

Sent by email to:

xx/xx/2025

Dear Sir/ Madam

**Eastleigh Local Plan**

Thank you for consulting the Home Builders Federation (HBF) on the Issues and Options for the Eastleigh Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

***Q1: Do you have any comments on the key issues we have identified? Are there any other key issues we should consider?***

The key issues are an appropriate basis on which to prepare the local plan. The Council states that they will need to not only consider their own needs but also any unmet needs arising in the Southampton housing market area. HBF agrees that this will be necessary and an important aspect of any co-operation between Eastleigh and other Boroughs in the area. The most recent local plan consultation by Southampton City Council in 2023 indicated that the most the city could deliver was approximately 16,800 between 2022 and 2040, around 930 dwellings per annum (dpa). The latest standard method requires Southampton to plan for at least 1,214 which will mean a shortfall of approximately 280 dpa – a total of 5,112 homes over an 18-year plan period. Given that Southampton City Council’s boundary is drawn closely to the urban edge of the city will therefore mean Eastleigh will have to work close with the city council to identify areas for expansion to ensure any unmet needs are addressed.

One other area the Council may wish to focus on more with regards to housing is how it can secure the delivery of homes earlier in the plan period. As the Council may be aware recent research has shown that the “*hotel of mum and dad*” is the busiest it has been for two decades as an increasing number of young adults in the UK are living with their parents. The research by the IFS outlines that the prohibitive cost of renting, let alone buying, is one reason why more twenty- and thirtysomethings are “*co-residing*” with family at an age when their parents would have been living independently. The research estimated 1.7 million adults in the UK aged 24-34 are living with parents, almost 20% of the total cohort and an increase of 450,000 since 2006, when 13% of this age group lived at home and is most acute where housing costs are high – such as in the South East of England. This is a sign that too few homes have been built in the past and as such a boost is needed in the short term. Too often LPAs seek to meet needs later in the plan period through a reliance on larger sites. The Council should therefore have the objective of boosting supply early in the plan period in order to ensure a greater range of sites are allocated and provide homes for those who need them now.

***Q2: Do you agree or disagree with the draft vision we have suggested for the Local Plan review?* And *Question 3: Do you have any comments on how this vision could be changed?***

HBF would suggest that the fourth bullet point on housing should be more ambitious and state the intention of the Council to meet housing needs in full in order to deliver a range of quality, affordable homes. With regard to the 5th bullet point the reference to urban sprawl is an emotive one that can be misinterpreted. To many urban sprawl is any development on the edge of settlement rather than unplanned and incoherent development spreading out from settlements. HBF would suggest a more positive vision statement would be “*Protecting the distinct identity of towns and villages through the delivery of high-quality development that is well integrated into existing communities and respects the character of the area*”.

***Q6: Which of the following objectives are the most important to you?***

* ***Meeting as much of the need for new homes and business space as possible***
* ***Making effective use of land (for example through careful design fitting more homes onto an area of land, meaning fewer sites overall need to be developed)***
* ***Locating development where walking, cycling and public transport can be supported, and traffic congestion / carbon emissions / pollution minimised***
* ***Protecting countryside settlement gaps to maintain separation between and protect the individual identity of towns and villages***
* ***Protecting the most attractive countryside (e.g. sensitive landscapes, the coast, or South Downs National Park) Locating development where it can do most to enhance biodiversity***
* ***Other (please specify)***

The HBF considers the primary objective of any development plan is to ensure that sufficient land is allocated to meet the development needs of the area – a position that is clear in paragraph 11 of the NPPF which states that all plans must meet the development needs of their area. However, focusing on meeting development needs in full does not mean that this is at the expense of the other objectives or reduce their importance. In meeting development, the Council will still need to ensure that it is delivered in the most sustainable manner, ensuring any negative impacts are addressed and positive benefits of development are maximised.

***Q7 and Q8 - Key Approach 1: How should we help tackle climate change, and protect / enhance biodiversity, the countryside, and green spaces.***

With regard to biodiversity HBF agrees that the Council will need to ensure that the plan closely aligns with the Local Nature Recovery Strategy to identify the most valuable areas for nature improvement and where it would be most appropriate and effective to deliver any offsite biodiversity net gains resulting from new development.

As for policy relation to the delivery of BNG the HBF does not consider these to be necessary given that this is already set out in both regulations and guidance. PPG supports such an approach stating that plan-makers should be aware of the statutory framework for biodiversity net gain and that they do not need to include policies which duplicate the detailed provision of this statutory framework. It also states that it would be inappropriate to include policies which are incompatible with this framework. The PPG is also clear that plan makers should not seek a higher percentage than the statutory objective for 10% BNG, unless justified. The HBF considers 10% to be sufficient to ensure the impact of development is not only mitigated against but that it leaves a positive impact on biodiversity.

In relation to reducing energy and water use the HBF consider the most appropriate approach is for these to be delivered through building regulations and not through the adoption of policies through local plans. The Future Homes Standard is expected to be adopted in 2025 and will mean that all new homes will be zero carbon ready. This means that as the national grid decarbonise so will these homes ensuring that new development will be zero carbon from 2035. If the Council choose to go beyond building regulations the Council will need to have regard to the Written Ministerial Statement from December 2023. Whilst this was written by the previous Government it has not be rescinded and remains a material consideration and requires any policies in local plans that go beyond national standards to be robustly justified to ensure that it does not impact on the viability, affordability and supply of new homes.

***Q9 and 10. Key Approach 2: How should development be planned to create communities?***

On strategic sites the Council should ensure that they are delivered in a way that creates new communities with the necessary series and infrastructure to ensure that they thrive. However, the Council must not rely solely on larger sites that deliver new communities to be the primary focus of their development strategy. In order to ensure there is a mix of homes coming forward across the Eastleigh the Council must allocate a range of sites which meet the needs of different communities. Allocating a range of sites, in terms of both size and location, also allows homes to be delivered more consistently across the plan period with small and medium sized sites delivering earlier to meet the desperate need for homes that already exists rather than pushing this into the future.

The Council should also notes that the NPPF[[1]](#footnote-2) requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. The HBF would therefore wish to see the 10% small sites allowance delivered through allocations (and not windfall). Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%. The HBF also notes that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of additional non-strategic allocations would expand the range of choice in the market, and (possibly most importantly), be of a scale that can come forward and make a contribution to housing numbers earlier in the plan period.

**Q11 and 12. Key Approach 3: How do we optimise the use of land?**

As required by the NPPF the Council will need to try and make the most efficient use of land. However, the Council’s drive to ensure more homes are delivered in urban areas in order to reduce the amount of green field development must not be at the expense of those communities. Whilst higher densities are most appropriate in towns it is not the case that all sites in urban are can deliver significantly higher densities than the surrounding area. The Council will need to be careful to ensure that what is being proposed on is not only in keeping with the character of the area but remains viable and supported by sufficient infrastructure. Council will also need to consider the interaction between policies density and other policies in the plan. Policies such as open space provision, SuDs, tree provision, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency and parking provision will all impact upon the density which can be delivered upon a site.

When considering the efficient use of land, the Council must not just take into account the demand for the type of home in Eastleigh but across the HMA. It is likely that development in Southampton will be higher density flatted development given the high level of need and a constrained land supply. This will point to those less constrained area surrounding the city providing homes that meet the needs of families looking for larger homes. It will therefore be vital for the Council to work with Southampton to not only understand what is needed across the HMA but also the type of homes that will be provided to ensure the correct mix of homes is planned for.

***Q17 and 18. Key Approach 5: What is the need for development in the Borough that we should consider***

The local housing needs assessment using the standard method set out in PPPG will require the council to plan for a minimum of 922 dwellings per annum (dpa), a total of 18,440 homes over the suggested twenty-year plan period of 2024 to 2044. However, in addition to these homes the Council will also need to take into account any unmet needs arising in neighbouring areas. Primarily this will be Southampton which on the basis of current supply figures will have unmet needs in excess of 5,000 homes over the next 20 years.

**Q21 and 22. Key Approach 6: How much development can be accommodated in urban areas?**

See response to Q11. However, in assessing what can be delivered in turban areas the Council must ensure that the sites are available and deliverable. In our experience some Councils can be overly optimistic as to what can be delivered in urban areas, including sites that are never likely to come forward within the plan period in order to reduce the number of homes that must be built on green field sites.

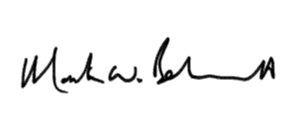
**Q23 and 24. Key Approach 7: How many new homes, community facilities and business spaces should be located on green field sites?**

The Council, as required by national policy, must meet housing needs in full therefore the number of homes built on green field sites will be in direct relation to the number of homes that can realistically be developed in urban areas.

**Q25 and 26. Key Approach 8: Where should we locate new development? What improvements are needed to support development in these locations? Which areas should we protect?**

HBF doesn’t comment on location for development. However, as set out previously it will be important for the council to ensure that it allocates a range of sites both in terms of size and location in order to deliver a consistent supply of news homes across the plan period.

Yours faithfully



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1. NPPF December 2024 Paragraph 73 [↑](#footnote-ref-2)