

Proof of Evidence of Eastleigh Borough Council on Five Year Housing Land Supply

Land at Satchell Lane, Hamble le Rice

PINS Ref: APP/W/1715/W/22/3292580

PROOF OF EVIDENCE of Emily Howbrook On behalf of the Local Planning Authority

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FINAL

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1. SUMMARY

1.1. My name is Mrs Emily Howbrook. I am the Strategic Development Manager in the Council's Finance & Housing Executive, specialising in housing delivery and strategy for the Council's own housing programme. I have been asked by Eastleigh Borough Council's planning team to provide evidence at this Inquiry on five-year housing land supply. My evidence draws upon published reports and updated evidence to consider the five-year land supply position against the housing requirement in the Eastleigh Borough Local Plan.

Context

1.2. Paragraph 74 of the National Planning Policy Framework (NPPF) states:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”.

Housing Requirement

1.3. This proof of evidence clarifies the housing requirement which is used for the land supply calculation. This evidence does not provide a justification for this requirement figure, and instead refers to the adopted Eastleigh Borough Local Plan (April 2022) and supporting evidence.

1.4. For the purposes of calculating the five-year land supply, the housing requirement is set out in adopted Policy S2 in the Local Plan **(CD4.1)**. Adopted strategic Policy S2 (Approach to New Development) sets out that the Council will promote the delivery of a minimum of 14,580 new dwellings 2016-2036. The adopted Local Plan Monitoring Framework (Appendix C) **(CD4.1)** states that reports on five-year land supply will be published annually, with a target net additional dwelling completions figure of 729 per annum (14,580/20 years).

1.5. The housing requirement used for the five-year land supply calculation is 729 dwellings per annum, including a 5% buffer resulting in an annual requirement of 765.5 (rounded up to 766).

1.6. This housing requirement is a significant increase from that used in previous five-year land supply calculations.

Five Year Housing Land Supply

1.7. My assessment of five-year land supply position has a base date of 1st July 2022 and covers the five-year period to 30th June 2027.

1.8. The assessment of supply is set out in Section 6 of my evidence, with supporting tables and relevant correspondence from site developers and promoters in **Appendix EH3**.

1.9. My monitoring work in collaboration with Hampshire County Council’s Hampshire Services team has led me to identify the following sources of supply over the five-year period:

Source of supply (category)	Description	Five- year supply
Small site commitments	Sites of less than 10 dwellings with planning permission on 110 sites, which have been discounted by 4% for lapses	165
Large site commitments	Sites of 10+ dwellings with planning permission and planned build out over the five-year period. 13 sites are under construction or have a material start. 9 sites are planned to commence and deliver completions within the five-year period.	2,565
Sites with resolution to grant	Sites with a local planning committee resolution to grant permission, at the base date. There are five sites in this category which are expected to deliver completions, or be completed, within the five-year period.	863
Specialist Elderly Housing (C2)	Sites with planning permission which include Class C2 residential (bedrooms) and can equate to an equivalent number of dwellings (i.e the amount of accommodation released in the housing market from the provision of bed spaces). There are two sites with C2 bed spaces as part of the development not counted elsewhere in the supply.	105
Sites within EBC’s Housing Programme Pipeline	Sites in the planning pipeline (pre-application stage) with Council support for development, and evidence that they will be delivered within five-year period (subject to planning). There are three such brownfield sites in the Council’s Housing Programme.	48
Local Plan site allocations	Sites in the planning pipeline with Council in principle support for development, and evidence that they will be delivered within five-year period (subject to planning). There is one such greenfield site expected to deliver completions within the five-year period.	35
Windfall allowance	Sites not identified specifically but based on historic data on past completions (includes a % discount), and allowance covers years 3-5 (54 dpa).	162

1.10. When brought together, the evidence on sources of supply shows a total deliverable supply of 3,943 dwellings over the period 1st July 2022- 30th June 2027.

1.11. The requirement figure taken from the adopted Local Plan over a five-year period from the base date is 3,645 (729 x 5) plus a 5% buffer (182 dwellings), giving a total housing requirement of 3,827 dwellings (766 per annum, rounded upwards).

1.12. I conclude, therefore, that based on the latest evidence, the five-year housing land supply in Eastleigh Brough exceeds five years (5.1 years).

2. INTRODUCTION

- 2.1. My name is Mrs Emily Howbrook. I am a Strategic Development Manager at Eastleigh Borough Council, Hampshire. I have 17 years' experience in planning policy, strategy and development and, since 2019, have been working as a Strategy Manager for Eastleigh Borough Council's housing programme.
- 2.2. I have been employed by Eastleigh Borough Council since 2016. Prior to this, I was employed in the Environment Department at Hampshire County Council (2009-2016) and in the Planning Department at Rushmoor Borough Council (2005-2009).
- 2.3. I specialise in advising the Council on strategic planning issues as these relate to housing delivery and local authority intervention through its own projects and partnerships. I am responsible for monitoring progress against the Council's corporate priority of meeting housing needs. During 2016-2020 I contributed to the preparation of the Eastleigh Borough Local Plan and since 2019 have been managing the preparation of the five-year land supply quarterly reporting.
- 2.4. My wider experience includes planning policy; affordable housing evidence work; site assessments; monitoring section 106 agreements and site implementation; and funding bids for infrastructure, land release and housing delivery. I have been a Chartered Member of the Royal Town Planning Institute (RTPI) since 2010 and RICS Associate since 2019.
- 2.5. The evidence which I have prepared and provided for this Inquiry (PINS Reference APP/W/1715/W/22/3292580) is true and has been prepared, and in accordance with, the guidance of the National Planning Policy Framework and I confirm that the opinions expressed are my true and professional opinions.

Scope of Evidence

- 2.6. The scope of this evidence does not include housing need, although background on the housing requirement figure used for the five-year land supply calculation is provided. This Proof considers the five-year housing land supply against the housing requirement figure, and provides details on the methodology and assumptions used to identify sources of supply and delivery rates within the five-year period.

Structure

2.7. I have structured my evidence as follows:

- Section 3- Policy and Legal Background
- Section 4- Housing Requirement
- Section 5- Deliverable Supply
- Section 5- Five-year Land Supply Calculation

3. POLICY AND LEGAL BACKGROUND

3.1. In this section I summarise relevant national policy and guidance and legal decisions interpreting this, as it relates to the calculation of five-year land supply.

3.2. Paragraph 60 of the NPPF published July 2021 sets out that:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

Sustainable Development

3.3. Paragraph 11 of the NPPF sets out a presumption in favour of sustainable development:

“For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

3.4. According to footnote 8 of the NPPF ‘out of date’ in the context of applications involving the provision of housing, includes:

“...situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.”

3.5. The Council has published reports demonstrating a five-year land supply of deliverable housing sites since May 2017.

3.6. This Proof of Evidence tests whether the Council can currently demonstrate a five-year housing land supply and will demonstrate to the Inspector the full and up-to-date position in this regard.

Housing Requirement

3.7. Paragraph 74 of the NPPF states:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”.

3.8. The Eastleigh Borough Local Plan’s strategic policies were adopted following receipt of the Planning Inspectorate’s Report on the examination in April 2022 (**CD5.1**). It follows that any update of housing land supply after the date of plan adoption should identify supply against the housing requirement set out in the adopted Policy S2. This is confirmed by the Local Plan Inspector’s report which states that on the basis of the Plan’s overall housing requirement of 14,580 dwellings (annualised as 729 per annum), the five-year housing requirement is 3,827 (para.74).

Maintaining Supply and Delivery

3.9. Paragraph 74 of the NPPF sets out that:

“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or

c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

3.10. The Council did not seek to ‘confirm’ a five-year housing land supply for a year through adopting the plan in April 2022. Paragraph 72 of Local Plan Inspector’s Report (March 2022) confirms that the Council does not have a record of a persistent under delivery and a 5% buffer is appropriate. Accordingly, a 5% buffer is used to calculate the housing land supply requirement reported in this Proof.

3.11. The Council has not submitted an annual position statement to the Planning Inspectorate to confirm its five-year target for 12 months, opting instead to quarterly monitor. The use of a 10% buffer is therefore not considered appropriate for this calculation.

3.12. Paragraph 72 of Local Plan Inspector’s report (March 2022) **(CD5.1)** confirms that the Council does not have a record of a persistent under delivery. The use of a 20% buffer is therefore not considered appropriate for this calculation.

3.13. The July 2019 revision of the PPG for Housing Supply and Delivery (Paragraph 022 Reference ID: 68-022-201907022) states:

“To ensure that there is a realistic prospect of achieving the planned level of housing supply, the local planning authority should always add an appropriate buffer, applied to the requirement in the first 5 years (including any shortfall), bringing forward additional sites from later in the plan period. This will result in a requirement over and above the level indicated by the strategic policy requirement or the local housing need figure.

Buffers are not cumulative, meaning that an authority should add only one of the following, depending on circumstances:

- *5% - the minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to demonstrate a 5 year housing land supply;*
- *10% - the buffer for authorities seeking to ‘confirm’ 5 year housing land supply for a year, through a recently adopted plan or subsequent annual position statement (as set out in paragraph 74 of the National Planning Policy Framework), unless they have to apply a 20% buffer (as below); and*
- *20% - the buffer for authorities where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results”.*

3.14. The annual housing requirement approved in the adopted Local Plan of 729 dwellings *per annum*, plus an appropriate buffer of 5%, would make Eastleigh’s figure 765.5 dwellings per annum for the purposes of identifying a five-year land supply.

Under Delivery

3.15. As noted above, paragraph 72 of Local Plan Inspector’s report confirmed that, as of March 2022, the Council does not have a record of a persistent under delivery and the use of a 20% buffer was not appropriate.

3.16. The Housing Delivery Test identifies whether past rates of development have met housing requirements, based on the percentage of “net homes delivered against the number

of homes required” over a rolling three-year period. Where the requirements of the test have been fully satisfied, there are no further requirements placed on a Local Authority.

3.17. However, where a Plan-making Authority’s delivery rate falls below the number of homes required, then certain consequences as set out in the NPPF apply, including the application of a 20% buffer on a Plan-making Authority’s five-year housing land supply requirement, if housing delivery falls below 85% of the required number of homes.

3.18. Since publication of the Housing Delivery Test, however, delivery in Eastleigh Borough has not fallen below 100% of the of the Local Planning Authority’s housing requirement over the previous three years (see Table 1). Indeed, results published in January 2022 showed that Eastleigh had delivered 3,250 dwellings over the three years between 1st April 2018 and 31st March 2021 against a target of 1,826 dwellings in the same period. This means that Eastleigh Borough continued to pass the Housing Delivery Test and is not subject to a 20% buffer.

Table 1 Eastleigh Borough Council Housing Delivery Test (HDT) published measurements (2016-2022) (source: DLUHC www.gov.uk/government/publications/housing-delivery-test-2021-measurement)

ONS Code	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: measurement	Housing Delivery Test: consequence
	2018/19	2019/20	2020/21		2018/19	2019/20	2020/21			
E07000086	706	658	462	1826	1162	1223	865	3250	178%	None
E07000086	530	706	658	1894	893	1162	1223	3278	173%	None
E07000086	539	530	706	1775	517	893	1162	2572	145%	None
E07000086	548	539	530	1617	456	517	893	1866	115%	None

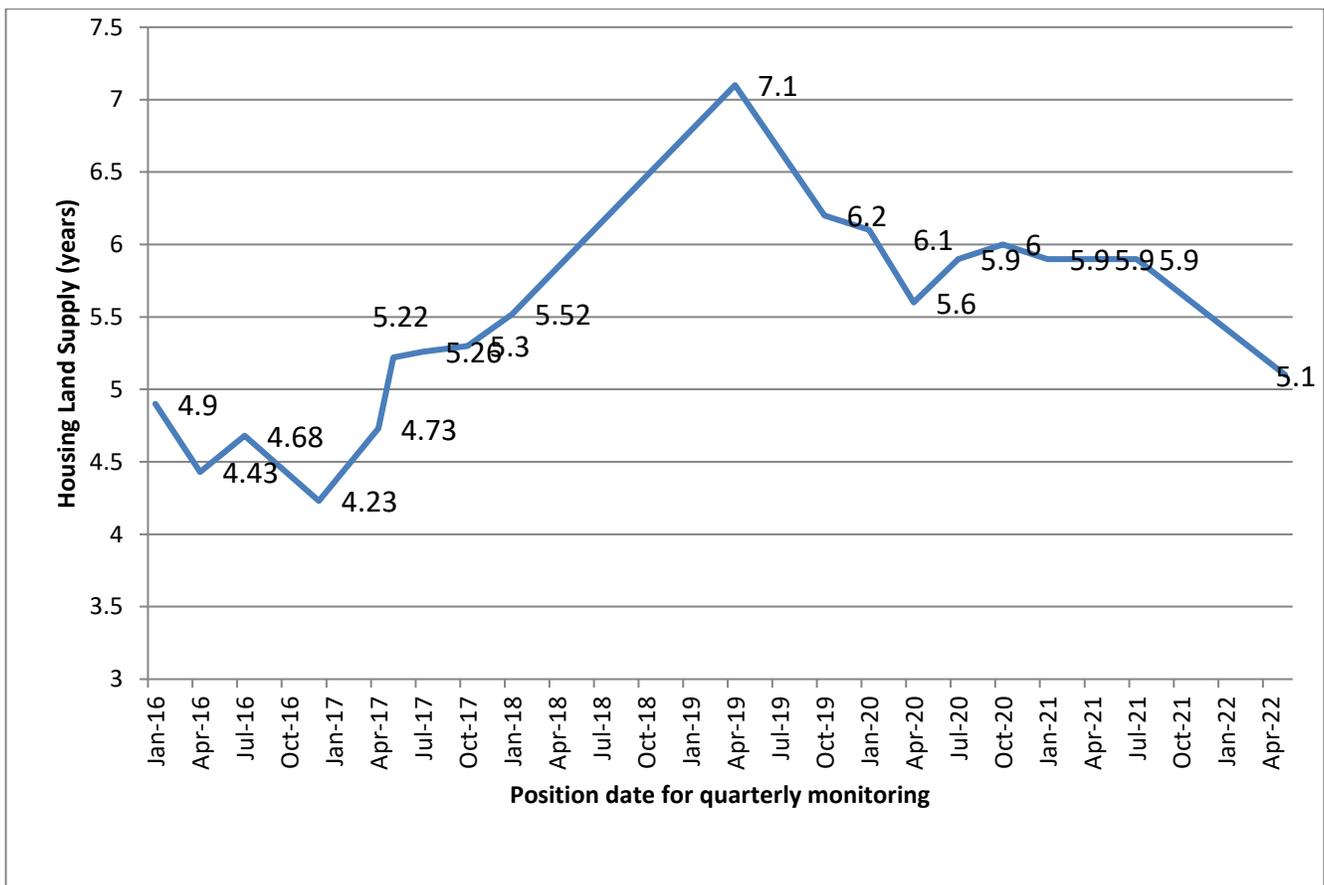
3.19. Table 2 below illustrates the net dwelling completions (i.e., taking account of demolitions) since 2016-17. This shows that whilst the Local Plan annual target is 729 dwellings per annum (as an annualised, average for monitoring purposes), completions over recent years have averaged 891 dwellings per annum (2016-2022). The data reflects the pace

of permissions issued by the Local Planning Authority since 2016, as permission have translated to completions on the ground.

Table 2 Net dwelling completions (Eastleigh Borough) (source: HCC Land Supply Monitoring)

Monitoring year (financial)	Net dwelling completions annual total
2016-2017	517
2017-2018	893
2018-2019	1162
2019-2020	1223
2020-2021	844
2021-2022	707
Average	891

Figure 1 Housing Land supply figure as calculated and reported in EBC quarterly reports (from base date January 2016- July 2022) (source: Eastleigh Borough Council)



3.20. Paragraph 76 of the NPPF states that: to maintain the supply of housing, Local Planning Authorities should monitor progress in building out sites which have permission. The Council has been preparing and publishing quarterly five-year Land Supply Reports and the monitoring land supply trends as shown in Figure 1. The *Eastleigh Borough Local Plan 2016-2036* was adopted at Full Council 25 April 2022. In submitting evidence to support the Local Plan examination, the Council stated it “has closely monitored its 5 year land supply and published updated calculations throughout progress of the Local Plan” **(CD 15.6)**.

3.21. The Local Plan Inspector’s Report states that the Council can demonstrate a five-year land supply, indicating that evidence was scrutinised and considered up to date evidence for the purposes of planning policy. Paragraph 76 in the final Inspector’s report **(CD5.1)** states as follows:

“Taking into account past delivery rates and the evidence presented, there is in my view a clear prospect that there will be an up-to date supply of specific deliverable sites which are able to provide five years’ worth of housing land against the requirement identified at policy S2 upon adoption of the Plan.”

3.22. The Inspector’s Report refers to a five-year supply calculation with a base date 1st April 2019 (examination document ED61B), demonstrating 6.3 years supply **(CD15.7)**. It also refers to evidence provided in examination document ED90 **(CD15.6)**, which referred to the updated supply position reported in the April 2020 published Report (with a base date 1st January 2020) (demonstrating 6.1 years). This April 2020 Report was prepared by HCC Hampshire Services, using the same methodology as the most recent land supply report (August 2022) **(CD5.6)**.

Housing Supply

3.23. Paragraph 74 of the NPPF states:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”.

3.24. Annex 2 of the NPPF defines deliverable as:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five-years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is

clear evidence that homes will not be delivered within five-years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five-years.”

3.25. As explained in NPPG paragraph 007 (Reference ID: 68-007-20190722), sites are either considered to be deliverable in principle, or are the sites which would require further evidence to be considered deliverable, namely those sites which:

- have outline planning permission for major development;
- are allocated in a development plan;
- have a grant of permission in principle; or
- are identified on a brownfield register.

3.26. In interpreting this guidance and NPPF glossary, planning authorities can come to their own judgement as to whether any site which is not listed in either Category A nor B should nonetheless be considered “deliverable”.

3.27. Paragraph 71 of the NPPF states that a windfall allowance may be justified in the anticipated supply if a Local Planning Authority has compelling evidence.

4. Housing Requirement

- 4.1. Where an Authority has an up-to-date plan-based housing requirement (adopted in the last five years), the housing requirement set out in the Local Plan is the basis for assessing five-year housing land supply.
- 4.2. The *Eastleigh Borough Local Plan 2016-2036 (CD4.1)* was adopted at Full Council on 25th April 2022. Adopted Strategic Policy S2 (Approach to New Development) sets out that the Council will promote the delivery of a minimum of 14,580 new dwellings 2016-2036. The adopted Local Plan Monitoring Framework (Appendix C) states that reports on 5-year land supply will be published annually, with a target net additional dwelling completions figure of 729 per annum (14,580/20 years).
- 4.3. The land supply position reported in this Proof uses this figure as the base for the housing requirement, therefore, and not the Local Housing Need figure, as had been the case prior to the adoption of the Local Plan.
- 4.4. As already explained, the housing requirement plus an appropriate buffer of 5% being applied makes Eastleigh's figure 765.5 dwellings per annum for the purposes of identifying a five-year land supply. This has been rounded up to 766.
- 4.5. Appendix EH4 provides background information on the housing requirement and rationale for using the figure of 766 dwellings per annum in the five-year land supply calculation. Commentary is also provided in Appendix EH4, to explain that this figure is comparatively greater than both the local need figure (using the standard methodology) and the annualised planned supply across the Plan period. The purpose of this commentary is to demonstrate 'sensitivity' testing of the 5.1 years land supply.
- 4.6. Whilst there is no dispute about the use of the Local Plan annual target (the housing requirement), it is to be noted that calculating the land supply using a different methodology would generate a land supply greater than 5.1 years. This gives added confidence as to the security of supply, in real terms, to meet Eastleigh's future needs.

5. DELIVERABLE SUPPLY

- 5.1. The five-year Land Supply Report **(CD5.6)** was prepared by Hampshire County Council's Land Supply team, with whom the Council works in partnership with to monitor housing land supply in the Borough. Land supply information is published online at www.hants.gov.uk/landplanningandenvironment/facts-figures/land-supply.
- 5.2. Since 2014, the Council has published regular five-year Housing Land Supply Reports, and since 2019 has commissioned the Hampshire County Council (HCC) Land Supply Team to prepare these Reports through HCC's Hampshire Services.
- 5.3. The methodology used by HCC Hampshire Services is set out in the Reports; the most recent of which are published online at www.eastleigh.gov.uk/planning-and-building/planning-policy-and-implementation/local-plan/local-plan-monitoring. The aim of the Reports is to provide a position statement covering each quarterly monitoring period. The Reports are typically published following receipt of updated dwelling completions data from sources such as NHBC and local authority building control. Site visits are then undertaken on an annual basis to provide the most complete picture for an April update. The Quarterly Reports for July, October and January only include progress derived from Building Control and NHBC reports and therefore the data is likely to be undercount of progress (commencements and completions) that have occurred on sites.

Latest Available Evidence

- 5.4. The adopted Local Plan Monitoring Framework (Appendix C) **(CD4.1)** states that reports on five-year land supply will be published annually. This is supported by the NPPG (paragraph 004) which states for decision-taking purposes, an Authority can demonstrate a five-year housing supply when dealing with applications and appeals using the latest available evidence such as an Authority Monitoring Report¹.
- 5.5. The Council's latest five-year Housing Land Supply report is dated August 2022 and covers the period looking ahead five years of the base date 1st July 2022. This is the latest available evidence on five-year land supply for the purpose of this Inquiry.
- 5.6. The August 2022 Report has been prepared by HCC Hampshire Services in accordance with the NPPF and National Planning Policy Guidance (NPPG) on five-year housing land supply (www.gov.uk/guidance/housing-supply-and-delivery#year-housing-land-supply).
- 5.7. The methodology is summarised in each Quarterly Report and described in more detail in the April Base Date Reports. See, for example the August 2021 published version (online at:

¹ <https://www.gov.uk/guidance/housing-supply-and-delivery#year-housing-land-supply>

Demonstrating Deliverability

- 5.8. The NPPG (Paragraph: 007 Reference ID: 68-007-20190722) lists the type of evidence that might be included to demonstrate deliverability of sites. For the sites included in the five-year Land Supply Report, the sites under construction have been substantiated through site visits. For larger sites, correspondence with the developer has been ongoing and shown in Appendix EH3 where applicable.
- 5.9. For sites not yet under construction, commentary on progress with discharge of conditions applications is noted in the commentary of Appendices B-D of the Land Supply Report **(CD5.6)**. Progress towards start on site is evidenced by correspondence with developers (see Appendix EH3).
- 5.10. For sites subject to resolution, commentary is provided herein, and at Appendix C of the five-year land supply report and Appendix EH1 where supplementary information about ownership, site constraints and programmes are provided. Appendix EH2 provides the minutes for the relevant planning committees or decision letters as appropriate for sites listed as having a resolution to grant planning permission only, at the base date.
- 5.11. In identifying the sites which can be clearly identified as being deliverable, the Quarterly five-year Land Supply Reports specifically consider the following:
- The current planning status of the site – allocated, outline planning permission (and progress towards reserved matters), detailed planning permission, or resolution to grant planning permission;
 - Whether a planning performance agreement is in place for the site;
 - Correspondence with the developer/housebuilder/landowner or agent in relation to anticipated:
 - start date,
 - first housing completions,
 - phasing of development for the duration of the build,
 - information on site assessment work being undertaken,
 - anticipated dates for planning applications being submitted or planning permissions being approved,
 - constraints, ownership and market or cost factors that have the potential to delay delivery of the development;
 - Progress towards the discharge of planning conditions;
 - Assumed lead-in times, build-out rates and lapse rates

- General information available from public records relating to typical build-out rates of similar sites and housebuilders general rates of delivery.

5.12. On an annual basis the Land Supply Team at HCC look to supplement the monthly NHBC and Building Control reports by undertaking site visits to give the most complete picture as at a 1st April base date of commencements and completions during the financial year.

5.13. The Council has fully considered the meaning of ‘deliverable’ taking account of relevant guidance and appeal precedents. The information provided below has been gathered after the base date (1st July 2022) and supports sites identified as deliverable as of the base date only².

Rates of Delivery on Larger Sites

5.14. The Council acknowledges that correspondence on delivery programmes from developers should be assessed independently. Hampshire Services have therefore applied their judgement to timescales in some instances, taking a more cautionary approach to avoid over estimating supply where appropriate. Examples of these sites are: Boorley Gardens (O/15/75953); Boorley Park (O/12/71514); Pembers Hill Farm (O/15/77190).

5.15. To apply reasonable assumptions on timescales and delivery on large housing sites, localised information is taken into consideration by Hampshire Services for the Quarterly Reports. Two recent studies looking at sites within in Hampshire have been undertaken to complement national work. The first focused in greater detail on the housing supply observed in the County between 2000 and 2020 on sites of 100-399 dwellings. The second study concentrated on 4 major sites within the Winchester City Council area:

- Housing Delivery trends in Hampshire 2000-2020 **(CD15.5)**
- Strategic Housing Delivery on 4 key sites in Winchester 1980-2020 **(CD15.4)**

5.16. The findings were that on sites of 100-199 units, the mean housing delivery was 57 dwellings per annum. On sites of 200-299 units, the mean housing delivery was 89 dwellings per annum. On sites of 300-399 units, the mean housing delivery was 77 dwellings per annum. The mean housing delivery across all sites (100-399) was 64 dwellings per annum. The highest delivery, excluding large solely flatted development, was 179 dwellings per annum. For sites within the range of 100-399 units then the rates assumed within the five-year housing land supply report all fall within these ranges.

² As the Secretary of State confirmed in the ‘Woburn Sands’ decision and again in the ‘Land at Mitchelswood Farm’ decision **(See Appendix EH5)**

Assessment of Deliverable Supply

5.17. The July 2022 base date Report assessing five-year land supply and covers the period 1st July 2022- 30th June 2027. The supply is made up from seven sources:

- A. Net Outstanding Planning Permissions for small sites (1-9 units) expected to be built by 30th June 2027 (discounted by 4% for lapses)
- B. Net Outstanding Planning Permissions for large sites (10 or more units) expected to be built by 30th June 2027
- C. Sites with Resolution to Grant Planning Permission that are expected to be built by 30th June 2027
- D. Specialist Elderly Housing (C2) expected to be built by 30th June 2027
- E. Sites with Local Plan allocations which the Council expects to be building out by 30th June 2027
- F. Sites in Eastleigh Borough Council's Housing Programme (Pre-Planning)
- G. Windfall Allowance for year 3, 4 and 5 (2024-2027)

Table 3 Summary of land supply from sources (taken from 1st July 2022 base date report (August 2022))

Source of supply (net dwellings)	5 YLS (No. dwellings)
Planning permissions for small sites	165 (including discount for lapses)
Planning permissions for large sites: Under Construction/ Material Start	1,747
Planning permissions for large sites: not commenced	818 (410 + 408)
Sites with Resolution to Grant Planning Permission	863
Specialist Elderly Housing (C2)	105
Local Plan site allocations	35
Sites within EBC's Housing Programme Pipeline	48
Windfall allowance	162
TOTAL SUPPLY	3,943

A. Outstanding Planning Permissions for Small Sites

5.18. As shown in Appendix B of the Land Supply Report **(CD5.6)**, there are 110 planning permissions able to deliver **172** net dwellings completions. Once an allowance for lapses of 4% is included, it is considered that small site commitments will yield 165 dwellings within the five-year period.

5.19. These are sites with permission for less than ten dwellings, received following a Full planning application or Prior Approval process. At the base date, records show that 30% of these sites had commenced, with the remainder reported as not yet started.

B. Outstanding Planning Permissions for Large Sites

5.20. As shown in Appendix B of the land supply Report **(CD5.6)**, there are 13 large sites ('major' applications) in the Borough which are under construction or where a material start has been recorded. These planning permissions are therefore technically and legally implemented and will not expire.

5.21. The projected supply from these sites during the five-year period from the base date is **1,747 dwellings**. To summarise, the major sites under construction at the base date are:

Table 4 Large sites with Planning Permission COMMENCED OR UNDER CONSTRUCTION (1st July 2022 base date) (source: extract from Five Year Land Supply Report August 2022 (CD5.6))

Site Address (Scheme Name)	Application ref(s)	No. completions July 22- July 27
Wilmot close, Bishopstoke (Regal Homes)	F/19/86348 X/20/88203	6 (net)
North Stoneham Park (Highwood and Bargate Homes) <ul style="list-style-type: none"> Avenue Park (Phase 4a) 104 units remaining (Highwood) Homewood Park (marketed as Heritage Place) (Phases 3a and 5a) 322 units remaining (Bargate) Earlier phase 1a (3 units remaining) 	O/15/76023 R/17/79892 RM/17/81168	429
Boorley Park, Botley (Bloor and Vistry)	O/12/71514 R/15/77595 R/16/79470 X/18/83548	374
Boorley Gardens, Botley (Bellway Homes Wessex and	O/15/75953	475

Site Address (Scheme Name)	Application ref(s)	No. completions July 22- July 27
Miller Homes)	(as amended by X/19/84943) RM/17/81628 RM/18/84466 RM/19/86658	
Bandstand Court (PMC for Eastleigh Borough Council)	F/16/77785	49
Millers Walk (Phase 1), West End (Foreman Homes Ltd)	O/15/76418 RM/18/82821	50
Maddoxford Park, Boorley Green (Foreman Homes Ltd)	O/16/78389 RM/18/83875	44
Oakeley Vale, Bursledon (Foreman Homes Ltd)	O/14/74322 R/16/77966	1
Pembers Hill Park (Vistry Partnerships and EBC)	O/15/77190 RM/18/83278	99
Royal Victoria Grange, Netley (Elivia Homes)	O/16/79466	55
CWM, Corner of Mortimers Lane and Knowle Lane, Fair Oak	F/16/78074	27
Land west and north of Waylands Place and Peewit Hill Close	F/17/80651	49
Land North of Grange Road, Netley Abbey	O/16/78014 RM/19/86186	89
		TOTAL: 1,747

5.22. Despite a material start there are 3 sites where delivery at pace has been cautiously pushed back to later in the five-year period, due to known land release issues which are currently being addressed but have delayed start on site:

- CWM, Corner of Mortimers Lane and Knowle Lane, Fair Oak F/16/78074
- Land west and north of Waylands Place and Peewit Hill Close (St Johns Place phase 2) F/17/80651
- Land North of Grange Road, Netley Abbey O/16/78014

5.23. The total net outstanding dwellings at the base date on sites which have already commenced is 2,009 and 1,747 dwellings are expected to be completed during the five-year period. Two sites are expected to deliver dwellings beyond the five-year period: Land west and north of Waylands Place and Peewit Hill Close and Boorley Gardens, Botley.

5.24. Land west and north of Waylands Place and Peewit Hill Close has permission for 106 dwellings and is phase 2 of St Johns Place, Hedge End. Residential plot commencement will begin on site once the delivery of highway infrastructure to the south of the site is secured, although this is not a prerequisite for implementing F/17/80651. Eastleigh Borough Council is landowner of the land with permission F/17/80651.

5.25. As shown in Appendix B of the land supply report **(CD5.6)**, there are 7 large sites ('major' applications) in the Borough which have the benefit of planning permission issued (or Prior Approval) and at the base date had not yet commenced. These applications are either Full or Outline with Reserved Matters issued. There are no planning or site-specific risks associated with the delivery of these dwellings as approved. The projected supply from these sites during the five-year period from the base date is **410 dwellings**.

Table 5 Large sites with Planning Permission NOT COMMENCED (1st July 2022 base date) (source: extract from Five Year Land Supply report August 2022)

Site Address	Application ref	No. completions July 22-July 27
Land north and east of Boorley Green, Winchester Road, Botley (Boorley Park Gateway Centre)	F/19/86233	66
Bursledon Hall, Blundell Lane, Bursledon	PN/21/91216	16
Bampton House, Bampton Court, Hursley Road, Chandlers Ford	PN/21/90906	13
Serenity, Heath House Lane, Hedge End	F/19/86829	122
Land at Botley Road, West End (Phase 2)	F/19/85439	29
Land south of Maddoxford Lane, Boorley Green	O/16/79600 RM/19/84879 F/19/84937 (to be implemented)	72 (net)
Land at Providence Hill, (rear of Oakeley Vale) Bursledon	O/17/81166 RM/21/91772	92
		TOTAL: 410

5.26. As shown in Appendix B of the land supply report **(CD5.6)**, there are an additional 2 large sites ('major' applications) in the Borough which have Outline Planning Permission only issued and at the base date had not yet commenced. The land supply assumptions take into account that these permissions require submission of reserved matters applications. Both the sites are owned by Hampshire County Council and further details following recent correspondence with the Council's development team is provided in Appendix EH3.

Supplementary information about these two sites (part of the Uplands Farm development) is provided in Appendix EH1.

5.27. The projected supply from these sites during the five-year period from the base date is **408 dwellings**. These sites will continue to add to the land supply beyond the five-year period therefore.

Table 6 Large sites with Outline Planning Permission NOT COMMENCED (1st July 2022 base date) (source: extract from Five Year Land Supply report August 2022)

Site Address	Application ref	No. completions July 22-July 27
Land to the North and East of Winchester Street, Botley ('Botley Fields') (Landowner Hampshire County Council)	O/18/83698	63
Total 375 units		
Land west of Woodhouse Lane ('Woodhouse Meadows') (Landowner Hampshire County Council)	O/18/83634	345
Total 605 units		
		TOTAL: 408

C. Sites with Resolution to Grant Planning Permission

5.28. Appendix C of the August 2022 Report (**CD5.6**) includes sites subject to resolution to grant planning permission. At the base date there are 5 sites with this planning status, which will provide a supply of 2,720 in total. The land supply at the base date expects 863 dwellings to be completed by 30th June 2027.

5.29. These sites are judged to be achievable with a realistic prospect that housing will be delivered on the sites within five years. The build out assumptions recognise that a detailed permission must be approved prior to commencement of delivery. The inclusion of Appendix C sites in the land supply follows the Secretary of State's confirmation of the inclusion of sites capable of being deliverable where supported by evidence³. Reference to written statements and delivery intention and start and build-out rates from developers, is included in the five-year land supply report where applicable as commentary.

5.30. Supplementary information about One Horton Heath is provided in Appendix EH1.

5.31. The Committee decisions setting out the resolutions to grant, including those issues to be addressed before a decision letter can be issued, are shown in Appendix EH2.

³ See Consent Order for East Northamptonshire Council v Secretary of State for Communities and Local Government (CO/917/2020) (See Appendix EH5)

5.32. Correspondence with the developers and/ or planning officer is shown in Appendix EH3.

Table 7 Large sites with Committee Resolution (at 1st July 2022 base date) (source: extract from Five Year Land Supply report August 2022)

Site Address	Application Ref(s)	No. completions July 22-June 27	Supporting Information
Land West of Allbrook Way, Knowle Hill (Landowner Cranbury Estates Ltd)	O/19/86980	52	<ul style="list-style-type: none"> Resolution at June 2021 committee. Draft s106 in circulation with relevant parties Emerging mitigation solutions Site marketed by landowner 2022. Understood a volume housebuilder was the successful bidder for the site (with contractual agreements subject to planning consent issued). Applicant has been working to address nature conservation matters through a mitigation strategy which now includes the provision of on-site wetlands
One Horton Heath (Land at Burnetts Lane, Fir Tree Lane and Allington Lane) Landowner EBC	O/20/89498 F/20/89500	643	<ul style="list-style-type: none"> Resolution to grant outline application (O/20/89498) Resolution to grant first residential parcel ('Lower Acre') (F/20/89500) Submission of Phase 3 road F/21/91185 Draft Habitats Regs Assessment mitigation strategy Draft s106 in circulation
Land at Toynbee Road, Eastleigh Landowner VIVID	F/21/91686	105	<ul style="list-style-type: none"> Resolution at January '22 committee. UPDATE: Decision issued October 2022. Site is extension of the Bakers Quarter (Taylor Wimpey's completed residential scheme) Developer is Foreman Homes Ltd on behalf of VIVID (registered provider) Build out rate 3 units per month.
Treetops, Allington Lane, Fair Oak Linden Homes (Vistry Group)	F/21/91132	35	<ul style="list-style-type: none"> Resolution at March '22 committee. Start on site planned for September '22 and expecting first occupations summer '23. Construction by Linden Homes (part of Vistry Group) Third phase of Linden Homes' Limewood

Site Address	Application Ref(s)	No. completions July 22-June 27	Supporting Information
			Grange development. <ul style="list-style-type: none"> • Build out rate 1-2 units per month.
Former Post Office, High Street, Eastleigh Landowner EBC	F/20/89125	28	<ul style="list-style-type: none"> • Resolution at January 2021 committee. • Applicant is landowner Eastleigh Borough Council and this site is within the corporate Housing Programme. • A contract is being negotiated with contractor PMC for the build (to start demolition Oct 2022). • This is a mixed use flatted scheme to be held by the EBC as landowner and asset holder. • Demolition and start on site expected by end of 22/23 with completion by August 2024.
		TOTAL: 863	

D. Specialist Elderly Housing

5.33. The NPPG (para. 043, ref. ID: 3-043-20180913) states that local planning authorities should “count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement”.

5.34. To establish the amount of accommodation released in the housing market, the NPPG indicates that authorities should base calculations on the average number of adults living in households using the published Census data. This is “to establish the amount of accommodation released in the housing market”, from the provision of bed spaces.

5.35. As shown in Appendix D of the August 2022 Report **(CD5.6)**, there are 2 large sites (‘major’ applications) in the Borough which have Full Planning Permission issued for Use Class C2. There are 198 bed spaces associated with these sites, this is the equivalent of 105 dwellings. This means that an equivalent of 105 dwellings is expected within the five-year period from the following sites.

- Continuing Care Retirement Community (CCRC) (North Stoneham Park, Eastleigh)
- Alston House (Highwood and Hamberley scheme) (Former Police Station, Eastleigh)

5.36. Appendix D of the five-year land supply report (**CD5.6**) includes Continuing Care retirement Community (CCRCR) element of North Stoneham Park (F/19/86946). This part of North Stoneham Park straddles Eastleigh and Test Valley administrative areas. Some units in the Village Centre scheme are more than 1-bed, and that Block A1 falls within the EBC boundary. Within the Eastleigh Borough area there will be the Village Centre block (total 106 bedrooms including bedrooms providing both nursing and dementia care, Care Suites offering fully supported living, and close care apartments). Block A1 of the scheme provides an additional 8-bedroom accommodation.

5.37. This equates to estimated 114 bed accommodation falling into the Eastleigh area. For the purposes of Appendix D of the five-year land supply report, this would equate to equivalent 60 units, based on 1.9 persons per household (based on 2011 Census).

E. Local Plan Site Allocations

Land east of Kings Copse Avenue and east of Tanhouse Lane

- 5.38. The NPPG (paragraph 007) states that to demonstrate five years' worth of deliverable housing sites, some sites would require further evidence to be considered deliverable, and this includes sites allocated in a development plan. For the purposes of the latest five-year land supply report, one site allocation has been identified for inclusion in the land supply (Appendix E of **CD5.6**).
- 5.39. This is site allocation BO3 in the adopted Local Plan 2016-2036: Land east of Kings Copse Avenue and east of Tanhouse Lane. This site has been allocated for approximately 120 dwellings.
- 5.40. The site owner and promoter is Hampshire County Council, and in March 2022 HCC Property Services opted to market the land prior to submission of an outline planning permission. In July 2022, the Property Services team notified the Council that marketing of the site for disposal will commence September 2022. Site assessment work has commenced (including completion of a detailed hydraulic drainage model, agreed with the Environment Agency). Factoring in 24 months for the planning process (i.e. September 2024), it is reasonable to assume that a target start on site by March 2026 with 35 completions by July 2027.
- 5.41. The Council consider this site deliverable because there is clear evidence from the site promoter that housing completions will begin on site within five years (or in this case by 2025/26).

F. Sites in Eastleigh Borough Council’s Housing Programme (Pre-Planning)

- 5.42. Appendix F of the August 2022 Report (**CD5.6**) includes sites which do not have planning permission but are considered deliverable with a realistic prospect that housing will be delivered within the five-year period. This follows case law that the definition of deliverable provided in the NPPF glossary does not provide a ‘closed’ list, as clarified by the Secretary of State⁴. The Council has come to the judgement that there are development schemes within its own Housing Programme which are achievable within five years. The Council can provide sufficient evidence to support this view.
- 5.43. At the base date there are 3 sites with this status, which will provide a supply of 48 dwellings in total. The land supply at the base date expects all 48 dwellings to be completed by 30th June 2027.
- 5.44. The NPPF definition of “deliverable” identifies sites should be available now and a suitable location to meet this definition. The three sites included are on land owned by Eastleigh Borough Council with no title or other land constraints. The land at 237 Chamberlayne Road is a cleared and vacant site for example. Formal pre-application advice has been sought from the local planning authority and highway authority and the submission references are shown below. Planning application submission for these sites is programmed for early 2022/23.
- 5.45. These sites are included in the Council’s corporate Housing Programme and progress and delivery is monitored monthly by a Programme Board. Delivery of these sites is also supported by the Board and subsequently Cabinet approval to proceed (i.e. budget approval). A recently approved (2020) Housing Programme delivery strategy is provided (**CD15.3**), demonstrating the Council’s commitment to delivery activity.

Table 8 Sites included in the Council's Housing Programme (pre-application stage) (at 1st July 2022 base date) (source: extract from Five-Year Land Supply report August 2022)

Site address	(Pre)application Ref(s)	No. Completions July 22-June 27	Start on Site (Programme Target)
Land at 30-32 Queens View, Netley	Q/22/92640	20	Q2 24/25
Land at 237 Chamberlayne Road, Eastleigh	Q/21/90499	11	Q2 23/24
Land at Station Road (Arch Theatre), Chandlers Ford	Q/21/90/496	17	Q1 24/25
		TOTAL: 48	

⁴ East Northamptonshire Council v Secretary of State for Housing, Communities and Local Government and Lourett Developments [Claim No. CO/917/2020]. See Appendix E5.

G. Windfall Allowance for year 3, 4 and 5

5.46. The National Planning Policy Framework (NPPF) glossary defines windfall sites as “sites not specifically identified in the development plan”. The NPPF states at paragraph 71, that:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”.

5.47. The Council has demonstrated that such sites have consistently become available in the Borough and will continue to provide a reliable source of supply to the housing position.

5.48. As shown in the August 2022 Report (**CD5.6**), the calculated supply includes a figure for small site windfalls of 162 dwellings within the five-year period. This figure (54 dwellings per annum) is used for years 3, 4 and 5 of the land supply period, to reflect the assumed level of applications received on those small sites not yet identified. This is to ensure no double counting occurs with current, live permissions. All such identified small sites which have permission are counted in years 1 and 2 and are shown in Appendix A of the five-year land supply report.

5.49. An allowance for windfall is appropriate within years 3, 4 and 5 of the five-year housing land supply, as residential development on small sites (1-9 units) through infilling, changes of use and redevelopment has provided a steady supply of net additional dwellings in recent years.

5.50. The updated average annual small site completions (for ten-year period 2011/12-2020/21) is 55 dwellings (see Table 9). This supports the annual windfall allowance used as evidence for the adopted Local Plan of 54 dwellings (calculated in 2019) and supported by the Local Plan Inspector in her Report to Eastleigh Borough Council (March 2022) at paragraph 75:

“A windfall allowance totalling 162 dwellings over the five-year period (applicable to years 3,4 and 5) has also been included. [...] The Council have provided evidence to justify the approach to the windfall allowance and have explained the past delivery rates in relation to windfall as I have set out above. The approach to the windfall allowance presents a justified and evidence-based approach”.

5.51. The evidence referred to above is the housing trajectory analysis published in June 2019 (**CD15.1**); and the five-year housing land supply published for the submitted Local Plan (**CD15.2**). This latter report references appeal decision APP/W175/W/15/3139371 (Land off Botley Road, West End), where the inspector agreed with Council’s calculation of windfalls (see Appendix E5).

- 5.52. It should be noted that revisions to the NPPF no longer specifically refer to windfall sites being on previously developed land or considers that exclusions should be made to development on residential gardens, as was the case for previous methodologies for calculation windfall allowance. The evidence for the Local Plan was prepared in accordance with the previous NPPF (2012) which included some exclusions for qualifying windfall allowance on small sites therefore **(see CD15.1)**. This suggests that moving forward, a wider definition of windfall sources is likely to lead to 55 dwelling per annum being an under-estimation.
- 5.53. For consistency however, the five-year land supply report **(CD5.6)** includes an allowance of 162 as agreed by the Local Plan Inspector, which was based on average annual small site completions over a 17-year period (2001-2018/19) **(see CD15.2)**.
- 5.54. The updated figures below (Table 9) are used to sense-check the allowance figure, and show that using past completions as an indicator, the figure of 162 is now a slight under-estimation.
- 5.55. To support the inclusion of the past completions data in the Land Supply Report, Hampshire County Council Land Supply team have provided an updated schedule (October 2022) shown in Appendix EH6 covering the period from 2001/02 to 2021/22. This shows an average annual small site completion rate of 71 dwellings. My conclusion is that the completion data produces a different average rate depending on the period of time for which the data covers (e.g. see **CD15.1**). I am satisfied however, that the most up-to-date completions data continues to support the inclusion of (at least) 54 dwellings per annum from small site windfall sources, for the purposes of five-year land supply calculation.

Table 9 Windfall Calculation (August 2022 update)

Small Sites Windfall Allowance (evidence)	Number of Dwellings
Net Small Site Completions 2011/12-2020/21	548
Net Small Site Completions 2021/22	58
Average Annual Small Site Completions 2011/12-2021/22 (without exclusions or discounts)	55
Small site windfall allowance for years 3, 4 and 5	165

6. THE FIVE-YEAR HOUSING LAND SUPPLY CALCULATION

Evidence at 1st July 2022 Base Date

- 6.1. The NPPG (paragraph 004) states that for decision-taking purposes, an authority will need to be able to demonstrate a five-year housing land supply when dealing with applications and appeals and can do this by an Authority Monitoring Report. The Council publishes such a report more frequently than annually, to provide robust, up-to-date evidence. The latest report is the August 2022 Quarterly Report by HCC Hampshire Services (**CD5.6**). The methodology for this reporting does not simply revise the completions trajectory for each source of supply. All elements of the land supply calculation are revised as appropriate for each base date position.
- 6.2. To demonstrate a five-year land supply, the Council must identify specific 'deliverable' sites sufficient to provide a minimum of five years' worth of housing: in this case 3,827 units between 1st July 2022 and 30th June 2027 (i.e. 765.5 X 5 years). As shown in table 10, the expected supply during the five-year period is 3,943, which is surplus, despite the use of a buffer.
- 6.3. **The conclusion is that, based on the latest evidence, the five-year housing land supply in Eastleigh Borough exceeds five years at 5.1 years.**

Table 10 Five- year Land supply calculation (1st July 2022 Base date) (extract from CD5.6)

Column ID	Housing Requirement 1st July 2022 - 30th June 2027	Eastleigh Borough
a	Housing Requirement Figure in Adopted Local Plan: Dwellings per annum	729
b	Housing Requirement Figure in Adopted Local Plan for 1 st July 2022 – 30th June 2027	3,645
	Buffer	
c	5% buffer; (b*5%)	182
d	Total Housing Requirement for period from 1st July 2022 - 30th June 2027 (c+b)	3,827
e	Annual Requirement over the period 1st July 2022 - 30th June 2027 (d/5)	766
	Housing Supply 1st July 2022 - 30th June 2027	
f	Net outstanding planning permissions for small sites (1-9 units) expected to be built by 30th June 2027 (discounted by 4% for lapses)	165
g	Net Outstanding planning permissions for large sites (10 or more units) expected to be built by 30th June 2027	2,565
h	Sites with Resolution to Grant Planning Permission that are expected to be built by 30th June 2027	863
i	Specialist Elderly Housing (C2) expected to be built by 30th June 2027	105
J	Sites in Adopted Local Plan expected to be built by 30th June 2027	35
k	Sites in Eastleigh Borough Council’s Housing Programme (Pre-Planning) expected to be built by 30th June 2027	48
l	Windfall Allowance for year 3, 4 and 5	162
m	Expected Supply for the period 1st July 2022 - 30th June 2027 (f+g+h+i+j+k+l)	3,943
n	Expected Supply Surplus/Deficit over period 1st July 2022 - 30th June 2027 (m-d)	116
o	Supply in Years (m/e)	5.1