
Eastleigh Local Plan

Examination of the Local Plan

Schedule of Matters and Issues for the Examination

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Introduction

Following my initial examination of the Eastleigh Local Plan (the Plan) and the supporting material, I set out below the main Matters, Issues and Questions regarding the soundness of the Plan. These should be read in conjunction with the guidance note for people participating in the examination issued on 20 August 2019.

As the hearing sessions will take place across a number of weeks, matters have been grouped together and the deadline for the submission of statements is set out in the guidance note. As highlighted within the guidance notes, participants should be aware that the Council have published a number of additional documents to their evidence base which are located on the examination website and which representors may wish to take into account in their responses below. The Council have also produced a schedule of modifications (document reference ED32) as well as the Council's response to the Inspectors initial comments and questions (document reference ED4). Agendas for the individual hearing sessions will be issued before the hearings commence.

The questions identified below concerning soundness are primarily focussed on the plan's policies. Insofar as they relate to the plan's soundness other elements of the plan, including the supporting text, will be considered as part of the discussion of the relevant policies. Apart from the Council, there is no obligation for participants to produce hearing statements. You should only do so if there is something to add to your original representation, do not repeat what is in your original representation, just provide a cross reference to it where necessary. The Inspector will determine the manner in which discussions take place at the hearings.

As identified within the Guidance notes, all references below to the Framework are to the March 2012 version of this document.

Matter 1: Legal and Procedural requirements

Main Issues: Have the relevant legal requirements been met in the preparation of the Plan and is the Plan legally compliant?

Questions:

- 1.1 Has the Plan been prepared in accordance with the 'duty to cooperate' imposed by Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended)? What has been the nature of the cooperation undertaken and on what issues has this focused? In preparing the Plan did the Council engage constructively, actively and on an on-going basis with neighbouring authorities and other relevant organisations on cross-boundary issues, in respect of the Duty to Cooperate? In responding to this, the Council is asked to provide detailed evidence to support its position with reference to the timing and preparation of the Plan.
- 1.2 Are the likely environmental, social and economic effects of the Plan adequately and appropriately assessed by the Habitats Regulations Assessment (HRA) and the Sustainability Appraisal? Is the Sustainability Appraisal (SA) adequate in terms of:

- its assessment of the likely effects of the plan's policies and allocations,
 - its consideration of reasonable alternatives, and
 - its explanation of why the preferred strategy and policies were selected? (This question relates to the legal compliance of the SA and HRA only and detailed questions concerning the SA and HRA are considered under matter 2 below).
- 1.4 Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Regulations?
- 1.5 Does the absence of some of the site notices being displayed for all of the site allocations at the Regulation 19 stage contravene the requirements of the SCI? If so, what are the implications of this for the test of legal compliance? What actions did the Council take to rectify this?
- 1.6 Does the plan accord with the Local Development Scheme (LDS) and has the consultation carried out during the preparation of the Plan been adequate?
- 1.7 Was the Regulation 19 version of the Plan adequately publicised compared to previous draft versions? How were local residents likely to be affected by the proposed site allocations informed? Representations indicate that a number of notification letters were issued after events had taken place.
- 1.8 Is the Plan legally compliant in terms of how it seeks to address climate change? Does the Plan include policies designed to secure that the development and use of land in the District contributes to the mitigation of, and adaptation to, climate change as required by Section 19(1A) of the PCPA?
- 1.9 Is the geographical illustration of all relevant policies shown on the submission policies map? Page 35 of the Plan refers to the urban edge as defined on the policies map to be revised to take account of permitted development and allocations within the Plan. Has this been addressed and if not why not?

Matter 2: Vision and Objectives (chapters 2 and 3), the SA and HRA

Main Issue - Does the Plan identify a Vision and Objectives for the Borough and is the approach appropriately justified?

Has the Plan been informed by an adequate process of Sustainability Appraisal and Habitats Regulations Assessment?

Vision and Objectives

- 2.1 Does Chapter 3 of the Plan provide a clear, positively prepared and justified vision for the Borough? Do the vision and objectives provided at pages 28/29 of the Plan provide an appropriate framework for the strategic policies outlined at chapter 4 of the Plan?
- 2.2 Is the text at paragraph 1.9 of the Plan regarding Neighbourhood Plans up to date? Are there now any 'made' Neighbourhood Plans within the Borough? If so, has regard been had to them in preparing this plan? Paragraph 6.1.11 of the Plan notes that Bishopstoke Parish Council are investigating the option for a Neighbourhood Plan – has this progressed?

Sustainability Appraisal

- 2.3 A number of representors raise concerns in relation to the assessment of options as part of the SA selection process and the availability of the evidence base, have these been satisfactorily addressed? How does the site selection of options B and C reflect the SA process? In order to assist the hearings, please could the Council produce a detailed table setting out the timeline for the relevant stages of the site selection process detailing what parts of the evidence base were available for each of the stages identified. This should start with the Issues and Options from December 2015 and work through to the Regulation 19 Consultation and the evidence updates prepared in 2019.
- 2.4 Does the SA address all of the alternative sites appropriately? The SA indicates that the SGO will have either negative or minor negative effects in relation to a number of key SA objectives. What reasonable alternatives have been considered to avoid these effects and if they are avoidable, is the Plan justified?
- 2.5 Has the formulation of the Plan been based on a sound process of SA and testing of reasonable alternatives, does the SA consider all likely significant effects on the environment, together with economic and social factors? Is it clear how the SA has influenced the final Plan?

Habitats Regulations Assessment

- 2.6 Is the Plan based on a sound HRA? Is it clear how the HRA has influenced the Plan? The HRA considers a number of European sites including Emer Bog Special Area of Conservation (SAC), New Forest Special Protection Area (SPA), Mottisfont Bats SAC, Solent and Southampton Water SPA, Solent and Dorset Coast potential SPA, New Forest Ramsar site, Solent and Southampton Water Ramsar, New Forest SAC, River Itchen SAC, Solent Maritime SAC. Is the Plan sufficiently clear how the mitigation measures identified by the HRA will be secured?
- 2.7 The Habitats Regulations Assessment of the Regulation 19 Local Plan has been updated (October 2018) in response to representations made. Where adverse effects have been identified, either alone or in combination with other plans and projects, the report defines a mitigation strategy capable of preventing adverse effects on ecological integrity. The report confirms that no reliance has been placed on mitigation during the screening assessment. Is the RA process consistent with the Wealden judgement (Wealden DC v SSCLG, Lewes DC and South Downs NPA)? Is the HRA and the conclusions drawn sufficiently robust?
- 2.8 Does the HRA process for screening plan policies in or out of the assessment remain valid in light of up to date and emerging evidence on visitor behaviour and traffic impact? For example, since the submission HRA was completed, the Council have produced additional survey information in connection with the Southern Damselfly in Itchen Valley Country Park as well as visitors to the New Forest. Does the HRA update (June 2019) present a comprehensive picture?
- 2.9 Does the HRA adequately address the issues of air quality?

Matter 3: Strategic Policies, Spatial Strategy and distribution of development (policies S1, S2, S3)

Main Issue – Are the strategic objectives justified and in accordance with national policy?

Questions:

- 3.1 Does policy S1 provide an appropriate basis to the delivery of sustainable development within the Borough? Are the requirements identified within the policy justified?
- 3.2 Is the proposed approach to new development outlined by policy S2 sufficiently clear, is it supported by a robust and up to date evidence base?
- 3.3 Is the settlement hierarchy identified at table 1 (page 34) supported by a robust evidence base? I am not adequately clear as to what methodology has been used to decide which settlement sits within each tier. What do the numbers within the table relate to? Is the text sufficiently clear concerning the roles and functions of these defined settlements? If not, is additional explanatory text required?
- 3.4 Paragraph 3.7 of the Plan advises that the Borough’s settlement hierarchy at paragraphs 4.6/4.7 should be the main consideration in the spatial distribution of new development. Where is the evidence to demonstrate that this statement has been taken into account in relation to the distribution of development? The Council is asked to produce a statement detailing how the distribution proposed will address each of the strategic objectives of the plan identified at pages 28/29.
- 3.5 In relation to Policy S3:
 - are the locations identified for new housing the most appropriate locations when considered against all reasonable alternatives?
 - what factors have influenced the distribution proposed?
 - what role has the sustainability appraisal had in influencing the distribution of development?

Matter 4: Meeting housing need, the housing requirement, housing land supply, five year supply and affordable housing (policies S2/S3/DM30)

Main Issues- Does policy S2 reflect an objective assessment of housing need over the plan period defined as 2016-2036?

Should the level of housing required be increased or decreased?

Does policy S2 provide an appropriate policy framework for the maintenance of a five year housing land supply?

Is the level of housing required deliverable?

Is the approach to affordable housing and the threshold levels set supported by a robust evidence base? Will policy DM30 be effective in securing the delivery of a sufficient level of affordable housing?

Questions:

The objectively assessed need for housing

- 4.1 Eastleigh is identified as being within the Southampton Housing Market Area. Is this justified?
- 4.2 What period is this OAN based on and how have you arrived at the OAN?
- Where precisely is the evidence base to support the figure of 630dpa? Is this figure based on robust and up-to-date evidence?
 - The rationale for the use of this figure appears to rely to some extent on it being a figure used by the Council in support of a number of planning appeals. Is this correct?
 - If it is not, where is the evidence base to support this approach and is it robust?
 - What methodology has been used and does it follow the advice set out within the Planning Practice Guidance (see heading 'Methodology: assessing housing need'). Please explain how the approach adopted, and in particular document HOU004 accords with the Framework and the advice contained within the PPG. If there are any departures from this approach, please provide a detailed explanation and justification accordingly.
- 4.3 Are the assumptions contained within the Housing Trajectory Background Paper and OAN background paper appropriate, in particular:
- Are the adjustments made for market signals and local demographic changes appropriate and justified?
 - Is the OAN based on the most up to date household projections?
 - Has any allowance been made for vacancy and second home ownership of existing and future housing stock?
 - How have employment trends been taken into account and what conclusions are drawn in this regard?
 - Is the evidence base sufficiently robust?

The Housing Requirement

- 4.4 Strategic policy S2 advises the Plan will promote the delivery of 14,580 (13,166)¹ new dwellings between 2016-2036. How has the 14,580 (13,166)² figure been arrived at? is this figure justified and consistent with national policy and guidance, local circumstances and economic growth?
- 4.5 What contribution does the Plan propose to make to housing supply outside of Eastleigh? Is this approach justified?
- 4.6 The Local Plan housing target is identified at 729 dpa. Other evidence base documents appear to rely on a different figure, is this a problem? the Council is requested to provide a trajectory based on the Plan's housing target.

¹ Figures in brackets are from the Council's proposed main modifications table

² As above

The overall supply of land for housing and how it will deliver the Plans target

4.7 Policy S2 advises the Council will promote the delivery of at least 14,580 new dwellings between 2016-2036. The policy goes onto note that this will be made up from:

- 7570 dwellings with planning permission or resolution to grant planning permission
- 1210 on sites carried forward from the previously submitted Local Plan
- 4050 dwellings on new sites
- 1860 windfall allowance

In light of the housing trajectory 2018, are these figures up-to-date and are they based on the Plans requirement? If not, please could the Council provide up-to-date figures. (The Inspector notes the proposed new figures put forward within the draft main modifications schedule which will alter the above figures). The Council is requested to provide an explanation to these new figures including the proposed new category e, '740 dwellings on new sites allocated in this plan'.

4.8 What is the justification for the 1210 (1070)³ dwellings on sites 'carried forward'? why is the 1210 separated out from the 7570 (6790)⁴ dwellings with planning permission or resolution to grant planning permission, what is the difference and what is the purpose of this?

4.9 Are the housing numbers used within policies S2 and S3 consistent?

4.10 The Council have applied a number of discounts to the housing supply which vary between 5 and 30%. These have been explained at paragraph 114 onwards of the Housing Trajectory Update, June 2019. The report acknowledges this is not an approach advanced by the Framework. The Council is requested to provide a detailed explanation for this approach.

4.11 What is the justification for both a small site allowance and windfall allowance? Is the estimate of windfall numbers identified by the Plan appropriate and realistic? Is this approach consistent with the Framework?

4.12 Are the suggested rates of planned housing development realistic and achievable when considered in the context of the past completion rates? Where is the evidence to support the approach adopted?

4.13 Is the housing trajectory update June 2019 realistic? In the context of footnote 11 of the NPPF, does it form an appropriate basis for assessing whether sites are deliverable?

³ Figures in brackets are from the Council's proposed main modifications table

⁴ As above

The five year housing land supply

- 4.14 What is the five year supply requirement upon adoption of the plan?
- 4.15 Will the Council be able to demonstrate a five year supply of housing land upon adoption of the Plan?
- 4.16 The Housing Trajectory Update (June 2019) refers at paragraph 39 to the preparation of a statement of common ground (SOCG) to address strategic housing and employment targets and consider the production of an Infrastructure Investment Plan. Has this document been prepared and if not, what is the anticipated timetable?
- 4.17 Does the five year housing land supply position as set out at table 1, page 4 of the Five Year Housing Land Supply position Statement, March 2018 present the most up-to-date position? Is it consistent with the remaining housing evidence? The table indicates a 20% buffer for persistent under delivery has been applied, is this correct?
- 4.18 Overall, is there a supply of specific deliverable sites sufficient to provide five years' worth of housing, with an appropriate buffer (moved forward from later in the plan period) to ensure choice and competition in the market for land? In accordance with paragraph 47 of the Framework, the Council is requested to clearly set out how the five year supply has been calculated and as part of this, identify the specific deliverable sites against which the housing requirement will be met.

Affordable housing

- 4.19 What is the total affordable housing need over the plan period, including any existing backlog? Has this need been calculated in accordance with the Planning Practice Guidance?
- 4.20 The Affordable Housing Market Assessment (2017) advises that 3300 affordable homes are required over the plan period 2016-2036. This report is based on an OAN of 580 dwellings per annum. Does this study present a robust evidence base to support the housing requirement and the level of affordable housing necessary to be delivered by the Plan? If this figure is correct, should the policy reflect this figure to allow for effective monitoring over the plan period?
- 4.21 In relation to policy DM30:
- How has the affordable housing target of 35% identified by policy DM30 been calculated? Is the approach sound?
 - Is the threshold level set for affordable housing deliverable? Is it supported by the viability evidence?
 - Part (c) of the policy advises that the tenure split, size and type of affordable housing will be informed by the SHMA, housing register and the level and type of existing affordable housing. The Affordable Housing Market Assessment (2017) provides an identified need for affordable housing of different types and sizes. Should the policy be more specific regarding the mix expected?

- Is part (f) as drafted appropriately worded so as to be effective in its application? Is it clear how this part of the policy would be applied in practical terms?

4.22 The evidence base advises that revisions maybe required from April 2018 to reflect the change in the definition of affordable homes to include starter homes at 20% discount of market prices. Has this been done and if not why not?

Matter 5 – Strategic growth option (SGO) (policies S5/S6)

Main Issues: Are the policies for the development and delivery of the two new communities identified by policy S5 justified, effective and consistent with national policy?

Does the Plan take a justified and effective approach to the delivery of the strategic transport and infrastructure necessary to support policy S5?

Does the evidence base support the site allocation and strategic growth option proposed and demonstrate that it is both viable and deliverable, having regard to all of the policies contained within the Plan?

Questions:

5.1 Policy S5 identifies that the SGO would deliver approximately 5200 dwellings. What evidence is there that the SGO is capable of delivering 5200 dwellings?

5.2 There is no figure within the Plan indicating the extent of the SGO, merely a cross reference to the policies map and an indication of the SGO on the key diagram. For the Plan to be consistent with how other site allocations are referred to within the Plan should there be? The IDP Update June 2019 for the SGO advises the site area has been extended.

5.3 How precisely does policy S5 accord with the strategic objectives of the Plan? For example, the strategic objectives set out within chapter 3 of the Plan include 'maintaining the identity of the towns and villages'. How will the SGO address this strategic objective? Does the Plan need to be more reflective of the impacts of the SGO?

Viability and deliverability

5.4 Does the evidence base support the SGO and demonstrate that it will be viable and deliverable, having regard to all of the policies contained within the Plan?

5.5 Is the viability work undertaken to date sufficiently robust to support the SGO? Noting the Delivery and Viability of the Strategic Growth Option: Update of the IDP (June 2019) does it reflect the nature of the SGO in sufficient detail to justify the approach adopted?

5.6 The evidence assumes an annual rate of delivery of 258 dwellings per year for the last 12 years of the plan period (2024-2036). How has this figure been arrived at?

- 5.7 The trajectory update assumes a delivery of 50 dwellings per year from 2019/2020 until 2023/2024. Is this to reflect the planning permission at Pembers Hill Farm? If so how does this effect the infrastructure requirements of policies S5 and S6?
- 5.8 To what extent does the viability work take account of the full costs of the link road as required by policy S6? Does the viability work take full account of the environmental mitigation measures required? The additional viability work produced in June 2018 advises that the timings are as per the October 2018 assessment.

Infrastructure Provision

- 5.9 The Council acknowledge that the infrastructure required to support the SGO is extensive in terms of education provision, the evidence base identifies that the SGO would necessitate a requirement for at least 3 primary schools and on 7FE secondary school. How do these requirements fit with the planned rates of delivery and what assurances are there that these education requirements would be met as part of the SGO phasing? Are these requirements accurately reflected in the IDP undertaken to date?
- 5.10 Paragraph 4.31 of the Plan advises health infrastructure could be met either within the site or by an appropriate financial contribution for the expansion of an existing surgery close to the development. Given the scale of the development proposed is this approach justified and does it accord with the Framework? What evidence does the Council have that this would be a justified and effective approach?
- 5.11 Utilising the housing delivery for the SGO set out within the Housing Trajectory update (June 2019) as well as the Delivery and Viability of the Strategic Growth Option: Update of the IDP (June 2019) could the Council produce a table setting out the key infrastructure requirements for the successful delivery of the housing planned on a year by year basis. This should also address school place requirements necessary as a result of the SGO. A column should also be added indicating the likely costs, funding sources and mechanisms to secure funding. This should include all infrastructure requirements as envisaged by policy S5 and should also clearly explain the delivery of all transport infrastructure necessary to support the SGO in light of the phasing requirements identified by policies S5 and S6.

Transport

- 5.12 Where precisely is the evidence concerning the implementation of phase 2 of policy S6? If the road is to be realigned, does this have any flooding implications? How will the realignment of the road address the current height restrictions?
- 5.13 What would be the effect of the proposed relief road on the maintenance of a gap between Colden Common and Bishopstoke?

- 5.14 Where is the evidence to demonstrate that the link road as required by policy S6 is technically feasible, viable and capable of delivery?
- 5.15 Have Network Rail provided any view in relation to the proposed road realignment and the Plan generally? The Council is requested to agree a SOCG in relation to this particular matter.
- 5.16 Part 9 of policy S5 sets out a number of requirements in relation to the provision of the link road. Primarily, that phases 1-3 have full planning permission. What assurances are there around this given that phases 2 and 3 are located within Winchester City Councils (WCC) administrative area? The SOCG states that WCC are seeking to delete the reference to phases 1 and 2, as well as seeking other changes to the wording of the policy. The Council is requested to provide a full response on these suggested changes to the policy wording.
- 5.17 The Delivery and Viability of the Strategic Growth Option: Update of the IDP (June 2019) identifies £3 million towards the cost of a public transport and cycle strategy as part of the SGO. Precisely how has this figure been arrived at? What measures is it envisaged that this level of funding would deliver?

Ecology and Biodiversity

- 5.18 Does policy S5 (parts 12 and 13) provide a justified approach to the assessment of the SGO in relation to the environmental designations of acknowledged importance?
- 5.19 The Environment Agency has raised a number of concerns in relation to flood risk, hydrology and biodiversity. Noting the SOCG in relation to ancient woodland (July 2019), the Council is requested to prepare a SOCG with the Environment Agency to address the above issues.
- 5.20 The SOCG in relation to ancient woodland (July 2019) advises the Council are proposing a number of changes to the site area of the SGO boundary. Do these amendments have any implications for the SA and HRA work already undertaken?

General matters – policy wording

- 5.21 How does the SGO and policies S5 and S6 accord with policy S8 concerning countryside gaps?
- 5.22 Part 6 of policy S5 refers to the Borough wide office target (policy S4) what is the borough wide office target and where is this stated within policy S4? (in asking this question, the Inspector notes the proposed main modification MM17)
- 5.23 Where is the evidence base to support the level of retail floorspace envisaged by policy S5 which is somewhat higher than that indicated by the retail needs study? In asking this question, I am aware of the conclusions reached within

document RTC002 on this matter. However, the document also advises at paragraph 14 that 'work on this justification is still evolving'.

- 5.24 Where within the evidence base is the justification for the 30,000 sqm of employment floorspace included within the allocation? How has this figure been arrived at?

Matter 6: Transport, Infrastructure and Delivery (policies S12, DM13, DM40, BO5, BO6, AL1)

Main Issues - Does the Plan take a justified and suitably evidenced based approach to strategic transport, infrastructure and delivery?

Is the Plan consistent with national policy in this regard and will it be effective in terms of its implementation?

Questions:

Transport

- 6.1 Does the Eastleigh Strategic Transport Study provide a comprehensive review of all strategic transport schemes?
- 6.2 What is the updated status of the Chickenhall Lane link road project? The IDP Update (October 2018) advises there is a funding gap of £60m to deliver this road. The IDP describes it as 'not essential' to the delivery of development in the Plan (para 3.13). Notwithstanding this, the road is identified at para 6.28 as 'new road infrastructure which **is essential** to support the policies contained within the Plan'. If only part of the road is deemed essential, which part of the road is it?
- If the road is not an essential part of the infrastructure requirements, what is the justification for the requiring that contributions identified for to the delivery of the road identified as a policy requirement under policy E7?
 - Is the inclusion of the link road in the Plan justified and necessary? Is it deliverable and viable?
 - Is the approach to this project consistent throughout the Plan?
 - The IDP advises that the road would open up land for development allocated under policies E6, E7 and E9 (paragraph 6.12). This being the case, why do policies E6 and E8 not reflect the contributions sought by policy E7? Does this impact on the delivery of the employment land allocated under policy E7?
 - In the context of paragraphs 6.4.38 and 6.4.39 of the Plan, what precisely is envisaged in terms of the 'phasing of development' referred to?
- 6.3 The Council is requested to produce a SOCG with Hampshire County Council on this issue. This should cover the issues of timing, delivery, funding and phasing in so far as it relates to policy E6 and E7.

6.4 In Allbrook the following transport improvements are proposed:

- Allbrook Hill relief road
- M3 Junction 12 and Allbrook Way
- Allbrook Rail Bridge

6.5 Is this correct? Are there any other proposals which should be included within this list? Does the latest modelling work including the junction changes within the evidence base accurately reflect the policy requirements for the above works identified within the Plan?

6.6 In relation to the transport infrastructure listed at policy S12 (i – xiii) have the full costs of the individual elements been identified? Has the necessary funding been secured for each of the individual projects listed?

6.7 Is policy DM13 sufficiently clear as to what type of development will be required to provide a transport assessment?

Infrastructure and Delivery

6.8 Does the evidence base support the site allocations and demonstrate that they are viable and deliverable, having regard to all of the policies contained within the Plan?

6.9 Are the viability assessments contained within the evidence base sufficiently robust and are they based on reasonable assumptions? Is the housing growth proposed by set out in Policy S2 financially viable? In particular:

- Do the viability assessments adequately reflect the nature and circumstances of the proposed allocations?
- Has the cost of the full range of expected requirements on new housing been taken into account, including those arising through policy requirements identified by the Plan (for example, in relation to affordable housing)?
- Have the costs of upgrading the strategic transport infrastructure that the modelling is predicated on and other likely infrastructure costs been identified in the IDP and has the necessary funding been secured? If not, why not and what are the implications for the delivery of the Plan?
- Have the full costs of ecological mitigation measures been identified in the IDP and has the necessary funding been secured? If not, why not and what are the implications for the delivery of the Plan?
- Does the evidence base demonstrate that the above costs would not threaten the delivery of the housing planned?
- Is there a reasonable prospect that the sites identified will come forward for development during the plan period?
- The Council is requested to provide a clear explanation as to what methodology has been used to assess viability.

6.10 Is there robust evidence to demonstrate that all of the necessary infrastructure to support the level of growth proposed can be provided in accordance with the timetable identified? This includes all infrastructure including health care, education, transport, open space. In particular:

- What are the key infrastructure requirements for the successful delivery of the housing planned? The table on page 137 of the Plan provides a useful starting point however it is not sufficiently detailed in order for me to understand the infrastructure requirements for each of the site allocations proposed.
- Please could the Council produce a chart showing the level of anticipated housing delivery in each of the settlements on a year by year basis, with reference to the site allocations as necessary, along with the delivery of the infrastructure needed to support the new homes.
- A column indicating the likely costs, funding sources and mechanisms to secure funding would also be of considerable assistance.
- This should include all infrastructure requirements as envisaged by policy DM40 and the IDP.
- This should also address school place requirements necessary as a result of the site allocations listed at paragraph 13.1 of the education provision SOCG between Eastleigh Council and Hampshire County Council. Are the policies sufficiently clear in term of school place planning and the level of growth proposed? Where, when and how will the additional school places and early education provision required as a result of the 4050 dwellings on new sites as identified by policy S2 be provided?
- What reassurances are there that these elements can and will be delivered when and where they are needed?
- Has the cost of these infrastructure elements been estimated, and funding sources identified?
- In what way do the policies provide a clear and effective framework for securing the necessary infrastructure or other obligations to mitigate the effects of, or support development?

Matter 7: General housing matters (policies DM1, DM23, DM24, DM25, DM26, DM27, DM31, DM32)

Main Issue - Are the policies concerning residential development and design standards justified and consistent with national policy?

Questions:

- 7.1 Are all of the criteria in relation to policy DM1 sufficiently clear and justified? For example, should (ii) views be taking into account? The policy notes 'if adjoining development is poor in urban design terms' how will this be assessed?
- 7.2 The Framework requires that local plans set out their own approach to housing density to reflect local circumstances. Policy DM23 advises at part (iii) that a minimum density of 40 dwellings per hectare should be achieved for residential development in urban areas. Where is the evidence base to support this figure?
- 7.3 What is the purpose of policy DM24 and how would it work in practice?
- 7.4 Is the wording of policy DM25 sufficiently clear and precise? What has informed the indicative dwelling numbers which are provided for each site? The policy stipulates that the sites contain unneighbourly employment uses which are no longer considered to be compatible with their residential location, but also asks applicants to demonstrate how the existing use can be accommodated or relocated – will this policy wording be effective?

- 7.5 Does policy DM26 provide a suitable policy framework for the assessment of self build housing? With reference to the Self build and Custom Housebuilding Act 2015, should the Plan define how many self build homes it aims to deliver and how will the land necessary for such provision be provided? Is the policy wording and criteria used sufficiently flexible to reflect market and economic conditions over the Plan period?
- 7.6 In the context of policy DM27:
- Does the policy, and the Plan overall, do enough to support the specific needs of the older population?
 - Is the policy requirement that new development is located within or close to a local centre too restrictive? What is the justification for restricting the location of this type of development to local centres only?
 - Is it necessary for a definition to be provided of the term 'specialist housing'?
- 7.7 Is the approach to meeting higher national access standards sought by policy DM31 consistent with both national policy and is it supported by the evidence base?
- 7.8 Are the space standards sought in policy DM32 consistent with both national policy and are they supported by the evidence base?

Matter 8: Countryside and Green Infrastructure (policies S7, S8, S10)

Issue - Does the Plan take a justified and suitably evidence-based approach towards the Countryside, Countryside Gaps and Green Infrastructure?

Questions:

- 8.1 Where is the evidence base to support policies S7 and S8? Are the policies as currently drafted sufficiently robust and is the approach based on a sound methodology? How will the policies be monitored, and will this monitoring be effective?
- 8.2 Strategic Policy S8 advises that the precise boundaries of countryside gaps connected with the Strategic Growth Option will be determined following masterplanning. Strategic Policy S5 advises two distinct and separate communities will be created, separated by a countryside gap as defined on the policies map. How will this approach be effective?
- 8.3 In relation to policy DM28, is the policy and supporting text sufficiently clear for an applicant to understand what is meant by being disproportionate in size to the existing dwelling? If not, does the explanatory text need to be amended to make it clear how an applicant should respond to the policy wording?
- 8.4 With regards to the maintenance of a gap between Colden Common and Bishopstoke, does the Winchester City Plan stipulated that the gap should be maintained between the two settlements? If so, what would be the effect of the proposed relief road on this gap and associated surrounding landscape? (see representation on behalf of Colden Common Parish Council).

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- 8.5 In order for the policies map to be consistent with policy S8, should the term 'countryside gap' be consistently applied throughout the Plan?

Matter 9: Gypsies and travellers, Nature conservation, recreation and open space and heritage (policies DM33, DM11, DM12, DM34, DM37)

Main Issues - Does the Plan present a justified and appropriate strategy for gypsies and travellers over the plan period?

Are the policies relating to nature conservation, recreation, open space and heritage sufficiently positive, clear and consistent with national policy objectives?

Questions:

Gypsies and travellers

- 9.1 What is the identified need for gypsy and traveller sites over the plan period?
- 9.2 Does the Gypsy and Travellers Accommodation Assessment (2017) provide a realistic assessment of the needs of the gypsy and traveller community? Does the approach accord with the PPTS?
- 9.3 The PPTS sets out how evidence should be used to plan positively and manage development. In particular, it advises at policy A 7 (c) that local authorities should use a robust evidence base to establish accommodation needs to inform the preparation of local plans. Nevertheless, para 5.140 of the Plan advises that there is 'unconfirmed need' and that the evidence base provides an 'estimate of need'. On this basis:
- Is the approach taken by policy DM33 sufficiently robust and justified?
 - Does the policy make satisfactory provision to meet the needs of the gypsy and traveller community over the plan period?
 - Are the sites allocated by policies FO7, BU4, BU5 and BU6 sufficient to meet the need identified over the plan period?

Nature conservation, recreation and open space and heritage

- 9.4 Is policy DM11 sufficiently clear? Does the policy wording appropriately reference all relevant nature conservation designations of international, national and local importance within the Borough?
- 9.5 Does policy DM12 provide an accurate reflection of the relevant statutory obligations in terms of the requirement to conserve or enhance the character or appearance of the heritage asset? At present, part (i) advises that development will be permitted if it does not harm or detract from the significance or special interest of the asset. Is the approach consistent with the Framework?
- 9.6 The Council have made reference to the preparation of a SOCG with Historic England. Please could such a statement be prepared.

- 9.7 Should policy DM34 make specific reference to the recreation use of water sources within the Borough? Does the current wording of policy DM37 acknowledge this role sufficiently?

Matter 10: Meeting employment needs and the rural economy (policies S4, DM15, DM16, DM17, DM18, DM19)

Main Issues - Are the policies in relation to employment needs justified, deliverable and consistent with national policy?

Are the site allocations proposed by the Plan in relation to employment growth clearly justified and appropriately defined?

Are the policies relating to the rural economy sufficiently positive, clear and consistent with national policy objectives?

Questions:

- 10.1 Is policy S4 as currently worded sufficiently flexible? Should it seek to identify how many new jobs are to be provided over the plan period as well as how much land?
- 10.2 Policy S2 states that the plan will promote the delivery of 144,050sqm (net) new employment development over the Plan period 2016-2036. I understand that the PUSH position statement (2011-34) provides an annualised figure of 4957sqm which produces a local plan target of 124,000sqm. Document ECON002 (GL Hearn Employment Land Needs Study) indicates a Local Plan target of 80,000sqm. Are these figures correct? Is there a consistent approach to gross and net figures throughout the Plan?
- 10.3 Is the amount of employment provision and its proposed distribution consistent with the evidence base? Is the approach adopted sound and based on a robust and up to date evidence?
- 10.4 Is the employment target informed by robust and up to date evidence? In what way does the target relate to the planned level of housing growth? Paragraph 4.17 of the Plan advises 'new site allocations will provide sufficient employment opportunities to meet the needs of the new economically active population'. Where is the evidence to support this statement?
- 10.5 Looking at Table 1 (page 6) of the Updated Employment background paper (June 2019), and noting the comments in paragraph 6.6 of the report, can the Council please explain in detail the difference in the local plan allocations of 81,349 (original background paper) and 36,549 (updated to 2018 base data)?
- 10.6 Table 2 sets out losses from previously anticipated supply and includes sites CF3 and BO2 which both reflect employment provision within the site allocations as proposed – is this correct?
- 10.7 Paragraph 5.94 of the Plan states that all major existing employment sites were reviewed and found to be viable. Where is the evidence to support this statement?

- 10.8 Are all of the existing employment sites accurately reflected on the policies map? (the Council is requested to specifically respond to the representation in relation to Vicarage Farm Business Park).
- 10.9 Has sufficient land been identified to meet the short and long term employment needs of the borough over the plan period?
- 10.10 What effect would policy DM15 concerning the safeguarding of existing employment sites have on future losses of employment land?
- 10.11 Does policy DM15 provide sufficient flexibility in terms of redevelopment within designated employment areas? Are the use class restrictions defined within parts (i) and (ii) justified by the evidence base and will they allow sufficient flexibility? Is there a conflict between these use classes and the definitions provided at paragraph 5.92 of the Plan? Is the policy wording sufficiently clear?
- 10.12 Is the wording of policies DM17 and DM18 sufficiently clear so as to be effective in its application?
- 10.13 Is the wording of policy DM19 sufficiently clear so as to be effective in its application? Should the policy include reference to the retention of features of architectural or historic interest in light of the representation from Historic England?

Matter 11: Community facilities, retail development (policies S11, DM21, DM22, DM38, E3)

Main Issues – Does the Plan take a justified and suitably evidence-based approach to community facilities and retail development?

Is the Plan consistent with national policy in relation to these matters and will it be effective in implementation?

Will policies DM21 and DM22 be effective in protecting the vitality and viability of the Boroughs defined centres?

Are the policies relating to community facilities, and retail development sufficiently positive, clear and consistent with national policy objectives?

- 11.1 Paragraph 5.109 refers to 'limited' need for additional convenience and comparison goods floorspace across the Borough. The evidence base (Eastleigh Retail and Leisure Needs Assessment) draws specific conclusions in relation to the retail needs of individual centres across the Borough. This is defined in both floorspace terms for both comparison and convenience goods floorspace as well as identifying timeframes accordingly. Does the plan and in particular policy DM21 provide sufficient detail on this issue? By failing to set out a breakdown of the new floorspace requirements over the Plan period within the Plan, it is difficult to understand if the Council have allocated sufficient sites in accordance with paragraph 23 of the Framework.
- 11.2 In answering this question, it would be helpful if the Council could produce a table indicating:

- Overall capacity for both convenience and comparison goods floorspace over the Plan period (see table 1 of document RTC002)
 - Identify which site allocations will contribute to this requirement (use the local plan references for consistency)
 - Indicate the town/district centres concerned
 - Include a timeline for delivery which should reflect the capacity timeframe as indicated by the evidence base
 - Indicate any infrastructure/delivery considerations which will need to be taken into account
- 11.3 Does the policies map reflect the suggested revisions to the primary and secondary frontages as recommended by the evidence base?
- 11.4 How have the conclusions reached in the evidence base in relation to retail growth and expenditure for the SGO been reflected in the Plan?
- 11.5 How would the SGO address the policy criteria to be applied to new retail development as set out by policy DM21? Is the reference to the SGO at paragraph 5.109 sufficiently clear?
- 11.6 Paragraph 5.108 acknowledges that new centres will be established as a result of the SGO envisaged by policy S5. On this basis should the Plan reflect where these new centres will fit within the overall retail hierarchy?
- 11.7 Is policy DM38 concerning community, leisure and cultural facilities sufficiently clear and justified?
- 11.8 Are the threshold levels identified by policy E3 in relation to the Swan Centre and the primary and secondary shopping zones justified?

Matter 12: Climate change, flood risk and pollution (policies DM2, DM3, DM5, DM6, DM8)

Main Issue - Is the policy approach to climate change, flood risk and pollution justified and consistent with national policy?

Questions:

- 12.1 Are all the criteria contained within policy DM2 justified and in accordance with national policy?
- 12.2 Does policy DM3 present an appropriate policy in relation to adaption to climate change?
- 12.3 Do policies DM5 and DM6 present a clear approach in relation to managing flood risk and sustainable surface water management and watercourse management? Is the approach supported by the evidence base? Does document ENV005b represent the most upto date flood risk assessment (February 2016). This is marked final version for approval, is this correct?
- 12.4 Does policy DM8 provide an appropriate basis for the assessment pollution impacts?

Matter 13: Site Allocations within the Parishes:

- Bishopstoke, Fair Oak and Horton (policies Bi1, policies FO1-FO9 inclusive)
- Burlesdon, Hamble-le-Rice and Hound (policies BU1-BU9 inclusive and HA2)
- Chandler's Ford and Hiltingbury (policies CF1-CF3 inclusive)
- Eastleigh (policies E1, E2, E4, E6,E7,E8,E9)
- Allbrook and North Boyatt Parish (policies AL1 and AL2)
- Hedge End, West End and Botley (policies HE1-HE7 inclusive except for policy HE6, policies WE1-WE4, BO1-BO4 inclusive)

Main Issue – Are the policies and site allocations outlined above justified, effective and consistent with national policy?

Questions:

- 13.1 In relation to all of the above proposed site allocations contained within Chapter 6 of the Plan:
- Is the criteria in the allocations policy necessary, relevant and deliverable?
 - Is the approach taken to identifying site capacity appropriate?
 - Is the allocation justified by the evidence base?
 - Is the extent of each site correctly identified?
 - Are the detailed requirements for each site clear and justified?
 - Is the allocated site deliverable?
 - Have all of the site constraints, development mix and viability considerations been taken into account?
- 13.2 In order to provide a comprehensive response for each of the site allocations, it is requested that the Council respond to each of these bullet points above individually for each site allocation. All responses should be supported by reference to the evidence base as appropriate.

Site Specific Matters

- 13.3 Policy Bi1- Is the policy sufficiently clear as to whether the healthcare provision is to support the existing community or to support the SGO?
- 13.4 The Plan envisages high density development in Eastleigh town centre (page 16) and at policy E3. What does the plan mean by high density development, how precisely does the plan achieve this objective?
- 13.5 In the context of policy HA1, is the delivery of the allocation sufficiently clear in light of the text identified at paragraph 6.2.55? Have all the site constraints, including access been adequately addressed? The Council is requested to prepare a SOCG in relation to the access issue to demonstrate the site is deliverable.
- 13.6 Policy HA2 – should the requirement for an archaeological assessment form part of the policy?

- 13.7 Policy CF2 – the site is allocated for employment purposes although the policy requirements seek to restrict the development of ‘noise sensitive’ uses or those which may have a significant impact on the amenities of surrounding occupiers.
- Is the Plan sufficiently clear as to what would constitute a noise sensitive use?
 - What is the justification for this approach?
 - If there are site specific circumstances which warrant this policy wording, should the range of uses identified by the policy be more restrictive?
- 13.8 Paragraph 6.3.24 refers to an identified need for amenity open space and allotments in the Chandlers Ford area. Aside from policy DM36 referred to, how does the Plan seek to address this need?
- 13.9 Policy E1 – Is the criteria at part (ii) of the policy sufficiently clear? Is the requirement identified by (iii) justified and in accordance with National policy in relation to heritage assets? Part (iv) is this part of the policy sufficient clear so as to be effective in its application? Is there a lack of consistency between this part of the policy and how policy E2(v) addresses the issue of trees?
- 13.10 Policy E4 – (i) Given the emphasis placed within the Plan on high density development within Eastleigh Town Centre (page 16) What evidence is there to support restricting development to 3 storeys in height in this location?
- 13.11 Policy E12 – is this a designated heritage asset as defined by the Framework?
- 13.12 Policy BO2 – should reference be made within the policy to the Botley to Bishops Waltham trail?
- 13.13 In relation to policy E8, the Environment Agency have made a number of comments regarding the lack of reference to a project level HRA as the proposal many have implications for the River Itchen SAC. The Council is asked to respond on this issue.

Matter 14: Monitoring and Other Matters

Main Issue – Does the Plan set out a clear framework for monitoring the implementation of the policies? How will the effectiveness of the Plan and its policies be measured and assessed?

Questions

- 14.1 Are the indicators set out in appendix C of the Plan in relation to monitoring and delivery sufficiently precise so as to be effective?
- 14.2 Should appendix C include more precise targets and associated indicators and timescales to assist monitoring? Are the targets/directions listed sufficiently precise so as to be effective in the monitoring? This relates to all of the indicators and target/directions identified across pages 254-259 inclusive. Would these measures assist in assessing the effectiveness of the policies identified?

- 14.3 Is it clear what mechanisms will be used to assess the indicators identified? This applies across all of the indicators listed. For example, in relation to a healthy Community, page 257, the indicator is to achieve adult participation in sport at least once a week. How will this be measured in practical terms? Is it necessary for the Council to reconsider how these indicators have been worded so as to be effective in terms of the monitoring role indicated?

Christa Masters

Inspector