

## Matter 4

Action 4.1 EBC to review base date of plan and consistency of approach throughout Plan, consider implications of the approach if it is not consistent

1. Further to discussions at the hearing session about the need for consistency throughout the Local Plan document, the Council is no longer proposing to amend policy S2 to set out housing figures from 2018 onwards. The modifications proposed are set out in MM10.

Action 4.2 Place PUSH Joint Committee Report – 14<sup>th</sup> October 2019 in library.

2. See separate report

Action 4.3 Regarding affordable housing, Council actions will depend on the letter from the Inspector.

3. ORS have produced an affordable housing update to calculate the affordable housing need 2016-2036. This used the OAN of 729 dwellings per year and identified a need for an average of 200 dwellings per year, 27% of the total housing number. This is based on the assumption that the level of housing benefit remains constant.

Action 4.4 Consider need to introduce a Policy or supporting text on 5YS in the local plan.

4. The Local Plan sets out the housing requirement up to 2036. The deletion of the Strategic Growth Option means that there is a shortfall in the overall housing supply identified in the plan. This affects the supply in last 4 or 5 years of Local Plan time period.
5. Eastleigh Borough Council has closely monitored its 5 year land supply and published updated calculations throughout the progress of the Local Plan (ED61a&b, ED51, HOU015). The latest 5 year land supply published for the Local Plan examination calculated a 6.3 year supply for the borough (ED61b). This included a 5% buffer as the Council does not have a record of persistent under-delivery. This has since been updated to a 6.1 year supply in the latest published housing land supply document<sup>1</sup>.
6. In accordance with the NPPF, the Council will continue to identify the supply of deliverable housing sites and monitor progress on building out housing sites. This will be updated at least annually. The monitoring framework will include reference to this updated five year housing land supply position. It will be determined against the Local

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<sup>1</sup> Calculation of Five-Year Housing Land Supply Eastleigh Borough Council (April 2020) available at <https://www.eastleigh.gov.uk/media/7629/calculation-of-five-year-housing-land-supply-january-2020-update.pdf>

Plan housing requirement and take account of completions since the start of the plan period in 2016.

Action 4.5 Consider need for a further Mod to S2 or S3 to make the numbers consistent

7. MM10 and MM11 fully update Strategic Policies S2 and S3 to reflect all of the matters discussed at the Matter 4 hearing sessions regarding the housing trajectory. They reflect the changes recommended by the Inspector including the deletion of the SGO, deletion of the 'carried forward allocations' category of supply, the removal of discounts and the introduction of a five-year supply buffer in its place. The supply has been re-based to a 2016 base date to reflect the submitted plan time period but captures information on actual completions achieved in the 3 year period 2016-2019. The numbers are now consistent between the two policies, between the policies and the housing trajectory and, in terms of large identified sites, between the housing trajectory and the five-year supply trajectory (ED61B).
8. As shown in table 1, the difference between the total housing figures in the two policies are due to the inclusion of completions in policy S2. When these are taken into account the updated figures in both policies lead to a shortfall against the target of 2,614 dwellings. Policy S3 sets out the components of the commitments and windfall figures from policy S2 (8,662 dwellings). These are the strategic sites with planning permissions, other sites with planning permission and windfalls.

**Table 1 Housing figures in policies S2 and S3**

Component of Supply	Strategic Policy S2	Component of Supply	Strategic Policy S3
Target	14,580	Target	14,580
Completions	2,572		
Commitment	7,187	Strategic Sites with pp	5,960
Windfall	1,475	Other sites with pp & windfalls	2,702
Allocations	732	Allocations	732
Total	11,966	Total	9,394
		Shortfall	-5,186
		Add in completions	2,572
Shortfall	-2,614	Shortfall	-2,614

Action 4.6 Consider whether the current proposed modifications to policy S3 (including references to infrastructure) are necessary for soundness.

9. The initial modifications (ED32 and ED33) were proposed to reflect an update of the housing trajectory and requests for greater clarity and consistency in how housing supply was presented. They included more information on strategic sites with planning permission which did not have a specific site allocation in the plan.
10. Following discussions in the hearing session (Matter 3, 26<sup>th</sup> November 2019) about including this information in the policy, this modification is not being taken forward in the full. The council is proposing. See MM11 which does not include the references to infrastructure.

Action 4.7 Amend policy S3 so that it presents Pembers Hill Farm correctly (as is already the case in the housing trajectory).

11. The initial modification MM8 identified Pembers Hill Farm as a separate strategic site allocation. This modification is being taken forward with updated bullet point numbering. Policy S3 (1) a vi refers to the development of 250 dwellings at Land at Pembers Hill Farm (MM11).

Action 4.8 Delete the category of “carried forward allocations” from the housing trajectory and re-allocate sites to other components of supply or delete them if undeliverable as appropriate.

12. This has been actioned in full as can be seen from MM10 and the updated housing trajectory and accompanying note.

Action 4.9 Redo tables 18 & 22 of the Trajectory (HOU021) to reflect the new GL Hearn 5YS numbers agreed in ED61B.

13. This action has been addressed in the updated housing trajectory and accompanying note which explains how the numbers attributed to the large sites within the local plan housing trajectory is consistent with the treatment of those same large sites in ED61B for the five year period covered by ED61B.

Action 4.10 Clarify the missing 40 dwellings in the allocations between the submitted plan and the updated figures.

14. The relevant part of Strategic Policy S2 in the submitted plan is reproduced below:

***Strategic policy S2, Approach to new development***

*The Council will promote the delivery, 2016-2036, of a minimum of:*

i. 14,580 new dwellings 2016-2036;

The pattern of delivery is expected to involve (approximately):

a. 7,570 dwellings with planning permission or resolution to grant permission

b. 1,210 dwellings on carried forward proposed allocations (from the previously submitted Local Plan)

**c. 4,050 dwellings on new sites**

d. 1,860 allowance for windfall development

15. Criterion c. of Strategic Policy S2 notes that part of the contribution towards meeting the 14,580 dwellings target will come from 4,050 dwellings from new sites allocated in the local plan. Given that the assumption at the time was that 3,350 of these dwellings would be delivered on the SGO, this leaves 700 dwellings coming from other smaller new allocations. However, the housing trajectory appendices (HOU007b and HOU021) both recorded 742 dwellings (740 rounded) coming from this source. The Inspector sought clarification and explanation of this difference of 40 dwellings between the trajectory and the submitted plan.
16. Further investigation has clarified that the figures quoted in Strategic Policy S2 of the submitted plan did not directly relate to either of the published housing trajectory reports. Policy S2 in the submitted plan was carried forward unaltered from that contained in the consultation draft local plan (published for consultation between June and August 2018). The figures in the consultation draft version of Strategic Policy S2 were derived from an earlier, unpublished draft version of the housing trajectory dated April 2017.
17. The equivalent summary table from the unpublished April 2017 version of the trajectory is reproduced in Table 2 below.

**Table 2 Eastleigh Borough Local Plan 2011-2036 Housing Trajectory**

			Rate
Total Housing Requirement 1.4.2011 – 31.1.2036		16,250	(650pa)
Total Net Completions 1.4.11 – 31.3.26	1,674		(335pa)
Residual Requirement 1.4.16 – 31.3.36		14,576	(729pa)
<b>Supply:</b>			
Net Large Site Commitment (permissions) at 1.4.16	5,137		
5% discount for non-delivery	257	4,880 (A)	
Resolutions at and post 1.4.16	2,984		
10% discount for non-delivery	298	2,686 (B)	

Former Local Plan Allocations	1,509		
20% discount for non-delivery	302	1,207 (C)	
Small Site Allowance @50pa x 20 years (inc 20% discount over past rates)	1,000	1,000 (D)	
Large Site Windfall Allowance @86pa x 10 years (inc 20% discount over past rates)	860	860 (E)	
SGO	3,350	3,350 (F)	
Total Supply	14,840	13,983	
	<i>(Undiscounted)</i>	<i>(Discounted)</i>	
Shortfall (+= surplus)	+264	-593	
	<i>(Undiscounted)</i>	<i>(Discounted)</i>	
Shortfall +10% discount for non-implementation	n/a	-652	
	<i>(Undiscounted)</i>	<i>(Discounted)</i>	
Allocated in emerging draft Local Plan		696 (G)	
Surplus		+44	

18. With respect to the components of Policy S2:

- the discounted commitment / resolution figures added together in Table 1 above (A + B) total 7,566 dwellings which, with rounding, matches the figure of 7,570 quoted in criterion a of Strategic Policy S2;
- the discounted former local plan allocations figure of 1,207 (C) matches, with rounding, the figure of 1,210 quoted in criterion b of Strategic Policy S2;
- the small site and windfall allowance totals in Strategic Policy S2 criterion d match (1,860, D + E); and
- most importantly, the 4,050 figure in Strategic Policy S2 criterion c matches the 3,350 SGO allowance (F) plus the 696 new allocations figure (with rounding, G).

19. The figure of 700 dwellings for new sites (excluding the SGO) in criterion c of the submitted version of the plan is therefore derived from an undiscounted figure for new and greenfield allocations totalling 696 dwellings (rounded to 700) This was as set out in an unpublished early version of the housing trajectory in Table 1 above.

20. The equivalent figure of 742 dwellings in both versions of the published housing trajectory reports is a discounted figure. It includes four further 'Stage 2' sites that were

assessed in the Small and Medium sites Background Paper (HOU018). It was not possible to arrive at a firm recommendation on these site allocations at an earlier stage due to outstanding issues or uncertainties. These had to be addressed or clarified before a final decision could be made. The figure of 742 dwellings equates to allocations totalling 824 dwellings discounted by 10%.

21. In summary, the missing 40 dwellings is explained by the different components of new sites as shown in Table 3 below:
- Strategic Policy S2 (c.) includes an undiscounted figure comprising Stage 1 and DM25 sites (from an unpublished trajectory, April 2017);
  - the published trajectory reports (Tables 14 & 15 of both HOU007b and HOU0021) include additional 'Stage 2' sites with the total discounted by 10%

**Table 3 Components of housing trajectories**

	Unpublished trajectory (April 2017) and Strategic Policy S2 c.	Published trajectory HOU007b and HOU018 (June 2018 & June 2019)
Stage 1 sites	611 dwellings	611 dwellings
Stage 2 sites: AL1 - West of Allbrook Way; 45 dwellings FO6 - Foxholes Farm ; 45 dws BO4 - Land at Myrtle Cottage; 22 dws HE3 - Home Farm; 16 dws	N/A	128 dwellings
New urban (DM25) sites	85 dwellings	85 dwellings
Total	<b>696 dwellings (rounded to 700 dws)</b>	824 dwellings
Minus 10% discount	N/A	<b>742 dwellings (rounded to 740 dws)</b>

Action 4.11 Consider the appropriate base date for the Plan

22. The initial modifications to policy S2 updated the housing figure to cover the period 2018-2036. In order to avoid any confusion, the Council is proposing to amend policy S2 to retain the 2016-2036 period for housing but include information on housing completions on adoption; see MM10.

Action 4.12 Produce a table to demonstrate that the shortfall from 2011 to 2016 or 2018 can be delivered in the next 5 years rather than the overall plan period (Sedgefield v Liverpool methods).

23. Table 4 below shows that the shortfall is made up within 5 years regardless of which base and end dates are used for this calculation. The table shows the situation based on shortfalls built up during the periods 2011-2016 (5 years), 2011-2018 (7 years) and 2018-2019 (8 years) (row 4.). It then shows that delivery in the equivalent five year period after these periods (2016-21, 2018-23 and 2019-24) all more than makes up for the shortfalls accrued in the early years (row 8.).

24. This table is part of the revised housing trajectory.

**Table 4 Housing shortfall in various time periods from 2011**

	Shortfall periods		
	5 Years	7 Years	8 Years
	1.4.11 to 31.3.16	1.4.11 to 31.3.18	1.4.11 to 31.3.19
1. Local Plan Annualised target 1.4.11 to 31.3.36	650	650	650
2. Expected delivery at 650pa	3,250	4,550	5,200
3. Actual Net Completions (see Table 18 of HOU021)	1,674	3,084	4,246
4. Shortfall	-1,576	-1,466	-954
5. Shortfall / 5	-315	-293	-191
6. Revised Five Year Requirement (1. + 5.) x 5	4,825	4,715	4,205
7. Five Year Supply (see revised Housing trajectory)	5,096	5,135	4,636
8. Surplus (7. – 6.)	<b>271</b>	<b>420</b>	<b>431</b>

Action 4.13 Confirm how SA has dealt with employment as set out in policy S2.

25. Paragraph 6.26-6.27 in the Sustainability Appraisal report (SUB003b) provides a general commentary on the effects of meeting employment land requirements, estimated at 115,500-142,100sqm. The table following paragraph 6.28 provides an assessment of the effects of Policy S2 as a whole with supporting text in 6.29-6.33.

26. Appendix 11 explains that the alternative employment floorspace options were not identified as the employment figures are based on targets agreed in the South Hampshire sub region and the plan exceeds this in order to deliver the sub-regionally important Airport Economic Gateway, part of Eastleigh Riverside.