

Written Response on MM73 which relates to Policy HH1 Land West of Horton Heath & the associated map changes PM5 & PM15

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)

As MM73 relates to the allocation west of Horton Heath, with this allocation also referred to in Strategic Policy 3 under MM11 a large part of this representation is common to the representation relating to MM11.

Proposed main modification MM73 allocates approximately 125 hectares of land to the west of Horton Heath for approximately 1,500 dwellings. ADD supports this allocation, but considers that it should be increased. The reason for this is that 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.

It is therefore considered that the allocation under MM73 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 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.

For these reasons it is not considered that MM73 is sound as it is not justified, as it is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It is not effective as there is likely to be a conflict with policy HH1 in potentially delivering 166% of the dwellings allocated under policy HH1 and there is a conflict with national policy in not making the most effective use of land, which is likely to lead to the need to allocate further potentially environmentally sensitive greenfield land, contrary to the core planning principles of the framework, which state in paragraph 17 that *'allocations of land for development should prefer land of lesser environmental value.'*

MM73 should therefore increase the allocation under HH1 to up to 2,500 dwellings, to make the policy consistent with application O/20/89498.