree/Group Canopy
Tree Stem
Root Protection Area

Category A: Trees of high quality and value

Category B: Trees of moderate quality and value

Category C: Trees of low quality and value

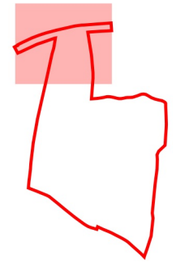
Category U: Trees of poor quality and value

Trees to be Removed

Protective Fencing in accordance with BS 5837:2012

Crown Lift to 2.5m in accordance with BS 3998:2010

No Dig



purpose of issue **PLANNING**

rev	description	date	by
-	Original	10/04/2025	PDr

client

Bloor Homes Limited

project title

Land south of Mortimers Lane, Fair Oak

drawing title

Tree Protection Plan (Site Access)

date	**10 APRIL 2025**	drawn by	**PDr**
drawing number	**edp7852_d041**	checked	**DGa**
scale	**1:750 @ A3**	QA	

the environmental dimension partnership

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REGISTERED ORGANISATION CIfA

URBAN DESIGN GROUP REGISTERED PRACTICE

IEMA CORPORATE PARTNER

Landscape Institute
Registered practice

.

Appendix 12: Air Quality Technical Note (AQC, April 2025)

Technical Note
Land South of Mortimers Lane, Fair Oak

11 April 2025

1 Introduction

Air Quality Consultants Limited (AQC) prepared an Air Quality Assessment[1] (report reference: J10/15952A/10/01, dated 25th October 2024) for the proposed residential development on land south of Mortimers Lane in Fair Oak, Eastleigh in October 2024. The assessment considered the impacts of operational road traffic emissions on local air quality conditions, and the suitability of the site for residential development.

The Air Quality Assessment concluded that additional traffic generated by the proposed development would have negligible impacts on concentrations of nitrogen dioxide and particulate matter (PM_{10} and $PM_{2.5}$) at all assessed locations, including within the Eastleigh Air Quality Management Areas (AQMAs). The assessment also demonstrated that, with the good design measures embedded in the scheme, future residents would experience acceptable air quality conditions, and there were no constraints to where residential units could be placed across the site. There was, therefore, no requirement to recommend mitigation, and the air quality effect was concluded to be 'not significant'.

The outline planning application (reference O/24/98619) was submitted to Eastleigh Borough Council (EBC) in December 2024. Separate comments on the Air Quality Assessment have subsequently been received from the Pollution Control Specialist (PCS) in the Planning and Environment – Pollution department at EBC, and SUEZ Recycling and Recovery UK ("SUEZ").

This technical note addresses the comments from both the PCS at EBC and SUEZ.

2 Planning and Environment – Pollution Comments

Whilst the comments from the PCS indicate that the modelling methodology and conclusions of the assessment have been broadly accepted, there are two comments that are considered further in this note.

Comment 1:

"The assessment utilised 2023 data from the Middle Wallop meteorological monitoring station, located approximately 29 km northwest of the proposed development site. Please confirm the adequacy of the data capture to ensure its relevance and accuracy for the study".

With the exception of precipitation rate, data capture for all meteorological parameters at the Middle Wallop site in 2023 was 100%; data capture for precipitation rate was 98.9%, with gaps filled using data from Boscombe Down, Odiham and Bournemouth meteorological sites. Data capture has also been consistently above 95% in the last five years. There is, therefore, sufficient data to justify its use in the dispersion modelling.

Whilst the closest meteorological site to the proposed development is located in Southampton Airport, 6 km to the southwest, data capture was only ~70% in 2023, and the site has consistently recorded missing data in the last five years. Meteorological data are also recorded at the Gosport Fleetlands site, approximately 16 km to the southeast of the proposed development; however, this site was not used in the modelling study as it is located adjacent to Portsmouth Harbour and thus will be influenced by the effects of coastal meteorology, and therefore is not judged to be representative of the study area which is inland.

It is, therefore, judged that whilst Middle Wallop is not the nearest site, there is sufficient data capture for use in the modelling study, and it is the most representative of the study area.

[1] Air Quality Consultants (2024), Air Quality Assessment: Land South of Mortimers Lane, Fair Oak.

Comment 2:

"Paragraph 5.2 states "No significant industrial sources have been identified that are likely to affect the proposed development, in terms of air quality". However, it should be noted that the CWM aggregate company, holding both EBC (LAPPC043 under Process Guidance Note (PG3/01(12))) and EA (waste handling and transfer) permits, is located approximately 145 m from the development site and could potentially influence local air quality…

……. it is less clear with regards to the particulate matter as noted in the report and given the proximity of the dust source (CWM Aggregate) presenting a potential source of localised emissions.

We recommend that the assessment be revisited to account for the potential impacts associated with such a nearby source. Further consideration of the site layout and the implementation of physical barriers (fences) nearest to this dust source or other measures might be advisable to minimise future residents' exposure to dust, traffic and noise, as well as reduce the likelihood of nuisance complaints."

As described in Paragraph 4.7 of the Air Quality Assessment, industrial sources that may affect the area were identified using Defra's UK Pollutant Release and Transfer Register (PRTR)[2]. Paragraph 5.2 identifies that the facility is not included on the PRTR database, indicating that it does not meet the pollutant threshold (for example, 50 tonnes per day for the disposal of non-hazardous waste) to require inclusion, and therefore is not considered a major source of pollutants.

As shown in Figure 1, the CWM Aggregates facility is approximately 150 m west of the proposed development and separated by several residential properties that form part of the Pembers Hill Park development that was constructed in 2019 (application reference O/15/77190). The facility has been operational for a number of years and is shielded from the surrounding Mortimers Lane (to the north) and Knowle Lane (to the east) by dense hedgerows and fencing.

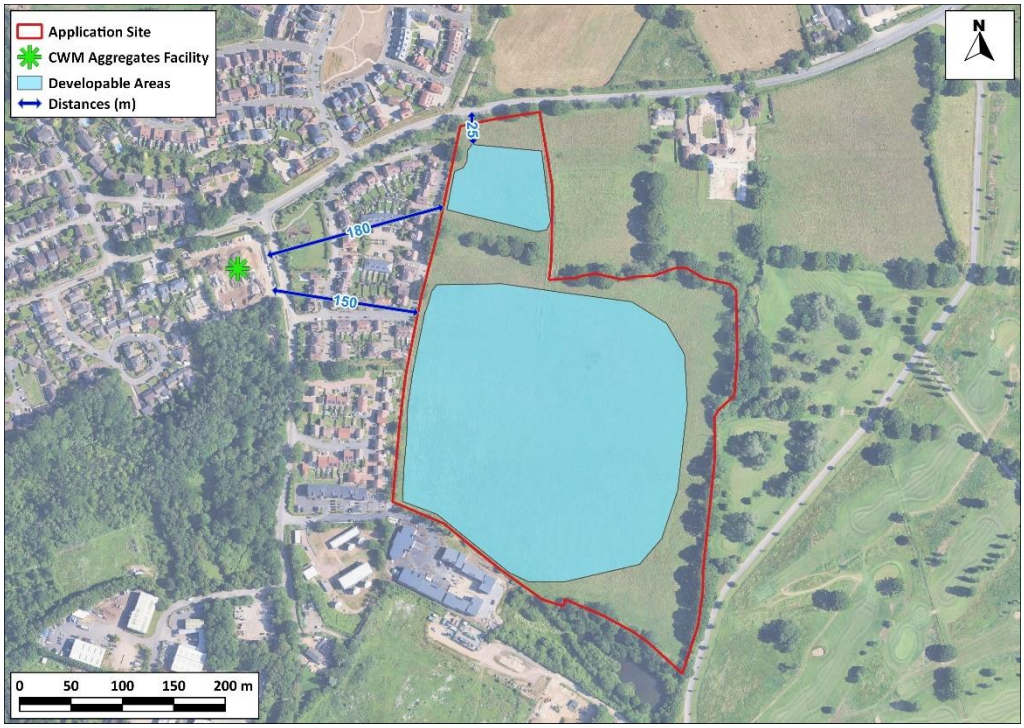


Figure 1: Proximity of CWM Aggregates and Mortimers Lane to Developable Areas within the Proposed Development

Imagery ©2025 Airbus, Maxar Technologies

The Institute of Air Quality Management (IAQM)[3] has developed an approach to determine the impacts on air quality from construction sites[4]. The guidance considers the potential for impacts within 250 m of the site boundary, or within 50 m

[2] Defra (2025), Pollutant Release and Transfer Register.
[3] IAQM (2024), Guidance on the Assessment of Dust from Demolition and Construction v2.2.
[4] Given the scale of the works at the facility, it is judged that this is the most appropriate guidance document.

of roads used by construction vehicles; beyond these distances, it can be concluded there will be no significant effect. As shown in Figure 1, the proposed development is located no closer than 150 m from the facility, and new properties will be set back from Mortimers Lane by at least 25 m. Further, the proposals will retain the existing hedgerow and proposes new planting adjacent to the western boundary which will act as a buffer between the facility and proposed development. The area of the proposed development is thus classed as 'low sensitivity' to both dust soiling and human health effects[5] from to the CWM Aggregates facility.

Notwithstanding, in accordance with both the Local Authority Part B permit and the Environment Agency permit referenced by the PCS, it is assumed that environmental control measures are applied at the facility, such as the use of dust suppression techniques, and that the facility adopts best practice when operating to minimise emissions of dust.

Taking into account the low sensitivity of the area covering the proposed development to impacts from the CWM Aggregates facility, the measures that are likely to be in place at the facility, and the presence of vegetative barriers and residential properties which will disrupt the dust pathway, it is judged that there will be no significant effects at the proposed development from the nearby CWM Aggregates facility. This conclusion accords with the findings of the air quality assessment for the Pembers Hill Park development[6], which is 50 m from the facility and thus would be impacted to a greater extent than the proposed development.

3 SUEZ Recycling and Recovery UK Comments

SUEZ operates a restored landfill site approximately 55 m to the south of the application site; waste was last accepted at the site in 2009. The site comprises the capped landfill, and a flare and Combined Heat and Power (CHP) unit within an environmental management compound; the flare and CHP unit combust landfill gases as part of the management process. Nonetheless, residual amounts of landfill gas can also be emitted from the surface, as well as point features such as gas well seals. Operations at the site are controlled by an environmental permit issued by the Environment Agency to control emissions as required by the Landfill Directive. The SUEZ site is separated from the proposed development by the newly constructed East Horton Business Park and an area of woodland, as shown in Figure 2.

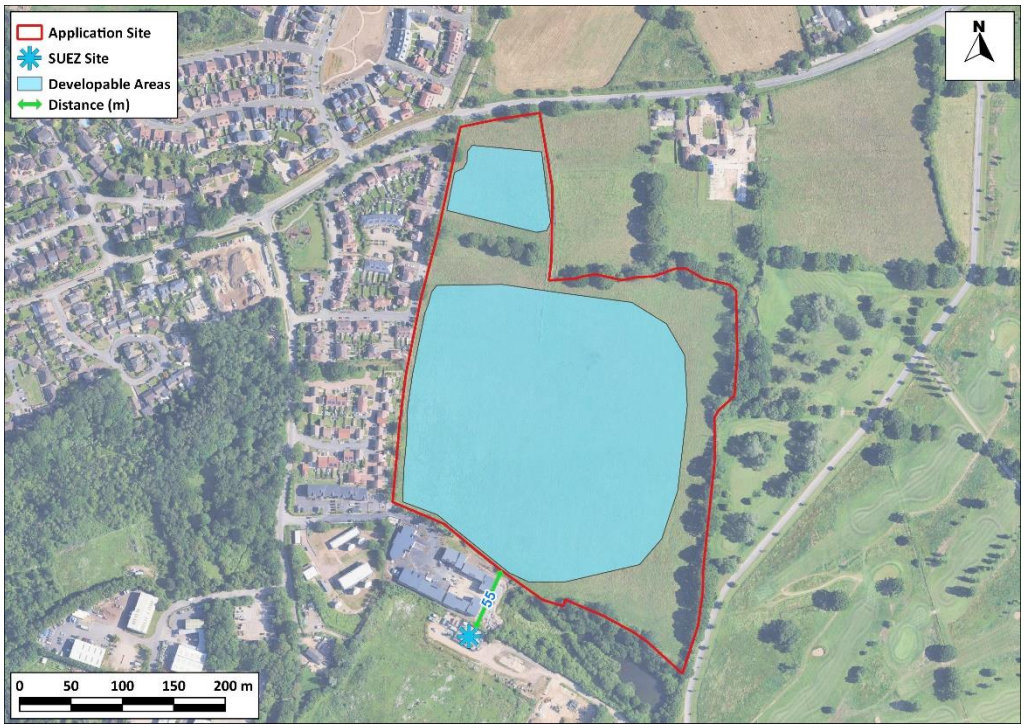


Figure 2: Location of SUEZ Site Relative to Developable Areas within the Proposed Development

Imagery ©2025 Airbus, Maxar Technologies

[5] The highest predicted PM_{10} concentration at an assessed receptor in the Air Quality Assessment is 16.2 µg/m^3.
[6] Pegasus Group (2015), Chapter 9: Air Quality. Application Reference: O/15/77190.

SUEZ's comment on the application states:

"The submitted application documents acknowledge the presence of the closed but still licensed landfill site and its environmental management infrastructure. We do have concerns regarding the scope and assumptions made in the noise and air quality assessments and these are explained further under the respective sub-headings below.

The air quality assessment appears only to consider traffic impacts and does not acknowledge emissions from the landfill gas management system, emissions from which are modelled and monitored under the environmental permitting regime. SUEZ would be happy to provide this data on request."

As part of the East Horton Business Park planning application in 2023 (application reference F/23/94668), an air quality assessment[7] was prepared which assessed the impact of both nitrogen dioxide and trace gas emissions from the SUEZ site using landfill gas composition data provided by SUEZ.

Whilst the air quality assessment did not consider impacts beyond the East Horton Business Park boundary, contours showing the total annual mean and total 99.79th percentile of 1-hour mean nitrogen dioxide concentrations were presented in Section 5; these contours have been reproduced below in Figure 3.

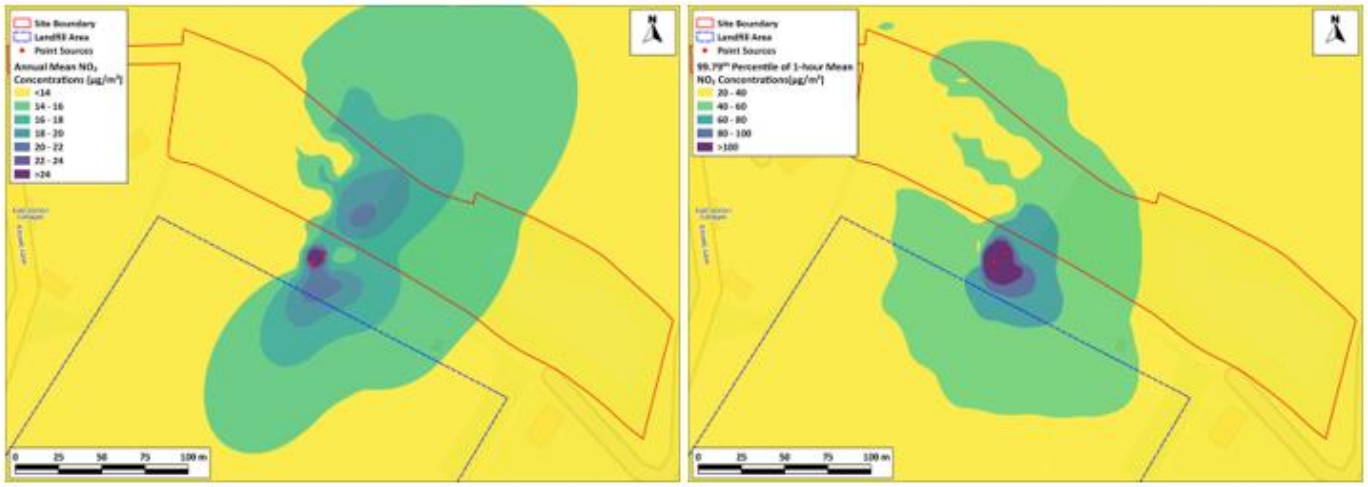


Figure 3: Total Annual Mean (Left Image) and Total 99.79th Percentile of 1-hour Mean (Right Image) Nitrogen Dioxide Concentrations from the SUEZ Site

Figures reproduced from the Air Quality Assessment for Knowle Lane, Fair Oak[7]

With respect to annual mean nitrogen dioxide concentrations, the contours demonstrate that the maximum predicted concentration in the area to the north of the East Horton Business Park boundary, corresponding to the site of the proposed development, was 20 µg/m^3, whilst the maximum predicted 99.79th percentile of 1-hour mean concentrations was 60 µg/m^3. These concentrations are well below the air quality objectives, of 40 µg/m^3 for annual mean and 200 µg/m^3 for 1-hour mean concentrations, set to protect human health.

With respect to the trace gases from the landfill site, the assessment states that "*each of the trace components of landfill gas will contribute a very small amount to concentrations of each of the 29 priority trace pollutants considered, equivalent to significantly less than 1% of the long-term (annual) assessment criteria and 10% of the short-term criteria…The contributions are thus considered insignificant under EA guidance*". Since the proposed development is located further from the landfill site, it is reasonable to conclude that concentrations of trace gases will be no higher than predicted in the air quality assessment for East Horton Business Park.

[7] Air Quality Consultants (2023), Air Quality Assessment: Knowle Lane, Fair Oak, Eastleigh. Report Number: J10/12639C/10/1/F2, dated 23rd January 2023.

Overall, it is concluded that emissions of nitrogen dioxide or trace gases from the operation of the SUEZ site will not have a significant air quality effect on the proposed development.

4 Conclusions

The Air Quality Assessment[1], which has been broadly accepted by the PCS at EBC, demonstrates that future residents will experience acceptable air quality conditions, and that the development will have no significant effect on local air quality at any existing receptor.

In response to comments from the PCS, this note has provided further information relating to the meteorological data used in the assessment and demonstrates the appropriateness of its use in the dispersion modelling. The note has also assessed the potential for dust impacts from the nearby CWM Aggregates facility and concludes that the facility is unlikely to cause dust impacts at the residential properties within the proposed development.

The note has also utilised a previous assessment of the SUEZ landfill site to demonstrate that significant air quality effects from the operation of the landfill gas management infrastructure (such as the flare or CHP unit) or as a result of fugitive emissions from the surface of the restored landfill are unlikely.

Overall, the conclusions of the air quality assessment submitted in support of the residential development on land south of Mortimers Lane in Fair Oak remain valid.

Issued by:	Frances Marshall (Principal Consultant) 3rd Floor St Augustine's Court, 1 St. Augustine's Place, Bristol, BS1 4UD Tel: +44(0)117 974 1086 **E** FrancesMarshall@aqconsultants.co.uk
Reviewed by:	Penny Wilson (Technical Director)
Date:	11 April 2025
Reference:	J10/15952B/10/F1

.

Appendix 13: Contaminated Land Response ref. GE22375-FG-TN01-250205

Technical Note

Geo-Environmental

Site:	Land South of Mortimers Lane, Fair Oak	**Ref:**	GE22375-FG-TN01-250205
Client:	Bloor Homes Southern	**Date:**	February 5, 2025
To:	Yacklin Panza – Eastleigh Borough Council	**Cc:**	Rebecca Fenn-Tripp – Bloor Homes Nina Lloyd - Turley

RE: Response to queries raised by Local Authority

This technical note provides a response to the queries raised by Yacklin Panza Pollution Control Specialist at Eastleigh Borough Council, following the submission of the Desk Study Report (ref GE21215/DSRv1.1/NOV24) and the Ground Investigation Report (ref GE21215/GIRv2.1/NOV24) in support of the planning application O/24/98610, in relation to land south of Mortimers Lane, Fair Oak.

The following queries were raised by the Local Authority:

- Could you confirm the radon potential for the site and provide clarity on whether radon protection measures are necessary? The discrepancy between the Envirocheck report and the UK radon map.
- Could you elaborate on the decision not to undertake dissolved gas testing? Given the presence of groundwater above the response zone, understanding whether dissolved gases are present would provide a more comprehensive assessment of potential risks.

Radon

With regards to radon potential for the site, Geo-Environmental contacted Landmark, which produces the Envirocheck reports, to clarify that the most up to date radon data was utilised and to confirm what mapping scale is used as part of the report. Whilst the UK Radon maps are based on data on a 1km grid square, Landmark has confirmed that the radon data utilised within the Envirocheck reports is based on a 25m grid square. As such, the Envirocheck data is more site specific than the UK Radon data maps. In addition, Landmark also confirmed that the Radon data within the Envirocheck for this site was the most up to date, i.e. it utilised data that had been updated on 1st December 2022. An email correspondence chain from January 2023 between Geo-Environmental and Landmark is appended that documents the above. Therefore, the Radon risk stated within the Envirocheck report and the Desk Study for the site is the most up to date and site specific and is therefore considered suitable and relevant.

Dissolved gas

With reference to the query regarding why the sampling of dissolved gases was not considered necessary, four nearby offsite former landfill sites were identified as potential sources that may impact the site due to the types of wastes deposited. The nearest of these four landfill sites is Fair Oak Landfill which lies approximately 50m from the subject site with an area of land used for a combination of open storage and woodland lying between the subject site and Fair Oak Landfill. In addition to this c.50m offset a stream/ditch and pond also lies between the subject site and the adjacent storage and woodland land, providing further separation from the Fair Oak Landfill site.

As no sources of ground gas have been identified on the subject site, gases would have to migrate onto the site in order to be considered a risk to the proposed development. With regards to Fair Oak Landfill site, any lateral migration at shallow depth would have to travel across the site immediately adjacent to the landfill and would then

be intercepted by the shallow stream/ditch running along the southern boundary of the site and thus ground gas could ventilate to atmosphere prior to reaching the subject site. As such shallow lateral migration is not considered a plausible pathway for dissolved gases to migrate to the subject site.

The four former landfill sites are assumed to be located within the geology of the Whitecliff Sand Formation, based on the Fair Oak Landfill study undertaken by Card on behalf of Eastleigh Borough Council in April 2012. The Whitecliff Sand Formation is a lenticular deposit and thus, by definition, tapers out. Mapping indicates such a tapering on, or proximal to the site, i.e. this stratum is not necessarily laterally extensive. Geo-Environmental has undertaken two phases of intrusive investigation works across the subject site, including on a grid pattern within an area of the site where BGS mapping indicated that Whitecliff Sand soils may be present. The intrusive works undertaken have only established the presence of clay soils of the London Clay Formation. No soils representative of the Whitecliff Sand Formation were encountered, and based on the location of the exploratory holes, it is considered unlikely that soils of the Whitecliff Sand are present on site. The soils encountered across the site during the intrusive investigations are considered relatively impermeable, therefore it is considered that preferential pathways via Whitecliff Sand are absent.

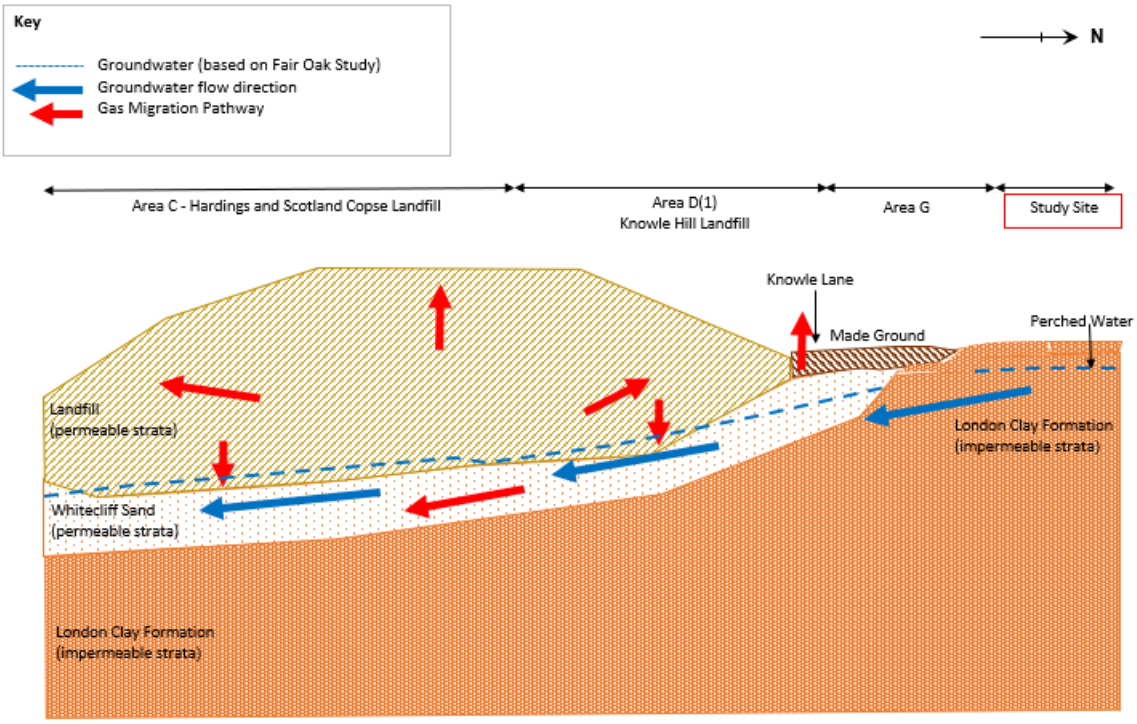
The migration of gases is likely to occur through more permeable strata, to date only soils of the London Clay Formation have been identified on the subject site, therefore gases are more likely to migrate through permeable soils of the Whitecliff Sand Member, which are understood to underlie (won out from) the former landfill sites and areas to the south and west of the subject site. Groundwater flow is also understood to run in a southern westerly direction, i.e. from the subject site towards the Fair Oak Landfill site. Therefore, gas flow is likely to following these preferential pathways and be in a south westerly direction and so not towards the subject site.

Although groundwater has been noted as being present at shallow depth across the site, the waters encountered are considered to be representative of perched waters as opposed to a continuous groundwater body. This is due to the low permeability of the encountered soils underlying the site and the classification of the Environment Agency of soils of the London Clay Formation as unproductive strata. As these waters represent perched waters, they are not considered a pathway for dissolved gases from the nearby landfill sites to the subject site.

As outlined above migration pathways have not been established as being present in order to allow for the migration of gases from the nearby landfill sites to the subject site. As such it was not deemed necessary to undertake sampling of dissolved gases on the subject site.

In addition, gas monitoring, in the form of spot monitoring, was undertaken across the subject site on 12No. occasions between December 2022 and August 2023. This monitoring did not record the presence of elevated concentrations of either methane, carbon dioxide or VOC's with the headspace of the monitoring wells, that would indicate that the sampling of dissolved gases would be required.

An updated conceptual site model (CSM) with regards to ground gas and migration pathways is presented below. This updated CSM demonstrates that migration pathways are not considered to be present onto the subject site.



For and on Behalf of Geo-Environmental

FIONA GOODE BSc (Hons), MSc, FGS, MIEnvSc, RSoBRA
Senior Consultant Engineer
fiona.goode@gesl.net

From: Geodata
To: Laura Legate
Cc: Fiona Goode
Subject: RE: FW: Revision of Radon Dataset
Date: 27 January 2023 11:59:42

Good morning Laura,

Thank you for your email.

In regards to the below, all of our radon data is provided within a 25m grid to ensure the most accurate information is provided.

Therefore, there may be slight discrepancies within the data you can see due to this smaller sizing.

I do hope this resolves your query however if you do have any further queries please do not hesitate to contact us.

Kind Regards,

Emily Brooks
Customer Services Advisor

Landmark Geodata
Landmark Information Group

Mapping – 03300 366 611
Environment – 03300 366 618
Imperium, Imperial Way Reading, Berkshire RG2 0TD

landmark.co.uk

---------- Original Message ----------
From: Laura Legate [laura.legate@gesl.net]
Sent: 27/01/2023, 10:25
To: geodata@landmark.co.uk
Cc: fiona.goode@gesl.net
Subject: FW: Revision of Radon Dataset

Good Morning Emily,

Further to your email to Fiona on the 12th January can you please confirm what grid size the radon data you are providing in the Envirocheck Reports is based on. Is it the 1km grid spacing or smaller?

As we have now identified a number of sites where we have obtained a Envirocheck report and we have discrepancies with the radon data provided in your reports when compared to the radon website (https://www.ukradon.org/information/ukmaps). With your reports reporting lower radon values than we are seeing on the UK Radon website. As such we need to understand what grid spacing the data in the Envirocheck reports is based on.

Would appreciate if you could come back to me asap on this please.

Kind Regards

Laura

Laura Legate
CGeol, CSci, BSc (Hons), MSc, FGS
Environmental Director

From: Geodata <geodata@landmark.co.uk>
Sent: 12 January 2023 12:14
To: Fiona Goode <Fiona.Goode@gesl.net>
Subject: RE: Revision of Radon Dataset

Good afternoon Fiona,

Thank you for your email.

In regards to the below, The BGS map update coincides with the Radon Potential update in December. This was a large update for Radon (the first one in 6 years or so), thus BGS sent us the data ahead of the release on the 1st of December so we could process it and make tweaks on our end. Therefore the radon data is up to date, and is compatible with the new map update.

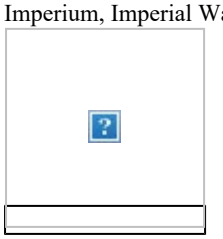
I do hope the above resolves your query however if you do have any further queries please do not hesitate to contact us.

Kind Regards,

Emily Brooks
Customer Services Advisor

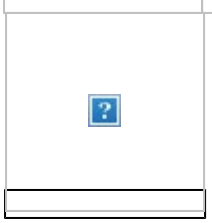
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---------- Original Message ----------
From: Fiona Goode [fiona.goode@gesl.net]
Sent: 12/01/2023, 10:49
To: customerservice@envirocheck.co.uk
Subject: Revision of Radon Dataset

Hi,

Following the recent revision (1st December 2022) by the British Geological Society (BGS) of their Radon dataset, please can you confirm the date when the Enviro-check reports began utilising this updated dataset?

I have an Enviro-Check report date 7th December 2022 which states that the site lies within a <1% radon area, however following a review of the BGS Radon map the site appears to be located within a 3-5% radon area.

I wanted to confirm whether the data reported with the Enviro-check report (order No. 304784389_1_1) was based on the updated Radon dataset or not to try and understand this possible discrepancy.

Many Thanks,

Fiona Goode?
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