

Written Response on MM10 Strategic Policy 2 Approach to New Development and MM11 Strategic Policy 3 Location of New Housing

Response to the Main Modification

Please explain your comments, including any changes you think are necessary and revised wording (continue overleaf/attach further sheets if necessary)

The proposed changes to policy S3 iii increase the allocation comprising land West of Horton Heath, and Land at Fir Tree Farm, Fair Oak, which are now a combined site described as West of Horton Heath from 1,400 to 1,500 dwellings.¹ This increase is supported as the site is located in a sustainable location close to the services in the settlements at Horton Heath, Bishopstoke and Fair Oak. However, ADD considers that the allocation should be increased as in December 2020 Eastleigh Borough Council applied for outline planning permission (O/20/89498) for this same site for:

'Phased mixed-use development comprising: up to 2,500 residential units in total; a primary Local Centre (and supporting secondary local centres) comprising mixed-use residential/retail/leisure/community/employment/day nursery/food establishment uses; office, commercial and industrial uses; a Primary School; public open space including formal sports facilities and informal provisions; relocation of solar panels; key infrastructure and utilities provision including new roads, footpaths and cycle paths and improvements to the existing road junction at Fir Tree Lane/Burnetts Lane; and ecological, landscape, site preparation and demolition works (All Matters Reserved Except Access).'

This application is still currently undetermined, but according to the Council's website is due to go to Committee on the 4th August 2021. However, as the application is not a speculative application, but the applicant is Eastleigh Borough Council itself; the application has been subject to Environmental Impact Assessment and an Illustrative Masterplan (29067A 1000) submitted with the application showing how the development would be laid out, there are reasonable grounds for considering that the potential capacity of up to 2,500 dwellings will be achieved.²

It is therefore considered that the allocation under MM11 in policy S3 ii relating to land west of Horton Heath should be increased from 1,500 dwellings to 2,500 dwellings. The reasons why this is necessary to make the plan sound are as follows:

- 1) Paragraph 111 of the Framework (2012) states that '*planning policies and decisions should encourage the effective use of land,*' and this is clearly not the case should policy HH1 allocate the land west of Horton Heath for approximately 1,500 dwellings, when it has the capacity according to the

¹ In the submission Local Plan the allocations under S3 b) West of Horton Heath is allocated for 950 dwellings and under S3 e. Land at Fair Tree Farm, Fair Oak for 450 dwellings

² The post hearing housing trajectory ED101 which forms part of the evidence base for the main modifications is dated July 2020 and therefore confusingly takes no account of this new application and still makes reference to the earlier applications which give a total of 1,400 dwellings.

Council's own assessment to accommodate up to 2,500 dwellings without a significant adverse impact on the environment.

- 2) If account is not taken of this increase in delivery it means that the Local Plan gives an inaccurate picture of the likely shortfall in housing delivery over the plan period, thereby potentially leading to the unnecessarily allocation of an additional site or sites for development, which may have adverse impacts on the environment.
- 3) It is inconsistent for the Council to allocate the land west of Horton Heath for approximately 1,500 dwellings while seeking outline planning permission for up to 2,500 dwellings.

By making this increase of 1,000 dwellings to the land west of Horton Heath, the shortfall of 2,614 dwellings identified in paragraphs 4.11 & 4.12 would fall to 1,614, resulting in the need for a much smaller site than that promoted as a Strategic Growth option in the submission Local Plan.

In addition, the Council acknowledges in its 'Eastleigh Borough Council's Response to the Inspector's Letter of 4th August 2020 on the 2018-based household projections,' (ed77) that if the 2018 household projections were used, instead of the 2014 projections which it has used, that:

'Using the 2018-based household projections and feeding this into the SHM, therefore, results in an annualised housing figure of 627 dpa, approximately 100 dwellings per year lower than the annualised Local Plan figure (729 dpa). The 20-year Local Plan housing target is 14,580 dpa. A 20-year target based on the 2018-based household projections would total 12,540; a reduction of around 2,000 dwellings or 14%. However, for the reasons given above, such an approach is not appropriate in view of the clear guidance in the 2019 NPPG.'

Main modifications 10 and 11 acknowledge in paragraphs 4.11 and 4.12 that the actual shortfall over the plan period is 2,614 dwellings. If therefore the housing requirement was reduced by 2,000 dwellings, the shortfall would be only 614 dwellings, which could be met on a smaller allocation and would not require a large Strategic Growth Option to be identified. Indeed, as noted above, the Council currently has an application for an extra 1,000 dwellings on land west of Horton Heath, so potentially no further allocation at all might be required.

It is acknowledged that currently the Planning Practice Guidance instructs local planning authorities to use the 2014 household projections. However, it is considered that reference should be made in the Local Plan to the 2018 projections, as these are more up to date, and in the event that Government advice changes with regard to this matter this would highlight the lower target that needed to be met. Given that potentially significant adverse environmental impacts could arise from a Strategic Growth Option this would also meet the soundness test of being justified, by providing the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.