

Home Builders Federation

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Matter 3, 4, 7 and 8

## EASTLEIGH LOCAL PLAN EXAMINATION

### 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?*

Q 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?

No comment

Q3.2 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?

As stated in our representations we do not consider policy S2 to be sound as it fails to provide for the delivery of sufficient new homes to meet the needs of the Housing Market Area (HMA). In our statements to matter 4 we set out our concern that the Council have not provided a robust justification as to why they cannot provide for further homes within Eastleigh to address, even in part, the shortfall in dwellings across the Southampton HMA. The Council should have done more to boost the level of housing supply through this local plan as required by paragraph 47 of the NPPF.

Q3.3 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?

No comment



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.

No comment

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?

No comment

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

**The objectively assessed need for housing**

Q4.1 Eastleigh is identified as being within the Southampton Housing Market Area. Is this justified?

No comment

Q4.2 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.

It would appear from paragraph 1.2 in the Council's OAN Background Paper (HOU004) that the justification for an OAN of 630 dpa is based principally on the proof of evidence produced by GL Hearn. This evidence seemingly builds on the evidence prepared in 2016 for the Partnership for Urban South Hampshire (PUSH) but reconsiders the methodological requirements for assessing needs as set out in the PPG. Most notably they proof of evidence revisits the consideration of market signals from the PUSH Strategic Housing Market Assessment (SHMA).

However, it is important to note that the Council have not looked to extend the approach taken to market signals across the Southampton HMA. If the Council considers it necessary to amend its approach to market signals the same is likely to be true of the other authorities within the HMA. Paragraph 47 of the 2012 NPPF requires Councils to "ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market" and the Council should have considered, with the other authorities in the HMA, the necessity of a higher uplift across the whole of the HMA. To consider housing needs in isolation is not consistent with national policy or the duty to co-operate. We would suggest that a higher uplift would be required across the HMA to take account of worsening market signals which would have resulted in a higher level of overall need and consequently a higher level of unmet needs based on the capacity estimates set out in the PUSH Spatial Position Statement (HOU001).

Q4.3 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?

Whilst we broadly consider the approach taken to be consistent with the methodology set out in PPG, we do have some issues with regard to the approach to market signals and the consideration of economic growth. These are set out below.

Market signals

The principal difference between the SHMA produced by PUSH for the HMA and the proof of evidence is its treatment of market signals. In the 2016 SHMA it was suggested that an uplift of just 6% above the demographic starting point (34 homes per annum) would be sufficient to address market signals. This approach was clearly not consistent with PPG and in particular paragraph 2a-020 which requires any market signals uplift to increase planned supply by “*by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability*”.

The approach set out in HOU004 provides a more detailed consideration of the market signals within Eastleigh and arrives at the position that a 15% uplift would be a more appropriate response to the market signals seen in the Borough. We would agree that there was clearly a need for a higher market signals given the evidence and we welcome the increase proposed by the Council. The evidence shows a worsening trend with regard to affordability in the Borough. For example, the latest affordability ratio published by ONS showing that the lower quartile income to house price ratio for Eastleigh was 11.06 an increase of 2.21 over the last five years.

The evidence on market signals is therefore clearly sufficient to warrant an uplift of 15% on the demographic baseline. However, this should patently be considered a minimum uplift and further deliberation is required by the Council as to whether this would improve affordability as established in paragraph 2a-020 of PPG. It could be argued that higher uplifts are required to improve affordability in Eastleigh given the worsening affordability position in the last five years and the significant under supply of homes in previous years. If a comparison is made to the standard method, where the much higher uplift of 34% is considered necessary to see appropriate improvements in affordability, then it would clearly be apposite in this situation for a market signals uplift of more than 15% to be applied.

## Labour force and economic growth

As set out in our representations we are concerned that jobs growth in the area could be higher than that suggested by the Council. It is important that realistic scenarios for jobs growth are used in the Council's evidence and we would suggest that in order for the assessment to be robust a higher level of jobs growth should be considered.

### **The Housing Requirement**

4.4 Strategic policy S2 advises the Plan will promote the delivery of 14,580 (13,166) new dwelling between 2016-2036. How has the 14,580 (13,166) figure been arrived at? Is this figure justified and consistent with national policy and guidance, local circumstances, and economic growth?

The Council in the submission document committed the Council to the delivery of 14,580 dwellings per annum between 2016 and 2036. This would seem from the Council's Housing Implementation Plan 2018 (HOU008) to be based on housing need over the 2011 to 2036 period of 630 dwellings per annum, an uplift of 20 homes to address unmet needs across the HMA and the backlog in delivery between 2011 and 2016.

Our main concern with the requirement is the Council's failure to allocate sufficient sustainable sites to better meet the needs of the HMA. We do not consider the Council has justified why it could not do more to meet the unmet needs arising in the HMA. These concerns are considered in our answer to question 4.5 below.

However, the approach taken in arriving at the housing requirement of 14,580 homes between 2016 and 2036 is also inconsistent with national policy. By shortening the plan period and including the backlog within the plan requirement the Council are effectively aiming to deliver any backlog across the whole plan period. This is inconsistent with paragraph 3-035 of PPG which states: "*Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible*". We would suggest that the Council acknowledges the level of backlog within its housing requirement and states within S2 that the backlog will be addressed within five years in order to maintain conformity with national policy.

In addition, we do not consider it necessary to amend the plan period to take account of delivery between 2016 and 2018 reducing the requirement by some 1,414 homes. Delivery during this period will be accounted for within the trajectory for the plan period and as such it is an unnecessary modification to the plan.

4.5 What contribution does the Plan propose to make to housing supply outside of Eastleigh? Is this approach justified?

It is not clear the degree to which the Council are meeting the unmet needs of the Housing Market Area. Over the 2011 to 2036 period the Council are seeking to ensure

the delivery of 16,250 new homes - this reflects the level of delivery proposed for Eastleigh in the PUSH Spatial Position Statement (SPS) (HOU001). On the basis of the assessment of need supporting the SPS this would see Eastleigh delivering some 70 homes per annum above their OAN. The Council confirm this earlier position in paragraph 34 of the HOU020 and outline that even with this level of over delivery there in Eastleigh there would still be a shortfall of 103 dpa across the HMA.

However, the Council evidently consider the 2016 SHMA to represent an underestimation of housing needs for Eastleigh. In particular the proof of evidence, as reproduced in the HOU004, indicates that the Council consider the 2016 SHMA to have misjudged the uplift required to take account of market signals. This reassessment of its position means that the Council now consider that delivery in Eastleigh for the 2011 to 2036 period should be 630 dpa. This would suggest - if the assessment of needs in the 2016 PUSH SHMA for the other areas are considered to be sound (a position we would not ascribe to) - that the OAN for the HMA is 2,330 dpa. As such the shortfall would increase to a minimum of 213 dpa. It would therefore appear that the Council are delivering an additional 20 dpa to address the higher shortfall across the HMA. Given the scale of the unmet needs identified this is a minimal contribution towards a total unmet need of 5,325 homes<sup>1</sup>.

What is clearly evident is that the needs of the HMA are not being met in full. As a minimum we would suggest that there is a shortfall of some 213 dpa that must be addressed through further allocations in the Eastleigh Local Plan. The Council propose in paragraph 34 on HOU020 that "*no stone has been left unturned*", and it is justified to have a shortfall due to the constraints present across the HMA. We recognise that national policy at paragraph 14 indicates that there may be circumstances where constraints may lead to housing needs in a local plan not being met. However, the NPPF also outlines in paragraph 179 that joint working should enable local planning authorities to work together to "*meet development requirements which cannot be wholly met within their own area*". Given that Eastleigh contains no land designated as AONB, Green Belt or National Park and only 7.4% of the Borough under other statutory designations there is a limited amount of land where national policy, as set out in footnote 9 of paragraph 14, considers development should be restricted, we would suggest that the Council must do more to close the gap between delivery and needs within the HMA.

However, the Council do not consider it possible for Eastleigh to do more until there is a new OAHN and a review of the spatial strategy and the distribution of housing across the HMA. This is not the positive approach required by the NPPF with regard to meeting housing needs in full. These have been identified and it is necessary for needs to be met in full within the plan period and not put off for consideration to some point in the future. Whilst we would not suggest the Council meets all of the unmet needs identified it must meet a reasonable share of any unmet needs arising within the HMA. Without an increase in supply in response to the unmet needs identified across the

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<sup>1</sup> 213 dpa x 25 years

HMA we do not consider the current requirement to be positively prepared, justified, or consistent with national policy.

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.

There should be no uncertainty as to what the Council considers its housing requirement to be. In part this would appear to be the result of the Council choosing to amend its plan period and include its backlog within the new trajectory. A definitive trajectory as to the Council's position is welcomed.

### ***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 on to 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'.

For Council

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

For Council

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

This is for the Council to answer but there must be consistency with the figures used in the Local Plan to ensure consistent and effective monitoring of the delivery new homes in Eastleigh.

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.

It is generally acknowledged that in order for a Council to ensure it meets its housing requirement it should plan to allocate sufficient land to deliver beyond that target. The reason for the provision of this “buffer” between the requirement and supply is to take account of the delays that inevitable occur in the delivery of allocated sites and the potential for sites with planning applications to be stalled. The justification for a reasonable buffer on overall supply are manifold, from lengthy master planning process and delays in decision making on both applications and pre commencement conditions through to the resolution of complex infrastructure requirements prior to delivery. As such we broadly welcome the position taken by the Council in discounting delivery expectations which to some extent achieves the same principal as a buffer.

However, after reviewing the latest evidence provided in the housing trajectory update (HOU020) indicates that the undiscounted supply is only 7% greater than the housing requirement we are concerned whether the discounts applied are sufficient to ensure delivery. The HBF recommends a 20% buffer is necessary to ensure the housing requirement is delivered within the plan period and as such consider it necessary for the Council to revisit some of its considerations with regard to the discounts applied. In particular we note that no discount has been applied to the Strategic Growth Opportunity. Whilst we welcome the identification of such sites that can deliver a substantial amount of new homes the Council must be equally cautious regarding their delivery as with any other allocation. The complexity of bringing forward such sites can lead to delays with initial delivery of new homes coming later than expected. This should be recognised within the housing trajectory.

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?

The inclusion of large windfall sites in an area that has not had an adopted local plan since 2011 is a concern. It is inevitable that more windfall sites would come forward in area without an up to date local plan and as such we would suggest that there is not the compelling evidence required by paragraph 49 of the NPPF that large scale windfall sites will continue to form part of the supply across the whole plan period. This is especially the case given that the authority has stated that it has left no stone unturned with regard to the identification of deliverable and developable sites.

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? And 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?



The HBF do not wish to comment on individual sites. The HBF would continue to recommend that the Council's assumptions on sites in relation to delivery, potential capacity, lead in times and build out rates should be realistic and based on evidence supported by the parties responsible for housing delivery; engagement with the relevant landowner, promoter or developer; other stakeholders involved, and sense checked by the Council based on local knowledge and historical empirical data. In particular we advise caution with regard to the delivery rates for new communities where there is a substantial amount infrastructure required prior to their commencement. In particular we suggest that these should not be included in the supply of new homes within the first five years following the adoption of the plan.

#### *The five-year housing land supply*

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.

Whilst we recognise that this plan is being examined in relation to the 2012 NPPF it will be delivered under the auspices of the 2019 Framework. The definition of deliverability as set out in the Glossary requires Council's to have clear evidence that allocated sites, sites with a permission in principle and sites with an outline permission are deliverable. To ensure that the Council has a five-year housing land supply on adoption the Council will need to have this evidence. Therefore, we would suggest that the Council must provide the clear evidence necessary that those sites defined under part b of the definition of "Deliverable" in the 2019 NPPF will come forward within 5 years.

#### **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?

No comment

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?

No comment

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?

As set out in our representations we do not consider it justified to have a single requirement given the evidence set out in the Viability Assessment. This assessment indicates that in the lower value areas, such as Eastleigh town centre, that viability is compromised with by the policy requirements of the local plan. The appendices of the viability assessment show that in these lower values areas the delivery of 35% affordable housing will not be viable for a significant number of the schemes tested.

This is clearly a concern of the report's authors as they state in paragraph 3.4.24 the consideration should be given to lower rates of affordable housing being set for town-based scenarios. As such we are surprised that differential requirement was not considered appropriate not only on the basis of the viability evidence but also with regard to the inclusion of large windfalls within the trajectory and the Government's aims of delivering as much development as possible on previously developed brownfield sites (paragraph 17 and 111 of the NPPF). If the Council are to achieve their aspirations of delivering 860 homes on larger windfall sites, they will need to ensure the policies in the local plan support the development of previously developed land in and around the Borough's town centres. At present the Council's policies will potential discourage the development of such sites which is contrary to the principles of the NPPF and not justified by the evidence.

The Council should amend the policy to require a lower proportion of affordable housing within its towns and in particular Eastleigh. From the evidence published by the Council this should be no greater than 20%.

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?

We generally support modifications to ensure consistency with national policy but will reserve full consideration until any revisions are published.

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

Q7.7 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?

The Written Ministerial Statement published in March 2015 states that “*The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need ...*” However, whilst we recognise that some new homes should be built to the part M4(2) and M4(3) we remain of the opinion that that Council has not clearly evidenced the need for 80% of all new homes to be provided to the optional part M4(2) of the building regulations.

The Council point in HOU013 to the assessment of Affordable Housing Market Assessment which indicates that over the plan period 43% of the projected increase in population will be people over 75 and 79% of the increase in households will contain someone over the age of 65. However, whilst we would agree with these figures, we do not consider the fact that the Borough has an ageing population to be sufficient to warrant 80% of all homes being built to part M4(2). Firstly, not all people over 65 or indeed 75 will require their home to be adapted. According to the 2011 Census only 21% of all people over 65 have a long-term limiting illness or disability that affected there day to day activities a lot.

Secondly, it must be noted that the Council's evidence indicates at paragraph 3.88 that the majority of the growth in older people will result from the ageing of the existing population not people migrating into the area. If they require adaptations, they are more likely to have these to be made their current home rather than seek to move to a new property. This is a situation that is broadly reflected in the English Housing Survey last published data on the need for more accessible homes in 2016<sup>2</sup>. This data outlined that 9% of households in the UK require some form of adaptation but of those households and that where an adaptation was required 81% considered their current home to be suitable to meet their needs. The survey found that only about 10% of those in need of adaptations had to move to find more suitable accommodation to address their housing needs. Whilst we recognise that these are figures from a national survey it shows that the number of households who actually have to move in order to meet their needs is relatively small.

This evidence also provides an indication that the majority of adaptations that are required to home as people get older can be made to most homes, even those built prior to the existing mandatory Building Regulations for accessibility Part M4(1). Given that all new homes will be built to part M4(1), which will ensure reasonable provision for most people with a long-term illness or disability to approach and enter the dwelling

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<sup>2</sup> [www.gov.uk/government/statistics/english-housing-survey-2014-to-2015-adaptations-and-accessibility-of-homes-report](http://www.gov.uk/government/statistics/english-housing-survey-2014-to-2015-adaptations-and-accessibility-of-homes-report)

and to access habitable rooms and sanitary facilities on the entrance storey we do not consider the Council to have provided the clear evidence necessary to require 80% of all new homes to be built to the higher part M4(2) standard. If the Council wishes to include a policy with regard to the delivery of accessible homes it will need to be proportionate and based on clear evidence of the need for such homes.

*Q7.8 Are the space standards sought in policy DM32 consistent with both national policy and are they supported by the evidence base?*

Policy DM32 also requires development to meet national spaces standards as a minimum. Again, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.

Paragraph 56-020 of PPG establishes the type of evidence required to introduce space standard through the local plan. It states that:

*“where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- *Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”*

The Council therefore needs a robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. Firstly, we note the Council recognise that since the introduction of the space standards by Government development in Eastleigh has come forward at or above these standards without their being an adopted local plan policy being in place. This would suggest that there is no need for this policy to ensure development meets minimum standards. Secondly, the HBF also consider that the space standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but

are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms.

We would suggest that the evidence indicates that homes will be brought forward at or above NDSS in Eastleigh without a policy and that its imposition would limit the flexibility of the plan to support the delivery of well-designed smaller homes where there is a market for such properties. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.

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

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?

The Council's evidence to support the introduction of policy S8 is set out in the Countryside gaps background paper. This paper outlines the national policy and local evidence it considers to support the application of countryside gaps within Eastleigh. As we set out in our representations, we do not consider the evidence presented to be sufficient justification to warrant the inclusion of policy S8.

It is important to note that the aim of this policy is to maintain the separate identity of settlements and separation from Southampton. The only part of the national planning policy framework that seeks to achieve such an aim is Green Belt policy. As is set out in paragraph 82 of the 2012 NPPF and the establishment of new Green Belt should only be undertaken in exceptional circumstances. It would appear that the Council are seeking to circumvent national policy through the extensive use of Countryside Gaps. It is also a concern that the Council's policy is more stringent than that applied to Green Belt which restricts inappropriate development and even then, allows such development in very special circumstances. Policy S8 restricts all development which physically or visually diminishes the gap or has an urbanising effect.

Whilst we acknowledge that there may be circumstances where development in the countryside will need to be restricted this can be achieved through other policy mechanisms that are consistent with national policy. Indeed, the Local Plan contains such policies and we would suggest that these will be sufficient to manage development within the Countryside without the need for the proposed gaps.

Given that the Council acknowledge that there are unmet needs across the Housing Market Area, with a significant proportion arising from Southampton, we do not consider it to be consistent with national policy for the Council to include significant additional restrictions to the delivery of new development within the Local Plan for Eastleigh.

8.2 Strategic Policy S8 advises that the precise boundaries of countryside gaps connected with the Strategic Growth Option will be determined following master planning. 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?

No comment

Mark Behrendt MRTPI  
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