

## Response ID ANON-K6KV-EX2Z-B

Submitted to Local Plan Main Modifications  
Submitted on 2021-07-21 17:00:55

### Introduction

1 Following this consultation, your name and comments will be published, but other personal information will remain confidential. Please note, you will not be able to proceed without ticking this box.

I agree to my name and comments being published.

### About you

1 What is your full name?

Name:  
Christine Lassam

2 Are you responding as an individual or on behalf of an organisation?

As an individual

3 What is the name of your organisation?

Organisation:  
I am responding as an individual not an organisation

4 What is your address? (or that of your organisation)

Address:

5 What is your email address?

Email:

6 What is your telephone number?

Telephone number:

7 Did you make representation to the Regulation 19 consultation?

No

8 Would you like to be notified when the Inspector's report is published?

Yes

9 Would you like to be notified when the Local Plan is adopted?

Yes

10 If you are not currently on our Local Plan database, would you like to be added?

Yes

### What are you responding to?

1 What document are you responding to?

## Main Modification Schedule

2 Please enter the reference number this comment relates to, for example MM number for Main Modification; PM number for Policy Map changes; ED number for Examination Document; or enter the section/paragraph number for Sustainability Appraisal and Habitats Assessment.

Reference number:

MM5

3 Do you support or object to this Modification?

Object

4 Is this Main Modification legally compliant?

No

5 Is this Main Modification sound?

No

6 If you answered 'No' to question 5, please specify on what grounds (tick all that apply).

Positively prepared, Justified, Effective, Consistent with National Policy

## Your response to Main Modifications

1 Please explain your comments.

explain your comments:

1. Please explain your comments. MM5

My comment:

With new Planning legislation in the pipeline we do not know how many new houses are needed within the Eastleigh Local Plan area. The statement in section a below relating to MM5 refers to an increase in housing provision. Why is this?

It is good that c refers to focussing on brownfield sites. But worrying that d refers to new greenfield development with no obvious indication about where these would be located. Because of the unknown factors regarding how many houses will actually be needed. The new planning legislation is not very clear about who sets the targets for housing requirements. So overall I felt that it was better to object to this MM5 modification, as we want to ensure that new housing is that of the type needed and in the right place, preferably not on Greenfield sites. Ensuring that there are sufficient gaps and wild spaces kept is important for carbon capture and the wellbeing of residents.

MM5 states:

a. The Local Plan will seek to deliver an increase in housing provision compared to previous plans in order to provide a more diverse mix of housing (including affordable and specialised housing) to meet the borough's objectively assessed housing need and contributing (where feasible) to meeting the needs of the wider Southampton housing market area;

b. The borough's settlement hierarchy should be the main consideration in making decisions about the spatial distribution of new development to ensure that development is located in areas which provide the widest range of employment opportunities, community facilities and transport infrastructure and in order to support, enhance and reinvigorate those areas;

c. Development will be focused first on suitable brownfield sites within the defined settlement boundaries of the borough's most sustainable settlements;

d. However, given the tightly drawn boundaries of those settlements and the scale of development likely to be required over the plan period, the plan will need to make provision for a significant scale of new greenfield development;

2 Please state the changes you think are necessary to this modification, including revised wording where possible.

Necessary changes:

2. Please state the changes you think are necessary to this modification, including revised wording where possible. MM5

If this statement is replacing 3.8 on page 30 of the original Eastleigh Plan written in 2016. Then I think the whole issue of new housing requirements needs to be looked at with current housing needs rather than previously imposed housing requirements. We do not know how much housing is actually needed.

and we do not know who will set the housing requirement targets

My rewording of MM5 :

a. The Local Plan will seek to provide a diverse mix of housing (including affordable and specialised housing) to meet the borough's objectively assessed housing needs .

b. The borough's settlement hierarchy should be the main consideration in making decisions about the spatial distribution of new development to ensure that development is located in areas which provide the widest range of employment opportunities, community facilities and transport infrastructure and in order to support, enhance and reinvigorate those areas; ensuring that the local infrastructure and local green spaces are not

c. Development will be focused first on suitable brownfield sites within the defined settlement boundaries of the borough's most sustainable settlements;

d. In consideration of the tightly drawn boundaries of those settlements, the scale of the development will not exceed that which can be easily absorbed . Residents in areas where new housing is proposed will be consulted to ensure that the number of new dwellings does not put a burden on the facilities in the area; and will ensure that there is still green space available nearby for people and wildlife to enjoy.

We will ensure that any Greenfield sites identified for development in the Plan will be given full protection for all 'on site' habitats: trees, hedges, orchards, scrub and grasslands and meadow areas. If necessary balancing ponds may be added. The size of the development will not put pressure on the local amenities and facilities.

3 Would you like to submit another representation?

Yes

What are you responding to?

1 What document are you responding to?

Main Modification Schedule

2 Please enter the reference number this comment relates to, for example MM number for Main Modification; PM number for Policy Map changes; ED number for Examination Document; or enter the section/paragraph number for Sustainability Appraisal and Habitats Assessment.

Reference number:

MM13

3 Do you support or object to this Modification?

Support

4 Is this Main Modification legally compliant?

Yes

5 Is this Main Modification sound?

Yes

6 If you answered 'No' to question 5, please specify on what grounds (tick all that apply).

Your response to Main Modifications

1 Please explain your comments.

explain your comments:

1. Please explain your comments. MM13

I am delighted that you have decided to delete Strategic Growth Option Section before paragraph 4.18 Paragraphs 4.18 – 4.19

Strategic Policy S5, New Communities, land north of Bishopstoke and land north and east of Fair Oak Paragraphs 4.20 – 4.37

To reflect deletion of the SGO policies, supporting text and all associated cross references from the Plan as recommended by Inspector's post hearings letter dated 1 April 2020

My Comment: I am so glad and relieved that you have decided to cancel Strategic Policy S5, New Communities, land north of Bishopstoke and land north and east of Fair Oak Paragraphs 4.20 – 4.37

That this suggested development has been cancelled is a huge relief . To know that the Ancient woodlands will not now be divided by the proposed new road . The communities of Bishopstoke and Fair Oak will be glad to know that this area has been preserved from being developed; especially bearing in mind the close proximity to the Itchen which was a concern. The cancellation of the new road and all the development will leave a good space for wildlife and people to enjoy. All the proposed long term disruption for the area and the long term negative effects had been removed. This is extremely welcome news.

Preserving the land there is important for carbon collection and as a green lung for the people of Eastleigh and an important facility for wildlife.

2 Please state the changes you think are necessary to this modification, including revised wording where possible.

Necessary changes:

2. Please state the changes you think are necessary to this modification, including revised wording where possible. MM3:

No further wording needed as all the suggestions for MM13 were deleted.

3 Would you like to submit another representation?

Yes

What are you responding to?

1 What document are you responding to?

Main Modification Schedule

2 Please enter the reference number this comment relates to, for example MM number for Main Modification; PM number for Policy Map changes; ED number for Examination Document; or enter the section/paragraph number for Sustainability Appraisal and Habitats Assessment.

Reference number:

MM35 Policy DM1, General criteria for new development Paragraphs 5.7 and 5.8

3 Do you support or object to this Modification?

Object

4 Is this Main Modification legally compliant?

No

5 Is this Main Modification sound?

No

6 If you answered 'No' to question 5, please specify on what grounds (tick all that apply).

Positively prepared, Effective

Your response to Main Modifications

1 Please explain your comments.

explain your comments:

1. Please explain your comments : MM35

On the whole I think the sentiment is right BUT it is not sufficiently robust in the statements aimed at protecting on site habitats. Any & all new developments need to protect existing habitats onsite. In the past it has been thought that planting somewhere else as mitigation is the answer. Current knowledge about the value of longstanding habitats for wildlife and carbon collection is such that we now know that any undisturbed environment will absorb carbon: hedges; trees; grasslands; wild flower meadows and scrub land all absorb carbon.

Also clearing of land prior to development will potentially grub up nesting sites where hedgehogs or other nocturnal creatures might be nesting. In a recent debate in the House of Commons about Dwindling Hedgehog Numbers which was in response to a petition brought by the British Hedgehog Preservation Society Chris Grayling (Epsom and Ewell) (Con) who said: "It was brought home to me this week by a message I received from one of the hedgehog groups distraught that, just down the road from where it is based, a developer starting to clear a site ahead of development had killed a significant number of hedgehogs just by clearing the undergrowth alongside a roadway to make way for that development. In accordance with the law, we in this country do a lot of work before we develop sites, such as checking for bats and newts, but I want the Government think differently, because searching for an individual species on a development site is not the right way forward. We need an holistic approach to nature on a development site. ". We do not know what legislation will be brought in to protect Hedgehog nest sites. But knowing that Eastleigh Borough has green credentials I know that they wouldn't want this to happen on their watch. Putting robust statements and checks in place to protect on site habitats is vital. Hedges provide huge protections for wildlife; many miles of hedgerows have been grubbed up since 1945; and we must do everything in our power to protect and replant hedgerows in new developments.

I believe the statement in MM35 needs to spell out the protections in much more detail. I will suggest alternative and additional wording in question 2.

MM35 states:

All new development should (as relevant):

- [b] ii. biodiversity (avoiding significant adverse impacts); and
- [c] iii. the significance of heritage assets;

[iv] d. not involve the loss of or damage to trees, woodlands, hedgerows, ponds, priority habitats or other landscape features of value to the character of the area, for appearance or biodiversity unless they can be replaced with features of equivalent or enhanced value, (recognising that some species and habitats may be irreplaceable);

[vi] f. protect and enhance public rights of way and National Trails and provide fully connected green infrastructure that interlaces the development and connects into the wider network

[viii] h. incorporate provision for [disabled] people with disabilities and create accessible communities that cater for all;

2 Please state the changes you think are necessary to this modification, including revised wording where possible.

Necessary changes:

2. Please state the changes you think are necessary to this modification, including revised wording where possible. MM35

MM35 Policy DM1, General criteria for new development Paragraphs 5.7 and 5.8

All new development should [ I would delete (as relevant):

Comment 1: I don't think you need "As relevant" as it leaves the question open as to who decides what is relevant & gives developers the opportunity to decide that it isn't relevant - which should not be an option.

[b] ii. biodiversity (avoiding significant adverse impacts); and

Comment 2: This statement should be more robust I would replace the above with:

suggested wording:

ii. Retaining good biodiversity on site is important. Existing habitats should be fully protected; no trees or hedges or other wildlife habitats should be removed.

Adverse impact on: 'on site habitats' is unacceptable.

[c] iii. the significance of heritage assets;

Comment 3: I am not sure quite what this refers to, I guess it would be buildings or heritage features such as wells, old walls etc but I think this needs to be made clear in further text.

[iv] d. not involve the loss of or damage to trees, woodlands, hedgerows, ponds, priority habitats or other landscape features of value to the character of the area, for appearance or biodiversity unless they can be replaced with features of equivalent or enhanced value, (recognising that some species and habitats may be irreplaceable);

Comment 4: I suggest for d you make the statement more robust for example:

d. the council expects there to be full protection for existing 'on site' habitats; ensuring that there is no loss or damage to trees, woodlands, hedgerows, ponds, priority habitats or other landscape features of value to the character of the area. It is important that the developer understands the importance of fully protecting all on site habitats; some species such as Hedgehogs may have nest sites on the land to be developed and these should be fully protected; these habitats and the wildlife who inhabit them are irreplaceable. It may be necessary for developers to enhance the development for appearance and better biodiversity in which case additional features may be incorporated. For example Hedgehog Highways, swift boxes and wildlife corridors.

Comment 5: My concern about the wording in the second part of the original statement: "unless they can be replaced with features of equivalent or enhanced value (recognising that some species and habitats may be irreplaceable)" This statement could give developers the opportunity to ignore retaining the existing 'on site habitats' It is important to retain as much of the existing wild areas on site as possible as it will be better for wildlife and better for carbon collection.

Comment 6: The Statement "unless they can be replaced with features of equivalent or enhanced value " should NOT be offered to developers. Having the option to replace existing habitats, is NOT a better option for wildlife or carbon retention.

Comment 7: The second part of the statement: "(recognising that some species and habitats may be irreplaceable)" Putting this statement in brackets makes the statement look like an afterthought , rather than being an important statement. To sum up I think there need to be more robust guidelines for Developers which set out to positively protect the existing habitats on new development sites. These guidelines need to ensure that the existing habitats and wildlife currently on site are protected prior to and during the building work being carried out on site.

[vi] f. protect and enhance public rights of way and National Trails and provide fully connected green infrastructure that interlaces the development and connects into the wider network Comment 8: this wording seems fine.

[viii] h. incorporate provision for [disabled] people with disabilities and create accessible communities that cater for all; Comment 9: this wording seems fine.

Comment 9: 5.7 needs to be completely reworked . As we know so much more now about the value of most habitats for carbon collecting than we did in 2016..

There is NO justification for the removal of any landscape features on site

[ Delete: The Planning Statement should also explain and justify the removal of site assets such as landscape features and propose suitable mitigation for their loss.' ]

I would suggest that the wording should say:

5.7 'The Planning Statement specifies that there is No justification for the removal of on site assets such as landscape features eg: existing hedges trees and habitats.

Mitigation for their loss is now Not an acceptable way forward so there should be No loss of any onsite habitats.

[ Delete: In the case of trees] add: The new Trees and Development SPD will set out the detailed expectations and requirements to protect trees and hedgerows and habitats within the development site, these should be retained at all costs.

[Delete: wherever possible. Where this is not possible, it will provide guidance on the suitable mitigation required. ]

Comment 10: The Tree and Development SPD needs to back up this more positive approach to protect all on site trees hedges and habitats.

Comment 11: I am not sure how to change this statement but I feel that the statement should not make it easy for developers to just decide to get rid of trees as a convenience to them Not sure how to amend this wording: "Where trees [which] may be adversely affected by the proposed development, the Council will require the applicant to submit a tree survey in accordance with the methodology set out in BS5837:2012 'Trees in relation to design, demolition and construction – recommendations' and an Arboricultural Impact Assessment and method statement...'

My Comment 12: My rewording suggestion for 5.8: Developments should NOT lead to the loss of Trees Hedges or habitats; green space should be protected as much as possible by locating dwellings to maximize the existing habitats and green space. Plans can be made to incorporate dwellings on the existing sites without unnecessary disturbance of the existing site.

However I can understand that there may be some loss of green space in which case the reworded statement below would be acceptable

MM35 suggests this rewording for:'5.8 [ I would delete: All] [I would add Any] developments that {I would delete: will}

So 5.8 would then read: Any developments that lead to the loss of any green space or habitat should be accompanied by a Biodiversity Mitigation and Enhancement Plan (BMEP), informed by a Phase 1 Extended Habitat Survey and any other up to date species specific survey as agreed with the Local Planning Authority. The BMEP must include details of the biodiversity features affected as well as details of proposed mitigation and enhancement measures. Pre-application engagement with the Council and Natural England is encouraged.'

3 Would you like to submit another representation?

No