

# Winchester District Local Plan Part 1 – Joint Core Strategy (JCS) Examination hearings

## Further Submissions of Eastleigh Borough Council Representation Reference Number 75

References in this submission to the JCS refer to the revised version of the Joint Core Strategy (Version 2), published on 3 October 2012.

### 1. The Inspector's Questions

#### 1.1 Policy SH3 – North Whiteley

- i) Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF, and in terms of environmental, economic and social impact?*
- ii) Are they clear and deliverable, including in respect of the associated infrastructure requirements?*

#### 1.2 Policy CP10 – Transport

- i) Is the overall transport strategy and policy consistent with the NPPF and the Local Transport Plan and, if not, what needs to be changed and why?*
- ii) Is the policy suitable and appropriate to deliver the necessary transport infrastructure improvements with new developments, including in terms of rail and bus services, park and ride, cycling and walking and, if not, what else needs to be done and why?*

### 2. The Borough Council's concerns

2.1 The JCS contains a proposal for the construction of about 3,000 new dwellings, with ancillary development, at North Whiteley in the period to 2026 (Policy SH3). Paragraph 3.65 notes that the site might accommodate more than 3,000 new homes. North Whiteley is already a community of about 3,000 homes. Significant further development is proposed in the wider area including about 2,700 new homes on three sites to the north and west of Botley in Eastleigh borough and some 7,500 new homes in the proposed strategic development area to the north of Fareham, to the east of Whiteley.

2.2 Eastleigh Borough Council is concerned that the combined impact of these developments on traffic flows on the A334 through Botley will result in intolerable environmental conditions in this historic village. The Council considers that the only satisfactory means of mitigating these impacts is the construction of the long-planned Botley bypass. It is considered that it is therefore vital that the plans proposing the North Whiteley development and the developments proposed in Eastleigh refer specifically to the need for the bypass and that these developments make a contribution towards the cost of its construction.

- 2.3 The Eastleigh Borough boundary and the village of Botley are only 1.5km from the northern limits of the proposed North Whiteley development. The A3051 Botley Road north from Whiteley connects with the A334 which forms an important east to west link from Wickham through Botley to Hedge End and the M27 junction 7. Whiteley is currently accessed primarily via junction 9 of the M27. This junction is heavily congested and it is one of the primary objectives of transport strategy to reduce the pressures on this junction. The completion of Whiteley Way as a through route will enable Whiteley to be accessed to and from the north via the A3051 and the A334.

### **3. The Winchester City Council Joint Core Strategy proposals**

- 3.1 In the JCS paragraph 3.69 refers to the need for mitigation measures to reduce the traffic impact on the local and strategic network, including junction improvements and traffic calming, the completion of Whiteley Way as a through route and a package of smart choices to achieve a modal shift away from the private car. No mention is made of a bypass to nearby Botley village.
- 3.2 JCS policy SH3 includes a requirement for a “comprehensive assessment of existing access difficulties affecting Whiteley” and for solutions to be agreed prior to the grant of planning permission. It also requires a “full transport assessment” of the proposals to ensure the incorporation of a package of mitigation measures including “any off-site contributions as deemed necessary”. It does not suggest what these mitigation measures or off-site contributions might be.
- 3.3 The policy specifically requires the completion of Whiteley Way as a thorough road in a manner which does not “encourage traffic from adjoining areas to use the new route to gain access to the strategic road network”. There is no acknowledgement of the potential for traffic from Whiteley itself using the new route to access the local network to the north of Whiteley and particularly the A334 through Botley.
- 3.4 However, proposals map 29N Whiteley (North) which accompanies policy SH3 references saved policy T12 from the adopted Winchester District Local Plan Review 2006, which states that land is reserved for a Botley bypass, for the completion of Whiteley Way to the A3051 Botley Road and for improvements to the A3051 up to the A334. This suggests that some movement of traffic north to the A334 is envisaged. This raises the question of whether the completion of Whiteley Way as a through route would be important if it were not anticipated that it would carry significant flows of traffic in a northwards direction from both the existing and proposed developments at Whiteley, thereby relieving the pressures on the significantly overloaded junction 9 on the M27.

- 3.5 Policy CP10 Transport of the JCS is a generalised transport policy which seeks to reduce the demands on the transport network, manage effectively the existing infrastructure and secure investment to make necessary improvements. It notes that “improvements to accommodate additional traffic should be undertaken (or funded) where necessary”, but it contains no specific proposals.
- 3.6 Appendix E to the JCS, an Infrastructure Delivery Plan, summarises the infrastructure requirements for North Whiteley including “a range of transport related infrastructure”. These are to include off-site improvements to mitigate transport impacts and reference is made to traffic management in Botley village. Precise measures are not specified but are to be determined through the transport assessment.
- 3.7 Elsewhere, the JCS notes at paragraph 3.45 that the Pre-submission Eastleigh Borough Local Plan includes a proposal for a Botley bypass and that land in Winchester district is reserved to enable this to be completed, if it is required by the County Council as highway authority.
- 3.8 Appendix A to the JCS lists the policies of the Winchester District Local Plan Review 2006 that are to be saved as statutory planning policies. These include policy T12 Safeguarded Land (Botley bypass and Whiteley Way). Accordingly, and pending the preparation of the City Council’s JCS /Local Plan Part 2 Sites and Policies document, the Botley bypass remains a proposal and policy objective of the Council.
- 3.9 There is no detailed transport assessment of the JCS, although a number of transport studies concerning the JCS and other development proposals in the surrounding area have been published. These are referred to in section 5 below.
- 3.10 Peter Brett Associates, acting for the promoters of North Whiteley have produced the ‘North Whiteley Access and Movement Strategy’ but there is, as yet, no publicly available transport assessment of the North Whiteley proposals. The published document contains no figures of the anticipated traffic impact of the development.

#### **4. The Historical Context**

- 4.1 Proposals for a Botley bypass have featured in adopted local plans since at least the late 1980s. As noted at paragraph 3.8 above, the adopted Winchester Local Plan contains a proposal for a bypass to Botley village and reserves an alignment for this road from the A334/A3051 junction to the boundary of the district.
- 4.2 The adopted Eastleigh Borough Local Plan (Review) 2001 – 2011 retained, at policy 91.T, earlier proposals for a Botley bypass and safeguarded land for that purpose. From the boundary with Winchester District at the River Hamble the road was to run westwards, to the north of Botley, to a junction with Winchester Street (the B3354

Winchester road) then run south along an improved Woodhouse Lane to the Maypole roundabout on the A334 at Hedge End.

## **5. Transport Studies**

- 5.1 The Peter Brett Associates' 'North Whiteley Access and Movement Strategy' (NWAMS) contains a comprehensive summary of the transport studies that have been undertaken in relation to development proposal in this part of south Hampshire.
- 5.2 At paragraph 2.2.19 of the NWAMS it is noted that that the 'Delivering Strategies' transport assessment of the Winchester LDF stated that "The completion of Whiteley Way is also required to allow northbound traffic access by avoiding use of the M27 Junction 9" and among the identified issues associated with Whiteley (paragraph 2.2.20) noted that "a severe constraint of the site is the failure to complete the Whiteley Way which was aimed at providing access to the north".
- 5.3 In the Hampshire Local Transport Plan 2011 – 2031 (LTP), approved in February 2011, the key policy priorities include the delivery of improvements in air quality and to deliver transport improvements to support growth and development. The LTP, referring to safeguarding strategic routes, retains a proposal for a Botley bypass as part of the strategy for south Hampshire.
- 5.4 Transport assessment undertaken in connection with the EBLP has concluded that there is inadequate justification in transport terms for the Botley bypass in connection with current development proposals. However, the assessment has been challenged by the Highways Agency on the basis of concerns about baseline calibration and the trip generation rates it uses. The Borough Council is therefore examining in more detail the traffic modelling that has provided the basis for the transport assessment of the EBLP.

## **6. The Eastleigh Borough Local Plan 2011 – 2029 (the EBLP) August 2012**

- 6.1 Pre-submission consultation on the EBLP closed on Friday 12 October. The Council hopes to be able to submit the Plan to the Secretary of State early in 2013.
- 6.2 The Plan provides for the development of 9,400 new homes in the borough. Large-scale greenfield housing development, with ancillary facilities, is proposed on sites to the north and east of Botley:
  - Policy BO1 proposes 1,400 new homes and other development on land at Boorley Green, to the east of Winchester Road to the north of Botley.
  - Policy BO2 proposes about 300 dwellings on land north of Winchester Street on the edge of Botley village.

- Policy HE1 proposes about 1,000 new homes on land west of Woodhouse Lane, on the edge of Hedge End to the west of Botley

- 6.3 Further development and redevelopment is likely to take place on land within the built-up areas of Botley and the much larger settlement of Hedge End over the plan period.
- 6.4 Policy BO3 of the EBLP reserves an indicative route for a new road bypassing Botley to the north.
- 6.5 Hampshire County Council has objected to the Botley bypass proposal in both the draft and pre-submission version of the EBLP on the grounds that no transport justification for the proposal has been demonstrated.
- 6.6 In the absence of support from the highway authority for this vital piece of infrastructure, the Borough Council has commissioned a preliminary feasibility study of the Botley bypass to identify the broad cost and the engineering feasibility of the proposal.

## **7. Botley village**

- 7.1 Botley village, situated astride the A334 only 1.5km north of the northern limit of the North Whiteley development, is one of the most attractive and historic villages in the borough of Eastleigh. The village centre is a designated conservation area and the High Street and Winchester Street, in particular, are lined with a fine array of listed buildings. The village centre performs a local centre function for the community, containing a range of local and specialist shops, public houses and social and community facilities, including the village church and the primary school. Over the years the Borough Council has undertaken environmental improvements to maintain and improve the character of the area.
- 7.2 The village centre suffers from a continuous flow of traffic which severs the community and presents noise, disturbance and danger to local people.
- 7.3 In accordance with the Environment Act 1995 the Borough Council continuously monitors air quality and recent monitoring has given rise to concern that nitrogen dioxide objectives are not met along the whole length of Botley High Street (the A334) from the Maypole roundabout to Mill Hill, east of the Winchester Street junction in the village. Monitoring over a two year period showed nitrogen dioxide levels to be almost continuously above the Expert Panel on Air Quality Standards recommended safe levels.
- 7.4 In early 2012 the Council adopted the 'High Street Botley Air Quality Management Area Action Plan 2012 – 2017'. The primary source of air pollution in the area is road vehicles, exacerbated here by a narrow

road with buildings and vegetation that limit dispersion and heavy traffic flows (with a high proportion of heavy goods vehicles) and low speeds which are frequently disrupted by junction turning movements and pedestrian crossings.

- 7.5 The potentially most effective action measures identified in the Action Plan are the construction of a bypass, restrictions on heavy goods vehicles and improvements to the traffic flow, together with actions under the smarter choices agenda to reduce the use of the private car. The Borough Council is now working with the County Council, as highway authority, to examine the costs and benefits of these measures and the potential for implementation.

## **8. Conclusions**

- 8.1 The Botley bypass was first proposed as necessary in the 1980s but the resources have never been available to implement the project despite the very large amount of development that has taken place in the Hedge End area over the last 25 years. Much recent transport assessment work has been predicated on the provision of the Botley bypass or has at least acknowledged the proposal.
- 8.2 The adopted local plans for both Winchester and Eastleigh and the County Council's Local Transport Plan contain proposals for the bypass. Again, however, no resources are identified to enable the project to go ahead.
- 8.3 The A334 through Botley village is a heavily used route carrying a high proportion of heavy goods vehicles. The road functions as a relief route whenever congestion on the M27 motorway prompts drivers to seek alternative routes. Many motorists also use the A334 and Winchester Road as an alternative to the M27 as a route northwards to Eastleigh, Winchester and the M3 motorway.
- 8.4 A large amount of development is now proposed around Botley at North Whiteley, Boorley Green, east of Hedge End and in Botley itself. Traffic from these developments will use roads through Botley to access the local and strategic road network. It is difficult to see how the unspecified traffic management measures and traffic calming envisaged in policy SH3 of the JCS and in the NWAMS can satisfactorily ease this inevitable traffic burden.
- 8.5 The Borough Council acknowledges that preliminary work on the traffic implications of the developments proposed in the JCS and in the EBLP does not appear to justify the provision of the Botley bypass on traffic grounds alone. However, the Borough Council does not accept that the work to date provides an adequate basis for any firm conclusions to that effect at the present time. Serious questions about the trip generation rates used in the EBLP transport assessment have been raised by the Highways Agency and there is no transport assessment

of the JCS that is based on actual traffic figures. No transport assessment of the North Whiteley proposals is available. Considerable further work on the traffic impacts of the developments proposed around Botley is necessary before firm conclusions can be drawn about the traffic impact of these developments on the village.

- 8.6 What is, however, certain is that environmental conditions in Botley village are already poor. The continuous flow of traffic through the heart of the village detracts from its character and is damaging its historic buildings. It severs the community and results in delays, inconvenience and danger to local residents. It makes the village a difficult and unsatisfactory place in which to stop to use its commercial, community and social facilities. Traffic conditions are largely responsible for air pollution that has justified the designation of an air quality management area. The provision of a bypass for the village is essential in order to address the environmental issues in Botley even if transport assessment work does finally conclude that it cannot be justified purely on traffic grounds.
- 8.7 The development proposals around Botley provide a unique opportunity to secure contributions towards the cost of the Botley bypass. Indeed, the developments proposed at Botley (policy BO2) and west of woodhouse Lane (HE1) in Eastleigh borough will actually necessitate works which would form part of the bypass. The opportunity to secure these physical and financial contributions towards the cost of the bypass might never arise again because the land for development on this scale in the vicinity of Botley village will simply not be available.

## **9. The Borough Council's Recommendations**

### **9.1 North Whiteley – policy SH3**

- i) Eastleigh Borough Council does not wish to object to the proposals for development at North Whiteley but is concerned that the policy only identifies in vague and non-specific terms the highway infrastructure required to support the development. Whilst noting the absence of a detailed transport assessment of the plan as a whole and of the North Whiteley development in particular, the Borough Council believes that the development will have a significant impact on traffic flows through Botley, particularly when taken together with other development proposed in the area. The resulting social, economic and environmental impact on the village and its community justifies the provision of a Botley bypass. Policy SH3 should, therefore, specifically refer to the need to provide a Botley bypass and for the development to contribute to the cost of the proposed road.
- ii) In this context, the infrastructure requirements associated with the North Whiteley proposals are insufficiently clear and precise and should specifically refer to the need for the Botley bypass and for the

development to make a contribution towards the cost of providing the bypass.

## 9.2 Transport – policy CP10

- i) Although the Botley bypass is specifically referred to in the Local Transport Plan as a strategic route, and the policy and proposals in the adopted Winchester Local Plan relating to the bypass are to be retained in the JCS, there is no specific reference to the bypass in JCS policy CP10 (or in policy SH3, other than via the proposals map). The Borough Council considers that there is an overwhelming justification for the provision of the Botley bypass arising from the scale of development now proposed in the area and that these developments provide a unique opportunity secure contributions towards the cost of the road. The Council accordingly considers that in the spirit of the duty to cooperate policy CP10 should specifically identify a proposal for a Botley bypass and establish a requirement for development at North Whiteley (and any other development in the vicinity) to contribute towards the cost of delivering this necessary infrastructure.
- ii) Policy CP10 fails to identify specific proposals and is therefore inadequate to ensure the delivery of essential transport infrastructure to support new development and to satisfactorily mitigate its impacts. Policy CP10 should specifically refer to the Botley bypass and to the need for development in the vicinity to fund it.

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