

Eastleigh Borough Councillors  
Bishopstoke, Fair Oak and Horton Heath Local Area Committee

20<sup>th</sup> January 2017

Dear Councillors,

**Outline Application for 250 Dwellings at Pembers Hill Farm, Mortimers Lane, SO50 7EA  
Ref. O/15/77190**

Please find below the comments of CPRE Hampshire on the Outline Application for 250 Dwellings at Pembers Hill Farm. We believe that a decision on this site at this stage is premature and would prejudice any objective assessment of the strategic options that are being considered as part of the Local Plan process. An approval at Pembers Hill Farm would essentially give implicit acceptance by EBC that Options B and C are the chosen strategy, and would therefore pre-empt any possibility for interested parties to comment and challenge these options through the examination in public. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. With the Local Plan process still underway, approving Pembers Hill may be contrary to this principle and to the NPPF inter alia; evaluating all available options, empowering local people, encouraging the use of brownfield land, conserving heritage assets and promoting sustainable transport.

Crucially the NPPF states that a Local Plan must be based on adequate, up-to-date and relevant evidence. After appraising all the documents, CPRE concludes that EBC have not updated their housing needs to take account of the newest projections available from DCLG, and are not therefore in accordance with current government guidance. The input numbers to the PUSH SHMA of June 2016 have also now been superseded.

Specifically, the latest available figures from DCLG released in July 2016 show that Eastleigh had 54,650 dwellings in its stock supply and 54,365 households. This is a surplus of 285 dwellings over households. Now this does not mean that everyone has the right size, tenure or price of dwelling, but it does show that there is no evidence of a substantial shortfall in supply.

Looking forward to 2036, DCLG has projected that Eastleigh will have 60,120 households, which is 5,755 more than currently, and would equate to a requirement of some 274 dwellings per annum (dpa). However, EBC are working with a number considerably higher than this figure, and even accounting for an uplift for affordability, this would appear excessive. It is important to note that the methodology for assessing the full OAN in the Boorley Green Inquiry (APP/W1715/W/15/3130073) was agreed with a starting point of 523 dpa from the 2012-based household projections, and that this was not significantly altered by the 2014 population projections. However, this number has now been superseded (and decreased) by the data released in July 2016.

One further argument is that Eastleigh needs to take 2,000 dwellings from Southampton over the plan period, but again the DCLG figures show that Southampton will have 4,000 fewer households by 2036 than had been predicted at the time of the PUSH report. Predictions are always guaranteed to be wrong, but projections to date have always over-estimated household formation, and there is recent expert opinion (Oxford Economics January 2017) that across the UK there are 1.2 million fewer households today than were anticipated in 2008, even accounting for a period of considerable migration.



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nationally for a beautiful  
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Registered charity number 1164410

Government guidelines state that the OAN housing numbers must be based on the most up-to-date housing projections. If an unrealistic estimate is chosen as an input figure to the OAN it explains why EBC are finding that the 5-year land supply is unachievable and under constant challenge.

For your information, CPRE has evaluated the alternative strategic options in terms of their impact on the countryside. This process has confirmed that Options B and C are the most damaging to the finest landscape in the Borough, and the least acceptable in environmental terms, leading to an unnecessary new road across fine countryside, and probable adverse impacts on the River Itchen SAC and the South Downs National Park. These sites are also the furthest geographically from Southampton, the railway and the transport links to the M27, connections to which the Corporate Strategy seeks to promote. To that end, CPRE Hampshire will be firmly objecting to Options B and C, throughout the Local Plan process.

In summary, CPRE Hampshire is a registered charity and its objectives are to promote and encourage for the benefit of the public the improvement, protection and preservation of the countryside of Hampshire and its towns and villages, and for better development of the rural environment.

Yours faithfully

CPRE Hampshire

cc: Mims Davies MP  
cc: Cllr Keith House  
cc: CEO Nick Tustain  
cc: WCC  
cc: SDNP

<https://www.gov.uk/government/statistics/dwelling-stock-estimates-in-england-2015>

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>