

**Winchester District**  
**Local Plan Part 1 – Joint Core**  
**Strategy**

**Submission June 2012**

**Background Paper – 6**  
**North Whiteley Strategic Allocation**

**August 2012**



**Winchester**  
City Council

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## 1. Introduction

- 1.1. The identification of land at North Whiteley for a potential housing development has been under consideration since the 1970's. The need for the level of housing locally is set out in the Housing Technical Paper<sup>1</sup> and justified in detail in Background Paper 1 – Housing Provision, Distribution and Delivery<sup>2</sup> and does not need duplicating in this paper, which will therefore concentrate on demonstrating the suitability and deliverability of the land at North Whiteley for a development of about 3,000 new houses. The final capacity of the site will be determined by the extent to which the development can effectively mitigate potential environmental impacts, and sound masterplanning principles.
- 1.2. The site is located to the north of the existing development at Whiteley, and bounded to the north by the Fareham to Eastleigh railway line; to the east by extensive woodland in the ownership of Forest Enterprises, and to the west the settlement of Curbridge and the Botley Road. The total site area is around 202 hectares of which around 108 hectares is unconstrained and considered suitable for development. The remaining land is considered suitable to provide significant amounts of green infrastructure required to support the new community and to help avoid or mitigate any potentially adverse environmental impacts
- 1.3. A development consortium of three national house builders and the principal landowner has been formed to promote and bring forward the development. They are currently in the process of finalising an outline planning application for the development, which will include a full Transport Assessment, Environmental Statement, and a comprehensive masterplan. The Council has worked closely with the consortium to ensure that their proposals are consistent with the emerging policy framework for the site.
- 1.4. The preparation of policy SH3 has been the subject of considerable consultation and community engagement, with adjoining Councils; relevant parish councils; Natural England; the Environment Agency; the Highways Agency; key service providers; and the local community. The main issues which emerged from the process of engagement are the need to avoid or mitigate any potential risks to the nearby internationally protected sites; ensuring that the transport proposals and strategy properly mitigate potential traffic impacts; and that the necessary infrastructure is provided in a timely fashion. These three issues will be explored in more detail in this Background Paper.

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<sup>1</sup> [Housing Technical Paper; WCC 2011](#)

<sup>2</sup> [Background Paper 1 – Housing Provision, Distribution and Delivery; WCC 2012](#)

## 2. Background

- 2.1. The development of Whiteley has its origins as one of 5 principal growth sectors identified in the South Hampshire Structure Plan 1977, which proposed that around 4,000 new houses should be built at Whiteley. However delivering this level of growth within the plan period would have proved difficult and therefore the adopted Whiteley Local Plan 1984 made provision for a new community of about 2,600 new homes with the remainder expected to come forward at a later date.
- 2.2. The Whiteley Local Plan indicated the possibility of a northern extension to the development area to come forward after 1996. To assist in bringing forward the development of this northern sector the area was sewered, and consent granted for a new road which would link with the Botley Road and provide a northern access to the site.
- 2.3. However due to the housing needs at that time, the Winchester District Local Plan adopted in 1998, which replaced the Whiteley Local Plan, reaffirmed the allocation of a total of 99 hectares of residential land but found no justification to allocate any additional land at North Whiteley for development until at least after 2001.
- 2.4. The Winchester District Local Plan Review which was adopted in July 2006 reaffirmed the existing outstanding housing commitments, in order to complete the development, but at that time there was still no requirement for the Council to consider bringing forward any additional land to meet the District's housing requirements during the plan period.
- 2.5. The residential phase of the original Whiteley development is now nearing completion. The development has provided around 3,000 houses of which around 1,400 are in the Winchester District. There are also significant areas of completed employment floorspace, together with a further 13 hectares of unimplemented employment land. In total the current employment floorspace provides around 5380 jobs, of which about 20% are taken by people living in Whiteley.
- 2.6. Planning consent has been granted, and is currently being implemented, for a new district centre comprising of 25, 672 sq m of retail and other town centre uses. This is in addition to the existing Tesco superstore and the local centre located in the Fareham part of Whiteley. There is only one primary school serving the new community. It is a relatively young population and the 2001 Census showed that almost 80% of the population were under the age of 45. As might be expected in a new development there are also high indices of home ownership of around 87% of the new housing

- 2.7. In order to help facilitate any additional housing to the north, and to provide a second access to Whiteley, consent was granted for the continuation of Whiteley Way linking the development with the Botley Road (A3051). Work commenced on constructing the road in the 1990s, but it was never completed due to issues of costs and land availability; although de facto this means that no further planning consent would be required to complete the road, the approved alignment passes through some of the most environmentally sensitive parts of the site.
- 2.8. Furthermore the design which is over 20 years old would have dissected any development which might have come forward in the northern sector. Hampshire County Council as the Highways Authority has indicated that it would seek to revisit this approach and would prefer the design of the new route to be more in keeping with the Manual for Streets<sup>3</sup> which has been adopted by the County Council. A more sensitive street based approach to the design of the new route is now being developed.
- 2.9. As a consequence of the Whiteley Way never having been completed, there is only one main access into the whole of Whiteley from Junction 9 of the M27 motorway (although there is a bus only access off of Yew Tree Drive). The sole access serves both the employment and commercial uses, and the residential areas.
- 2.10. There is also an under provision of educational facilities in the area, and all children of secondary school age have to travel some distance to gain their education; and there is also a shortage of primary school places locally.
- 2.11. Therefore, a key objective for any further development at Whiteley is that it must be of a sufficient scale to facilitate the completion of Whiteley Way and make good any shortages in educational facilities.
- 2.12. The South East Plan required the Council to plan for 6740 new dwellings between 2006 and 2026, in the southern PUSH (Partnership for Urban South Hampshire) part of the District. A number of options for meeting this target were tested<sup>4</sup>, which included a strategic development allocation at Knowle; expanding the Major Development Area at West of Waterlooville; and expanding the market towns of Bishops Waltham and Wickham, together with the possible expansion of Whiteley.
- 2.13. There were strong objections to the expansion of Wickham, Knowle and Bishops Waltham, mainly on the grounds of the adverse impact on the historic

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<sup>3</sup> [Manual for Streets; DfT Mar 2007](#), and [Manual for Streets 2; DfT 2010](#)

<sup>4</sup> [Core Strategy Issues and Options consultations; December 2007](#)

character and rural settings of these towns, and the inadequate infrastructure and lack of employment opportunities in those localities. While this did not rule out all development in these localities it would limit the scale of the development. This analysis highlighted the need to treat the rural settlements, such as Wickham and Bishops Waltham differently from the rest of the South Hampshire Urban Areas, and that development should be focused more on meeting the needs of these communities rather than on accommodating the required levels of growth in the sub-region.

2.14. The option of developing at Knowle was rejected as this would have competed with the Strategic Development Area (SDA) proposed immediately across the boundary in Fareham. It would also have seen the coalescence of Knowle with the SDA, which would have been contrary to the South East Plan, which requires a buffer in this location to specifically protect the separate identity of Knowle.

*Alternative options for expanding Whiteley*

2.15. Three options were tested for expanding Whiteley, which included developing the two areas which now make up the proposed strategic allocation and a separate site to the east of the settlement.

2.16. A workshop was held in the Solent Hotel on the 10th January 2008 to further test the development options for Whiteley; in respect of the most suitable location to accommodate the required level of growth. The following comments and views were expressed.

**Area 1: Land to the north of Whiteley <sup>5</sup>**

<b>Pros</b>	<b>Cons</b>
Closest to Whiteley Way	No existing infrastructure
Easier for existing communities to access schools etc	Is it sufficiently big enough to provide schools etc?
Botley Road is accessible	Must sort out transport with Area 2
Easy access to countryside etc	Traffic impact on Botley road – already congested

<sup>5</sup> For a map delineating the boundaries of the 3 areas of search see Appendix A

Adjacent to existing housing	Impact of construction traffic
If developed with area 2 more likely to resolve existing transport problems	Social housing
Locate school in area 1 – provide links to existing and new development	

### Area 2: Land north of Whiteley/ south of the railway line

Pros	Cons
Proximity to railway station	Can't develop this area until area 1 built
Easy access to countryside	Only develop with area 1 – may lead to acceptance of larger housing numbers
Botley Road is accessible	Only one access road – traffic overload
Easier for existing communities to access schools etc	
Opportunity to resolve road/rail issue	
Need hotel	
Social housing preferred in this area	

### Area 3: Land to the south east of Whiteley

Pros	Cons
Less impact on Whiteley during development	Isolated from existing development and existing facilities
Loss of existing facility (golf course)	Not part of Whiteley more Segensworth
Less sustainable	Close to motorway – noise impact
Possible access from motorway service area	Worsen congestion in Segensworth
Could be used for employment purposes - manufacturing	Lose strategic gap
Access poor	

Lack of link to rest of community – would become self-contained
Would require improvements to junction 10 on M27
Not good location for secondary school

2.17. The options were also the subject of a Sustainability Appraisal<sup>6</sup> which highlighted the need for any development proposals to prove that they would not have any significant adverse impacts on nearby European sites, and the need for strong precautionary measures.

2.18. A series of separate Strategic Sites Sustainability Appraisals were undertaken by the Council on the three options for locating growth at Whiteley, based on the Sustainability Appraisal Framework approved by the Local Development Framework (LDF) Cabinet in December 2007 and was used to assess all the potential strategic growth areas.

2.19. The sustainability objectives that were used to assess each area included;

- Increase accessibility; reduce car usage and the need to travel
- To improve the health and well being of all
- To protect, enhance and manage water resources in a sustainable way
- To ensure sustainable waste management
- To address the causes of climate change and to mitigate and adapt in line with Winchester's Climate Change Strategy
- To promote the sustainable design and construction of buildings and places
- To conserve and enhance biodiversity
- To protect and enhance built and cultural heritage
- To protect and enhance the character and quality of the landscape of Winchester District
- To secure high standards of design
- Minimise local and global sources of pollution

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<sup>6</sup> [Issues and options Sustainability Appraisal; Enfusion; April 2008](#)



- 2.20. The outcome of these assessments can be found in Appendix A. However the conclusion was that Area 3 was found to have substantial constraints, including being more isolated from the rest of Whiteley and difficult to integrate with the existing community. Access to this area is constrained and at present the only access is via unclassified roads. Furthermore there was not a cohesive and available development site capable of delivering the required level of growth.
- 2.21. For these reasons it was recommended that Area 3 should be rejected as a potential strategic allocation, on the grounds that it would encroach on the Meon Gap and potentially lead to the coalescence of Whiteley with adjoining settlements, but importantly it would not have been as well located in respect of the existing community, and it would not have facilitated the completion of Whiteley Way.
- 2.22. The Core Strategy Preferred Option which was published in May 2009, was therefore to merge Areas 1 and 2 to form a Strategic Allocation for about 3,000 dwellings at North Whiteley. This was subject to a further round of consultations and a Sustainability Appraisal<sup>7</sup>.
- 2.23. The Preferred Option was the subject of consultations in May 2009. This round of consultations raised no new issues in respect of North Whiteley, however before the Council could formally consult on the pre-submission draft of the Core Strategy the newly elected coalition government announced its intention to abolish Regional Strategies, and return decision making on housing requirements to the local level.
- 2.24. In response the Council launches its Blueprint consultation tool-kit to help facilitate a 'bottom up' debate within local communities on the level of growth and change that would need to be planned for at a local level. A Blueprint event was held in Whiteley, which reiterated the need to ensure the timely provision of the infrastructure required to support any new development.
- 2.25. At the same time the Council commissioned a study<sup>8</sup> to review the District's housing requirements in the light of changing economic circumstances and demographic projections. The outcome of this study was to confirm that the District's housing needs were broadly in line with the requirements in the South East Plan, in respect of the requirements within the District as a whole and specifically within South Hampshire Urban Areas Spatial Area
- 2.26. 'Plans for Places....*After Blueprint*' was published for consultation during the summer of 2011. The views and aspirations expressed through Blueprint were

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<sup>7</sup> [Preferred Option Sustainability Appraisal; Enfusion; April 2009](#)

<sup>8</sup> [Review of Employment Prospects, Employment Land and Demographic Projections; DTZ August 2011](#)

aligned with the emerging evidence base to include locally derived housing and population projections. The Plans for Places document set out the spatial strategy for the District and confirmed the need for a strategic allocation at North Whiteley.

2.27. In January 2012 the Council published the Pre-submission Draft of the Local Plan Part 1- Joint Core Strategy, while this elicited considerable comment on North Whiteley no new issues of substance were raised which had not already been taken into account, in previous iterations of the Core Strategy

### *Policy SH3*

2.28. The policy sets out the development principles which will guide the preparation and determination of the planning consents required to bring forward the comprehensive development of the site. The policy has been developed in response to the various consultations held with key parties aimed at identifying the infrastructure needed to make the development sustainable, and addressing the potential environmental constraints to development.

2.29. The policy seeks to provide sufficient detail to guide a planning application for the development of about 3,000 dwellings is viable and deliverable, without being too prescriptive, or pre-empting the outcome of the considerably more detailed transport and environmental assessment work which will be required to accompany any future planning application to bring forward the site for development. An important consideration in producing policy SH3 was to ensure that it contains robust 'policy hooks' to ensure that any outstanding detailed issues of concern are properly addressed at the appropriate stage.

2.30. The policy expresses the housing target as 'about 3,000'; this is because of the uncertainty over the site's exact capacity, as well as to allow flexibility. This is due to the need to properly avoid and mitigate all potentially adverse environmental impacts, including the need to fully address the issue of potential flood risk, and the need to provide adequate buffers to environmentally sensitive areas. However early capacity work has established that the site should comfortably be able to accommodate about 3,000 dwellings and, with the proper avoidance and mitigation measures in place, can potentially deliver up to 3,500.

2.31. The Council has therefore set a target of 'about' 3,000 dwellings in the policy to demonstrate that it can meet its housing requirements. But the Council would not wish to set an arbitrary cap on development if the site has the capacity to deliver more housing, which is why the policy identifies the masterplanning process, underpinned by sound urban design principles, as the correct means of establishing the exact development capacity of the site.

2.32. The policy must of course be read in the context of the Local Plan Part 1 as a whole, but of particular relevance is policy SH1 which sets out the development strategy for the South Hampshire Urban Areas. This policy sets the target of 40% affordable housing subject to meeting viability criteria, and other key principles.

2.33. The policy is compliant with the National Planning Policy Framework (NPPF) published in March 2012. In particular the NPPF puts sustainable development at the heart of plan-making, and contains a presumption in favour of sustainable development (para 14).

2.34. In particular policy SH3:

- Makes a substantial contribution to meeting locally identified development needs and illustrates cooperation with other authorities to meet the PUSH development aspirations.
- Provides for a range of house types and tenures to meet the needs of the whole community; and help support the local economy by contributing towards meeting the housing needs of the adjoining employment area
- Will provide a range of sustainable transport choices which aims at achieving a modal shift away from dependence on the private motor car
- Will provide extensive areas of Green Infrastructure to help create healthy life-styles, and improve bio-diversity. The substantial areas of green space and the strong landscape framework will provide an exceptionally high quality of environment for the new community

2.35. The development of Whiteley makes a substantial contribution to meeting the objectively assessed development needs of the PUSH area in terms of both housing and infrastructure provision, but with sufficient flexibility embedded into policy SH3 to allow for changing needs and circumstances. The policy seeks to provide 40% affordable housing subject to viability, in order to widen choice for the new community.

2.36. The policy is also in accordance with NPPF paragraph 52 which makes the point that the supply of new homes can sometimes be best achieved through planning for larger scale settlements or extensions to existing towns, and towns that follow the principles of Garden Cities. The development has always been seen as an urban extension to the existing settlement of Whiteley, and a fundamental development principle set out in the first paragraph of policy SH3 is that the existing woodlands on and adjoining the site should be used to create attractive neighbourhoods with a distinct sylvan character.

- 2.37. The policy is consistent with section 4 of the NPPF in that it actively promotes sustainable transport modes, by promoting walking, cycling and public transport. The policy requires a package of measures to be developed to ensure 'smarter transport choices' to achieve a modal shift which minimises car usage. These measures are also aimed at improving the current low level of self containment in Whiteley.
- 2.38. In accordance with NPPF Section 6, the policy seeks to provide a wide choice of high quality homes, including setting the target of 40% affordable housing. By planning over a longer period it will ensure a continuous supply of new housing over a 12 to 15 year period.
- 2.39. The policy (which should be read together with Policy CP13) is aimed at promoting a high quality design and residential environment by requiring the masterplan and detailed proposals to exploit the woodland setting and sylvan character of the site. Provision will be made for sport and recreation, together with allotments to promote healthy lifestyles and healthy communities.
- 2.40. While the development is on a largely greenfield site, it will be expected to enhance wherever possible the natural environment, and achieve tangible improvements in biodiversity. The most environmentally constrained parts of the site have been excluded from consideration for development, and the subsequent developable areas will therefore avoid the most environmentally sensitive land. In accordance with NPPF Section 6 the policy seeks to minimise impacts on biodiversity and provide net gains wherever possible.
- 2.41. The advice in NPPF paragraph 112 is to seek to avoid the loss of the best and most versatile agricultural land. This issue was something that was taken into account in weighing up the options for the potential development areas. However whilst there are areas of high quality agricultural land present on the site, the other environmental and social benefits of providing housing on this site are considered to outweigh any loss.
- 2.42. In all other respects the policy is consistent with the NPPF, both in terms of its content and the collaborative process by which the policy was developed. The evidence base produced to support the policy is proportionate to the strategic allocation of the site for a development of about 3,000 dwellings.

### *Community Engagement*

- 2.43. In the Spring of 2007 the Council undertook a front-loading exercise for the Core Strategy under the title of 'Live for the Future'. This included a number of community and stakeholder workshops including a workshop in the local centre at Whiteley, and an on-line questionnaire. This helped to identify the local

issues that would need to be addressed and fed directly into the Issues and Options draft of the Core Strategy.

2.44. The Council undertook a series of consultations on the Issues and Options for the Core Strategy. This included a workshop which was held in Whiteley in January 2008. The main conclusions to be drawn from the consultation exercises were that further development at Whiteley could be accommodated and would receive a degree of public support if it could improve infrastructure and service provision. A report to the LDF Cabinet in December 2008 recorded the fact that there were 1,404 responses to the option of locating growth at Whiteley, and that 90% of the responses agreed that Whiteley should grow substantially beyond its existing boundaries.

2.45. In 2008 Whiteley Parish Council, which covers the Winchester part of Whiteley, undertook consultations on the preparation of a Parish Action Plan, which was adopted by the Parish Council in March 2009. The priorities which they set out include:

- Increase traffic capacity to key distributor Roads, removal of a single route dependency, and additional points of access to Whiteley from surrounding areas
- Timely provision of primary schools
- A secondary school
- Open spaces
- Affordable housing to meet local needs

2.46. Further consultations on the Core Strategy Preferred Options elicited the response that as a prerequisite to development, Whiteley Way should be completed, along with the provision of two primary schools and one secondary school.

2.47. In order to help bring forward the development and to ensure that there is a local 'platform' to allow the community to raise issues of concern, the North Whiteley Development Forum was established in March 2010. This acts as an informal advisory body which receives regular up-dates from both Winchester City Council and the developers on progress in developing the policy framework and preparing a masterplan and background material to support an outline planning application. Membership of the Forum includes local Winchester City Council Members, Members of the County Council, Eastleigh Borough Council, Fareham Borough Council, and adjoining parish councils. Members of the public and any other interested party can attend and raise any issues of concern.

- 2.48. To assist in their masterplanning exercise, the developers have held a series of exhibitions and workshops. An introductory exhibition was held in Whiteley on the 22nd and 23rd July 2011, this was to engage in a dialogue with the local community to allow the development consortium to better understand the range of issues that would need to be addressed in preparing for an outline planning application to bring forward the development of the site. While the public exhibition was essentially an event organised by the development consortium, representatives of the Council attended to hear any concerns and to explain the process and stages reached in preparing the Core Strategy.
- 2.49. A follow up public exhibition was held in the Whiteley Community centre in Fareham between the 12th to the 15th October 2011 to present feedback from the previous exhibition and to consult on a series of masterplanning options, including potential linkages beyond the development boundary. Again officers from the Council attended to discuss any issues of concern and to explain the policy framework.
- 2.50. A joint workshop was held in Winchester in 2011 to discuss and start the process of developing a green infrastructure strategy. This was attended by representatives from Fareham, Natural England, the National Trust, RSPB, Forest Enterprises, Hampshire Bio-diversity Centre, and the local wildlife trust. Separate meetings have been held with Natural England as the policy has developed, to ensure a sound policy framework that will ensure that an effective package of mitigation measures will be put in place to avoid the risk of harming any of the adjoining internationally protected sites.
- 2.51. A transport project team has been established by the development consortium, and supported by the Council. This involves HCC as the Highways Authority, Transport for South Hampshire, the Highways Agency, and representatives from Winchester City Council, Fareham and Eastleigh Borough Councils. It has been instrumental in agreeing the parameters for transport modelling and in developing a sustainable transport strategy for North Whiteley. Meetings have been held with Whiteley Parish Council to discuss transport related issues.
- 2.52. Separate meetings have also been held with the County Council's Children's Services Department to discuss and agree the educational requirements, and to confirm that a secondary school should be provided. A further meeting has been held with the potential promoters of a 'free school' to run one of the proposed primary schools in the new development. Meetings have also been held with the Primary Health Care Trust to discuss any requirements for extending primary health care into the new community.

## *Sustainability Appraisal/ Habitats Regulations Assessment*

2.53. The emerging options have been the subject of a Sustainability Appraisal at each stage of the plan preparation<sup>9</sup>. In addition there was a requirement for an assessment<sup>10</sup> under the provisions of the Habitats Regulations which ensure that European sites of importance for nature conservation are protected in the development plan process by requiring Local Authorities to undertake a process known as a Habitat Regulations Assessment (HRA). The HRA has two stages and sets two tests;

- **Test 1:** the first stage of the HRA is the screening process, which considers whether or not a plan or project is likely to have a significant effect on a European site either alone or in combination with other plans or projects.
- **Test 2:** The second part of the HRA is only relevant to those plans or projects that are screened as likely to have a significant effect alone or in combination, and requires an 'appropriate assessment' of the plan or project. The role of the appropriate assessment is to consider the implications of the plan or project for the conservation objectives of the European sites in question, and should determine whether they will have an adverse effect on the integrity of the site. Depending on the outcome of the appropriate assessment, a local authority may need to adapt the plan to reflect the outcome of the appropriate assessment process.

2.54. The HRA screening stage<sup>11</sup> first determined the international sites in around the potential development area, which was defined by Winchester City Council and Natural England, as those sites within 15 km of the allocation boundary. The screening exercise then considered whether the allocation at North Whiteley is likely to have a significant effect either individually or in combination with other plans or projects on the international sites identified as relevant to the assessment.

2.55. Part of the allocated site is in proximity to the Upper Hamble Estuary and Woods which is a Special Protection Area (SPA) and therefore enjoys international protection and is part of the wider Solent and Southampton Water SPA and Ramsar site, and the Solent Maritime SAC. Natural England has confirmed that the Upper Hamble is generally in a favourable condition.

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<sup>9</sup> [SA Scoping Report, 2007](#); [Issues and Options SA, April 2008](#); [Preferred Options SA, April 2009](#); all by Enfusion

<sup>10</sup> [Conservation of Habitats and Species Regulations 2010](#) updated and made various changes to the earlier [Conservation Regulations 1994](#), which had transposed the requirements of the [European Habitats Directive](#) into domestic legislation

<sup>11</sup> [HRA Screening Report; Enfusion Feb 2008](#)

2.56. However, it should be noted that there will be no direct access from the potential development site to any part of this area, for pedestrians. It is expected that buffers will be provided as part of the Green Infrastructure (GI) to ensure adequate separation between the built up area and the protected habitats along the Upper Hamble. Nonetheless, the potential impact on these sites still has to be considered as part of the HRA process.

2.57. There is also the potential to impact on the following International sites.

- River Itchen SAC
- Solent Maritime SAC
- Solent and Southampton Water SPA/ Ramsar

2.58. Together with International sites within a 15km search area, which will also need to be taken into account:

- Chichester and Langstone Harbours SPA/ Ramsar
- New Forest SAC/ SPA/ Ramsar
- Portsmouth Harbour SPA/ Ramsar
- Solent and Isle of Wight Lagoons SAC

2.59. In May, 2009, Winchester City Council (WCC) published a screening report<sup>12</sup> which examined the Core Strategy Preferred Options. This concluded that the strategic allocation for North Whiteley included elements that could, or would, have a significant effect alone and/or in combination with other plans or projects and that the allocation, as part of the Core Strategy, should be subject to an appropriate assessment before the plan can be adopted. It should also be noted that, since this assessment was undertaken, two major developments close to north Whiteley have been reappraised. This has resulted in decisions that the Strategic Development Area North of Hedge End, which comprised 6,000 new dwellings and employment uses, would not go ahead and the Strategic Development Area to the North of Fareham has reduced its capacity from 10,000 new dwellings and 121,000 sq m of employment uses to between 6,500-7,500 new dwellings and a consequent reduction in employment floorspace.

2.60. Winchester City Council consulted Natural England in relation to the HRA Screening report for the Preferred Option of the Core Strategy, who confirmed that it was satisfied with the HRA methodology adopted by the Council. Natural

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<sup>12</sup> [Preferred Options Screening Test; Enfusion May 2009](#)



England emphasised the importance of first pursuing measures to avoid potential impacts, prior to the consideration of mitigation measures. Importantly Natural England also endorsed the approach taken in the HRA screening document that distance itself is not a definitive guide to the likelihood or severity of an impact.

- 2.61. The HRA of the Pre-submission draft of the Local Plan Part 1<sup>13</sup> undertook an Appropriate Assessment (AA) of the strategic allocation at North Whiteley. It considered the recreational and air quality impacts on the international sites within close proximity to the strategic allocation for North Whiteley, and also considered the implications of the allocation for the other international sites which fall within 15km of the site boundary.
- 2.62. The conclusion (paragraph 06) was that the potential impacts of the proposed development would most appropriately be addressed at the project level (i.e. through the preparation of the detailed HRA required to support any planning application). The project level HRA would be required to provide a detailed site level analysis and provide suitable mitigation measures to reduce the adverse impacts of development.
- 2.63. The HRA Report concluded that, provided the recommendations set out in the AA are incorporated into the policy, the Core Strategy contains effective strategic plan level mitigation to address the issues identified through the HRA process as far as is possible within the remit of a planning document (paragraph 07).
- 2.64. Policy SH3 has subsequently been amended to take account of the conclusions of the HRA report and also advice from Natural England. Specifically, the wording of the policy includes specific reference to producing measures to avoid or mitigate harmful impacts on European sites, and also includes the requirement to produce a Green Infrastructure (GI) strategy to avoid harmful impacts and mitigate the local and wider impacts of the development.
- 2.65. The GI strategy must include on and off-site measures to mitigate any harmful impacts on European sites. The policy refers to the woodland which is to the east of the site and known as 'Whiteley Pastures', which is required to be used together with existing woodland on the site itself to mitigate potential environmental impacts and improve bio-diversity in the area.
- 2.66. The Local Plan supporting text (paragraphs 3.52- 3.53) elaborates on the requirements to avoid or mitigate the potential impacts on international sites. It emphasises the importance (as highlighted in the HRA) of providing substantial

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<sup>13</sup> [HRA \(AA\) Report; Enfusion 2012](#)

multi-use areas which can facilitate dog walking to reduce pressures on the coast and estuaries.

- 2.67. The Solent Mitigation and Disturbance Project<sup>14</sup> has considered and will address the impacts of disturbance on wintering wildfowl. In particular it looked at how visitor access patterns to the Solent are linked to where people live. The emerging conclusion is that the closer that people live to the coast the more likely they are to visit. New development closer to the coast will therefore result in higher access levels, and potentially higher levels of disturbance. However at the present time the study has not been completed and the final stage, which will develop appropriate mitigation measures, is still being finalised.
- 2.68. Natural England is in the process of conducting a 'peer review' of the impact work, which is due for completion at the end of October 2012. Natural England expects to be in a position to advise Local Planning Authorities, by the end of November 2013, as to whether there is a likely significant effect, in terms of the Habitat Regulations, of future development on the coastal Natura 2000 sites in order to comply with the Habitats Regulations. Work on an 'avoidance and mitigation plan' is also due to start soon, in two stages. The first stage is to identify a short-list of potential suitable mitigation measures, including "quick wins," which could be delivered quickly and easily. This stage of the work is due to be complete before Natural England's peer review and could be agreed as an interim mitigation plan. Subject to the outcome of the peer review, the second phase of work would proceed to develop a strategy which responds to the evidence base and Natural England's advice, with the full avoidance and mitigation plan being available in the Spring of 2013 for endorsement and adoption by the Local Planning Authorities. The Solent Forum is leading the Solent Disturbance and Mitigation Project and their letter of 17 August 2012<sup>15</sup> sets out the process in more detail.
- 2.69. The approach adopted in policy SH3 therefore is to ensure that any potential impacts on the Solent are avoided by the provision of significant and viable alternative recreational facilities within and adjoining the site. However in the supporting text (paragraph 3.53) it is made clear that further off-site mitigation measures might be required depending on the outcome of the Solent Mitigation and Disturbance Project. The mitigation measures will need to be consistent with both the PUSH Green Infrastructure Strategy and, as far as practicable, the Solent Disturbance and Mitigation Project, once it is completed. This might require further off-site measures to mitigate potential impacts, with the full package of measures needing to demonstrate that harmful impacts on any

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<sup>14</sup> [Solent Disturbance and Mitigation Project; Footprint Ecology; February 2012](#)

<sup>15</sup> [Solent Forum letter of 17 August 2012 re Solent Disturbance and Mitigation Project](#)

European site would be avoided or adequately mitigated; otherwise the scale of the development would need to be reduced accordingly.

2.70. As previously mentioned, the total site area is approximately 202 hectares out of which approximately 94 hectares is either environmentally constrained or is otherwise not considered suitable for built development, and which will contribute towards the provision of GI. Although the Council does not accept that the situation at North Whiteley is comparable to the Thames Basin Heaths, this level of GI provision compares favourably with the standards adopted for the Special Protection Area on the Thames Basin Heaths (TBH). Here all relevant developments are expected to provide 8 hectares of Suitable Alternative Natural Green Space (SANG) for every 1000 people moving into the area. The policy SH3 allows for 'around 3000 dwellings' so working on an occupancy of 2.4 people per dwelling (the current rate used by the County Council to assess service provision) this is likely to generate an additional 7200 people in the local area. If the TBH SPA standard was applied, would require 57.6 hectares of SANG (or if the final dwelling total is nearer to 3500 dwellings, this would require 67.2 hectares), whereas at North Whiteley some 94 hectares are being provided.

2.71. The land available for GI in the allocated site at North Whiteley will amount to at least 94 hectares<sup>16</sup> which should be more than adequate to deliver a suitable scheme to mitigate land-based recreational impacts on the international sites, and would significantly exceed the standard adopted for the TBH SPA. It also compares favourably with the former standard set out for Eco-towns in the supplement to PPS1 (now superseded by the NPPF), which required 40% of the site to be given over to GI as compared with over 47% of the site being provided as on-site GI at North Whiteley. It should also be noted that there will also be an extensive area of land available for recreational use within the adjacent Whiteley Pastures woodland, which will also undergo extensive work to enhance accessibility.

2.72. Clearly, the TBH standard can only be used as a very broad rule of thumb to establish the sorts of areas of alternative recreational space that would need to be available to effectively mitigate recreational impacts on the international sites to the satisfaction of Natural England and other key stakeholders. Whilst it relates to similar land based recreational pressures, it does so in relation to heathland habitats and species which are very different to those present in the Hamble and adjacent coastal areas. However, it is an established and recognised approach to mitigating recreational pressures, and when taken together with other avoidance measures designed into the masterplan, should

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<sup>16</sup> This figure does not take into account the open space provision within the development parcels for local play, landscaping SUDS and street trees/planting; and the over 300 hectares of woodland adjoining the site

be more than adequate to direct recreational pressures away from the River Hamble and other sensitive areas.

- 2.73. The adoption of Policy SH3 in no way obviates the need to undertake a detailed HRA/AA at the project level when submitting a planning application. This will need to undertake further detailed survey work to understand potential impacts, including air quality monitoring and assessing potential impacts on water quality. So, while the full detail of the avoidance and mitigation measures will be provided through the submission of the necessary planning application and accompanying Environmental Statement, all the work undertaken on the HRA and AA so far suggests that there are no reasons to believe that there are any potential environmental impacts that cannot be satisfactorily addressed or resolved.
- 2.74. It is important to recognise that at this stage of the planning process the Council is seeking to allocate the site, and the evidence base has been directed towards establishing whether there are likely to be any reasons why this site cannot come forward for a development of about 3,000 dwellings. A detailed assessment of the site cannot be made in the absence of a detailed scheme; this can only be provided at the planning application stage. However the evidence to date and discussions with Natural England have determined that it should be possible to either avoid or mitigate any potential impacts through on-site measures.
- 2.75. This will also be the case in respect of any protected species present on-site which will require specific measures to protect them. Appendix B sets out some of the internationally and nationally protected species believed to be present on the site. A planning application will be required by legislation to include detailed survey work and mitigation measures aimed at protecting and, where practical, enhancing habitats and species.
- 2.76. This process is entirely consistent with the National Planning Policy Framework, (paragraphs 165- 167), and in particular the evidence base to support policy SH3 is commensurate with the potential risks of allocating this site for development.
- 2.77. It is therefore reasonable to conclude that any additional recreational pressures or other adverse impacts deriving from Policy SH3 would not lead to adverse effects on the integrity of international sites either alone or in combination with other plans and programmes, provided an effective programme of avoidance and mitigation measures as required by the policy are put in place.

## *Transport Issues*

- 2.78. There has been a series of transport studies which have helped inform the development of policy SH3. 'Towards Delivery' was commissioned by Transport for South Hampshire (TfSH) in 2008<sup>17</sup>. This study sets out the transport issues and priorities for the sub-region in the context of the planned growth required to meet the economic aspirations for South Hampshire as set out in the sub-regional (PUSH) spatial strategy. The strategy for managing growth is to reduce the need to travel by private car through the design of new development, and improved public transport; manage the existing infrastructure more effectively; and invest in appropriate infrastructure schemes.
- 2.79. The M27 Corridor Study<sup>18</sup> prepared by Mott Gifford for TfSH considered impacts of growth on junctions 5 to 12 of the M27 motorway. This was a precursor to the more detailed M27 Parallel Study Report; prepared for TfSH in collaboration with the Local Authorities adjoining this section of the motorway in July 2010<sup>19</sup>. This study reviewed the layout and operation of junction 9. It concluded that there were a number of options for improving capacity, but they would need to be considered in association with neighbouring junctions
- 2.80. The Issues and Options stage of Winchester District Core Strategy was the subject of a Transport Assessment; 'Delivering Strategies'<sup>20</sup>. The conclusions of this study were
- "Whiteley offers major potential, but this is only deliverable with significant transport measures to address not only the demands of new housing but also the established Whiteley area".*
- 2.81. This conclusion was reached because the current level of car dependency in the area is currently very high. To reduce the impact of any potential development, a series of measures will need to be put in place to switch preferred modes of transport away from the private motor car to other more sustainable modes of transport.
- 2.82. The LDF Transport Assessment proposed a series of transport interventions that would need to be considered if the potential traffic impacts were going to be either mitigated or managed effectively (Appendix C sets out a list of these measures).

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<sup>17</sup> [Towards Delivery; TfSH 2008](#)

<sup>18</sup> [The M27 Corridor Study<sup>18</sup>; Mott Gifford for TfSH 2009](#)

<sup>19</sup> [M27 Parallel Study Report; Mott Gifford for TfSH July 2010](#)

<sup>20</sup> [Delivering Strategies; Winchester District LDF Transport Assessment \(Stage 2\); MVA 2009](#)

- 2.83. The Assessment also raised concerns about increasing traffic at junction 9 of the M27, even with the completion of Whiteley Way to the north, because of the existing high levels of congestion. The conclusion therefore, was that in order to make the development acceptable, extensive improvements to public transport would be required.
- 2.84. However, the Assessment recognised that the level of growth under consideration at that time, which also included the proposed Strategic Development Area at Hedge End of circa 6,000 new dwellings, provides new opportunities for joint transport provision and funding.
- “To achieve further growth at Whiteley, substantial efforts are needed to secure strong bus/ bus rapid transport service, linking with other centres (including the SDA at Hedge End, Segensworth and Fareham), to promote more local walking and cycling and develop travel plan initiatives. Without this the proposed sites will not be able to function effectively”.*
- 2.85. Further discussions were held with the Highways Agency and Transport for South Hampshire as part of the process of taking forward the potential for a development of between 3- 3,500 dwellings, in order to identify a package of measures that would ensure the delivery of ‘smarter choices’ in respect of the transport options; and to mitigate the impact of development on the strategic road network.
- 2.86. The development consortium promoting North Whiteley has therefore worked closely with the Council, Highway Authority (Hampshire County Council), and the Highways Agency to develop a sustainable transport strategy to support their outline planning application; and this process has also helped to determine the sustainable transport requirements in policy SH3.
- 2.87. The consortium is also developing a strategic traffic model in consultation with the Highway Authority and Highways Agency which will predict traffic growth on the strategic and local road networks and test options for mitigation measures. The results of this modelling work have helped to develop the North Whiteley Access and Movement Strategy (AMS)<sup>21</sup>, which has been prepared on behalf on the developers to help support their outline planning application.
- 2.88. The AMS is a ‘live document’ which will continue to be developed and up-dated as the proposals are developed and the potential impacts modelled and assessed. In accordance with the strategy developed earlier by Transport for South Hampshire, there are three main strands to their strategy; reduce the

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<sup>21</sup> [North Whiteley Access and Movement Strategy; PBA, July 2012 on behalf of the North Whiteley Consortium](#)

need to travel and journey lengths; manage existing transport infrastructure more effectively; and invest to provide additional cost effective infrastructure.

2.89. The AMS is a comprehensive document which sets out a number of sustainable transport interventions aimed at supporting the development at North Whiteley, and identifies a number of key deliverables which will be required to help bring forward the development:

- Improved road infrastructure; including junction improvements
- Local traffic management and road safety improvements
- High quality pedestrian and cycle access
- Improved public transport accessibility and service provision
- Improved integration for the existing community with surrounding communities and improved transport links to serve them
- Travel planning/smarter choices

2.90. The strategy has also influenced the masterplanning process by ensuring that: all new routes will be designed to prioritise sustainable transport modes over car users; with the exception of the new section of Whiteley Way, streets will be subject to 20 mph design speeds; and public transport corridors will be identified, and the masterplan will ensure that all residential areas are within a 400m walking distance of a bus stop.

2.91. The AMS sets out the measures for accommodating vehicular movement, and includes as the main objectives the need to mitigate traffic impact; to ensure the effective delivery of the development and associated infrastructure; to improve road safety on the surrounding highways network; and help meet the widely-held aspirations to improve the accessibility of the area by more sustainable modes of transport, and help in reducing the area's high car dependency

2.92. In order to assist the process of developing the AMS a number of technical meetings have been held, usually chaired by the County Council (or TfSH) as the Highway Authority, and have involved the Highways Agency, and representatives from Winchester and the adjoining Councils of Fareham and Eastleigh. This has enabled the emerging strategy to be disseminated and refined, and the parameters for the traffic modelling to be discussed.

2.93. The above transport project team will continue to meet until the transport strategy required to accompany the planning application has been finalised. Summaries of the outcomes of the transport work are regularly brought before

the North Whiteley Forum for dissemination and discussion with the local community.

### *Flood risk*

- 2.94. The site and surrounding area has been the subject of a Strategic Flood Risk Assessment<sup>22</sup>, together with a more recent assessment undertaken for PUSH<sup>23</sup> in respect of the sub-region. This has identified the areas of the site that are liable to flood. These areas, which follow two minor water courses which run roughly east west through the site, are within Flood Zones 2 and 3, and therefore have been excluded from the developable area, and are shown as GI on Map 7 which accompanies policy SH3.
- 2.95. In addition, to reduce the risk of flooding a Sustainable Drainage System (SUDS) will be required which should channel and capture all surface water within the site, and result in no net increase in surface water run off into the surrounding water courses. The detailed requirement for SUDS is contained in Policy CP17 which should be read alongside the requirements for effective water management set out in Policy SH3.
- 2.96. The principle of the SUDS has been discussed and agreed with the Environment Agency who has raised no issues in respect of the means by which potential risk of flooding has been addressed in the policy. As is normal practice, the detailed design of the SUDS including its phasing and management will be provided in the future planning application.

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<sup>22</sup> [Winchester District SFRA;2007](#)

<sup>23</sup> [PUSH SFRA Dec 2007and updates September 2011](#)



### 3. Viability and deliverability

- 3.1. All the land allocated in policy SH3, required to bring forward the development, is in the control of a development consortium of 3 national house builders, Taylor Wimpey, Bovis Homes, and Crest Nicholson, together with the principal landowner, so there are no issues of land assembly. In this respect there are not believed to be any land ownership issues likely to delay the scheme once consent is granted.
- 3.2. In the expectation that a planning application will be submitted either towards the end of 2012 or the beginning of 2013, it is anticipated that outline planning consent should be granted in 2013. The development will therefore commence in 2014. However, due to the need to prepare the site and create an access to serve the construction vehicles, the development Consortium expects the first completions to occur in mid/late 2014. The Council has used this assumption in its 'Stronger Market Conditions Housing Trajectory' and taken a more cautious estimate in its Local Plan Part 1 Housing Trajectory, which assumes the first completions in 2015/16 (see table below).

<b>Year</b>	<b>Local Plan Part 1 Housing Trajectory</b>	<b>'Stronger Market Conditions' Trajectory</b>
2011/12	0	0
2012/13	0	0
2013/14	0	0
2014/15	0	50
2015/16	50	100
2016/17	100	300
2017/18	200	400
2018/19	300	400
2019/20	300	400
2020/21	300	400
2021/22	300	400
2022/23	300	400

2023/24	250	300
2024/25	250	200
2025/26	200	150
2026/27	200	0
2027/28	100	0
2028/29	100	0
2029/30	50	0
2030/31	0	0
TOTAL	3000	3500

3.3. The developers' expectation is for an average annual completion rate of 230 dwellings per annum (with an average of 175 completions for the market housing). This would effectively mean that the final completions, assuming the eventual site capacity is 3,500 dwellings, would be in 2030. The Council's Local Plan Part 1 Housing Trajectory assumes that the 3,000 dwellings allocation may not be completed until 2029/30, but the 'Stronger Market Conditions Housing Trajectory' assumes that a 3,500 dwelling scheme could be completed as early as 2025/26 in favourable market conditions.

3.4. The developers are expecting that in the first 5 years of the development they will complete 960 houses at an average of 192 dwellings per annum. This is in line with the Council's Local Plan Part 1 Housing Trajectory which assumes around 950 completions in the first 5 years of the development albeit with a later start date. The 'Stronger Market Conditions Housing Trajectory' assumes that development could start at the time assumed by the Consortium and could potentially deliver 1,250 dwellings in the first 5 years in favourable market conditions.

3.5. The Council's Infrastructure Delivery Plan prepared in April 2011 identified four major areas of infrastructure which would be required to support the new community:

- highways infrastructure including highways improvements and mitigation measures, together with measures to deliver 'smarter choices' such as improved bus services, and green travel planning;
- Green Infrastructure and natural green space, required to mitigate and avoid potential impacts on European sites; including access to off site

woodland; SUDS; and commuted sums for the future maintenance and management of the space provided

- two primary schools and a secondary school, one of the primary schools and the secondary school will be required to serve both the needs of the existing community and the new community;
- a range of community facilities, mostly aimed at meeting the needs of the new community including two community centres, allotments, sports, leisure and play facilities.

3.6. There is a requirement on this site for 40% of the new dwellings to be affordable. The target would be for the tenure mix to be 70% rented housing (with flexibility to allow for social or affordable rents), and 30% intermediate affordable housing, depending on further viability testing. To help meet the needs of an aging population, an extra care unit is currently being considered in lieu of some of the affordable housing, this will be determined once the scale of the extra care unit is known.

3.7. The Development Consortium has prepared a Viability Report to support the strategic allocation at North Whiteley<sup>24</sup>. The report supports the view that the policy SH3 is both viable and deliverable, however, the viability model does suggest that delivering the Council's aspiration for 40% of the housing to be affordable, at the required mix will be extremely challenging. The report concludes that at a lower percentage of up to 30%, depending on the tenure mix, the scheme would be viable and capable of delivering all the necessary social and physical infrastructure, whilst meeting landowner expectations.

3.8. The Viability Report is a summary of a more detailed report prepared by the Consortium. Whilst the Consortium would be prepared to make this available to the Inspector, it does not wish to make it public as it contains commercially-sensitive information. The Council does not consider the Local Plan Examination to be the right forum to assess in detail the assumptions in the report or to negotiate which, if any, policy requirements should be relaxed. Therefore, it agrees with the Consortium that the published Viability Report provides an appropriate level of detail for the examination and adequately demonstrates the overall viability of the allocation.

3.9. The North Whiteley Viability Report assumes that affordable housing provision will need to be adjusted in order to achieve viability. Whilst the Plan allows for this, if necessary, the Council will wish to examine the various assumptions within the report in due course and look at all potential ways of overcoming any viability shortfall. As would be expected with any viability assessment, this

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<sup>24</sup> [North Whiteley Viability Report 2012; EC Harris](#)

would be undertaken in the course of negotiating the S106 agreement and the Local Plan examination is not the forum through which to resolve the precise details of viability testing and what may be needed to achieve the right balance between infrastructure provision and development viability. This can only be finalised once the Transport and Environmental Impact Assessments have been completed and the full extent and detail of the costs of the measures required to mitigate any potential impacts have been determined.

- 3.10. Therefore, the North Whiteley Viability Report is very useful in setting out a range of different scenarios in terms of the viability of the development. It provides a starting point for determining the final percentage and mix of affordable housing to be provided at North Whiteley, and will no doubt be the subject of detailed discussion at the outline application stage, when the Council will explore with the Consortium whether it is possible to better achieve its policy aspirations. This might include looking at ways to reduce affordable housing costs, for example by providing more two and three bedroom houses or altering the tenure mix, than is currently set out in the Viability Report.
- 3.11. Equally though, it will be necessary to look at the assumptions underpinning the report in detail and, if necessary, to explore other ways of funding or phasing some of the infrastructure. It will also be necessary to consider whether there are other sources of funding available, given that the report assumes all infrastructure and affordable housing provision will be developer-funded. While the report might therefore present a rather pessimistic outlook in respect of the percentage of affordable housing that can be achieved, it should be noted that there is sufficient flexibility in the Local Plan's policies to enable negotiations to take place to ensure that a viable scheme is produced with an appropriate level of affordable housing and other infrastructure.
- 3.12. The Council has worked very closely with all the delivery agencies including the County Council, Highways Agency, Natural England, and the Environment Agency to identify and agree the necessary infrastructure required to support the allocation of this site.
- 3.13. Therefore given the time and resources already expended by the developer to bring forward this development there is no reason to believe that policy SH3 is neither viable nor deliverable.

#### 4. Conclusions

- 4.1. At each stage of preparing policy SH3 the Council has ensured that it has involved the active participation of the County Council, the adjoining Councils of Eastleigh and Fareham; Whiteley, Curbridge and Botley Parish Councils; Natural England, the Environment Agency, and the Highways Agency; key service providers; and the local communities adjoining the site, both within the Winchester District and outside.
- 4.2. The Council has also worked closely with the development interests in helping to develop the masterplan, green infrastructure and transport strategies required to support their planning application, which is expected to be submitted towards the end of 2012, or early 2013. This process has also involved a high level of engagement with the local community and key stakeholders.
- 4.3. The main issues to emerge from the engagement process are the need to avoid or mitigate any potential risks to the nearby sites of European importance for their biodiversity; the need to ensure that the potential traffic impacts are effectively mitigated; and that the necessary infrastructure is provided in a timely fashion, in particular the completion of Whiteley Way and the provision of additional primary and secondary educational facilities.
- 4.4. While it would not be appropriate to be overly prescriptive in a Policy which is effectively seeking to allocate the site, these issues are all fully addressed in Policy SH3 which is clear on what is required to bring forward the site for development, including the main infrastructure requirements and the approach to be adopted by the developers in bringing forward effective mitigation measures.
- 4.5. Indeed to try to set out detailed mitigation measures in advance of the more detailed assessment work required to support the planning application would introduce an inappropriate degree of inflexibility, and would raise issues of soundness in respect of the deliverability of such prescriptive requirements.
- 4.6. Similarly, the viability report prepared for the Development Consortium is clear that a viable development can be delivered. However, the Local Plan is not the place to examine this in fine detail or to establish precisely the funding process for each item of infrastructure and which, if any, policy requirements may need to be relaxed. The Plan rightly sets out the key policy requirements for the development, which are consistent with other parts of the Plan, and the precise means of meeting, or relaxing, these will be for negotiation through the planning application process.

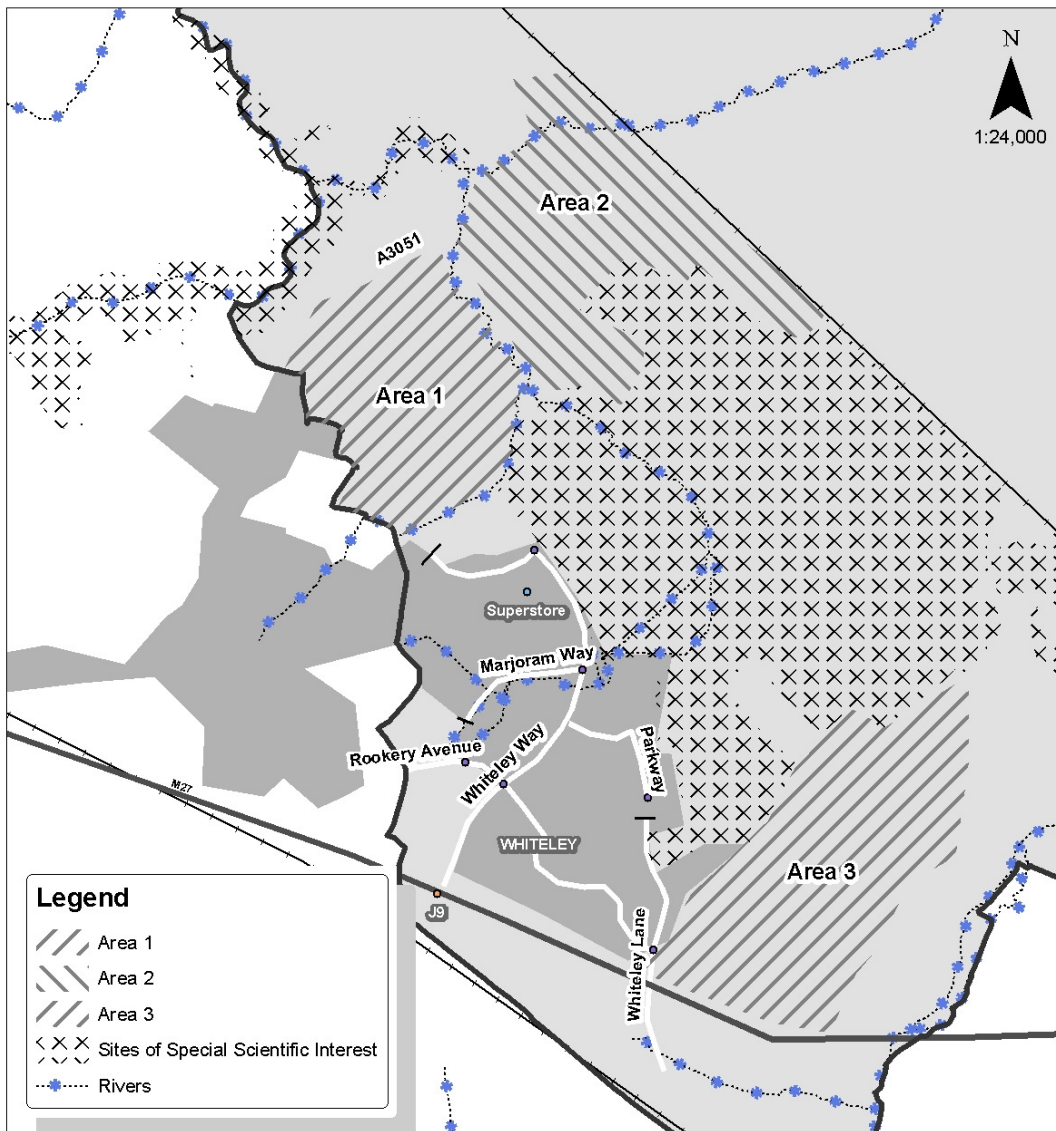
- 4.7. The Local Plan Part 1 has been the subject of a Sustainability Appraisal/ Strategic Environmental Assessment, and a Habitats Regulations Assessment and Appropriate Assessment, to identify all potential environmental impacts, especially those relating to the internationally protected sites. The assessments have clearly identified a number of potential risks, but the conclusion is that they are all capable of being adequately avoided or mitigated through proposals to be developed through the more detailed planning application process. Therefore, at this stage of the process there are no environmental reasons why the site cannot be allocated.
- 4.8. A similar approach has been taken to determine whether the transport issues facing the proposed development are capable of being satisfactorily addressed at the detailed planning application stage. Again a continuous dialogue with the Highway Authority and the Highways Agency has taken place to assist the process of developing a strategy to reduce the need to travel by unsustainable modes, manage the existing network more effectively and invest in the transport infrastructure.
- 4.9. The policy is consistent with the NPPF, both in terms of its content and the collaborative process by which the policy was developed. The evidence base produced to support the policy is proportionate to a strategic allocation of the site for a development of about 3,000 dwellings.
- 4.10. The policy is very much in line with the presumption in favour of sustainable development, and will provide for a range of house types and tenures; will require a range of sustainable transport options; and provide extensive areas of Green Infrastructure to promote healthy lifestyles and improve biodiversity. It remains the most sustainable and deliverable option for meeting the housing requirements of the area and delivering the PUSH economic growth strategy.

## Appendix A: Results of Strategic Sites Sustainability Appraisals

Extract from Issues and options paper December 2007 which delineates the broad areas of search at Whiteley;

**Map 9: Whiteley Strategic Options.**

Indicative map



The main conclusions of the assessment in respect of the options for Whiteley can be summarised as follows.

### **Whiteley Area 1;**

The site adjoins Burridge and Whiteley to the south west and countryside or woodland to the north west, north east and south east. It is an area of approximately 90 hectares. This area is the closest area to the existing settlement at Whiteley.

#### *Environmental impacts*

Proposed development of site may impact on:

- The western site boundary is close to the River Hamble which is a RAMSAR site (wetland site of international importance); a designated SAC (Special Area of Conservation: European status); SPA (Special Protection Area: European status) SSSI (statutory national designation).
- There are extensive woodlands both within and to the east of the site, including designated ancient woodland, the larger part of which is designated as a SSSI.
- Significant areas within and surrounding the site are designated as SINCs, covering both woodland and grassland areas.
- There is a very diverse range of habitats and species in both protected areas and within the site. Minor streams within the site drain into the Hamble, the District's only stretch of tidal river, with rich woodland surrounding the upper Hamble grading into neutral grassland, reed beds, salt marsh and tidal mudflats.
- Irregular small to medium sized meadows within the site closely integrated with a strong assorted woodland structure provide important nature conservation interest and green wildlife corridors.
- Good existing network of interconnecting rights of way throughout the site. Accessible links with green spaces / wildlife corridors, including historic hedgerows, allows good connectivity with natural environment and enjoyment both within and beyond the site.



- CRoW access for extensive woodland area within the site which extends into Area 2 and beyond site boundaries to the east.
- Proximity of large tracts of woodland (Forestry Commission) provides opportunities for renewable energy resource (dry biomass).
- Rich diversity of different landscape types and recognised landscape character as identified in Landscape Character Assessment within and surrounding the site. A main feature is pattern of irregular small to medium sized meadows closely integrated with a strong assorted woodland structure, important in terms of combined biodiversity/amenity value and as green corridors.
- Important views that contribute to landscape character and local distinctiveness:
  - Significant views to and from the high point in centre of site, 20.0m, mainly overlooking River Hamble and valley setting.
  - Skyline features to and from site e.g. tree belt through centre of site along east-west right of way.
- Landscape character of site boundaries when considering proposed vehicular access for development into site. Very restrictive from the east by woodland located within and beyond the site; railway line to the north and the proximity of highly sensitive landscape of River Hamble to the west.
- Agricultural Land Classification: the site includes grade 2 agricultural land and parts are therefore of 'the best and most versatile quality'. This will need to be taken into account alongside other sustainability considerations including biodiversity, heritage, landscape character (PPS 7 para 28.)
- Tranquillity: mainly evident within site, along rights of way and woodland areas. Intrusion of A3051 when close to the western boundary and from railway to the north.
- Geology: existence of London clay formation which may impact on proximity of existing/new trees to proposed development.
- Site contains small area of Flood Zone 2 and 3 along north eastern boundary.
- Site is within water catchment area for River Hamble.

### *Accessibility*

The site lies to the immediate east of the A3051 which links Botley and Park Gate and Swanwick. If Area 1 were to be developed with Area 2, the extension of Whiteley Way could be secured.

Access to this part of Whiteley would be principally gained from Junction 9 of the M27 via Whiteley Way and the Solent Business Park.

A footpath crosses the site from Burridge to the north east. A bridleway crosses the site from the Whiteley Farm Roundabout to the main road through Curbridge. This road is narrow, has poor visibility and no pavements in the vicinity of this footpath. The site is close to a traffic free cycle route through Whiteley and a cycle route, signed on the road which links with Solent Business Park.

There is an hourly bus service through Burridge and Curbridge, and an irregular bus service through Whiteley. Swanwick Station is located three miles from Whiteley Village. Botley Station lies to the north. Neither is easily accessible by foot, cycle or public transport.

The extension and upgrading of the footpath and cycle network could be secured by the development of the site resulting in its integration with Whiteley. An improved bus service could be secured by the development of the site, particularly if Whiteley Way is completed. This would improve the site's integration with Whiteley and communities to the south of the motorway.

Further discussions with the Highways Agency and Transport for South Hampshire are required to achieve optimal package of smart transport measures and to mitigate impact of development on the strategic road network.

### *Infrastructure*

If developed on its own the site would probably not be able to meet all its infrastructure requirements, it is unlikely that it would be able to facilitate the completion of Whiteley Way. It might however be able to provide for its primary education needs if the site could accommodate around 1500 dwellings, although further work would be required to ascertain whether it could also provide a secondary school.

### *Economic development potential*

Due to the close proximity of the business park at Whiteley, it is not envisaged that significant employment land would be allocated in this location. However a

mixture of housing types and tenures not least the 40% affordable housing could help to redress the significant in-commuting into the area.

It would also be possible to provide a range of employment uses within the site to support the nearby business uses, and to ensure a high level of self containment to reduce the need for out-commuting from the area.

### *Availability*

A consortium of house builders have put together a site, which effectively consolidates areas 1 and 2, and which has a gross site area of approximately 215 hectares. The site is therefore available.

### *Conclusions*

This site is environmentally sensitive; however, there would appear to be no overriding constraints to development. Indeed, there are potential benefits in terms of the provision of transport and other infrastructure and improving the balance of housing and employment. If developed on its own it might be expected to provide between 1,200 and 1,500 dwellings. However questions would arise as to whether the development of this site in isolation could provide all the necessary infrastructure, including the completion of Whiteley Way, and whether without the completion of this road it would be desirable to provide this level of housing in an area which already has serious congestion.

### **Whiteley Area2;**

The site adjoins Curbridge, a small linear hamlet, and the Burrige Road (A3051) to the west, the railway line to the north east and woodland and countryside to the southwest and south east. It does not adjoin any other settlement.

This is an area of approximately 110 hectares. It is bounded to the north by the railway track to the west by the river Hamble and to the east Whiteley Woods. However at the present time there is no direct access from the area to the river.

To the east of this area is Botley Woods, which is managed by the Forestry Commission, and at the present time has limited public access.

### *Environmental impacts*

Proposed development of site may impact on:

- Protected sites of national and international importance are close to the western boundary as the River Hamble is a RAMSAR site (wetland site of international importance); a designated SAC (Special Area of Conservation: European status); SPA (Special Protection Area: European status); and SSSI (statutory national designation).
- There are extensive woodlands within and to the east of site, including designated ancient woodland, a large part of which is designated as a SSSI.
- Significant areas within and surrounding the site are designated SINCs (local designation), covering both woodland and grassland areas.
- BAP Priority Habitats: diverse number of identified areas within the site
- Highly diverse range of habitats and species within and beyond the site. Minor streams within the site drain into River Hamble, the District's only stretch of tidal river. Rich woodland surrounds the upper Hamble grading into neutral grassland, reed beds, salt marsh and tidal mudflats.
- Irregular small to medium sized meadows within the site. closely integrated with a strong assarted woodland structure. provide important nature conservation interest and green wildlife corridors. One main right of way in the south east corner of the site links to an extensive woodland area within the site which is recognised CRoW access, extending into Area 1 and beyond the site boundaries to the east.
- Proximity of large tracts of woodland (Forestry Commission) provides opportunities for renewable energy resource (dry biomass).
- Both Romano-British building complex and kiln sites are situated along the alignment of a Roman road from Clausentum to Wickham and there is evidence for a Roman 'hard' or landing place on the River in this area. There is increasing evidence that Wickham itself is a small late Iron Age / Roman settlement or town with substantial evidence for industrial activity. The proximity of the site to Wickham and the known Roman remains at Fairthorne suggests that the site has a high potential for further Roman remains, the significance of which cannot as yet be determined.
- Rich diversity of different landscape types and recognised landscape character as identified in Landscape Character Assessment within and surrounding the site. Main features include irregular small to medium sized meadows; minor streams and associated wetland feeding into R Hamble; all closely integrated within a strong assarted woodland structure, important in terms of combined biodiversity/amenity value and as green corridors. Site is within river catchment area.

- High quality but fragile landscape which abuts highly sensitive River Hamble within National Trust land.
- Views mainly confined to local prominence due to small/medium enclosed field pattern and woodland. Site visible from elevated railway embankment and from public footpath and woodland, CRoW access in eastern half of site.
- A public right of way in the south east corner of the site connects with an area of dedicated woodland (Forestry Commission) within and beyond the site boundaries (also shown as CRoW access). Provides accessible links with green spaces and corridors of high amenity value, good connectivity with natural environment and enjoyment both within and beyond the site. Poor footpath links between site and R Hamble National Trust land to the W, exacerbated by busy A3051.
- Agricultural Land Classification: the site includes grade 3A agricultural land and parts are therefore of 'the best and most versatile quality'. This will need to be taken into account alongside other sustainability considerations including biodiversity, heritage, landscape character (Ref: PPS7 para 28.)
- Geology: existence of London Clay formation which may impact on proximity of existing/new trees to proposed development.
- Tranquillity: mainly evident within central areas of site, along right of way and woodland areas.
- The site contains Zone 2 and Zone 3 flood risk designations along its south western boundary and to the west of the site along the existing water course.
- Site is within water catchment for River Hamble.
- A County Minerals site lies within area 2: there is requirement to consult the County on any development that may affect this site, but it is not considered to be a major constraint against development.
- Electricity overhead cables run to the south east of the site boundary and north east of the railway line.
- An area where Radon Action is required lies in a band across the northern portion of the site along and to the south of the river floodplain.

### *Accessibility*

The site lies to the immediate east of the A3051 which links Botley and Park Gate and Swanwick. This road would be the site's sole direct vehicular access route unless/until Whiteley Way could be completed. To the north east the railway line is a significant barrier: to the east lies the woodland, only accessed by a footpath.

There is an hourly bus service through Burrridge and Curbridge, and an irregular bus service through Whiteley. Swanwick Station is located three miles from Whiteley Village. Botley Station lies to the north. Neither is easily accessible by foot, cycle or public transport. A footpath crosses the southern corner of the site linking Burrridge with woodland.

Further discussions with the Highways Agency and Transport for South Hampshire would be required to achieve optimal package of transport measures and to mitigate impact of development on strategic road network.

### *Infrastructure*

It is difficult to envisage the site being developed in isolation: it would have to be planned and developed alongside Area 1. This would ensure that all the necessary infrastructure was identified and provided for as part of the development.

### *Economic development potential*

Due to the close proximity of the business park at Whiteley, it is not envisaged that significant employment land would be allocated in this location. However a mixture of housing types and tenures, not least the 40% affordable housing, could help to redress the significant in-commuting into the area.

It would also be possible to provide a range of employment uses within the site to support the nearby business uses, and to ensure a high level of self containment to reduce the need for out-commuting from the area.

### *Availability*

A consortium of house builders have put together a site, which effectively consolidates areas 1 and 2, and which has a site area of approximately 215 hectares. The site is therefore available, and could potentially deliver about 3000 houses or more in the plan period, if developed along with Area 1.

## *Conclusions*

This site has a number of significant environmental constraints which would need to be fully taken into account if the site were to be preferred for development. It scores particularly poorly in the Sustainability Assessment in a number of areas when compared with other sites. However the site has been assessed in isolation, whereas in practice it would not be a sensible strategic allocation unless developed in conjunction with Area 1. The relatively low score for the first two sustainability objectives, 'building communities' and 'infrastructure' reflect the situation which would arise if the site were to be developed in isolation without Area 1 coming forward. If, as would be the case, the site was planned and developed as part of a wider development area which included Area 1, then the above concerns regarding 'building communities' and 'infrastructure' could be addressed.

This area also scores poorly on water issues; this is because a part of the site is within a flood risk zone 2 and zone 3. However the site is large enough to ensure that no development takes place within the areas at risk of flooding so this potential constraint can be overcome by ensuring that the development principles preclude any development within areas at risk of flooding.

The main areas of concern are the potential biodiversity and landscape impacts, particularly in view of the site's proximity to areas designated for their national, European and international biodiversity interest and its high quality and unspoilt landscape. The assessment suggests that biodiversity issues are an 'absolute sustainability constraint to development'. This reflects the strategic nature of the assessment and the constraints which it has identified. However, discussions have been held with Natural England and the development consortium (who are undertaking more detailed work), which suggests that the constraints can be avoided or mitigated, making development possible. However, the current assessment is not detailed enough to demonstrate this, hence its scoring for this aspect.

### **Whiteley Area 3;**

The site abuts the M27 to the south, an area of low density development to the east, and predominantly woodland and countryside to the west and north, with the exception of a small residential area to the south west which adjoins Solent Village and Solent Business Park. It includes a golf course and areas of scattered low density housing.

It is an area of approximately 117 hectares. It lies to the east of Whiteley and is within the Meon Gap. Part of the area contains a former landfill site. It was the least favoured area in the public consultations

## *Environmental impacts*

Proposed development of site may impact on:

- There are extensive woodlands that abut the site to the north-west, including designated ancient woodland, a large part of which is designated as a SSSI (statutory national designation).
- There are a number of SINC's (local designation) within site covering both woodland and grassland areas (refer constraint maps). Part of River Meon to the east of the site is designated as a SINC.
- Minor streams in the eastern half of the site flowing into R Meon.
- Golf course along W boundary provides green buffer for adjacent ancient woodland. Inclusion of water features may have some value although no protected areas within this site.
- There is a good existing network of interconnecting rights of way. Accessible links with green spaces / wildlife corridors linking adjacent woodland and Meon valley, providing understanding and enjoyment of natural environment both within and beyond the site.
- Proximity to large tracts of mature woodland (Forestry Commission) provides opportunities for renewable energy resource (dry biomass).
- Historic landscape character: small parliamentary fields and assarted woodland (pre-1810 wood pasture).
- There are statutorily Listed Buildings within the site at Lee Ground Farm and Great Funtley Farm.
- Variable landscape types as identified in Landscape Character Assessment within and surrounding the site. Main features include irregular small to medium sized meadows.
- Main ridgeline running north south through the site and golf course, max 40.00m height, with Meon valley slopes to east.
- Views mainly confined to local prominence in eastern half of the site due to small/medium enclosed field pattern, woodland and hedgerow boundaries. High point at Club house and Ground Farm with distant views of treed skyline to north.
- Three groups of protected trees within the site (TPO). One large area of protected trees (TPO) adjoining SW corner of the site.



- Good existing network of interconnecting rights of way. Accessible links with green spaces / wildlife corridors linking adjacent woodland and Meon valley, providing amenity and enjoyment of natural environment both within and beyond the site.
- Proximity of large tracts of mature woodland (Forestry Commission) provides opportunities for renewable energy resource (dry biomass).
- Agricultural Land Classification: the site includes grade 1 agricultural land along the eastern site boundary (Meon valley) and parts are therefore of 'the best and most versatile quality'. Mainly Grade 3 throughout remainder of site. This will need to be taken into account alongside other sustainability considerations including biodiversity, heritage, landscape character (Ref: PPS7 para 28.)
- Geology: existence of London Clay formation which may impact on proximity of existing/new trees to proposed development.
- A large area of the north of the site is a disused domestic landfill site with a large depth of fill. This part of the site is therefore unsuitable for housing.
- The Southern Water Sewer Lines cross the western portion of the site.
- A County Minerals site lies to the west of the area: there is requirement to consult the County on any development that may affect this site: There is relatively recent housing within this area.
- The site is in the water catchment area of the River Meon.
- The site lies to the west of Flood Zone 2 and 3, centred on the River Meon.

### *Accessibility*

The site can be accessed from Whiteley Lane, which continues to the south of the motorway, and Titchfield Lane and Fontley Lane via narrow roads. There is no vehicular access across the site: Springles Lane is closed off to vehicular traffic. It would therefore be difficult to achieve improved public transport links without significant highway improvements. Access to the site is restricted by the barrier formed by the motorway to the south and the width of roads.

Further discussions with the Highways Agency and Transport for South Hampshire would be required to achieve the optimal package of transport measures and to mitigate the impact of development on the strategic road network.

There is a well developed footpath network across the site and to the south west the site adjoins a cycle route, signed on the road which links with Whiteley Way and Whiteley itself. The extension and upgrading of the footpath network to a cycle network could be secured by the development of the site. This would improve the site's accessibility to Whiteley.

### *Infrastructure*

If the site were to be developed it is likely to be of sufficient size to ensure that the infrastructure needs of the new development are adequately met. Development in this location would not directly achieve the completion of Whiteley Way.

### *Economic development potential*

Due to the close proximity of the business parks at Whiteley, it is not envisaged that significant employment land would be allocated in this location. However a mixture of housing types and tenures, not least the 40% affordable housing, could help to redress the significant in-commuting into the area.

It would also be possible to provide a range of employment uses within the site to support the nearby business uses, and to ensure a high level of self containment to reduce the need for out-commuting from the area.

### *Availability*

This area is in multiple ownership. Several land owners have put forward a number of potential sites for development in this area, but they do not add up to a coherent or comprehensive development site capable of providing a strategic housing allocation (at least 2000 dwellings).

### *Conclusions*

Area 3 scored the lowest of the three Whiteley areas in respect of the Sustainability Assessment, even though it does not have the same level of biodiversity constraints as areas 1 and 2. It is poorly related to the existing built-up area of Whiteley and would be difficult to integrate with it. There are also concerns about whether it could be delivered as a comprehensive development area, given the very fragmented ownerships.

There would also be issues regarding gaining adequate vehicular access to the motorway from this land, which would put pressure on the local road network if

significant development were to take place. Furthermore, development in this area would not bring forward and complete the Whiteley Way.

It should be noted that all the three areas at Whiteley have a similar level of landscape constraint which would have to be taken into account if development were to take place.



## **Appendix B: Protected species likely to be found at North Whiteley**

**Dormice** and their habitats are highly protected under UK and European law. It will need to be established where Dormice are present and going to be impacted by the development. Dormice surveys need to be carried out to establish whether Dormice are present on site, and to give an indication of population size and distribution across the site. As a mainly arboreal species, Dormice predominantly use woodland, hedgerows and scrub habitats. It is important to both retain Dormice habitat and maintain the connectivity of habitats – for example by avoiding severance and isolation of hedgerows used by Dormice, and providing a ‘green network’ of suitable connectivity within the development layout.

Existing habitats should be enhanced, buffered and new habitat created. Where severance cannot be avoided, reconnection of any isolated habitat will be required through new habitat creation, and measures can be put in place to reduce the severance impacts – such as arboreal bridges or maintenance of canopy connectivity through use of carriageway pinch-points etc. Impacts from disturbance, lighting, and cat predation should also be considered, and may be able to be mitigated by buffering (including making inaccessible to people and pets) and enhancing existing habitats, and creation of new Dormice habitat

The layout and design of the scheme should aim to retain, buffer, connect and create potential Dormice habitat. Along with habitat creation, the buffers applied to other woodland and hedgerows will help mitigate impacts on Dormice habitat. As a European species, if present and impacted this would be of high significance and the first approach should be to avoid impacts.

**Great crested newts (GCN)** and their habitat are highly protected under UK and European law. It will need to be established whether GCN are present and going to be impacted by the development. GCN are only present in their breeding ponds during the spring and early summer – for the rest of the year, they will be dispersed across the surrounding area, generally in grassland, scrub, woodland and hedgerows, although they may be found in gardens. They are less likely to use the centres of arable fields or heavily managed grassland, and are more likely to use field boundaries and features. They can travel some distance from their breeding ponds, generally 500 m is considered to be a normal range.

Any GCN habitat loss (ponds or terrestrial) will have to be compensated through habitat creation, and connectivity of habitats across the site may need to be maintained (depending on where any populations are) – for example by avoiding severance and isolation of hedgerows and woodland strips, and providing a ‘green network’ of suitable connectivity within the development

layout. Existing habitats should be enhanced, buffered and new habitat created. Where severance cannot be avoided, reconnection of any isolated habitat will be required through new habitat creation, and measures can be put in place to reduce the severance impacts – such as use of under-road newt tunnels etc.

**Bats** and their roosts are highly protected under both UK and European law. It will need to be established whether bats are present and going to be impacted by the development. Different species have different habitat requirements at different stages of their lifecycle. Bats may be roosting within buildings or trees within or around the site.

Development may result in damage or destruction of roosts, and in addition, development that does not result in damage or destruction of a roost may still have an impact if it results in the significant loss of an important foraging area for bats. Bats will use linear landscape features such as hedges, watercourses and woodland edges to navigate by, and if such features are severed this may impact upon bats.

External lighting such as security lights, street lights and construction task lights can adversely affect bat behaviour, for instance if new lighting illuminates bat roosts in nearby trees or bat commuting routes. It can also change the behaviour of prey insects.

A 'green network' of suitable connectivity within the development layout should be provided. Existing habitats should be enhanced, buffered and new habitat created. Where severance cannot be avoided, reconnection of any isolated habitat will be required through new habitat creation, and measures can be put in place to reduce the severance impacts

**Other European species** which will need further consideration include the potential for otters on the site. In addition to those species which enjoy protection under both UK and European legislation other important species are protected under UK legislation including badgers and reptiles. Full species surveys will be required and a package of mitigation measures put in place to avoid disturbance.

## **Appendix C: Transport Interventions Proposed For Further Consideration In The LDF Transport Assessment**

### **Reduce**

- Continued delivery of comprehensive Workplace Travel Plan at Solent Business Park to reduce commuting and business travel. Package to include as a minimum:
  - Car sharing
  - Home working
  - Flexible working to reduce peak period travel demands
  - Season ticket loans for public transport
  - Good quality cycle parking and shower facilities for each employer
  - Appointment of Travel Plan co-ordinator
- Comprehensive Residential Travel Plan delivered at North Whiteley to reduce travel demand. Package to include as a minimum:
  - Personalised travel planning for new residents
  - Car club
  - Discounted public transport
  - High speed internet access
  - Consideration of central 'work hub' to facilitate remote working
  - Space for cycle parking provided in all dwellings
  - Appointment of travel plan co-ordinator
- Comprehensive School Travel Plan measures offered at all Whiteley schools. Package to include as a minimum
  - Identification of designated walk and cycle to school routes within development and beyond
  - Engineering measures to facilitate walking / cycling
  - Delivery of walking bus and / or chain gangs
  - Secure cycle parking and lockers

- Curriculum support initiatives
- Parent car share club
- Appointment of travel plan co-ordinator(s)
- Incentives offered for Solent Business Park employees to relocate to (North) Whiteley.
- Incentives offered for existing Whiteley residents to relocate jobs to Solent Business Park
- North Whiteley Personalised Travel Planning package extended to cover wider rest of Whiteley
- Introduction of Whiteley wide car club to reduce parking pressure and manage travel demand.

### **Manage**

- Delivery of new BRT (or similar) service serving Whiteley, Hedge End SDA and Segensworth, potentially linking with Southampton and Fareham
- Introduce a new bus route connecting Whiteley and the North Whiteley to Swanwick railway station which utilises Yew Tree Drive bus link.
- Extension of Windhover (J 8) Park & Ride service to Solent Business Park
- Investigate conversion to signals of roundabout access to Solent Business Park. Facilitates pedestrian / cycle access, allows bus priority and regulates traffic flow
- Commission a report to undertake a feasibility study for new station at Segensworth. Reliant on use of the Eastleigh Chord, positive demand forecasts and rescheduling opportunities.

### **Invest**

- Complete Whiteley
- Introduce Bus priority measures on M27 Junction 9 roundabout and Segensworth Roundabout to facilitate new BRT service
- Introduce High Occupancy Vehicle Lanes (HOV) on J 9 slip roads
- Investigate potential for separate on/off slips on J 9 east-facing to provide direct access to Solent Business Park



- The package of measures outlined above could be delivered through a variety of funding streams, some in conjunction with private sector developers, transport operators or infrastructure owners.

The assessment recognised that the development is not necessarily contingent upon all the above schemes being delivered. However, delivery of the above package would be the most appropriate strategy to mitigate impacts of development and move towards the modal shift targets. The main influence on modal shift will be through the Reduce and Manage initiatives.