



For official use only

**Publication of the Eastleigh Borough Local Plan
June 2018
Representations**

- Please quote the paragraph, policy, or map you are commenting on (question 1 in part B).
- If you wish to speak at the Examination, you need to clearly state you wish to take part (questions 6 and 7, part B).

You must send responses to Eastleigh Borough Council by **6th August 2018**

Responses can be submitted to:

**Planning Policy & Implementation, Eastleigh Borough Council, Eastleigh House,
Upper Market Street, Eastleigh, SO50 9YN**

By E mail to:

localplan@eastleigh.gov.uk

You can submit as many comments as you would like. Please complete a separate part B for each part of the plan on which you want to comment.

This form has two parts:

- Part A – Your Details
- Part B – Your comment(s). Please expand the comments table as appropriate

PART A

1. Personal Details

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	Mr	Mr
First Name	John	Steve
Last Name	Lauwerys	Pickles
Job Title (where relevant)		Policy Planner
Organisation (where relevant)	Action Against Destructive Development	West Waddy
Address		60 East St Helen St Abingdon Oxon
Postcode		OX14 5EB
Telephone		01235 523139
Email Address		s.pickles@westwaddy-adp.co.uk

3. Client Details

If you are an agent representing a specific site interest, please fill in the details below.

Site Interest	-
Client's Name	-

4. Please tick this box if you wish to be notified of future stages of the Eastleigh Borough Local Plan

5. Data Protection and Freedom of Information

For the purposes of the Data Protection Act 1998 processing of the representations you provide is necessary for the exercise of functions conferred on Eastleigh Borough Council in connection with the Local Plan under the Town and Country Planning (Local Planning) (England) Regulations 2012. **The representations will also be disclosed to the Secretary of State and may be put into the public domain, including on the council's website.**

PART B – Please copy and use a separate sheet for each representation

Name or Organisation:

Action Against Destructive Development

1. To which part of the Plan does this representation relate?

Paragraph number: 4.8 – 4.9

Policy Number: S2 & S3

Policies map:

2. Do you consider the Plan is:

2.(1) Legally Compliant

Yes

No

2.(2) Sound*

Yes

No

2.(3) Complies with the
Duty to co-operate

Yes

No

* The considerations in relation to the Plan being “sound” are explained in the National Planning Policy Framework in paragraph 182 and are set out in Appendix A of this form. If you have entered **No** to 2.(2) please continue to Q3. In all other circumstances, please go to Q4.

3. Do you consider the Plan is unsound because it is:

(1) Not positively prepared

(2) Not justified

(3) Not effective

(4) Not consistent with national
policy

4. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The stated total housing requirement over the plan period laid down in the Eastleigh Borough Local Plan 2016 – 2036 policies S2 and S3 is unsound. The figure given for the total number of houses to be built by 2036 is given as 14,580 of which all but 4,050 have already been built, are under construction or are expected to be delivered including on sites with planning permission. The choice of options B/C as the strategic growth option will, it is estimated, deliver 3,350 of this shortfall through to 2036 with the balance of the 5,300 full capacity of this choice delivered up to 2044.

The 'base' housing requirement for Eastleigh derives from figures produced by PUSH (Partnership for Urban South Hampshire, a consortium of the local authorities in south Hampshire) which calculate a base figure for Eastleigh derived from the overall assessed housing need of 580 per annum which was then increased to 650 per annum to allow Eastleigh to help Southampton meet part of its housing need, which in theory it could not manage by itself. Because there was an under-delivery against the PUSH targets by Eastleigh in the period 2011- 2016, this shortfall was added to the annual target of 650 to give a figure of 729 per year from 2016-2036. Although paragraph 15 of the Housing Trajectory Background Paper (June 2018) states that the Council was advised during a Planning Inspectorate visit that it was unnecessary to do so, Eastleigh has chosen to apply a discount factor of between 5% and 20% to the anticipated delivery of the housing expected under each broad heading (committed development sites, long standing allocations etc.). This means that, not only is Eastleigh building more houses than it needs to meet its own needs to help out a neighbouring authority, but it is also probably under-estimating the number of houses that will be delivered in the plan period. Such an approach might be considered as prudent albeit at the expense of forever destroying greenfield sites.

There is however a key important change that should cause Eastleigh (and indeed PUSH) to urgently re-examine its housing targets. The Office of National Statistics issued new projections on 24 May 2018 which substantially revise down the population projections for 2036 in the majority of the local authorities in the PUSH region. In the case of Eastleigh the figure has reduced from 154,000 to 142,500 a massive 11,500 reduction (the current population of Eastleigh is around 131,000) This is such a huge reduction that it must require a major re-think of the housing targets which are heavily influenced by estimates of population change. Moreover there are very significant drops in the estimated population growth in neighbouring authorities including in Southampton which has sought Eastleigh's help to meet its perceived inability to house a growing population.

Of particular significance to the argument that EBC is planning to deliver more housing than will be needed, most especially as a result of the reduction in the population growth estimates, is the choice of options B/C which is planned to eventually deliver nearly 2,000 more houses than are required to 2036. The Council argues that this will enable it to carry forward housing delivery into the next plan period but this makes no sense if the population does not in practice continue to grow

so as to require yet more housing beyond 2036.

Why then is it choosing an option which delivers so many more houses than the 3,350 it requires in the current plan period? The only apparent reason is that the cost of the North Bishopstoke link road (£50m +) is so high that only a development of 5,000 + houses will be able to meet this infrastructure cost on top of providing 35% affordable housing, a secondary school, three primary schools etc. However it is unjustified to commit to a huge damaging development which will deliver new houses that are simply not required.

The fundamental soundness issue arising from this over provision is that it will result in the development of an environmentally sensitive area characterised by a network of ancient woodland and hedgerows and close to the River Itchen Special Area of Conservation with likely significant negative impacts on these environmental assets and would therefore conflict with the environmental component of the presumption in favour of sustainable development and the NPPF's policy advice on conserving and enhancing the natural environment. It is not therefore consistent with national policy or justified and is therefore unsound.

(Please continue on a separate sheet/expand box if necessary)

5. Please set out what changes(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. Please note that any non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Adjust the housing figures downwards to reflect the Office of National Statistics new projections issued in June 2018, which could potentially remove the need to allocate the chosen strategic site for housing and the associated link road. This would avoid the significant negative impacts on the natural environment, which are likely to arise from these proposals, including a significant net loss of biodiversity contrary to national policy and the Council's own proposed Local Plan policy DM11 on nature conservation.

(Please continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Please note, you must answer yes to this question if you wish to have the opportunity to speak at the public examination.

No, I do not wish to participate at the oral examination

Yes, I do wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The proposed strategic allocation and associated link road proposed under policies S5 and S6 would have very significant adverse impacts on the environment and local community and Action Against Destructive Development has been specifically set up to oppose this allocation. A key part of the supporting evidence supporting these allocations are the housing figures proposed in policies S2 and S3, and if these are revised downwards this could potentially remove the need for these strategic allocations.

We therefore wish to strongly make our case at the examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

S. M. Rickles

Date:

6.8.18

Appendix A

Legal compliance

In order to be legally compliant, a Local Plan must meet the requirements set out in section 20(5)a of the Planning and Compulsory Purchase Act (2004). These requirements are:

- That the Local Plan is included in the current Local Development Scheme and that key stages have been followed.
- That the process of involving the community is in line with the Eastleigh Statement of Community Involvement.
- That the Local Plan complies with the Town and County Planning (Local Planning) (England) Regulations (2012), including making the required documents available at our offices and on our website, and notifying prescribed people and organisations (including those who have asked to be notified)
- That the Local Plan is accompanied by a Sustainability Appraisal report.
- In London, Local Plans must confirm to the London Plan (this does not apply to the Eastleigh Local Plan)

Soundness and the National Planning Policy Framework (March 2012, DCLG)

Paragraph 182 of the NPPF sets out the considerations in relation to a plan being 'sound' as:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Duty to Cooperate

The Duty to Cooperate was introduced in the Localism Act (2011). It requires Local Planning Authorities like ourselves to work together with other local authorities, and other relevant bodies to maximise the effectiveness of the strategic policies of our Local Plans.