

Sent by email to: [local.plan@eastleigh.gov.uk](mailto:local.plan@eastleigh.gov.uk)

20/07/2021

Dear Sir/ Madam

**Response by the Home Builders Federation to the consultation on the main modifications to the Eastleigh Local Plan**

1. Thank you for consulting the Home Builders Federation (HBF) on the main modifications to the submitted 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.

**MM10**

Modification is unsound as it is inconsistent with national policy.

2. The new paragraph 4.11 refers to the requirement in paragraph 47 of the 2012 NPPF that a 5% buffer has been added to the requirement for the period 2019 to 2024. It is not clear why this has been added to this particular five-year period given that national policy (paragraph 48 of the 2012 NPPF and paragraph 73 of the 2019 NPPF) requires the Council to be able to show annually that it has a five-year supply against its housing requirement which will include either a 5% or 20% percent buffer depending on the whether there is considered to be a significant under delivery of housing in previous years. As such a 5% buffer is not required to be applied to the specific period of past supply mentioned in paragraph 4.11.
3. However, this amount is not factored into the requirement but only when the five-year land supply is calculated – it is to ensure flexibility in supply against minimum requirements. This is a position that is recognised by the Council in paragraph 12 of ed101 and therefore it is surprising that the second sentence of modified paragraph 4.11 has been included stating that this 5% has been added to the requirement. As such we would suggest that the second sentence of paragraph 4.11 is either amended or deleted to avoid confusion.

**MM11**

Modification is unsound as it is ineffective.

4. The amendments to supply proposed by the Inspector mean that this local plan cannot show sufficient supply to meet its housing needs to 2036 in full. There is a



substantial shortfall of over 2,500 homes over the plan period. We recognise that much of this shortfall falls in the later years of this plan however, what is concerning is that on the basis of the latest housing trajectory the Council will not have a five-year housing land supply from 2021 (see appendix 1). Therefore, the Council's proposed modification to commence a review of the plan in a years' time would seem a wholly inadequate response to the substantial shortfalls that will occur in the next five years. In order for this plan to be found sound the Council should have allocated additional smaller sites across the Borough to bolster supply over the next five years during which the Council can prepare a new local plan to meet longer term needs. Alongside additional sites the Council should also commit to an immediate review of the local plan. Given the length of time it is likely to take to adopt a new local plan and the lack of five-year housing land supply so soon into the remaining plan period there seems little reason to delay its preparation.

### **MM36**

Modification is unsound as it is not consistent with national policy and is ineffective.

5. The HBF continues to consider the inclusion of the Passivhaus standards within this policy to be unsound and reference to it should be deleted. The Government has set out a clear framework for improving the energy efficiency of buildings under the Future Homes Standard. This will see new homes deliver reductions in CO2 emissions of at least 31% below current standards until 2025 from which new standards will see these reduce even further to 75% of current building regulations. Given these improvements requiring development to aim in providing 1% of homes on to Passivhaus standards is not necessary and is ineffective and should be deleted. If the Council, consider it necessary to refer to the Passivhaus standard it should do so in terms of providing encouragement for those developers that wish to build to this standard in the supporting text.

### **Conclusion**

6. We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

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## Appendix A

	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36
<b>Req.</b>	857	857	857	742	742	742	742	742	692	692	692	692	692	692	692	692	692	692	692	692
<b>Cumulative</b>	857	1,714	2,571	3,313	4,055	4,797	5,539	6,281	6,973	7,665	8,357	9,049	9,741	10,433	11,125	11,817	12,509	13,201	13,893	14,585
<b>Delivery</b>	517	893	1162	1330	1194	784	665	663	719	653	784	522	375	345	325	310	260	155	155	155
<b>Cumulative</b>	517	1,410	2,572	3,902	5,096	5,880	6,545	7,208	7,927	8,580	9,364	9,886	10,261	10,606	10,931	11,241	11,501	11,656	11,811	11,966
<b>Deficit</b>	- 340	- 304	-	-	-	-	-	-	-	-	-	-	-	-	- 194	-576	-1,008	-1,545	-2,082	- 2,619
<b>5-year req.</b>	4,055	3,940	3,825	3,710	3,660	3,610	3,560	3,510	3,460	3,460	3,460	3,460	3,460	3,460	3,460	3,460	2,768	2,076	1,384	692
<b>Deficit added</b>	4,055	4,280	4,129	3,710	3,660	3,610	3,560	3,510	3,460	3,460	3,460	3,460	3,460	3,460	3,460	3,654	3,344	3,084	2,929	2,774
<b>Buffer</b>	203	214	206	186	183	181	178	176	173	173	173	173	173	173	173	183	167	154	146	139
<b>Total req</b>	4,258	4,494	4,335	3,896	3,843	3,791	3,738	3,686	3,633	3,633	3,633	3,633	3,633	3,633	3,633	3,837	3,511	3,238	3,075	2,913
<b>5-year supply</b>	5,096	5,363	5,135	4,636	4,025	3,484	3,484	3,341	3,053	2,679	2,351	1,877	1,615	1,395	1,205	1,035	725	465	310	155
<b>Surplus/ deficit</b>	838	869	800	741	182	-307	-254	-345	-580	-954	-1,282	-1,756	- 2,018	-2,238	-2,428	-2,802	-2,786	-2,773	-2,765	-2,758
<b>5YHLS</b>	5.98	5.97	5.92	5.95	5.24	4.60	4.66	4.53	4.20	3.69	3.24	2.58	2.22	1.92	1.66	1.35	1.03	0.72	0.50	0.27

