Upham Parish Council Comments on Eastleigh Borough Council Main Modifications consultation.

Appendix A

An analysis taken from the Sustainability Appraisal appendix 6 Detailed SA matrices for Strategic Growth Options and reasonable alternatives

As noted in the main text, the Inspectors letter paragraphs 13-16 expresses concern regarding the Sustainability Appraisal prepared by LUC for Eastleigh Borough Council and shortcomings in the comparison between SGO sites particularly with reference to the Environmental Assessment of Plans and Programmes regulations.

Whilst the SGO is now no longer being proposed, we share the concerns regarding shortcomings in the appraisal process, and believe it is important that they are noted lest they are repeated on another occasion.

This appendix details the comparison between B/C and D/E as extracted from the SA appendix 6. This demonstrates that, contrary to the claims by EBC, there was very little difference in the appraisals of these two sites, even accepting as gospel the assumptions of the appraisers regarding the positive aspects of BC and the negatives of DE. Admitting the possibility that DE could enable a station at Allington Lane produces a substantial advantage to D/E. Likewise a re-assessment that B/C impacts on the National Park and threatens the SAC more than does D/E puts D/E as the much more suitable choice.

The methodology

The SA matrix for SGO B/C is listed on pages 278-284 of Appendix 6. Several reasonable alternatives are given, but that consistently mooted as being the most viable alternative to SGO B/C was option D/E, expressed in the SA as *Option D plus land immediately south of Option D and the railway line* (pages 296-301 of Appendix 6)

The separate tables within Appendix 6 take 48 different aspects of the options and allocate to each a colour (deep green, light green, orange, pink red and a non-numerical ranking varying from ++ to --

The ranking runs

++

++?

+

+?

-?

-

--?

--

We have brought these two tables, printed separately in the Appendix 6, into the same place, Table A, putting each of the 48 aspects to which a colour is attributed, side by side.

We have also, to provide for greater ease of a cumulative qualitative comparison, allocated to each colour a numerical value, varying from +2 deep green to -2 deep red. In terms of the non-numerical ranking we have allocated numbering as follows

++	**2**
++?	**1.5**
+	**1**
+?	**0.5**
	0
-?	**-0.5**
-	**-1**
--?	**-1.5**
--	**-2**

Some of the rankings are composite eg ++?/+. We have allocated these to the average of the two rankings, rounded up consistently in both sets of figures.

We have then introduced a third column showing the direct comparison between the two tables where a positive score indicates that B/C is better than D/E and vice versa. Thus if B/C scores a 2 and D/E scores a 1 then the number in this third column is a 1, coloured light green.

This numerical ranking enables an approach to a direct numerical comparison. It is accepted that this takes no account of significance weighting between the 48 different attributes. However in general the rankings are identical.

The overall possible scoring varies from +96 to -96, so the comparison between a very good option and a very poor option could in theory be 196 points.

In the event, as can be seen, and even accepting as gospel the assumptions of the appraisers regarding the positive aspects of BC and the negatives of DE, out of a total variance of theoretically 196 there is an actual variance of just 3.5. **That is a 1.8% difference between the rankings of the two sites, which would hardly constitute a resounding conclusion in favour of B/C.**

It has to be borne in mind that the date of the SA is June 2018 by which time the masterplan for B/C was complete and it was a scheme which had been the stated preference of EBC for over a year.

It would therefore be difficult to deny the possibility that there was either conscious or unconscious bias on the part of LUC in the completion of a table which contains a fair amount of subjective judgement. For instance to suggest, as the SA does, that B/C and D/E show an equal mild negative for their impact on the SAC and National Park seems questionable in the light of the evidence. Also the equal score given for the effect on ancient woodland and the biodiversity network for both options appear to contradict the advice of professional groups and Ebc's own Biodiversity Action Plan from 2004.

We have therefore run two hypothetical exercises.

Table B shows the impact on the scoring of adjusting the impact on the National Park, SAC and biodiversity network, also the cycleway from Horton Heath into Eastleigh. The possibility of an Allington Station is NOT factored in. The rational behind the ranking is shown wherever there is a change from the LUC assessment.

The result is a relatively conclusive 23 points in favour of D/E over B/C.

Secondly Table C keeps all of the environmental impact scores as shown on the original, but just Allows for a new station and the cycleway. The result is again by comparison with the EBC conclusion relatively conclusive at 18 points in favour of D/E

We have not run the two in combination. We leave that as an exercise for a later time.

TABLE A

LUC's analysis (appendix 6)

			B/C		D/E	Straight Comparison B/C better than D/E
Provide affordable housing						
1.1	contribute to afffordable housing need	++	2	++	2	0
1.2	other elements of housing need provision	+?	0.5	+?	0.5	0
Safeguard and improve community health and wellbeing						0
2.1	are community facilities available locally	++	2	++?	1.5	0.5
2.2	are health facilities available locally	++	2	++?	1.5	0.5
2.3	effect on provision of sports facilities	+?/--	-0.5	+?	0.5	-1
2.4	is P O S available locally	++	2	++	2	0
2.5	connections to local cycle network	0	0	+?/0	0.5	-0.5
Dynamic and diverse economy						0
3.1a	close to major rail station	- -	-2	- -?	-1.5	-0.5
3.1b	close to minor rail station	- -	-2	- -	-2	0
3.1c	close to frequent bus route	++	2	++/- -	0	2
3.1d	close to semi-frequent bus route	- -	-2	- -	-2	0
3.1e	close to major employment centre	++	2	++	2	0
3.2	contribute to need for new B1 use	+	1	+	1	0
3.3	net loss of exg employment land	0	0	0	0	0
3.4	increase commercial uses in town district and local centres	++?	1.5	++?/+	1	0.5
Reduce road traffic and congestion improve sustainable travel choice						0
4.1	close to major rail station	- -	-2	- -?	-1.5	-0.5
4.2	close to minor rail station	- -	-2	- -	-2	0
4.3	close to frequent bus route	++	2	++/- -	0	2
4.4	close to semi-frequent bus route	- -	-2	- -	-2	0
4.5a	will residential dev at the location be close to major employment centre	++	2	++	2	0
4.5b	will employment dev at the location be close to major population centre	-	-1	+	1	-2
4.6	are health facilities available locally	++	2	++?	1.5	0.5
4.7	are shopping facilities available locally	++	2	++	2	0
4.8	close to primary school	++	2	++?	1.5	0.5
4.9	close to secondary school	++	2	++/- -	0	2
4.1	can location be connected to cycle and footpath network	0	0	+?/0	0.5	-0.5
4.11	geographical barriers between location and key facilities	+	1	+/- -	-0.5	1.5

TABLE A sht 2

Protect and conserve natural resources							0
5.1	avoid sterilising mineral resources	-?	-0.5		-?/0	0	-0.5
5.2	loss of higher grade agriculultural land	-	-1		-	-1	0
5.3	use previously devloped land	-?	-0.5		-?	-0.5	0
5.4	deliver allotments/community farms	+?	0.5		+?	0.5	0
Reduce air soil water light and noise pollution							0
6.1	affected by noise or AQMA	-?	-0.5		-?	-0.5	0
6.2	will development increase pollution	- -?	-1.5		- -?	-1.5	0
Plan for anticipated levels of climate change							0
7.1	provide additional or improved green infrastructure	+	1		+	1	0
7.2	at risk from flooding	- -?	-1.5		- -?/0	-1	-0.5
7.3	at risk from coastal change	0	0		0	0	0
minimise contribution to climate Change							0
8	minimise contribution to climate Change						0
reduce waste generation							0
9	reduce waste generation						0
Protect enhance and manage biodiversity and geodiversity							0
10.1	negatively impact SAC or national park	-	-1		-	-1	0
10.2	negatively impact local biodicversity site	-?	-0.5		-?	-0.5	0
10.3	adversely impact aras of other conservation value	-?	-0.5		-?	-0.5	0
10.4	adversely ipact biodiversity network	-?	-0.5		-?	-0.5	0
10.5	adversely affect ancient woodland	-?	-0.5		-?	-0.5	0
Enhance Borough's green infrastructure							0
11.1	adversely affect TPO trees	-?	-0.5		-?	-0.5	0
11.2	connections to existing cycle and footpath network	0	0		+?/0	0.5	-0.5
11.3	wil developemtn provide additional green infrastructure	+	1		+	1	0
Protect and enhance character and appearance of landscape and townscape							0
12.1	adversely affect separation of neighbouring settlements	-?	-0.5		-?	-0.5	0
12.2	protect character of countryside, towns, villages incl views and settings	- -?	-1.5		- -?	-1.5	0
Protect and enhance buildings monuments etc of cultural and heritage importance							0
13.1	protect and enhance listed buildings and their settings and other sites	-?	-0.5		-?	-0.5	0
	Numerical difference (deep red equals -2 to deep green equals + 2)		**5.5**			**2**	**3.5**
	out of a theoretical max 196						

TABLE B ADD/Upham's analysis

		B/C	D/E	comparison B/C better than D/E	Comments
Provide affordable housing					
1.1	contribute to afffordable housing need				
1.2	other elements of housing need provision				
Safeguard and improve community health and wellbeing					
2.1	are community facilities available locally				facilities are likely to be provided in both areas
2.2	are health facilities available locally				facilities are likely to be provided in both areas
2.3	effect on provision of sports facilities			-2	loss of golf course
2.4	is P O S available locally				
2.5	connections to local cycle network			-2	EBC propose cycleway through DE to town centre
Dynamic and diverse economy					
3.1a	close to major rail station			-1	new cycleway will lead direct to main station
3.1b	close to minor rail station			-1	potential of new Allington station NOT taken into account
3.1c	close to frequent bus route				bus routes will adapt to new SGO
3.1d	close to semi-frequent bus route				
3.1e	close to major employment centre				
3.2	contribute to need for new B1 use				
3.3	net loss of exg employment land				
3.4	increase commercial uses in town district and local centres			-1	a single district centre in DE will work better than the 3 local centres proposed in BC
Reduce road traffic and congestion improve sustainable travel choice					
4.1	close to major rail station			-1	new cycleway will lead direct to main station 3800 away
4.2	close to minor rail station			-1	potential of new Allington station NOT taken into account
4.3	close to frequent bus route				bus routes will adapt to new SGO
4.4	close to semi-frequent bus route				
4.5a	will residential dev at the location be close to major employment centre			-1	site more accessible to riverside and town centre via cycleway
4.5b	will employment dev at the location be close to major population centre			-2	compact and walkable development vs development strung out along a road
4.6	are health facilities available locally				facilities are likely to be provided in both areas
4.7	are shopping facilities available locally				
4.8	close to primary school				facilities are likely to be provided in both areas
4.9	close to secondary school			2	
4.1	can location be connected to cycle and footpath network			-2	EBC propose cycleway through DE to town centre
4.11	geographical barriers between location and key facilities				facilities are likely to be provided in both areas. DE better connected to Eastleigh centre.

TABLE B sht 2

Protect and conserve natural resources						
5.1	avoid sterilising mineral resources				-1	EBC propose cycleway through DE to town centre
5.2	loss of higher grade agriculultural land				-1	BC has better agricultural land than DE
5.3	use previously devloped land					
5.4	deliver allotments/community farms					
Reduce air soil water light and noise pollution						
6.1	affected by noise or AQMA					
6.2	will development increase pollution					
Plan for anticipated levels of climate change						
7.1	provide additional or improved green infrastructure					
7.2	at risk from flooding				-1	
7.3	at risk from coastal change					
minimise contribution to climate Change						
8	minimise contribution to climate Change				-1	DE is a compact walkable development, BC is car dependent
reduce waste generation						
9	reduce waste generation					
Protect enhance and manage biodiversity and geodiversity						
10.1	negatively impact SAC or national park				-2	impact on SAC and National Park
10.2	negatively impact local biodicversity site					
10.3	adversely impact aras of other conservation value					
10.4	adversely ipact biodiversity network				-1	bidiversity connections retained in DE
10.5	adversely affect ancient woodland				-1	less ancient woodland in DE
Enhance Borough's green infrastructure						
11.1	adversely affect TPO trees					
11.2	connections to existing cycle and footpath network				-2	EBC propose cycleway through DE to town centre
11.3	wil developemtn provide additional green infrastructure					
Protect and enhance character and appearance of landscape and townscape						
12.1	adversely affect separation of neighbouring settlements					adequate gap to West End provided in DE
12.2	protect character of countryside, towns, villages incl views and settings				-1	Views into National Park will be affected by Accordia style development in B/C
Protect and enhance buildings monuments etc of cultural and heritage importance						
13.1	protect and enhance listed buildings and their settings and other sites					
	Numerical difference (deep red equals -2 to deep green equals + 2)				**-23**	
	out of a theoretical max 196					

TABLE C

LUC's analysis incl cycleway and station

		B/C	D/E	Straight Comparison B/C better than D/E
Provide affordable housing				
1.1	contribute to afffordable housing need			
1.2	other elements of housing need provision			
Safeguard and improve community health and wellbeing				
2.1	are community facilities available locally			
2.2	are health facilities available locally			
2.3	effect on provision of sports facilities			-1
2.4	is P O S available locally			
2.5	connections to local cycle network			-2
Dynamic and diverse economy				
3.1a	close to major rail station			-3
3.1b	close to minor rail station			-4
3.1c	close to frequent bus route			2
3.1d	close to semi-frequent bus route			
3.1e	close to major employment centre			
3.2	contribute to need for new B1 use			
3.3	net loss of exg employment land			
3.4	increase commercial uses in town district and local centres			2
Reduce road traffic and congestion improve sustainable travel choice				
4.1	close to major rail station			-3
4.2	close to minor rail station			-4
4.3	close to frequent bus route			2
4.4	close to semi-frequent bus route			
4.5a	will residential dev at the location be close to major employment centre			-1
4.5b	will employment dev at the location be close to major population centre			-2
4.6	are health facilities available locally			
4.7	are shopping facilities available locally			
4.8	close to primary school			
4.9	close to secondary school			2
4.1	can location be connected to cycle and footpath network			-2
4.11	geographical barriers between location and key facilities			1

TABLE C sht 2

Protect and conserve natural resources					
5.1	avoid sterilising mineral resources				-1
5.2	loss of higher grade agriculultural land				
5.3	use previously devloped land				
5.4	deliver allotments/community farms				
Reduce air soil water light and noise pollution					
6.1	affected by noise or AQMA				
6.2	will development increase pollution				
Plan for anticipated levels of climate change					
7.1	provide additional or improved green infrastructure				
7.2	at risk from flooding				-2
7.3	at risk from coastal change				
minimise contribution to climate Change					
8	minimise contribution to climate Change				
reduce waste generation					
9	reduce waste generation				
Protect enhance and manage biodiversity and geodiversity					
10.1	negatively impact SAC or national park				
10.2	negatively impact local biodicversity site				
10.3	adversely impact aras of other conservation value				
10.4	adversely ipact biodiversity network				
10.5	adversely affect ancient woodland				
Enhance Borough's green infrastructure					
11.1	adversely affect TPO trees				
11.2	connections to existing cycle and footpath network				-2
11.3	wil developemtn provide additional green infrastructure				
Protect and enhance character and appearance of landscape and townscape					
12.1	adversely affect separation of neighbouring settlements				
12.2	protect character of countryside, towns, villages incl views and settings				
Protect and enhance buildings monuments etc of cultural and heritage importance					
13.1	protect and enhance listed buildings and their settings and other sites				
	Numerical difference (deep red equals -2 to deep green equals + 2)				**-18**

out of a theoretical max 196