



Da Vinci House  
44 Saffron Hill  
London EC1N 8FH  
tel: +44 (0)20 3640 8508  
fax: +44 (0)20 3435 4228  
email: [info@iceniprojects.com](mailto:info@iceniprojects.com)  
web: [www.iceniprojects.com](http://www.iceniprojects.com)

Planning Policy  
Eastleigh Borough Council  
Eastleigh House  
Upper Market Street  
Eastleigh  
SO50 9YN

19<sup>th</sup> July 2021

Our Ref: 17/234  
BY EMAIL [[local.plan@eastleigh.gov.uk](mailto:local.plan@eastleigh.gov.uk)]

Dear Sir/Madam,

**EASTLEIGH BOROUGH COUNCIL MAIN MODIFICATIONS LOCAL PLAN CONSULTATION |  
LAND AT ALLINGTON LANE, BISHOPSTOKE**

---

Iceni Projects Ltd has been instructed by Thakeham Homes ('Thakeham') to prepare representations to Eastleigh Borough Council's ('the Council') Main Modifications Local Plan Consultation. These representations are provided in response to the documents which have been submitted to the Local Plan Examination between July 2020 and April 2021. The documents subject to consultation have been produced in order to allow the Plan to be found sound in light of the issues identified by the Inspector during examination.

These representations seek to support the Inspector's proposed modification regarding the need for an early review of the Local Plan, in order to address the shortfall of identified housing supply that exists in the current Local Plan.

**National Planning Policy Framework (2019)**

---

Thakeham would like to emphasise the importance of the Council producing a Local Plan that is positively prepared, justified, effective and consistent with national policy in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the NPPF.

Paragraph 33 requires policies in local plans and spatial development strategies to be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Specifically, it states relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.

**Response to Proposed Main Modifications**

---

In the context of national policy set out above Thakeham support the Council's emerging objective to commit to an early review of the Local Plan to ensure the Council are able to provide a sufficient housing land supply throughout the whole plan period to 2036.

## Housing Land Supply

The Pre-Submission Local Plan includes a requirement of 14,580 (729 dwellings per annum). This requirement is derived from the Partnership for Urban South Hampshire (PUSH) housing target for Eastleigh of 650 dwellings per annum and an allowance for persistent under delivery in recent years and the associated backlog<sup>1</sup>.

The Proposed Submission Plan 2016-2036 currently promotes the delivery of these 14,580 new dwellings, however the Inspector recommended the deletion of the Strategic Growth Option (SGO), deletion of the 'carried forward allocations' category of supply, the removal of discounts and the introduction of a five-year supply buffer in its place. Therefore, as set out in the Council's Post Hearing Housing Trajectory Amendments – July 2020 provided in response the Inspectors recommendations:

*“the local plan fails to meet its housing target with a shortfall of 2,614 dwellings. However, annualised there is still 16.4 years of supply available (from 1st April 2016) which provides sufficient time for the Council to address this shortfall in the later years of the plan period **by means of an early review of the local plan**”.*

Table 1: Pre-Submission Local Plan Housing Figures

Pre-Submission Local Plan Requirement	14,580 (729 dwellings per annum)
Shortfall After Removal of SGO	2,614
Pre-Submission Local Plan Housing Supply	<b>11,966</b>

The Inspector confirmed the need for an early review of the Plan in her Post Hearing Advice (April 2020) which states *“taking this approach would also provide an early opportunity for the evolving PfSH (formerly PUSH) joint strategy work to be taken into account in the selection of additional sites for housing”*.

Eastleigh Borough Council propose to add the following supporting text to point 4.12 associated with Policy S3 'Location of New Housing':

*‘The Inspector recommended that this shortfall, which will occur in the later years of the plan period, should be addressed through an early review of the local plan. Accordingly, the Council will commence an update of this Local Plan within 1 year of its adoption.’*

Thakeham is supportive of this approach and consider given the current insufficient housing land supply outlined in the Plan this is a suitable mechanism to allow the Plan to be found sound by the Inspector. Given the current undersupply of 2,614 dwellings within the Proposed Submission Plan 2016-2036 it is vital that the need for these homes is given due consideration at the earliest opportunity. In this context the wording above should be incorporated into Strategic Policy S3 to ensure this review mechanism is given the full weight when assessing future planning applications. Further to this, more specific wording should be included in the policy to provide timeframes and specific actions for the review mechanism to provide further clarity. Strategic Policy S3 should be redrafted to include the following text:

*‘Eastleigh Borough Council will commence a review of this Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012)*

<sup>1</sup> Eastleigh Borough Local Plan 2016-2036 Housing Implementation Plan (June 2018)

*by the end of December 2022 or within one year of the adoption of this Local Plan (whichever is the later). The Plan Review will be submitted for examination within two years from the commencement of the review. In the event that the reviewed plan is not submitted within two years then this Local Plan will be deemed to be out of date.'*

As such Thakeham agree with the Councils proposed position to include an early review of the Local Plan within 1 year of its adoption in order to meet the Borough's housing land supply needs. It is imperative this review is carried out as soon as possible to allow the conclusions from the various workstreams currently commissioned by Partnership for South Hampshire (PfSH), as referred to by the Inspector, to inform the housing needs and locations for growth within the Local Plan review. In order to solidify this intention Thakeham consider the above text should be included within Policy S3 with specific timeframes and actions within the policy wording. The timeliness of the review is a critical factor in ensuring that the plan-led system can genuinely address housing needs and overcome current deficiencies in the emerging Local Plan.

### **Land at Allington Lane, Bishopstoke**

---

This site was not allocated within the emerging Local Plan as it was considered '*development of the site would prejudice the ability to take a comprehensive approach to the wider area in future plans; saturate the local housing market, undermining the delivery of the Local Plan; and that the Plan has already met its housing target.*<sup>2</sup>'. The Council now accept that the Local Plan has not met its housing target due to the deletion of the Strategic Growth Option, therefore Thakeham consider Land at Allington Lane should be considered in the review of the Local Plan to contribute towards its housing supply.

Your attention is drawn to the Regulation 19 Pre-Submission Local Plan Consultation (2019) representations submitted on behalf of Thakeham found at **Appendix A1**. In summary these representations concluded the Land at Allington Lane has the potential to deliver up to 500 new homes including a mix of dwelling sizes and tenures to meet a range of local housing needs. In addition to new homes, the proposal would provide community facilities, playing fields, public open space, a potential primary school (if required) and possible allotment provision for the benefit of new and existing residents. There are no fundamental barriers to the delivery and the site is immediately available to come forward in the short-term. The Land at Allington Lane represents a logical and sustainable location adjacent to an existing settlement, to contribute to the future growth of the Borough. The site is capable of making a positive contribution towards the identified housing needs objectives which the current emerging Local Plan is not meeting.

Therefore further consideration needs to be given to this issue in the review of the Local Plan with Land at Allington Lane at the forefront of these considerations. We look forward to working with the Council on the review of the Local Plan and the future growth plans for the Borough in order to meet the full identified housing needs.

### **Conclusion**

---

In summary, these representations are supportive of the Proposed Submission Plan 2016-2036 Main Modifications specifically in relation to the need for an early review of the Plan to meet the Borough's identified housing needs. Thakeham request the changes set out above in relation to Policy S3 'Location of New Housing' are incorporated to ensure the Plan meets the requirements of Paragraph 33 of the NPPF and is therefore considered sound.

Given the updated context of the Proposed Submission Plan 2016-2036 and particularly the inability of the Plan to meet the identified housing need, Thakeham consider Land at Allington Lane should be allocated to address this shortfall in the review of the Local Plan. The site is available, suitable and

---

<sup>2</sup> The Small & Medium Greenfield Housing Sites Assessment of Additional Sites Document (2018).

deliverable as a potential sustainable residential development that can successfully contribute towards the progressive expansion of Bishopstoke as a settlement.

Thank you for the opportunity to respond to the Local Plan Main Modifications Consultation. We would be grateful for confirmation of the receipt of these representations and confirm that we would like to continue to be notified of the progress of the Local Plan.

Yours faithfully,

Leona Hannify  
**DIRECTOR**

# **Appendix A1 - Regulation 19 Pre-Submission Local Plan Consultation (2019) Representations**



Flitcroft House  
114-116 Charing Cross Rd  
London WC2H 0JR  
tel: +44 (0)20 3640 8508  
fax: +44 (0)20 3435 4228  
email: [info@iceniprojects.com](mailto:info@iceniprojects.com)  
web: [www.iceniprojects.com](http://www.iceniprojects.com)

Planning Policy  
Eastleigh Borough Council  
Eastleigh House  
Upper Market Street  
Eastleigh  
SO50 9YN

6<sup>th</sup> August 2018

Our Ref: 17/234  
BY EMAIL [[localplan@eastleigh.gov.uk](mailto:localplan@eastleigh.gov.uk)]

Dear Sir/Madam,

**EASTLEIGH BOROUGH COUNCIL REGULATION 19 LOCAL PLAN CONSULTATION | LAND AT ALLINGTON LANE, BISHOPSTOKE**

---

Iceni Projects Ltd has been instructed by Thakeham Homes ('Thakeham') to prepare representations to Eastleigh Borough Council's ('the Council') Regulation 19 Pre-submission Local Plan Consultation.

Thakeham wishes to outline the development potential of the land at Allington Lane, Bishopstoke ('the site') for allocation for residential uses in the emerging Eastleigh Local Plan. For reference, enclosed with these representations is a Deliverability Document which sets out the vision, key features and development potential of the site. The site can successfully contribute toward the progressive expansion of Bishopstoke as a settlement.

Since the Council's previous round of formal consultation, which was held in February 2016, Government aspirations to increasing housing delivery have been highlighted through the publication of a number of policy documents, including the Revised National Planning Policy Framework (2018), Housing White Paper (2017), and Planning for the Right Homes in the Right Places (2017) from the Ministry of Housing, Communities and Local Government (MHCLG). This has meant Local Authorities all over the country are facing increased pressure to provide sufficient dwellings through the local plan process.

Following the publication of Housing White Paper, Eastleigh was one of 15 local authorities nationally that was identified as having failed to make progress in producing a Local Plan, therefore the Council is being held to account to get a Local Plan in place to ensure public confidence in the plan-led planning system and to provide clarity to developers about where homes should be built to help fix the broken housing market.

As such, these representations seek to outline the importance of providing sufficient housing to meet identified needs, outline the sustainability of the site, and highlight the importance the site can play in helping the Council to meet their identified need. A number of concerns about the preferred approach of the Council are also highlighted.

## **a. Background**

---

The requirement for a new Local Plan has arisen as Eastleigh's current adopted Local Plan covered the period 2001-2011 and is therefore out of date. The Council's current Local Plan position is therefore uncompliant with the National Planning Policy Framework (NPPF).

### **The Site**

The site subject to these representations is located on the southern boundary of the settlement of Bishopstoke, which is located around 1.5km east of Eastleigh. The site comprises of two parcels. Area 1 comprises 3.24ha and is allocated as an Existing Recreation, Allotment and Open Space Facility, although it is not clear where this allocation originates from as the site is in private ownership and there is currently no public access to the area. Area 2 is 23.51ha and comprises a series of large grassland fields.

The site is primarily located within Flood Zone 1, and as such has a low probability of flooding. A small area, equivalent to approximately 10% of the total site area, on the southern and western boundary is located in Flood Zones 2 and 3.

There are several Public Rights of Way (PRoW) which cross the site providing links to Bishopstoke to the north and connectivity to the local area.

There are no listed buildings within the site and the site is not located within a Conservation Area.

The site's location adjoining the settlement boundary means that it is located within the countryside, however the site is not located within the green gap as identified in the both the existing and emerging Local Plans.

## **b. Strategic Matters**

---

There are a number of strategic matters that are identified in the Pre-submission Eastleigh Local Plan that are relevant to the determination of the most sustainable and deliverable options for the future development of the Borough.

### **Policy Framework**

#### **Housing White Paper**

In February 2017, the DCLG published the Housing White Paper which seeks to set out the Government's approach to fixing the 'broken' housing market.

The White Paper places further emphasis on the importance of having an up-to-date and sufficiently ambitious plan which seeks to meet required growth within the Borough, and further emphasises the requirement to increase overall delivery of dwellings throughout the country.

#### **National Planning Policy Framework**

The Government has recently published the new NPPF (2018), paragraph 214 of which identifies that the policies in the previous Framework (2012) (outlined in more detail below) will still apply solely for the purpose of examining plans, where those plans are submitted on or before 24 January 2019.

The Council's most recent Local Development Scheme (LDS) (December 2017) indicates that the on-going consultation was expected to take place during June and July 2018, since this expected timescale has slipped slightly, it is unclear whether the Council will still meet their expected Local Plan submission date of October 2018, or the January 2019 deadline to be considered under the 2012 NPPF. As such, a review of both the NPPFs from 2012 and 2018 is provided below.

## National Planning Policy Framework (NPPF) (2012)

The NPPF (2012) (paragraph 182) requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. The NPPF places various duties on the Council, including, but not limited to, ensuring the Plan is in keeping with the requirements of the NPPF.

Paragraph 182 of the 2012 NPPF confirms that, to be sound, a plan must be:

- a) *Positively prepared* – the plan should seek to meet the objectively assessed requirements in terms of housing and infrastructure, including unmet requirements from neighbouring authorities where reasonable;
- b) *Justified* – the plan should be the most appropriate strategy and, based on proportionate evidence, be more appropriate than reasonable alternatives;
- c) *Effective* – the plan should be deliverable over its plan period and be based on effective joint working on cross-boundary strategic priorities; and
- d) *Consistent with national policy* – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Enabling the delivery of sustainable development in accordance with the policies in the Framework is the golden thread running through the 2012 NPPF and it is therefore paramount that Local Plans are consistent with the objectives within the document to:

- Widen the choice of high quality homes [9];
- Positively seek opportunities to meet the development needs of the area [14];
- Contain sufficient flexibility to adapt to rapid change [14];
- Be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption in favour should apply locally [15];
- Respond positively to wider opportunities for growth [17];
- Set out a clear strategy for allocating sufficient land which is suitable for development in the area [17];
- Boost significantly the supply of housing [47];
- Meet the full objectively assessed housing needs of the housing market area and identify key sites that are critical to delivery of the housing strategy over the plan period [47];
- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups [50];
- Set out the strategic policies for the area, including policies to deliver the homes and jobs needed in the area [156 & 178];
- Be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date [157];



- Identify land where development would be inappropriate due to environmental or historic significance [157]; and
- Be deliverable and viable [173].

### National Planning Policy Framework (NPPF) (2018)

Thakeham would like to emphasise the importance of the Council producing a Local Plan that is positively prepared, justified, effective and consistent with national policy in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the recently published 2018 NPPF.

Paragraph 35 of the 2018 NPPF also confirms that, to be sound, a plan must be:

- Positively prepared* – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified* – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective* – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy* – enabling the delivery of sustainable development in accordance with the policies in this Framework.

The purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development should be delivered through the preparation and implementation of plans and the application of the policies in this Framework:

- Presumption in favour of sustainable development is at the heart of the Framework [10];
- Positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change [11];
- As a minimum, provide objectively assessed needs as well as any needs which cannot be met within neighbouring areas [11];
- Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings [15];
- Plans should;
  - a) be prepared with the objective of contributing to the achievement of sustainable development;
  - b) be prepared positively, in a way that is aspirational but deliverable;
  - c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
  - d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
  - f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant) [16];
- The preparation and review of all policies should be underpinned by relevant and up-to-date evidence [31];
  - To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed [56];
  - To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance [60];
  - Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability [67];
  - The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities [72];
  - Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period [73]; and
  - Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs [119].

### **Objectively Assessed Needs**

The Council's latest assessment of housing needs was published in June 2018 and has been taken from a proof of evidence prepared relating to a recent Appeal in the Borough (Appeal ref. APP/W1715/W/16/3153928). The document concludes that the Borough has an Objectively Assessed Need (OAN) of 630 dwellings per annum, which would equate to a total need of 12,600 dwellings over the plan period 2016-2036.

Despite this OAN calculation, the Council have been consistently under-delivering in recent years; dwelling completions over the period April 2011 and December 2017 amounted to 2,797 equating to average completions of around 430 dwellings per annum. On this basis, since April 2011, the Council has fallen short of meeting OAN by 1,465 dwellings which equates to a shortfall of almost 35%. This has resulted in consistent under delivery on the Council's part and significant backlog of supply.

The Pre-Submission Local Plan includes a requirement of 14,580 (729 dwellings per annum). This requirement is derived from the Partnership for Urban South Hampshire (PUSH) housing target for Eastleigh of 650 dwellings per annum and an allowance for persistent under delivery in recent years and the associated backlog<sup>1</sup>. It is considered that Eastleigh should be seeking to meet more unmet needs from other local authorities in the Southampton Housing Market Area (HMA). This is discussed in further detail below.

It is worth noting that following the Government's Housing White Paper publication last year, in September 2017, a proposed standardised methodology for calculating local housing need was published for consultation. This will come into effect through the recently published NPPF (2018) but

---

<sup>1</sup> Eastleigh Borough Local Plan 2016-2036 Housing Implementation Plan (June 2018)

transitional arrangements will apply and therefore may not apply to the Eastleigh Local Plan depending on the date of submission. Under this methodology it was found that Eastleigh's housing need would be 715 dwellings per annum, almost 15% higher than the current OAN of 630 dwellings per annum. This indicates the Local Plan will fall short of meeting actual local housing need particularly in the context of unmet needs.

The NPPF (2018) places a greater emphasis within its test of soundness on the strategy within Local Plans seeking to meet OAN **as a minimum** (emphasis added). This suggests that the Council should be planning for a higher housing requirement within the emerging Local Plan to ensure it is positively prepared and therefore sound.

### **Duty to Cooperate**

Local planning authorities have a duty to co-operate on strategic planning issues that cross administrative boundaries. The purpose of the duty to co-operate is to ensure strategic priorities are properly co-ordinated and clearly reflected in Local Plans. The failure to demonstrate compliance with the duty to co-operate would render the plan incapable of being found legally compliant. The Council have published a Duty to Cooperate Statement of Compliance (June 2018) which outlines it has undertaken various work to date, including housing, economy, infrastructure and Green Belt. While the Council has worked collaboratively with other authorities in the Partnership for Urban South Hampshire area, it is considered that more could be done to accommodate unmet needs.

Paragraph 27 of the NPPF (2018) introduces a requirement for policy-making authorities to prepare and maintain one or more statements of common ground documenting the cross-boundary matters being addressed and progress in cooperating to address these. To ensure effective plan-making, Eastleigh along with other local authorities should be seeking to address the issue of unmet needs.

### **Unmet Housing Need**

The Partnership for Urban South Hampshire (PUSH) includes the unitary of authorities of Portsmouth, Southampton and the Isle of Wight; Hampshire County Council and the local authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, New Forest, Test Valley and Winchester. Parts of East Hampshire, New Forest, Test Valley and Winchester districts fall outside of the PUSH area.

In June 2016, PUSH produced a Spatial Position Statement which addressed important issues concerning the distribution of future development across South Hampshire, potential major development locations in the longer-term and key infrastructure to support sustainable growth. It identifies three HMAs across the PUSH area including Portsmouth HMA, Southampton HMA and Isle of Wight HMA. Eastleigh is located within the Southampton HMA alongside parts of Test Valley, Fareham, New Forest, Winchester as well as Southampton.

Due to the fact that the Southampton HMA cuts across local authority boundaries and each authority is at a different stage of the Local Plan process, it is very difficult at this stage to identify the full extent of unmet need. Nevertheless, the PUSH Spatial Position Statement established that due to the scale of housing need in Southampton, the city cannot fully meet its needs. A number of the other authorities have land availability, environmental and other development constraints however, Eastleigh is considered to be less constrained in this respect and therefore better placed to accommodate unmet needs from elsewhere in the HMA.

Importantly, the PUSH Spatial Position Statement highlights that local authorities need to continue to investigate opportunities to maximise development potential to minimise the gap in fully meeting needs, this should be actioned through the Local Plan process. Therefore, it is considered that Eastleigh should be exploring opportunities to allocate further sites within the Pre-submission Local Plan that are capable of demonstrating sustainable development credentials such as the site at Allington Lane, Bishopstoke.

Taking account of these strategic matters, the soundness of particular policies of the Local Plan is considered in further detail in the following section.

### c. The Pre-Submission Local Plan

---

#### **Strategic policy S2, Approach to new development/ Strategic policy S3 Location of new housing (Pages 35-37)**

Strategic Policy S2 'Approach to new development' identifies that the emerging Local Plan will make provision for the development of a minimum of 14,580 dwellings over the plan period 2016-2036. This equates to the development of 729 dwellings per annum over the plan period which, as previously outlined, has been identified as the Council's housing target to take account of some unmet needs (20 dwellings per annum) and persistent under-delivery in recent years. However, taking account of the scale of unmet needs across the HMA, as discussed above, Eastleigh should be investigating opportunities to maximise development potential to minimise the gap in fully meeting needs through the Local Plan process and on this basis, we **oppose Strategic policy S2** in its current form as it is not considered to be positive prepared as defined by either the NPPF 2012 or NPPF 2018 and as such the Pre-submission Local Plan is not sound.

Analysis of the breakdown of the approach to new development and the location of new housing raises a number of concerns with the Council's preferred approach. In the region of 7,570 dwellings or 52% of the housing requirement already benefit from planning permission or a resolution to grant permission; 1,210 dwellings, or 8% of the target, are coming from carried forward proposed allocations; 4,050 dwellings or 28% of the target on new sites and 1,860 dwellings, or 13% of the target, coming from windfall sites. The Strategic Growth Option north of Bishopstoke and north and east of Fair Oak is expected to deliver 3,350 dwellings within the Local Plan period which is equivalent to 23% of the housing target.

Given that there is a reasonable certainty over half of the housing requirement will come forward in the early part of the plan period through sites that already benefit from planning permission or a resolution to grant, it is argued that the plan should be more aspirational taking account of the fact it is a 20 year plan period and the Council should be planning for long term needs and identify further sites to accommodate growth.

Assuming that 13% of housing will arise from windfall sites is considered to be a high proportion of the total, particularly in the absence of compelling evidence (as required by para. 70 of the 2018 NPPF) and should not be relied on by the Council as being able to meet the identified housing requirement.

For a relatively unconstrained area, with just 3% of the land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest designations, the Council should seek to explore the full development potential of additional sites in the Borough to deliver additional housing, particularly unconstrained sites, sustainable, available and deliverable sites such as Allington Lane, Bishopstoke. Strategic Policy S3 'Location of new housing' sets out that the Council's preferred approach for the location of new housing is the development of sites within urban areas, the creation of two new communities to the north of Bishopstoke and north and east of Fair Oak, development of a number of strategic sites across the Borough, development on smaller sites which already have planning permission and a small amount of development on smaller greenfield sites adjoining existing settlements of Allbrook, Bishopstoke, Bursledon, Fair Oak, Hedge End, Netley and West End.

We **oppose both Strategic policy 2 and Strategic policy 3** as they place a heavy reliance on sites that already benefit from planning permission or a resolution to grant, windfall sites and a Strategic Growth Option and therefore are not consistent with national policy as they do not sufficiently positively seek opportunities to meet the development needs of the area or respond positively to wider opportunities for growth and as such are not sound.

Concerns on the assumptions relating to the deliverability of the Strategic Growth Option and the contribution that it can make to the housing requirement during the Local Plan period are highlighted below.

## **Strategic Policy S5 New Communities, land north of Bishopstoke and land north and east of Fair Oak (Page 40-48)**

Out of the 4,020 dwellings which are identified as coming from 'new' sites during the Local Plan period 2016-2036, 3,350 of these are expected to come from the Strategic Growth Option which is located to the north of the settlement of Bishopstoke and north east of Fair Oak.

Given that almost one quarter of dwellings to be allocated within the emerging Local Plan are coming from a single 'strategic site' means that any delays to delivery of this site could cause fundamental issues for housing supply within the Borough during the Plan period.

Although strategic growth opportunities, new settlements, and settlement extensions are supported and represent a good opportunity to deliver a significant number of dwellings in a sustainable manner, there are a number of concerns around deliverability. These primarily relate to the following matters:

- Inter-dependency on the delivery of the link road from the Allbrook Link Road to the B3037 east of Fair Oak;
- It has not been demonstrated that the development will not adversely affect the integrity of the River Itchen Special Area of Conservation or any other European Site particularly in the context of recent case law - People Over Wind and Sweetman V Coillte Teoranta;
- Assumptions relating to delivery rates; and
- The absence of a detailed masterplan.

As set out above, Strategic Policy S5 'New Communities, land north of Bishopstoke and land north and east of Fair Oak' seeks to promote for the development of two new communities to provide the borough with an additional 5,300 dwellings, 3,350 of which are expected to be delivered during the Plan period by 2036. As previously identified, the dwellings identified for delivery during the plan period make up a significant proportion (23%) of the proposed new dwellings for delivery within the plan period.

Policy S5 is clear that phases of the development will not be permitted until the link road (identified in Policy S6) has full planning permission, all the land is in the control of the developers and there is at least a strong likelihood that the entire link road will be funded. Furthermore, phases of the development will not be occupied until phases of the link road are completed. This highlights that there is a clear inter-dependency between the delivery of the new link road and the ability of the Strategic Growth Option to come forward for development. Any delays to the delivery of this road will have direct ramifications on the delivery of the Strategic Growth Option.

Paragraph 4.1 of the Pre-submission Local Plan states, in relation to the Strategic Growth Option, that the first new homes of this development are expected for completion during 2019/20. This means that the Council are expecting completions to start within the next 18 months. This is evidently unachievable given that the triggers identified above will not have been secured within these timescales. In addition, the Strategic Growth Option – Housing Trajectory (June 2018) published by the Council indicates that they are expecting an eight year lead-in period.

Paragraph 4.20 of the Pre-submission Local Plan states that the developer will be expected to prepare and submit to the Council a detailed masterplan for the site as a whole. This document will include an infrastructure delivery plan and phasing plan for the entire scheme, which, following the approval of the masterplan, could fundamentally be developed under separate planning applications. The wording of paragraph 4.20 goes on to state that the Council will only approve the first planning application on the wider site once the detailed masterplan has been approved.

A project-level Appropriate Assessment has yet to be undertaken to demonstrate that there will not be an effect on the integrity of the River Itchen Special Area of Conservation or any other European Site.

On this basis, we **oppose Strategic policy S5**.

Taking these factors into account, alongside the problems Eastleigh have experienced in maintaining a 5 year housing land supply in recent years, it is considered that the Council should seek to identify additional sites, such as Allington Lane, Bishopstoke, to add flexibility to the future supply of housing in Eastleigh and to ensure the emerging Local Plan is positively prepared and deliverable over the plan period and therefore sound in line with national policy tests.

In the event that the Council progresses with the approach set out in the Pre-submission Local Plan, it is requested that a commitment to undertake an early review within five years is secured to allow for the strategic policies to be updated to reflect changes in local housing need figures and the progress of housing allocations and the delivery of the Strategic Growth Option.

### **Strategic Policy S13 - Proposed Strategic Footpath, Cycleway and Bridleway Links (Page 66-67)**

The draft policies map which corresponds with draft Strategic policy S13 'Strategic footpath, cycleway and bridleway links' identifies a proposed strategic footpath, cycleway and bridleway which is shown to run through the land at Allington Lane, Bishopstoke and seeks to provide a link between existing footpaths which run in the area. The policy sets out that new development should integrate the routes, and development should not have a detrimental impact on the existing or proposed routes

As part of any redevelopment of the site, and as shown within the appended Deliverability Document, the Council's aspiration for this link to cross the site can be provided within a well landscaped setting. This demonstrates that site can help the Council to deliver this identified proposal and therefore we **support Strategic Policy 13.**

### **Land at Allington Lane, Bishopstoke**

The land at Allington Lane has the potential to deliver up to 500 new homes including a mix of dwelling sizes and tenures to meet a range of local housing needs. In addition to new homes, the proposal would provide community facilities, playing fields, open space, a potential primary school (if required) and possible allotment provision for the benefit of new and existing residents. Initial technical assessments indicate that there are no fundamental barriers to the delivery and the site is available to come forward in the short-term.

It is recognised by the Council that they are not able to meet their full housing requirement within the existing settlement confines on previously developed, brownfield land. The Council are therefore required to identify greenfield land suitable for development. The land at Allington Lane represents a logical and sustainable location adjacent to an existing settlement, to contribute to the future growth of the Borough. The site is capable of meeting housing needs objectives identified in the NPPF in the context of its accessible location and proximity to existing social infrastructure and public transport.

### **Sustainability**

A Sustainable Development Scorecard Assessment of the site has been undertaken. This considers the key features of the proposed masterplan against the three equal pillars of environmental, social and economic sustainability identified within the NPPF. The assessment provides a combined score from each of the three pillars, with a maximum score of 100%, as well as a parity score that provides a means of determining the balance of contributions from each of the three pillars.

The site achieves a sustainability score of 87% and a parity of score of 90% indicating that it is a highly sustainable site and is therefore suitable for development. The sustainability credentials of the site can also be maximised throughout the masterplanning process. Further detail of the assessment is included in the Deliverability Document.

### **d. Conclusion**

---

In summary, these representations and the supporting Deliverability Document confirm that the land at Allington Lane, Bishopstoke is available, suitable and achievable as potential a residential

development site within the Local Plan period. Thakeham request the following changes in the Council's Pre-submission version Local Plan to ensure the plan meets the requirements of paragraph 182 of the 2012 NPPF and paragraph 35 of the 2018 NPPF and is considered to be sound:

- The provision of a housing requirement for the Borough in excess of the OAN to assist in meeting the identified needs of the wider HMA within Strategic policy S2 to ensure the Local Plan is positively prepared;
- The allocation of land at Allington Lane, Bishopstoke to assist in meeting the Borough's OAN and unmet need from areas in the Southampton HMA as well as providing flexibility to the supply of housing in a highly sustainable, unconstrained location;
- An update of the assumption relating to the approach to new development set out in Strategic Policies S2, S3 and S5; and
- The commitment to undertake an early review of the Local Plan within five years if the approach set out in the Pre-submission Local Plan is secured to allow for the strategic policies to be updated to reflect changes in local housing need figures and the progress of housing allocations and the delivery of the Strategic Growth Option.

Thank you for the opportunity to respond to the Pre-submission Local Plan consultation. We would be grateful for confirmation of the receipt of these representations and would like to confirm that we would like to be notified of the Council's consideration of our proposals for the site and future submission of the Local Plan to the Secretary of State.

Yours faithfully,

Lorna O'Carroll  
Senior Planner