



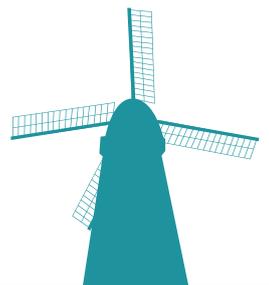
Eastleigh Borough Local Plan 2016-2036



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Statement of Common Ground between Eastleigh Borough Council and the Partnership for South Hampshire

August 2019



Statement of Common Ground on the Eastleigh Borough Local Plan (2016 – 2036) between Eastleigh Borough Council and the Partnership for South Hampshire

1. Summary

- 1.1 This Statement of Common Ground (SoCG) is between Eastleigh Borough Council (EBC) and the rest of the Partnership for South Hampshire (PFSH) authorities. PFSH consists of the Councils within South Hampshire. The Solent LEP, Environment Agency and Homes England are co-opted members. PFSH has been established to enable local authorities, local partners and government to work together for the greater good of South Hampshire.
- 1.2 This SoCG has been prepared on a 'without prejudice' basis with PFSH as a whole and does not fetter the ability of individual local authorities to comment on the Eastleigh Borough Local Plan 2016-2036 (EBLP).
- 1.3 The Partnership for South Hampshire and Eastleigh Borough Council agree that:
 - a) The PFSH Spatial Position Statement June 2016 plays an important role in demonstrating the operation of the 'duty-to-cooperate' between the South Hampshire planning authorities and other statutory bodies and agencies and is an important contextual document in the preparation of the EBLP;
 - b) With proposed delivery of new housing equating to 747.5 dwellings per year over the period 2016 – 2036, the EBLP proposes to exceed both the PFSH estimate of Objectively Assessed Housing Need (580 dwellings per year, 2011 – 2036) identified through the PFSH Strategic Housing Market Assessment and the Spatial Position Statement target equating to 650 dwellings per year (2011-2034);
 - c) The proposed Strategic Growth Option north of Bishopstoke and north & east of Fair Oak identified in Strategic Policy S5 and the proposed new link road identified in Strategic Policy S6 of the EBLP are consistent with the Spatial Position Statement's approach to the Strategic Development Locations set out in Position Statement SDL1;
 - d) Employment provision in the EBLP of 144,050m² net over the period 2016 – 2036 is consistent with the Position Statement E1 allocation to Eastleigh Borough of 114,000m² in the period 2011-2034;
 - e) The focus of new employment provision in the EBLP on the Southampton Airport Economic Gateway is consistent with the stipulation of Position Statement E2 and, specifically, E2.1;
 - f) The approach taken to the selection and allocation of new sites for development in the EBLP is consistent with the Spatial Position Statement's Key Principle A on Cities / Urban Areas first;
 - g) Strategic Policy S8 of the EBLP on the Protection of Countryside Gaps and the approach taken to selecting housing sites for allocation in the local plan accord with the provisions of Position Statement S1 on Strategic Countryside gaps;

- h) With regard to the provision of Green Infrastructure, EBLP Strategic Policy S10 accords with the priorities and principles set out at Position Statement G1;
- i) Policies DM2 and DM10 (as proposed to be modified) accord with the SPS approach to environmental & resource sustainability in committing that the authorities will continue to work together and with their partners to devise and implement consistent cross-boundary approaches on matters related to water supply, waste water disposal, water quality, flood risk management and energy efficiency;
- j) Overall the policies and provisions of the EBLP are in 'general conformity' with those of the PFSH SPS.
- k) There is joint commitment to review the SPS during 2019.

2. Introduction

- 2.1 This SoCG has been prepared between EBC and PFSH in view of the importance of the PFSH Spatial Position Statement June 2016 (SPS) (Examination Document HOU001) in shaping the strategy of the Eastleigh Borough Local Plan 2016 – 2036 (EBLP). PFSH did not make any representations on the 'regulation 20' consultation on the EBLP.
- 2.2 The SoCG focuses primarily on the degree of general conformity between the policies and provisions of the EBLP and the housing and employment land supply targets set out in the SPS. However, it also covers the broader, more contextual policies and spatial principles & objectives of the SPS which have influenced the spatial distribution of development proposed in the EBLP; in particular the area of search for strategic scale development, the framework for countryside gaps, green infrastructure, prioritisation of the use of previously developed and 'brownfield' sites, environmental and resource sustainability.

3. Status of the PFSH Position Statement

- 3.1 The EBLP is being assessed against the provisions of the 2012 NPPF under the transitional arrangements set out in Annex 1 to the 2019 NPPF. The SPS proposes development targets for both housing and employment provision for those full and part districts which fall within the PFSH area. The preparation of the SPS plays an important role in demonstrating the operation of the 'duty-to-cooperate' between South Hampshire planning authorities. The 'duty-to-co-operate' is a statutory legal requirement. The SPS is therefore an important consideration in the preparation of the EBLP. Nonetheless, it is a non-statutory strategy which has never been subject to public consultation or independent scrutiny or testing and so does not carry the full weight of the statutory development plan.

4. Housing Provision

- 4.1 The PFSH SPS covers the period 2011-2034. In terms of housing provision it is based on a Strategic Housing Market Assessment (SHMA) (Examination Document HOU002) and an

Objectively Assessed Housing Need Update (Examination Document HOU003) which cover the period 2011-2036. Position Statement H1 of the SPS identifies a housing target for Eastleigh borough of at least 14,950 dwellings for the period 2011-2034. This equates to an annual average of 650 dwellings per year. It is derived from an Objectively Assessed Housing Need (OAHN) figure for the borough identified in the PfSH SHMA and OAHN update of 580 dwellings per year, uplifted to reflect the SPS strategy and approach to the distribution of housing across the sub-region.

- 4.2 As set out in the published Housing Trajectory Background Paper (June 2018) (Examination Document HOU007) the EBLP makes provision for the delivery of 14,950 dwellings over the period 2016 – 2036 (747pa). This is a surplus of 374 dwellings against a target of 14,576 (729pa). The target of 14,576 over the period 2016–2036 is derived from the PfSH target of 14,950 over the period 2011-2034, carrying forward under-delivery in the 2011-2016 period and pro-rata-ing the SPS 650 target forward two years from the 2034 end-date of the SPS to the EBLP end-date of 2036.
- 4.3 Accordingly the level of housing provision identified in the EBLP is consistent with that identified in the SPS in that it is higher than both the OAHN and the SPS Position Statement H1 allocation.

5. Strategic Development Locations

- 5.1 Position Statement SDL1 of the SPS identifies the ‘Northern Part of Eastleigh Borough’ as a new strategic development location identified for mixed use development. Paragraph 5.38 identifies that:

“There is potential capacity in the northern part of Eastleigh Borough to accommodate new development, subject to significant investment in the infrastructure, particularly transport improvements. On this basis an additional potential growth location is identified in the northern part of Eastleigh Borough. This area provides opportunities for mixed use development, incorporating new housing, employment, local services & amenities and associated infrastructure. The location of strategic growth in Eastleigh Borough will be determined through the local plan process”.

- 5.2 The EBLP proposes a new Strategic Growth Option (SGO) comprising at least 5,300 dwellings (of which approximately 3,350 are likely to come forward within the plan period) in Strategic Policy S5 along with a new link road to connect the development to the M3 at junction 12 in Strategic Policy S6. It also includes other environmental and infrastructure improvements including new schools, retail centres, employment opportunity, green infrastructure and ecological and environmental mitigation enhancements.
- 5.3 The EBLP therefore accords with the provisions of the SPS insofar as the spatial distribution of strategic scale development is concerned.

6. Employment Provision

- 6.1 Position Statement E1 of the PfSH SPS requires the EBLP to make provision for a net increase in B-class employment over the period 2011 – 2034 of 114,000m² which is made up of 40,000m² of B1a office floorspace and 74,000m² of other B-class floorspace. It equates to an annual average figure of 4,957m²,
- 6.2 The EBLP proposes to make provision for a net increase of 144,050m² of B-class floorspace in the period 2016-2036 (which includes 42,710m² of office floorspace). This equates to an annual average provision of 7,203m². This target is derived from the PfSH SPS target but takes into account the additional 2 years of the EBLP period (2034 – 2036) and also losses of employment floorspace both in terms of those which have already occurred in the 2011-2016 period and those anticipated to occur during the remainder of the plan period. These losses tend to occur as former employment sites are redeveloped for non-employment (mainly residential) uses and need to be re-provided to ensure the net overall target is met.
- 6.3 A detailed site by site and year by year analysis of employment permissions, allocations and losses is set out in the Employment Background Paper / Trajectory (June 2018) (Examination document ECON001). It shows that, in all likelihood, more than 144,050m² of net new employment floorspace will be delivered during the plan period. There is some uncertainty surrounding the precise extent of land which will be developed at the Southampton Airport Economic Gateway (SAEG) within the plan period. The SAEG alone has the potential to deliver approximately 131,900m² of new floorspace. Only c30,000m² of this needs to come forward during the plan period to meet the EBLP target.
- 6.4 The site is also identified in Position Statement E2 (E2.1) of the SPS as an employment location of sufficient scale to have sub-regional importance and which should be protected for B-class development from competing development pressures through appropriate policies in local plans. In spite of the uncertainty surrounding the precise extent and timing of delivery of land at the SAEG the council considers that it is reasonable to rely on the SAEG as it is a sub-regionally important employment site in a prime location with unrivalled accessibility characteristics.

7. Urban Area and Brownfield Prioritisation

- 7.1 A key component of sub-regional planning policy in South Hampshire over many years has been 'cities first' which, in its broadest sense, means a focus on existing built up areas and on 'brownfield' sites before considering development on greenfield sites and land outside defined urban areas. This is captured in Key Principle A of the SPS. The council has followed the same approach in the EBLP through Strategic Policy S1 and the establishment of a settlement hierarchy. It is also evident in the Development Distribution Strategy & Principles (DDS&P) (Examination Document ORD012) which helped inform the approach to selecting potential sites for allocation in the EBLP. This DDS&P document notes:

- o The borough's settlement hierarchy should be the main consideration in making decisions about the spatial distribution of new development to ensure that development is located in areas which provide the widest range of employment opportunities, community facilities and transport infrastructure and in order to support, enhance and reinvigorate those areas;*
- o Development will be focused first on suitable brownfield sites within the defined settlement boundaries of the borough's most sustainable settlements;*
- o However, given the tightly drawn boundaries of those settlements and the scale of development likely to be required over the plan period, the plan will need to make provision for a significant scale of new greenfield development;*

7.2 Clearly 'cities first' does not equate to 'cities only' and the EBLP does allocate new greenfield sites for development; not least in the form of the proposed SGO. However, it has only been necessary to consider allocating development on new greenfield sites because there is not sufficient capacity within the borough's existing settlements and on sustainable brownfield sites to accommodate the quantum of new dwellings needed to meet the housing target.

8. Countryside Gaps

8.1 Another key aspect of 'cities first' and the council's approach to selecting sites for allocation in the EBLP the desire to retain the separate identity of individual towns, villages and local communities and to prevent their coalescence by retaining open and undeveloped countryside gaps between them. Position Statement S1 of the SPS reflects this important principle. It makes provision for local authorities to identify in local plans strategic countryside gaps of sub-regional significance as well as local countryside gaps which are of fundamental local importance.

8.2 Strategic Policy S8 of the EBLP sets out to do this and identifies 15 countryside gaps where development, which would physically or visually diminish the gap or have an urbanising effect detrimental to retaining its openness, its character or the separate identity of adjoining settlements, will not be permitted.

8.3 The DDS&P document notes that:

- o The separate identity of settlements and local communities should be safeguarded by ensuring the retention of undeveloped countryside gaps between them and avoiding decisions which would result in their coalescence;*

9. Green Infrastructure

9.1 Position Statement G1 of the SPS commits the PFSH local authorities and their partners to continue to work together to plan, provide and manage connected networks of multi-functional green spaces including existing and new green infrastructure (GI). It is derived from and supported by a PFSH GI strategy which was adopted in March 2017 and updated in July 2018. This sub-regional picture is reflected in Strategic Policy S10 of the EBLP which seeks to

provide, retain and enhance a wide range of multi-functional green infrastructure including major landscape-scale links, major country parks and open spaces, all manner of green links, stepping stones and inter-connected wildlife and habitat corridors. Significant new GI will be provided as an integral part of the SGO to the north of Bishopstoke and the north & east of Fair Oak as identified in Strategic Policy S5 of the EBLP (criterion 15).

10. Environmental & Resource Sustainability

- 10.1 In terms of water supply, waste water disposal and energy efficiency, Policies DM2 and DM10 of the EBLP seek to deliver the ambitions of the SPS in terms of working together to facilitate the sustainable use of resources across the wider sub-region. In turn these reflect the ambitions of the water company Water Resource Management Plans and the plans and proposals of the Environment Agency and other bodies to both reduce water use and improve water quality. Policy DM2 specifies energy efficiency and water consumption targets which reflect the environmental impact of new development in the relatively built-up sub-region and the fact that it is an area of water stress. The council will modify Policy DM10 in response to representations received so that it seeks to phase new development alongside improvements to new water supply and/or wastewater disposal infrastructure where this is necessary to comply with the requirements of the Habitats Regulations and/or the Water Framework Directive. It will also address the issue of nutrient neutrality
- 10.2 The council is committed to continuing to work with PfSH, its constituent local authorities and other relevant partners to devise and implement appropriate measures to address matters related to water supply, wastewater disposal, water quality, flood risk management and energy efficiency through work on projects such as the PfSH Integrated Water Management Study, Strategic Flood Risk Assessment and the Solent Energy Strategy.

11. Review of the Spatial Position Statement

- 11.1 At the PfSH Joint Committee meeting on 4th December 2018 a report was considered which discussed the need to scope out a review of the PfSH SPS in the light of the publication of the new NPPF in July 2018. It was noted at paragraph 9 of that report that the “timetable for doing this work needs to stretch over months rather than years”. A follow-up report to the 5th February 2019 meeting initiated that scoping process looking at the potential geographical footprint for the work and options for funding the work. Work is in progress through the PfSH Planning Officers Group and the Hampshire & Isle of Wight Planning Officers Group to undertake this review. EBC is fully committed to this work.

12. Conclusion

- 12.1 While it is a non-statutory document, the PfSH SPS (and the evidence which underpins it) have been important documents in providing the framework for the development of the EBLP. The council has co-operated proactively and effectively with PfSH, its constituent local authorities and other PfSH Partners and agencies in producing the SPS and has incorporated its key provisions in the EBLP. It will continue to do so moving forward to address strategic issues in

the light of the 2019 NPPF. Accordingly PFSH and EBC consider the EBLP to be in 'general conformity' with the PFSH SPS.

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