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Date: 16th October 2018

Graham Tuck Manager Strategic Transport Easteigh Borough Council Eastleigh House Upper Market Street, EASTLEIGH SO50 9YN

Dear Graham,

Eastleigh Local Plan 2016-2036 Pre-Submission Consultation

The representation submitted by Southampton City Council (SCC), Strategic Transport in response to Eastleigh Borough Council's (EBC) Pre-Submission Local Plan 2016-2036 was a holding representation pending additional information, as SCC could not confirm the soundness of the plan.

In summary, the reasons for this holding representation, on soundness, was due to the lack of robust transport modelling to demonstrate the impact on Southampton's highway network of the proposed level of development in Eastleigh. Additionally concerns were raised regarding policy wording for safeguarding site for strategic Park & Ride to serve Southampton.

Since the representation was made, SCC has met with EBC to discuss concerns through Duty to Cooperate and EBC has provided the additional transport modelling information requested for the following junctions in Southampton:

- A33 Bassett Avenue/A27 Bassett Green Road/M3 J14 (Chilworth Roundabout);
- A33 Bassett Avenue/A35 Winchester Road;
- A33 Bassett Avenue/A35 Burgess Road;
- A335 Stoneham Way/Wide Lane-A335 Stoneham Way/A335 Thomas Lewis Way-A35 Burgess Road-A27 Stoneham Lane-High Road (the Swaythling junctions);
- A27 Kanes Hill/A334 Thornhill Park Road; and
- A334 Thornhill Park Road/Hinkler Road.

SCC has reviewed the information provided and are satisfied that the 2036 "Do Something" option will not cause a significant worsening or queues or delays at the junctions during the AM and PM peak periods compared with the baseline. As development comes forward that would affect the city's network SCC requests that we continue to work closely with EBC and Hampshire County Council (HCC) on these matters.

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These are some detailed points on matters raised in our previous representation following ongoing dialogue with EBC which have not yet been resolved to our satisfaction.

Policy S12 - SCC acknowledges that within the Local Plan there is an emphasis on the promotion and provision of sustainable and active transport improvements, particularly for the SGO. The additional modelling indicates that the impact on the city is minimal, however, we reiterate the point that to ensure sustainable development it needs to be well served by public and active transport to minimise trips by private car. The highway infrastructure package needs to be supported by these modes as well as new smarter technology. The development of a Public Transport Assessment is welcomed and supported and we ask that SCC and Solent Transport is involved in the development of this assessment to ensure it aligns with the Southampton Public Transport Strategy and the wider cross Solent Mass Transit plans. It must also include active travel (walking, cycling and equestrian) as well. Following this additional evidence SCC can support the development subject to a comprehensive sustainable and active travel mitigation package that is worked on collaboratively.

Policy DM13 - sets out a commitment by the Borough to ensuring that for areas of new development, provision is made for access by public transport and that on-site and off-site high quality cycling and walking infrastructure is delivered. This is supported, however within this policy SCC believe that reference to Park & Ride needs to be retained. We welcome the text in the policy stating that developers will be required to implement mitigation measures such as on and off-site public transport, pedestrian and cycle infrastructure. This needs to include routes that serve Southampton as a key destination for work, leisure, retail and education.

Park and Ride and improved cross-boundary bus services (with bus priority) remain a policy proposal for Southampton as set out in LTP3 and in Connected Southampton 2040 Transport Strategy (the draft LTP4), and we want to see the following minor amendments made to the Eastleigh Local Plan, as these would help to enable the future delivery of Park and Ride provision and more efficient use of road capacity.

- The statement in paragraph 4.83 needs to add "Southampton City Council" as one of the authorities EBC will work with. This currently states that "The Council will also work with Hampshire County Council (HCC) to deliver bus priority to address the issue of congestion on key bus corridors". A wider collaborative approach, involving partnership between SCC, EBC and HCC delivering of cross-boundary bus priority measures will complement the approach set out in the emerging Public Transport Strategy for Southampton.
- We note the wording within the fourth paragraph of Policy DM14 (Parking) which suggests that proposals to provide "workplace park and ride facilities" will be permitted, under certain circumstances, including taking a sequential approach prioritising sites within the urban edge. In September 2018, the City Council was shortlisted as one of twelve cities in line to potentially receive a share of £1.28bn worth of funding from the Transforming Cities Fund. If successful, this funding would be used to deliver a package of measures which would include new Park and Ride provision by to March 2023. Given this, we would look for a bolstered, more

positive form of words in Policy DM14 which would not prevent a site beyond the urban edge from being delivered if there were no suitable sites within the urban edge.

 SCC would like to see stronger wording around a commitment to invest in public transport improvements to serve areas of new development, as this is a key part of SCC's emerging Public Transport Strategy. To this end, we would be happy to work with the EBC and HCC to agree a statement of common ground on this important area of planning future transport infrastructure improvements.

There are three elements of Policies which we want to see minor revisions made to, to improve clarity and better address cross-boundary transport planning matters.

 Firstly, we would encourage the Borough to revise the working of Policy S12 (Transport Infrastructure) to set out stronger support within this policy for improvements to public transport, as the current wording has a heavy emphasis on road network and capacity improvements. We would suggest the following revision (additions in red) to part xiii:

"local improvements to railway stations and interchanges and to the quality and punctuality of bus services and infrastructure to enhance accessibility and use, which may include improved journey times and frequencies as appropriate"

2. Secondly, we would encourage the Borough to slightly revise the working of the fourth paragraph of Policy DM14 (Parking) as follows (additions in red), so that park and ride facilities are permitted for general commuter use, and not restricted only to use by a single workplace or employees of a particular business park:

Proposals to provide new car parks, extend existing car parks or provide workplace and commuter park and ride facilities will be permitted if....

It may also be helpful to set out the different purposes that a Park and Ride site could serve. Depending on the location, there is potential for a Park and Ride site to serve the city of Southampton but a site could also serve other urban areas, such as Eastleigh town.

3. And finally, we have some concerns over the possible implications of the current wording of the final part of DM14 that states "Proposals in countryside gaps will only be acceptable in exceptional cases (see policy S8)". For the delivery of any Park & Ride site proposals in such a location, this could be too difficult a Policy constraint to overcome.

Within Policy S8, we do not support the current wording which states that: "In countryside gaps, development which physically or visually diminishes the gap, or has an urbanising effect detrimental to the openness of the gap, the character of the countryside or the separate identity of the adjoining settlements will not be permitted".

In our view this Policy does not provide sufficient clarity as to what the exceptional circumstances where parking could be permitted in a countryside gap location. We

have concerns that a potential future Park & Ride site within the Borough, and located so as to serve a key radial commuter corridor into Southampton would conflict with the requirements of Policy S8. Even with comprehensive landscaping, a car park for Park & Ride could be considered a feature of an urban nature.

To make Policy DM14 (Parking) acceptable, additional wording to the effect that "land in a countryside gap could be considered suitable for use as a park and ride car park in the event that there is no suitable site within the urban edge available". This would take account of the related Policy S8.

If the comments in this letter about Policies S8, S12, DM13 and DM14, are satisfactorily addressed, then we will remove the holding representation to the Eastleigh Local Plan from SCC Strategic Transport. We look forward to working collaboratively with you to deliver sustainable development in Eastleigh that creates a sustainable and active place to live that connects Southampton with the wider area.

Yours sincerely

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lain Steane Transport Policy Team Leader

CC.