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House of Commons  
London  
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**Leader of the Council**  
**Councillor Keith House**

Our Ref: KH/PS  
Your Ref:

8 April 2020

Dear Paul

**Re: Local Plan**

Thank you for your letter, dated 6 April, concerning the letter, dated 1 April, from Ms Christa Masters, the Planning Inspector examining Eastleigh's proposed Local Plan.

I note that your own position is that, in the light of Ms Masters' letter, the Council should "scrap the current plan" and "go back to the drawing board". With the greatest of respect, however, the Inspector has advised precisely the opposite. Indeed, she has been quite explicit in paragraphs 42 and 57, clearly stating that:

1. There are significant advantages to having an adopted Local Plan in place;
2. The housing sites proposed through Policies S2 and S3 are sufficient to meet housing needs for the majority of the Plan period;
3. Delivering these sites through this Local Plan would, in the circumstances, be the most beneficial course of action;
4. Although there would be a housing shortfall towards the end of the Local Plan period because of her concerns about the Strategic Growth Option ("SGO"), which I will address below, the most pragmatic way forward would be to address that shortfall in the Local Plan review (which has to take place within five years of adoption of the currently proposed Local Plan in any event); and
5. The Main Modifications she has proposed will remedy the problems she has identified so that the Plan can proceed to adoption and secure the significant advantages to which she had earlier referred.

The Inspector's letter therefore provides a clear way forward to enable the Local Plan to be adopted so as to guide the Council's planning decisions in a Plan-led system, which has been the Council's principal objective in developing its Local Plan.

It is correct, of course, that the Main Modifications which the Inspector has recommended include the deletion of Policies S5 and S6 relating to the SGO, the Inspector deciding that she was unable to conclude that the approach to the site selection of the SGO represented a justified and evidence-based approach (paragraph 36).

The principal reasons that the Inspector came to that view are, however, as follows (you will appreciate that the following may be incomplete because Officers are going to take time carefully to consider all of the matters raised):

1. The Development Distribution Strategy and Principles (“DDSP”), adopted in December 2016 to guide work on the Plan, had been drawn up without sufficient evidence to underpin elements of it, including in respect of:
  - a. Transport movements in the Hamble peninsula (paragraphs 8 and 11); and
  - b. Settlement gaps (paragraphs 30, 34 and 35); and
  - c. Mineral safeguarding (paragraph 9)
  
2. The process of considering the reasonable SGO alternatives had not been undertaken on an equal footing (principally with regard to transport, settlement gaps), *inter alia* because:
  - a. Some forms of mitigation, or ways to reduce impacts, had been considered for some options but not for others (paragraph 21);
  - b. The potential longer-term advantages of some options had been dismissed or given insufficient weight in the process (paragraph 21); and
  - c. No assessment had been made of the combined Option D/E (paragraph 35).

However, and noting that the Inspector has specifically identified that the next Local Plan review will need to address the housing shortfall which will be occasioned in the later years of the Plan, the Inspector has also identified the ways in which the Council can address the above concerns.

The Council will carefully consider the Inspector’s letter and all other relevant considerations in conducting such a review, and it will ensure that it is supported by a robust, comprehensive and up-to-date evidence base. The issues to which the Inspector has drawn attention will be fully addressed wherever relevant to the Plan review. So, for example:

1. A detailed transport assessment with regard to Hamble peninsula (and all other relevant issues) will be undertaken;
2. A clear and robust paper on gaps in relation to strategic growth will be prepared; and
3. Further consideration will be given to traffic issues in the South Downs.

With regard to gaps, you will have seen that the Inspector specifically found that the general principle of preventing the coalescence of settlements was supported by national policy (paragraph 30). And she was clear that the gap issues that she raised could be addressed through Main Modifications and the preparation of a paper on the issue, with each of the settlement gap designations currently proposed being revisited in light of the observations she had made (paragraph 32). Such a paper would be updated on any review, including with regard to strategic growth.

Such a review would also be supported by a sustainability appraisal involving full consideration of all reasonable alternatives on an equal footing and addressing all of the matters which the Inspector has specifically identified as causes for concern. As the Council emphasised in its press release, all options will be considered, including the SGO (whether as currently proposed or in amended form).

Finally, I must respectfully disagree with your criticism that the Council has been misleading in its press release and elsewhere in suggesting that the Inspector “has not dismissed the Council’s proposed Strategic Growth Option, nor found it unviable”. The Council, of course, accepts that the Inspector is requiring deletion of the SGO from **this** Local Plan in order for it to be adopted. But she has **not** suggested that the SGO is unviable, nor that it would not be a reasonable alternative by which the longer-term housing needs of the Borough might be met under the **next** Local Plan review.

I hope that assists in explaining the Council’s current position. We are of course carefully considering the Inspector’s letter in full and will provide our response to her in due course.

Yours sincerely

A handwritten signature in black ink, appearing to read "Keith House".

Councillor Keith House  
**Leader**