

For and on behalf of
Mulberry Investment Pension Scheme

**Addendum Hearing Statement
Five Year Requirement and Housing Land Supply**

APP/W1715/W/24/3350858

**Land West of Cobbett Way, Botley
Eastleigh Borough Council**

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December 2024

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1.0 BACKGROUND AND PURPOSE OF THIS ADDENDUM AND SUMMARY OF THE APPELLANT'S CASE

1.1 This statement has been prepared in relation to the Housing Land Supply Statement ('5YHLS Statement') published by the Council with a base date of April 2024.

i) Background

1.2 At the point the Appeal was submitted the local planning authority did not consider that the assessment of housing land supply was relevant to determination. The Appellant provided its reasons why the requirement to demonstrate a five year supply was engaged in a Report dated April 2024 and submitted with the Appeal, which also concluded that the Council was unable to demonstrate sufficient deliverable supply against the five-year requirement.

1.3 The relevance of housing land supply to the Appeal is now agreed. It is now agreed that the base-date for the five-year period is 1 April 2024, and the Council does not rely on its latest published assessment of supply for the Appeal. The Appellant continues to dispute the Local Planning Authority's (LPA) ability to demonstrate a five-year supply of deliverable sites against the minimum five-year requirement, which is itself not a ceiling.

1.4 The Council provided data for commitments at 1 April 2024¹ as part of exchanges in correspondence ahead of submission of its full Statement of Case for the Hearing. At the point of submitting its Hearing Statement the Council could provide neither complete evidence nor detailed forecasts of supply for the five-year period corresponding to the detail of commitments.

1.5 Following the exchange of the final evidence that the Council seeks to rely on at the base-date further limited information was provided in relation to the assessment of individual sites was provide on 21 November and the Council confirmed a total forecast supply of 3,227 units. The Council confirmed that it is unable to demonstrate a five year supply (at best 4.43 years).

ii) Scope and Purpose of this Addendum

1.6 This Addendum Statement updates the Appellant's case on disputed sites and considers the updated forecasts of supply at 1 April 2024 in terms of performance against the Local Plan.

1.7 The Appellant has updated its evidence in terms of disputed sites and provided its own forecast of supply from the 1 April 2024 base-date. The Appellant continues to dispute the extent of deliverable supply stated by the Council.

1.8 The Addendum Statement also addresses relevant material changes to the context for national policy and guidance including the Appellant's position on the Labour Government's agenda for planning reform in relation to housing land supply for this Appeal..

1.9 The relevance of these overarching elements of my case, including the weight accorded to relevant development plan policies and the benefits associated with additional housing provision, will be addressed by the Appellant's planning witness.

1.10 The remainder of this statement is structured as follows:

- **Section 2** offers an overview of the current national policy landscape, including proposed changes to the Standard Method for calculating housing need.

¹ Net Annual Large Site Commitments: 2,942 dwellings; Specialist Housing for Older People / Care Homes: 96 net dwelling equivalents; Small Sites: 142 net dwellings

- **Section 3** summarises the Council's position as of 2024.
- **Section 4** updates the assessment of specific disputed sites and their contributions to housing supply.
- **Section 5** outlines the current context and status of affordable housing delivery within the area.
- **Section 6** addresses other indicators relevant to the housing market and indicators of need and supply.

iii) *Summary of Addendum Statement Findings and the Appellant's Case on Deliverable Supply*

- 1.11 The Appellant's Statement submitted with the Appeal forecast that the Council would be unable to demonstrate a five year supply of deliverable sites at 1 April 2024. This is now confirmed.
- 1.12 Further to the Appellant's Land Supply Statement submitted with the Appeal sites that have been completed have been removed, and classifications have been adjusted (for example, from resolution to permit to granted, where relevant). Thus, commitments and completions are now being compared appropriately on a like-for-like basis at an agreed base date.
- 1.13 The Council has not materially changed its methodology for assessing deliverability since its most recently published August 2022 assessment of supply versus requirement. There remain 14 sites in dispute and for 11 of these the Council has not provided clear evidence of deliverability in accordance with the requirements of national policy.
- 1.14 It remains the case that in certain instances, the Council's own trajectory does not support full build-out of some sites, and in others, the forecast exceeds the total permissions granted (such as Horton Heath). The Appellant's position is that in several cases the Council's trajectory is still wholly unrealistic but already lags far behind the expectations of the Local Plan on adoption.
- 1.15 For the following list of sites, the Council now forecasts 1,801 completions in the period 2018-2029 (including 1,608 in the current five-year period assuming some catch-up in trajectories), which is 885 fewer than in the Local Plan trajectory on adoption assumes for the same sites.
- Waylands Place and Peewit Hill Close (disputed site (a))
 - Land at Horton Heath (Allocation Ref HH1) (disputed sites (b) and (f))
 - Allocation reference BO2 on land north east of Botley Street (disputed site c).
 - Land at Woodhouse Lane (Allocation Ref HE1) (disputed site (d))
 - Land north west of Boorley Green, Winchester Road, Botley (not disputed 2024-2029)
- 1.16 The Appellant forecasts only 687 completions for the same sites – a difference of -921 dwellings a substantially responsible for a difference of -1,182 dwellings between the parties.
- 1.17 The reasons for this, as outlined in this Addendum, include delays with infrastructure delivery, failure to appoint contractors, successive revision of trajectory assumptions and lack of site disposal by both Hampshire County Council and Eastleigh Borough Council.
- 1.18 The change and reduction in the Council's forecast for planning commitments is notable, leading the Council to increasingly rely upon forecasts from allocated and unallocated sites without planning permission where clear evidence has also not been provided.
- 1.19 The following table summarises the key figures from the Council and the Appellant's cases at the 1 April 2024 base-date. The Appellant notes that the Appeal will be determined against the latest version of the NPPF available at the time of the Decision Letter, and if as proposed

in the July 2024 consultation on changes to the NPPF a 5% buffer is to be added to the five-year requirement supply under the Appellant's case reduces from 2.81 to 2.67 years

- 1.20 The Appellant has sought to document matters agreed and areas in dispute as part of the Topic Statement of Common Ground on Housing Land Supply prepared for the Appeal:

Table 1. Comparison of 2024-Based EBC and SPRU Assessments of Supply

Category	EBC 2024		SPRU 2024		Difference
	No Buffer	5% Buffer	No Buffer	5% Buffer	
Local Housing Need	729	729	729	729	
Buffer	0	182	0	182	
5-Year Requirement	3,645	3,827	3,645	3,827	
Supply					
Large Sites					
Full permission not started / under construction	810		523		-287
Outline permission not started / under construction	148		0		-148
Resolution to support in principle outline permission	538		35		-503
Reserved Matters	1,109		1,109		0
Prior approval not started / under construction	16		0		-16
Elderly Persons Housing	96		96		0
Local Plan Allocations	166		0		-166
Pre planning / EBC Housing	46		0		-46
Small Sites	136		120		-16
Windfall	162		162		0
New Sites Post 2022					
Total 5 Year Supply	3,227		2,045		
Five Year Land Supply	4.43	4.22	2.81	2.67	
Over/Undersupply	-418	-600	-1,600	-1,782	
Difference between EBC and SPRU Supply			-1,182	-1,182	

- 1.21 The assessment identifies a significant discrepancy in the anticipated supply of housing from large sites, with EBC projecting 2,929 units compared to the SPRU's forecast of 1,763 units.
- 1.22 This variance results in a total 5-year supply of 3,227 units under EBC's assessment, whereas the revised supply under SPRU stands at only 2,045 units. The Council can provide at best 2.81 years' deliverable supply against the minimum five-year requirement.
- 1.23 The difference in the overall projected supply signifies a critical undersupply of housing, particularly the 1,182-unit shortfall against the relevant five-year requirement under the SPRU assessment. This highlights the urgent need for a reassessment of the housing delivery trajectory and expectations of the Local Plan, including allocated strategic sites, and thus consideration of alternative sources of supply to address the deficit in the five-year requirement.

- 1.24 This Addendum identifies that under its own case on supply and reported completions the Council is already -463 dwellings expectations of the Local Plan trajectory. The Local Plan was adopted in the context of a requirement for early review and an overall shortfall in supply against objectively assessed needs of -2,614 dwellings.
- 1.25 Adhering to the expectations of the trajectory, and Local Plan review, are central to the justification for adoption of the Local Plan and avoiding negative effects associated with the consequences of the identified shortfall. Under the Council's case delivery will remain -289 dwellings behind Local Plan expectations at 31 March 2029. The Appellant's case is that underperformance against the Local Plan trajectory will increase to -1,471 dwellings and that a shortfall of -687 dwellings will accrue against the average annual requirement of the Local Plan.
- 1.26 Finally, this Addendum Statement explores the consequences of the Council's faltering record of delivery and inability to demonstrate a five year supply of deliverable sites. This includes the Appellant's case that there are presently only 548 units' deliverable commitments for further affordable housing supply, worsening waiting lists for affordable housing and continued affordability constraints. This outlines the further negative consequences of the failure against expectations of the Local Plan (including its requirements for net additional affordable homes) and the Council's current inability to demonstrate sufficient deliverable supply.
- 1.27 The Appellant concludes that a total of 2,853 net additional affordable housing completions would be achieved by 2028/29 (around 219dpa). The Appellant identifies that this total should also be reduced for other changes in stock including sales not reported by the Council.
- 1.28 This is compared to an expectation the Local Plan would deliver 10,261 completions by 2028/29 and expects the completion of most strategic sites having been achieved. If supply identified in the Local Plan had achieved a c.33% proportion of affordable housing against forecast completions to this date around 3,386 net additional affordable housing completions would be expected. It is therefore highly likely that due to delays to the delivery of several strategic sites, together with a reduction in the ability to support housing delivery, the minimum net additional need for 4,000 affordable homes will also not be met.

2.0 NATIONAL POLICY

a) Background and Relationship to Submitted Evidence

- 2.1 The SPRU Housing Land Supply Report (dated April 2024) and submitted with the Appeal provides a detailed overview of national policy, planning practice guidance and continues to form the Appellant's case.
- 2.2 The Appellant's submitted evidence includes reference to the findings of relevant Decision Letters addressing the requirements for the assessment of deliverable supply. The Appellant has adopted a consistent approach in reviewing all the information that the Council now relies upon to demonstrate its supply position as at 1 April 2024. The Council has not significantly changed its approach or expanded upon the level of information provided to provide clear evidence (where required) and support its forecasts for the current five year period. Accordingly, this Statement should be read alongside the original Report.
- 2.3 The parties have reached a substantial level of agreement regarding the application of national policy to the calculation of the requirement against which supply is to be assessed. Housing land supply is agreed to be a main issue for the Appeal.
- 2.4 The relevance of national policy and guidance to the Appellant's case, as set out in the April 2024 Report, is not repeated in full here but should be read together with this update and the Topic Statement of Common Ground.

b) Summary of the Requirement to Demonstrate a Five Year Supply of Deliverable Sites for This Appeal

- 2.5 The provisions of paragraph 76 of the NPPF (December 2023) are not engaged for the purposes of this appeal, and that in accordance with the requirements of paragraph 77, the local authority is required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing.
- 2.6 For the purposes of the requirement against which supply is to be assessed under NPPF2023 paragraph 77 the Council has an adopted Local Plan that is less than 5 years old (adopted in April 2022). The land supply requirement for Eastleigh is 729 dwellings per annum in the period 2016-2036, as per the housing figure identified in the adopted Local Plan.
- 2.7 Performance against the expectations of the local plan is measured annually against the adopted housing requirement and the parties have agreed that no adjustment is to be made for any 'oversupply'.
- 2.8 In accordance with the planning practice guidance advising the use of up-to-date evidence to indicate whether local planning authorities are able to meet the housing requirement set out in adopted strategic policies for the next five years the Council has provided evidence with a base date of 1 April 2024 for the purposes of this Appeal. The relevant five year period is therefore 1 April 2024 to 31 March 2029.
- 2.9 Under the provisions of the current NPPF(Dec)2023 no buffer is to be applied to calculation of the minimum five-year requirement.
- 2.10 Based on the Council's own details exchanged on 21 November 2024 the local planning authority cannot demonstrate a sufficient supply of deliverable sites to satisfy the minimum five-year requirement at 1 April 2024. While the extent of the shortfall is not agreed a 5-year housing land supply and the points set out in footnote 8 and paragraph 11(d) of the NPPF are engaged for the determination of the appeal.

c) Consultation on Proposed Changes to the NPPF and Planning Reform

- 2.11 This appeal will be determined against the policies of the extant Framework at the decision date; at present this remains the December 2023 NPPF.
- 2.12 The Written Ministerial Statement (WMS) made by Angela Raynor, Deputy Prime Minister and Secretary of State (SoS) for Housing Communities and Local Government, on 30th July titled “Building the Homes We Need” and consultation draft of the National Planning Policy Framework are presently material considerations in the determination of this appeal. Significant weight can be given to the WMS where the July 2024 tracked changes draft of the NPPF attracts only limited weight.
- 2.13 The WMS clearly sets the tone and direction of the newly elected Government in their approach to reform and growth. The WMS reaffirms that the country is in “*the most acute housing crisis in living memory*” and resultingly “*home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home*”. Furthermore, the WMS explicitly commits the Government to improve affordability, turbocharge growth and build 1.5 million homes over the next five years.
- 2.14 The draft Framework provides policy mechanisms to support the ambitions of the Government set out within the WMS.
- 2.15 If published in a revised version of the NPPF prior to determination of the Appeal the proposed changes would mean:
- a) While it is not engaged for the determination of this Appeal, Paragraph 76 of the December 2023 would be deleted and a minimum five year supply of deliverable sites against the relevant would need to be demonstrated in all cases
 - b) The 5% buffer (moved forward from later in the plan period) would be reinstated and would apply to the minimum five year requirement against which supply is to be assessed. This restores a Government objective to ensure choice and competition in the market for land The effect of this would be to reduce the Council’s own position provided for the Appeal to 4.22 years’ deliverable supply inclusive of a 5% (182 dwelling) buffer.
- 2.16 As part of engagement with the local planning authority the Topic Statement of Common Ground presents outputs for the Appellant and Council’s case on deliverable supply measured against the five-year requirement excluding and including the 5% buffer. These scenarios are provided to assist the Inspector dependent upon the date the Decision Letter is issued.
- 2.17 If during the course of the appeal the proposed changes to the Standard Method are published in their current form, then this would increase the requirement to 903 dpa. This will not be used as the requirement against which supply is to be assessed until the Development Plan is over 5 years old (25th April 2027).
- 2.18 Although this figure would not be applied to the calculation of 5 year land supply is a clear indication that the present Local Plan figure would require to be adjusted at the Local Plan review. The proposed standard method figure exceeds the current adopted housing requirement of 729dpa by 24%. The proposed standard method figure exceeds the annualised provision identified by the adopted Local Plan ($11,966 / 20 = 598\text{dpa}$) by 51%. This reinforces the shortfall against housing need addressed by the current Local Plan.
- 2.19 The local planning authority has made no material progress on its review of the Local Plan, which was required to start within one year of adoption. Once published the consultation on proposed changes to the NPPF confirms the intention to make the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard

constraints and that they have exhausted all other options. None of the transitional arrangements set out paragraph 226 of the draft NPPF apply in Eastleigh. The Government's intentions for the mandatory use of the proposed standard method would thus apply immediately to the circumstances for plan-making in this local planning authority.

- 2.20 In her statement of 30 July 2024 "Building the homes we need" the Deputy Prime Minister committed to delivering 1.5 million homes over the next five year and went onto state:

"We are therefore reversing last year's changes which loosened the requirement for local authorities to plan for and meet their housing needs, and we are going further still, by mandating that the standard method is used as the basis for determining local authorities' housing requirements in all circumstances."

3.0 THE COUNCIL'S POSITION

a) Forecast for the 2024-2029 Five Year Period

- 3.1 This section will first set out the Council's updated claimed Five Year Housing Land Supply, and then details SPRU's assessment based on the newly available information
- 3.2 Since the initial submission of the appeal the Council has updated their assessment of deliverable supply against the relevant minimum five-year requirement to a base-date of 1 April 2024 for a five year period ending 31 March 2029. This claims to show a 4.43 year housing supply with a forecast supply of 3,227 dwellings against a requirement of 3,645 dwellings as shown below:

Table 2. Summary of Council Position

	24/25	25/26	26/27	27/28	28/29	5-year Total
Large Sites						
Full permission not started / under construction	153	187	225	245	0	810
Outline permission not started / under construction	0	0	0	44	104	148
Resolution to support in principle outline permission	0	0	109	253	176	538
Reserved Matters	373	338	175	136	87	1109
Prior approval not started / under construction	0	16	0	0	0	16
Elderly Persons Housing	0	36	0	60	0	96
Local Plan Allocations	0	0	0	86	80	166
Pre planning / EBC Housing	0	0	18	11	17	46
Small Sites						
Small Sites						136
Windfall						162
Total Supply	526	577	527	835	464	3227
Annual Housing Requirement						729
Years Supply						4.43
Shortfall / Deficit						-418
Annual Housing Requirement + 5% buffer						765
Years Supply						4.22
Shortfall / Deficit						-600

- 3.3 Of 3,227 total forecast dwellings 2,929 units are forecast from major development over 10 dwellings. The starting point for the Appellant's updated assessment of the Council's position is that at least 898 of these dwellings fall under part (b) of the NPPF definition of deliverable. These sites require clear evidence of a realistic prospect of completions within five years.
- 3.4 The Appellant also identifies, for sites falling under part (a) of the NPPF definition, where there is clear evidence that homes (or number forecast by the Council) will not be delivered within five years (e.g., 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) Local Plan Position

- 3.5 During the Local Plan Examination, the Council published a housing trajectory in November 2019 that outlined anticipated delivery timelines for various allocated sites (ref. ED56). This trajectory serves as an essential tool for assessing the expected rate and potential of housing growth within the district and ensuring that planned developments align with local housing needs.
- 3.6 The Inspector's report (Appendix 2) indicates that the housing trajectory is outlined in Examination Documents 61b and 90. However, the local plan does not include these trajectories, and an update is provided in ED101 (Appendix 1) informing preparation of the Report.
- 3.7 Performance of the Local Plan against the expectation of the housing trajectory is a significant material consideration in assessing this local planning authority's contribution towards the national policy objective of boosting housing supply. National planning policy requires the preparation of positively prepared plans that are aspirational but deliverable. The trajectory for the adopted Local Plan must be adhered to if the Council is to continue to demonstrate that its ability to meet minimum housing need is not merely an aspiration.
- 3.8 The trajectory is a means of assessing whether this aspiration is undermined by the lack of choice and flexibility in supply. In Eastleigh this stems partly from the failure of the plan-making exercise as a whole to identify sufficient provision for annualised needs calculated for a full 15 years on adoption. If the trajectory is not adhered to it logically follows that the Council will fail to accord with other requirements of national policy, such as the demonstration of five years' deliverable supply against minimum annual requirements and will require additional sources of delivery to be considered.
- 3.9 Paragraph 4.14 of the Plan records that the trajectory only makes provision for a total of 11,966 dwellings for the period 2016-2036. This is a shortfall of -2,614 dwellings against the Local Plan requirement of 14,580 dwellings. The annualised provision (equivalent to 598 dwellings per annum) means that the Council does not have an up-to-date Plan that has sought to provide for minimum annual housing needs in full.
- 3.10 The Local Plan was adopted on the basis that an early review would commence within one year. The under provision resulting from failing to plan in full for minimum annual housing needs would not otherwise have been acceptable. Meaningful progress of the review process has been significantly delayed. It is an expectation of the housing trajectory that due to the scale of development currently committed and under construction this shortfall occurs in the latter years of the plan period. Failure to adhere to both the Local Plan's trajectory and assumptions for Local Plan review represents a significant barrier to addressing housing need.
- 3.11 The Council has already fallen behind the Local Plan's expectations of delivery. The Local Plan trajectory (Appendix 1) forecast a total of 7,208 dwellings to 2023/24 (prior to the start of the current five year period). This would represent a surplus of 1,376 dwellings against the annualised requirement (729dpa; 5,832 dwellings). The front-loading of this part of the trajectory is furthermore a reflection of the Inspector's conclusion that the Local Plan requirement should include addressing shortfall against objectively assessed needs for the period 2011-2016 (IR paragraph 61 refers).
- 3.12 The Council has recorded total completions equivalent to 6,745 dwellings. This is 463 dwellings fewer than expected under Local Plan's trajectory assumptions.
- 3.13 The Housing Trajectory informing the Local Plan Inspector's Report forecast 10,261 units to the end of the current five year period in 2028/29. That would represent a surplus of 784 dwellings against the annualised requirement of 729dpa.

3.14 By the end of 2030/31, reflecting the shortfall in total plan period supply and falling forecast completions, the forecast total of 10,931 dwellings would essentially align with the cumulative annualised requirement (10,935 dwellings). A comparison of the cumulative expectations of the Local Plan trajectory against the minimum annualised requirement, and Council's current forecast against the annualised requirement, is shown in Table 3 below:

Table 3. Comparison of Local Plan, Annualised and HLS2024 Cumulative Trajectories

Year	ED101	Cumul. ED101	LP Req.	Cumul. LP Req.	Diff. ED101 versus LP Req.	HLS 2024 Five-Year Forecast EBC	Cumul. to 2028/29	Diff. EBC HLS Forecast versus ED101 Trajectory	Diff. EBC HLS Forecast versus LP Req.
2016/17	517	517	729	729	-212	517	517	0	-212
2017/18	893	1410	729	1458	-48	893	1410	0	-48
2018/19	1162	2572	729	2187	385	1250	2660	88	473
2019/20	1330	3902	729	2916	986	1223	3883	-19	967
2020/21	1194	5096	729	3645	1451	864	4747	-349	1102
2021/22	784	5880	729	4374	1506	707	5454	-426	1080
2022/23	665	6545	729	5103	1442	725	6179	-366	1076
2023/24	663	7208	729	5832	1376	566	6745	-463	913
2024/25	719	7927	729	6561	1366	571	7316	-611	755
2025/26	653	8580	729	7290	1290	622	7938	-642	648
2026/27	784	9364	729	8019	1345	627	8565	-799	546
2027/28	522	9886	729	8748	1138	889	9454	-432	706
2028/29	375	10261	729	9477	784	518	9972	-289	495
2029/30	345	10606	729	10206	400				
2030/31	325	10931	729	10935	-4				
2031/32	310	11241	729	11664	-423				
2032/33	260	11501	729	12393	-892				
2033/34	155	11656	729	13122	-1466				
2034/35	155	11811	729	13851	-2040				
2035/36	155	11966	729	14580	-2614				
2016-2029 Total	10261		9477			9972			
Plan Period Total	11966		14580						

Source: Eastleigh Local Plan Examination Document 101; AMR; SPRU Analysis

3.15 The Housing Trajectory informing the Local Plan illustrates the significant delay to several sites critical to the Council's demonstration of supply for the purposes of this Appeal. The above table indicates that the council is already behind schedule on several of these developments, raising concerns about the reliability of future delivery timelines. The implications of failing to adhere to the trajectory for these sites can be outlined separately and considered cumulatively, for example using the following entries:

- Land at Horton Heath (Allocation Ref HH1) was expected to contribute 210 units to

supply in the five-year period 2019-2024 (IR paragraph 99) - no dwellings have been completed..

- Land at Woodhouse Lane (Allocation Ref HE1) was expected to contribute 150 dwellings in the same period (IR paragraph 129) – no dwellings have commenced.
- 50 dwellings are forecast from allocation reference BO2 on land north east of Botley Street (IR paragraph 141) – no dwellings have commenced.
- Waylands Place and Peewit Hill Close was expected to be completed by 2021/22, accounting for a further 106 completions, but has yet to see construction of the first dwelling.
- Land north west of Boorley Green, Winchester Road, Botley, was expected to commence in 2019/20 with 333 completions anticipated by 2023/24. However, so far, only 193 dwellings have been completed.

3.16 These delays in the delivery of planned housing developments not only hinder the council's ability to meet local housing needs but also contribute to uncertainties regarding future housing supply within the area.

3.17 Table 4 summarises the Local Plan expectations for five sites versus the current forecast for supply and record of completions to 2023/24. This shows only 193 of 849 forecast completions have been achieved. The Council's latest assessment predicts a total of only 1,801 dwellings to 2028/29 versus 2,686 originally forecast.

Table 4. Summary of Site-Specific Local Plan and HLS 2024 Trajectories – Key Sites

Site Ref	Site Address	ED101			HLS 2024		
		2018/19 - 2023/24	2024/25 - 2028/29	2018-2029 Total	2018/19 - 2023/24	2024/25 - 2028/29	2018-2029 Total*
S3(iii) e	NW Boorley Green / Hedge End North	333	347	680	193	487	680 (-0)
BO2	Uplands Farm	50	250	300	0	26	26 (-274)
HE1	West of Woodhouse Lane	150	250	400	0	122	122 (-278)
HE2	St John's Road	106	0	106	0	106	106 (0)
S3 (ii) / HH1	West of Horton Heath	210	990	1200	0	867	867 (-333)
Total	Key Disputed Sites	849	1837	2686	193	1608	1801
	Difference – ED101 versus HLS2024				-656	-229	-885

Source: Eastleigh Local Plan Examination Document 101; AMR; SPRU Analysis (* Brackets showing difference ED101 versus HLS2024 under the Council's case)

3.18 Table 4 shows a clear difference between the updated site information and Local Plan expectations. Notably, there is a reduction in projected unit deliveries for the initial years of the plan.

3.19 As the plan period progresses, the Council continues to forecast a significant increase in

delivery for several sites, effectively to offset current delays against Local Plan expectations. This is especially evident for West of Horton Heath, which projects significant outputs, amounting to a total of 656 units over the five years. Such projections indicate an expectation that initial delays will resolve and allow for increased housing delivery as development advances. The Council lacks clear evidence its assessment that this can be achieved in terms of build out expectations from the remaining strategic allocations in the Plan.

- 3.20 Overall, despite the reduced performance in the early years, the Council considers that the five-year totals for 2024-2029 will broadly match Local Plan expectations. This pattern reflects that the non-starts of some sites means there has been a delay, but the sites are still being forecast as deliverable.
- 3.21 In reality the Council lacks clear evidence for the deliverability of this assessment and the even higher rates of development that would be required to catch-up shortfalls against the Local Plan trajectory. The Council has itself admitted that this acceleration will not be achievable on sites such as One Horton Heath (see Appendix 29 and Appendix 3). This is in stark contrast to the Local Plan expectation that by 2024 all five sites would have yielded significant previous completions.

4.0 SPRU ASSESSMENT OF HOUSING LAND SUPPLY

- 4.1 This Chapter sets out those entries in the Council's published Statement where the assessment of deliverability is contested. The contested entries are based on the contents of the most recently submitted Supply by Eastleigh Borough Council at April 1st 2024.
- 4.2 A Summary of which is detailed below in Table 5. The remained of this chapter will discuss the reasoning behind the contested site.

Table 5. Contested Entries

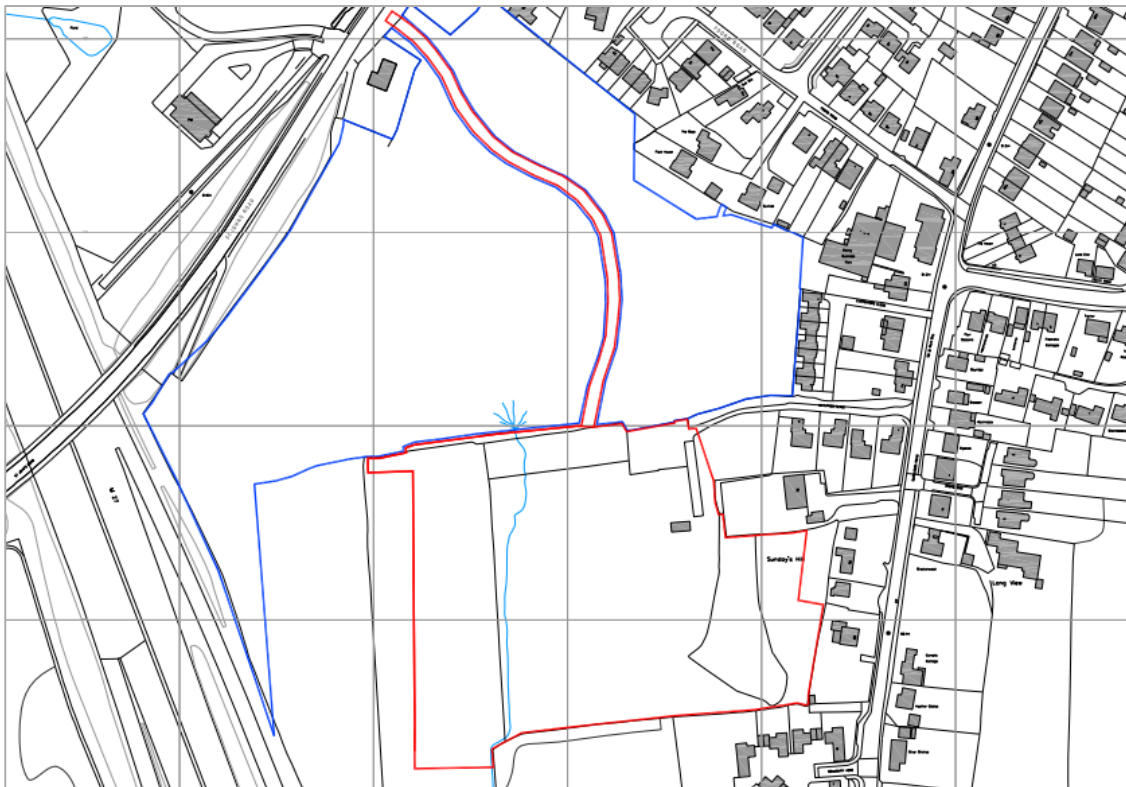
	Component	LPA ref:	Address	Capacity (Net)	LPA 5YHLS	Appellants' 5YHLS	Diff.
A	FULL	F/17/80651	Land west and north of Waylands Place and Peewit Hill Close	106	106	53	-53
B	FULL	F/20/89500	Land West of Horton Heath	381	381	147	-234
C	OUTLINE	O/18/83698	Land to the North and East of Winchester Street, Botley	375	26	0	-26
D	OUTLINE	O/18/83634	Land west of Woodhouse Lane	605	122	0	-122
E	RESOLUTION	O/19/86980	Land West of Allbrook Way, Knowle Hill	52	52	35	-17
F	RESOLUTION	O/20/89498	Land West of Horton Heath	2119	486	0	-486
G	PRIOR APPROVAL	PN/21/91216	Bursledon Hall, Blundell Lane, Bursledon	16	16	0	-16
H	ALLOCATIONS	0	Land south of Maddoxford Lane and east of Crows Nest Lane	30	30	0	-30
I	ALLOCATIONS	0	Kings Copse Avenue, Botley	120	95	0	-95
J	ALLOCATIONS	0	Land north of Myrtle Cottage, Winchester Road	22	22	0	-22
K	ALLOCATIONS	0	Land north of Providence Hill	19	19	0	-19
L	EBC HOUSING	Q/22/92640 - F/23/96224	Land at 30-32 Queens View, Netley	18	18	0	-18

	Component	LPA ref:	Address	Capacity (Net)	LPA 5YHLS	Appellants' 5YHLS	Diff.
M	EBC HOUSING	Q/21/90499	Land at 237 Chamberlayne Road, Eastleigh	11	11	0	-11
N	EBC HOUSING	Q/21/90496	Land at Station Road (Arch Theatre), Chandlers Ford	17	17	0	-17
O			Small Sites		136	120	-16
		Total = Disputed Sites			1,597	415	-1,182
		Total Supply less Dispute			3,227	2,045	-1,182

a) FULL F/17/80651 Land west and north of Waylands Place and Peewit Hill Close (Appellant forecast 53 dwellings – difference of -53 dwellings)

- 4.3 In 2022 the Council stated in its last published assessment of supply that the developer (Foreman Homes) has confirmed that discussions with landowners (who are Eastleigh Borough Council) were continuing but that at that time they were unable to confirm when the development would be built.
- 4.4 In the information exchanged on 21 November 2024 the Council states it has liaised directly with the developer and has determined that works at the site are expected from 2025, with the development anticipated to be built out by 2027/28. For the avoidance of doubt where the Council states this represents 'restarting' work on site this is because it deems the extant detailed permission to have been implemented and not because any individual units are under construction.

Figure 1. Site Location Plan: Land west and north of Waylands Place and Peewit Hill Close



- 4.5 The local planning authority has provided no confirmation that Foreman Homes has a current agreement in place to act as the developer for the site and to deliver homes on its behalf upon its own land. As an illustration of this the scheme is not listed on Foreman Homes' website amongst its 'coming soon²' section (Appendix 7)
- 4.6 The position is therefore unchanged from that disclosed by the Council in 2022. The site can only be accessed through the Foreman Homes St Johns Road/Foord Road 100no. dwelling site to the north. Agreement between the parties regarding Foreman Homes being formally contracted to deliver the site under terms acceptable to both parties is thus required in order for development to come forward.
- 4.7 In this context the assessment of the realistic prospect for completions beginning within five

² <https://www.foremanhomes.co.uk/coming-soon>

years should have regard to the planning practice guidance including clear relevant information regarding site ownership, development timescales and anticipated start dates and build-out rates (ID: 68-007-20190722). This planning status of the site, notwithstanding full planning permission, is significant in the context of the approval of development details as of 20 October 2017.

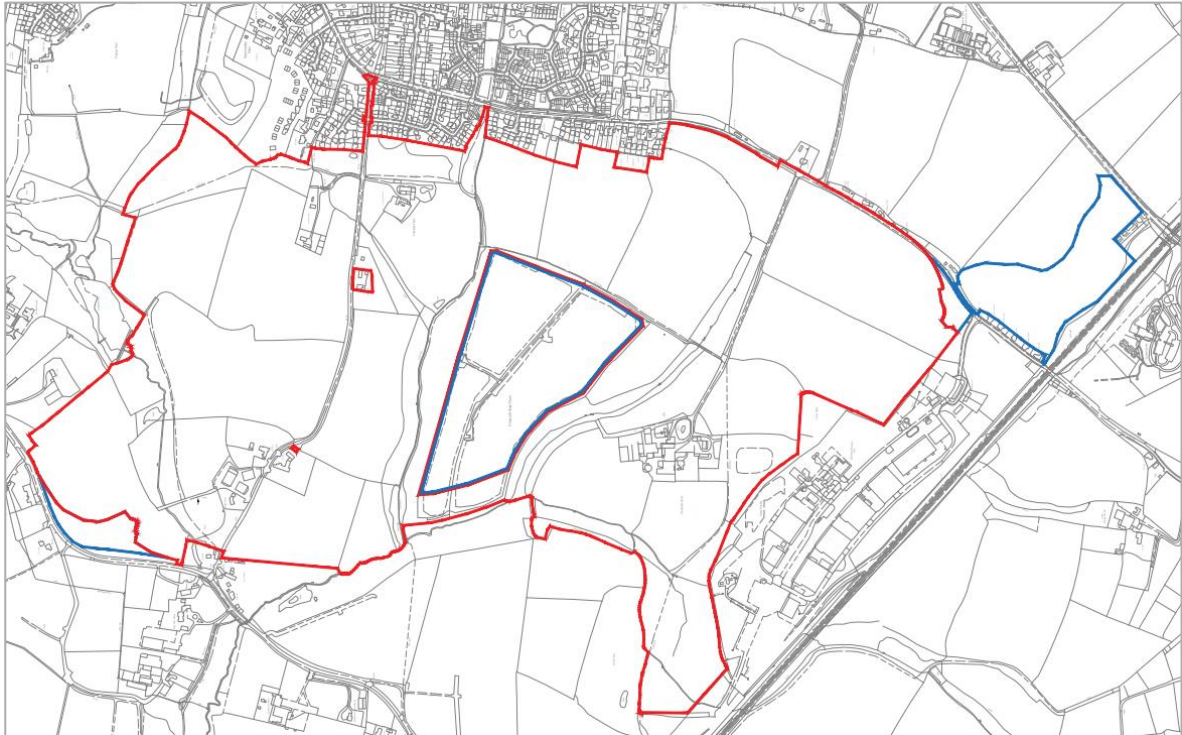
- 4.8 In the circumstances of longstanding detailed permissions such as this it is not uncommon for the delivery of development to be associated with, for example, variation of conditions and details for layout and house types in order to support implementation as well as deeds of variation of planning obligations (for example in terms of the take-up of affordable housing). These details would typically be contained as part of any development agreement between the parties. Those details are significant in this case in terms of whether Foreman Homes will deliver housing on behalf of the Council or for sale as private developer.
- 4.9 The Council's timescales for build-out and delivery rates appear to make no such allowances for these matters.
- 4.10 The Appellant acknowledges that undisclosed dialogue between Foreman Homes and EBC remains ongoing and the site remains allocated in the development plan. The delivery of homes from this site is ultimately a matter of timing. However, the scheme has benefitted from detailed consent for over 7 years (October 2017 to November 2024). While the matters raised are not judged to provide clear evidence that completions will not be delivered within five years it is appropriate to reassess the Council's build-out assumptions for the site.
- 4.11 The site is for 106 dwellings. Analysis in the third edition of Lichfields' Start to Finish Report (Appendix 8) is that schemes of 50-99 dwellings have a 3.8 year timeframe for submission to first completions (including 2.3 years from detailed approval to delivery of the first dwellings). For 100-499 dwelling schemes the total in 6 years including 3.2 years from detailed approval to first completions. This site has performed significantly worse than these metrics. The Council has provided none of its own evidence of lead-in timescales or indication of why this site has been delayed relative to local evidence.
- 4.12 The Appellant's case is to apply the detailed approval to first completions period from the base-date of the current five-year period. It is reasonable to take the lower average from the 50-99 dwelling category as commensurate with the detailed approval and scheme size, but to also apply the mean build rate (20dpa) for this category of site. The Appellant's case is therefore that, as an alternative, a realistic prospect for completions should consider first completions from August 2026 (in the 2026/27 monitoring year). This would equate to approximately 13 completions in year 3 and 20 completions in year 4 and 5 – a total of 53 dwellings in the five-year period.

Table 6. Land west and north of Waylands Place and Peewit Hill Close

Year	Initial Projection (2024 HLS)	Revised Projection (SPRU)	Difference
2024/25	0	0	0
2025/26	25	0	-25
2026/27	52	13	-39
2027/28	29	20	-9
2028/29	0	20	20
Total	106	53	-53

b) FULL F/20/89500 Land West of Horton Heath (Appellant forecast 147 dwellings – difference of -234 dwellings)

Figure 2. Site Location Plan: Land West of Horton Heath



- 4.13 In the information exchanged on 21 November 2024 the One Horton Heath site comprises two entries in the 1 April 2024 schedule of sites but is dealt with under a single heading on pp.4 of its summary letter (under the heading for Strategic Allocation HH1).
- 4.14 Both the outline and full application were made by Eastleigh Borough Council and the land was and remains in the ownership of Eastleigh Borough Council. Evidence of firm progress in relation to development timescales and rates of delivery has not been provided and this reflects barriers to achievability and disposal of the site.
- 4.15 The commentary below addresses full application (F/20/89500) that provides permission for 381 dwellings and was approved in December 2022. The Appellant considers this record under part (a) of the NPPF definition of deliverable, but it is relevant to identify the trajectory for this part of the site as a component of the forecast total, as shown below.
- 4.16 The site is performing significantly behind the expectations of the Local Plan. As summarised in Table 4 the Local Plan trajectory assumed a total of 1200 completions by 2028/29 and 210 to have been achieved by 2023/24. No completions have yet been achieved and the Council's own evidence now forecasts 867 units to 2028/29, which the Appellant does not accept. The site has been subject of consistent over-optimism in forecast supply. In its 2022 assessment the Council forecast 643 completions in the period 2022-2027 (relative to 264 in the same period in its latest update).

Table 7. One Horton Heath – Combined Trajectory

Year	F/20/89500 - Lower Acre	O/20/89498 - Horton Heath (Resolution)	Total	Appellant (Lower Acre Only)
2024/25	0	0	0	0
2025/26	48	0	48	0
2026/27	117	99	216	49
2027/28	216	211	427	49
2028/29	0	176	176	49
Total	381	486	867	147

- 4.17 While detailed permission was in place at the base date there is clear relevant information indicates significantly different circumstances in relation to implications for phasing, viability and infrastructure delivery impacting arrangements for development of this part of the scheme known as Lower Acre.
- 4.18 The Council forecasts delivery of all 381 dwellings from the site within the five-year period. The Appellant considers that 147 dwellings should be included as a forecast for the five-year period for the reasons outlined below.
- 4.19 Information contained in the Council's schedule of sites at 1 April 2024 provides no details to support its assumption that all 381 completions will be achieved from 2025/26 to 31 March 2028. In the information exchanged on 21 November 2024 the Council refers to Appendix 8 of its Statement of Case (December 2023 and July 2024 Cabinet Reports) to support delivery of the scheme. The Council's land supply assessment does not reflect that the July 2024 Cabinet provides further clear relevant information regarding phasing and viability and appointment of contractors and concedes further delays relative to the assessment at the base-date.
- 4.20 To this end, the Appellant has submitted a Freedom of Information Request to Eastleigh Borough Council related to the development process and disposal of the site. This reflects that in July 2024 the Council's Cabinet resolved to:
- award the main residential contract for delivery of the Lower Acre to the sole bidder but with the option to omit parcels beyond Phases 1/1A applicable to the first 126 dwellings only;
 - acknowledged the intent, should the contract be awarded, to work towards agreement of the price for parcel 2 (49 dwellings) by the end of October 2024 to ensure continuity of output; and
 - confirm, should the contract be awarded, that continuation with the selected contractor for future phases 2, 3, 3A, 4, 4A and the varied 1A will be dependent on future Cabinet approval.
- 4.21 The July 2024 Cabinet Report and Council response to the FOI request (copy at Appendix 3) should also be read alongside a Report to the 5 December 2024 meeting of the Council's Cabinet (copy at Appendix 29) providing further changes to the proposed delivery and phasing at Lower Acre.
- 4.22 In relation to phasing the Council's response confirms a delay of 3 months, assuming completion of the contract (yet to be awarded) by the end of the calendar year. Agreement of the price for Phase 2 has likewise been delayed beyond October. The Council continues

to expect delays to be made up during the construction period, meaning a practical forecast of first occupations are still expected in Summer 2025 with all units delivered by December 2027.

- 4.23 This is a wholly unrealistic forecast of completions from effectively one outlet delivering only the Eastbrook Homes product on behalf of the Council and accepting that even the Lower Acre part of the site will be phased across numerous smaller parcels. Even assuming first occupation by say July '25 (which seems highly unlikely) this equates to 13 housing completions / month. This is over three times the (relatively positive) build rate that may be expected from a single outlet if assuming one completion per week.
- 4.24 The Council has, however, already resiled from this trajectory in its December 5 Cabinet Report with forecast completions now extending into 2028. However, this is within the wider context of an ongoing review of trajectory assumptions and business plan for Lower Acre and the wider site.
- 4.25 Paragraphs 15 and 16 of the Cabinet Report confirm that this is within the context of inability of the contractor to accommodate an accelerated build programme that would *“also have posed a significant problem for the Council around the cost of holding housing stock which would have been produced more quickly than it could have been sold”*. However, the implications of the Council's current re-profiling are to push back a higher proportion of delivery of the Lower Acre site so that 4 parcels would be delivered concurrently in 2027/28. This would lead to a need to achieve over 24 occupations per month effectively from a single outlet with self-delivery controlled by the Council.
- 4.26 Paragraph 54 summarises that these impacts on the trajectory for Lower Acre and the wider site *“cannot be underestimated and the internal team have been working on the resulting impact on the Business Plan with changes to dates of completions of dwellings having an impact on both timing of income and also borrowing costs”*.
- 4.27 In the preceding paragraph 52 the Council confirms that it will be necessary to address capability limitations within the Council and direct additional resources to technical and developer planning teams to address the phasing and delivery requirements for the master programme for delivery of the whole site. The reality is that these considerations are already affecting the initial delivery and build-out of the Lower Acre element and provide clear relevant information that these are *preventing* the Council issuing deliverable permissions for the wider site.
- 4.28 Amendments to the full planning permission are required but not yet approved in order for completions to be achieved.
- 4.29 Further to the July 2024 Cabinet decision the Council's response also confirms amendments are required to the approved phasing. There are differences between details of the Lower Parcel and Section Plan at Appendix K of the Report (Appendix 10) are consistent with the NMA to the Phasing Plan for application ref: F/20/89500 FRP-PP-001 Rev B amended 18 June 2024 (Appendix 12) and submission of further amendments is required. Similarly, applications for the redesign and optimisation of Phase 1A are yet to be finalised let alone submitted and determined.
- 4.30 Paragraph 20 of the 5 December Cabinet Report (Appendix 29) adds further detail to the extent of changes required that are likely to affect the trajectory assumptions in future phases. This states:
- “Work to progress the planning approval for the Lower Acre continues. A programme has been put in place to discharge conditions and to secure approval for amended house types using non-material amendments (NMAs) where appropriate, or section73s (application to amend approved plans) where necessary. Overlay Plans are in the process of being*

prepared by Ridge to discuss the necessary amendments with Development Management. Revised Plans for the apartments have been progressed and will be discussed with Development Management imminently, after which point a s73 application will be prepared. The Deed of Variation submitted to the s106 for the removal of affordable housing needs to be signed with a subsequent Deed of Variation to follow for the highway crossing points in Burnetts Lane.”

- 4.31 Notably, in terms of firm progress of delivery, achievability and expected timeframes for development further application activity includes a resolution on 23 June 2023 removing the requirement for affordable housing from the Section 106 agreement associated with the application (V/23/95347). The Deed of Variation was not issued until 19 November 2024 and removes all definitions in relation to the provision of affordable housing (Appendix 9).
- 4.32 In relation to viability the July 2024 Cabinet Papers further note at paragraphs 73 and 74 that the delivery of affordable housing at the site is financially restrictive and requires Government grant (previously estimated at £125,000/dwelling) for it to be achieved. The Council’s responses accept that there is no new grant programme in place beyond 2026 but confirms it is anticipating an extension to the existing programme.
- 4.33 Until such time that a new funding programme is formally announced there is nonetheless a significant risk that the Council will be unable to provide Affordable units directly as it would not be financially viable and this will further impact on scheme phasing. The Council’s response indicates that *“in the highly unlikely event no grant, or alternative provisions, for the delivery of affordable housing become available it would mean the units would be converted to market units.”* The Council has provided no indication as to how this would be compatible with achieving a commercial return from delivery of parts of the scheme for market sale or disposing of its interest in completed dwellings.
- 4.34 The Cost Plan includes at Appendix L of the July 2024 Cabinet Report (Appendix 11) identifies totals for the Lower Acre at £183m; equivalent to approximately £430 per square foot. Using a sales price of £386 per square foot this part of the site would generate a £16m deficit indicating that it is highly likely that the Council will need to retain stock, await requisite funding for affordable housing and thus phasing of the scheme will be affected accordingly.
- 4.35 The 5 December Cabinet Report adds further detail to these implications for phasing, particularly in the context of the ongoing review of the trajectory and assumptions for sales rates. Paragraphs 49 to 51 confirm that the detailed design for Lower Acre was produced some time ago and the review of the business plan makes allowances for changes to house types in future parcels. However, paragraph 50 also reflects that these decisions will be dependent on the level of affordable housing to be provided, which is currently subject to unknown outcomes for grant funding beyond 2026:
- “A new suite of Council house types has been proposed to prioritise what is important to Borough residents. This review will go on to include a full commercial review of each unit and local housing need whilst ensuring 35% Affordable Housing is provided subject to grant being received. Any changes to house types are likely to improve upon construction costs. There may also be an impact on income levels although this is thought to be less likely. Any anticipated financial impacts will be reflected in future business plan iterations.”*
- 4.36 The Appellant’s assessment reflects the marked difference in the realistic prospect for completions relative to the Council’s assessment at the base-date. It is considered that in the absence of local evidence for lead-in and build-out provided by the Council national benchmarks could inform an assessment of delivery from a single parcel with detailed consent as of December 2022. The Lichfields ‘Start to Finish’ third edition suggests allowing 3.2 years from detailed permission to first completions and a mean build rate of 49 dwellings per annum. This is consistent with first completions from (approximately) April 2026 and a

total of 147 units to 31 March 2029.

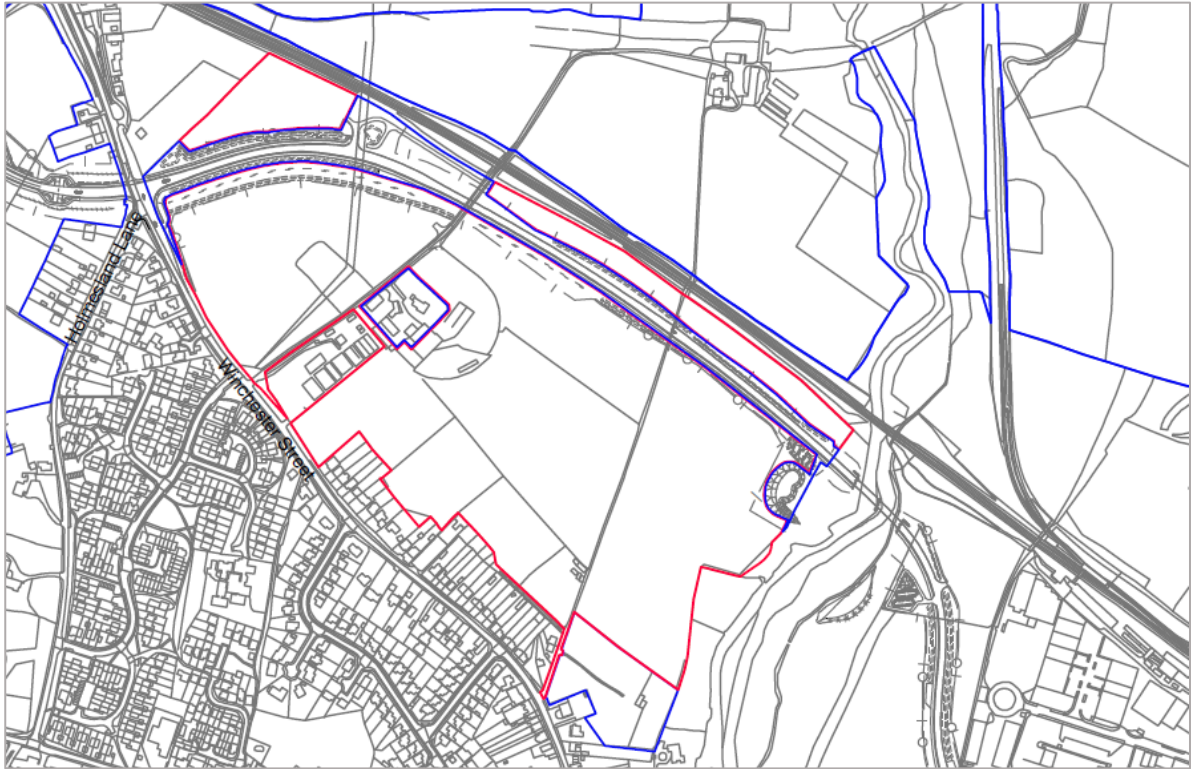
4.37 The following table compares this revised estimate with the Council's five-year forecast:

Table 8. Projection Comparison: Land West of Horton Heath

Year	Initial Projection (2024 HLS)	Revised Projection (SPRU)	Difference
2024/25	0	0	0
2025/26	48	0	-48
2026/27	117	49	-68
2027/28	216	49	-167
2028/29	0	49	+49
Total	381	147	-234

c) OUTLINE O/18/83698 Land to the North and East of Winchester Street, Botley (Botley Fields) (Appellant forecast 0 dwellings – difference of -26 dwellings)

Figure 3. Site Location Plan: Land to the North and East of Winchester Street, Botley



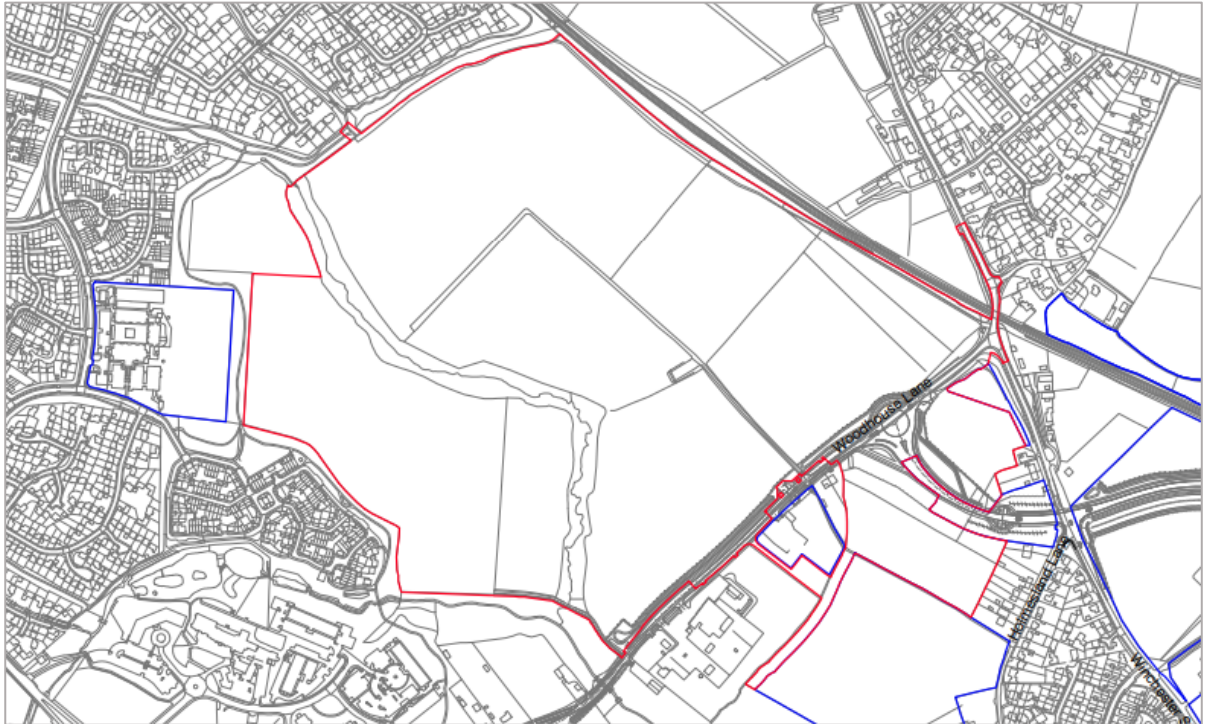
- 4.38 The inclusion of this site is disputed due to several critical factors affecting its achievability and overall deliverability.
- 4.39 The site is performing significantly behind the expectations of the Local Plan. As summarised in Table 4 the Local Plan trajectory assumed a total of 300 completions by 2028/29. The Council now forecasts a total of 26 dwellings at 31 March 2029. The site has been subject of consistent over-optimism in forecast supply. In its 2022 assessment the Council forecast 63 completions in the period 2022-2027.
- 4.40 Outline permission (O/18/83698) was granted on 24th March 2022 following the signing of the Section 106 agreement but there is no firm progress with timescales for residential development. There is no clear relevant information provided by Eastleigh Borough Council regarding site ownership and identification of a developer for the scheme. The Council's assessment in its schedule of sites regarding marketing dates and interest from two potential developers is disputed.
- 4.41 The Appellant has submitted a Freedom of Information Request to Hampshire County Council as owner of the site seeking details of any relevant activities (Response noted in Appendix 5). As part of its request the Appellant has noted, further to the most recent published commentary in the 2022 HLS Report, Botley Community Land Trust has been established to develop the site with their website stating that *"The Botley Community Land Trust has been established by members of the Botley community to purchase and develop land that will deliver homes and new communities for the residents of Botley Parish. The CLT intends to purchase the Uplands Farm (Botley Fields) site in its entirety and then work with development partners to create a different type of development than the current normal form the Botley community has grown accustomed to (i.e. the Boorley Park, Boorley Gardens*

and Whiteley Meadows new builds)”.

- 4.42 The County Council has confirmed that it is aware of the intentions of the CLT but has entered into no direct arrangement with them. In relation to the overall programme for disposal and delivery the County Council has stated its *“wish to ensure the delivery of the Botley Bypass is well underway prior to marketing the development site. The completion of homes will then be dependent on the timescales of a developer securing their Reserved Matters Application and the delivery of primary infrastructure.”*
- 4.43 The Appellant separately engaged with the Botley CLT pending receipt of any relevant clear evidence from the County Council or from Eastleigh Borough Council in relation to its updated assessment of supply. The CLT’s response does not provide clear evidence of a realistic prospect of completions within five years. The CLT confirmed that it has not acquired the site or selected development partners, and that it has no known trajectory for the expected timescales for development (Appendix 6).
- 4.44 A reserved matters application (RM/24/97106) was approved in August 2024; however, this application is focused on biodiversity enhancement rather than residential units. There are also two pending applications for Variation of Conditions applications related to archaeological assessments (DC/24/97105) and issues concerning heritage, arboricultural concerns, contaminated land, and landscape (DC/24/97107).
- 4.45 It is also important to note that the site must also protect the line of Botley Bypass (CS/17/81226) and is still owned by Hampshire County Council (HCC). The information exchanged by the Council on 21 November states *“design details for the remaining sections of the bypass and associated infrastructure is being progressed”*. No evidence has been provided. This is not firm progress with infrastructure delivery. The statement in the Eastleigh Borough Council’s assessment of deliverability is wholly inconsistent with that from the County Council regarding further delivery of the bypass as *necessary* before marketing the scheme. Delays to the delivery of housing are the consequence of delays to the delivery of infrastructure, as reflected in the exchange of correspondence from the County Council.
- 4.46 Therefore, the site remains undeliverable as no developer has been selected and no clear evidence has been provided to support references in the Council’s assessment to confirm marketing and disposal of the site and previous attempts have been confirmed as unsuccessful.
- 4.47 The presence of outstanding ownership and infrastructure constraints does not provide a realistic prospect for delivery in the next five years.
- 4.48 Based on the current context and discrepancies between the Council’s assessment and position of the County Council the site is undeliverable and should be removed.

d) OUTLINE O/18/83634 Land west of Woodhouse Lane (Appellant forecast 0 dwellings – difference of -122 dwellings)

Figure 4. Site Location Plan: Land West of Woodhouse Lane



- 4.49 The Council's forecast for deliverable supply and realistic prospect of homes being delivered for the site west of Woodhouse Lane within five years is disputed.
- 4.50 The site is performing significantly behind the expectations of the Local Plan. As summarised in Table 4 the Local Plan trajectory assumed a total of 400 completions by 2028/29. The Council now forecasts a total of 122 dwellings at this date. The site has been subject of consistent over-optimism in forecast supply. In its 2022 assessment the Council forecast 605 completions in the period 2022-2027.
- 4.51 Both the Council's schedule of sites and information exchanged on 21 November 2024 indicate an expectation of further marketing of the site in spring 2025 and suggests that disposal of the site could result in an option for all five phases being issued to the same developer. The accuracy of this information is disputed.
- 4.52 To this end, the Appellant has submitted a Freedom of Information Request to Hampshire County Council as owner of the site seeking details of activities related to its marketing and disposal following approval given by the Executive Member for Policy and Resources in July 2021 for actions related to a "group of short-listed parties identified in paragraph 26 to go through to the more design focussed stage 2 process with the outcome to be reported to a future meeting of the Executive Member". A copy of the County Council's response is included at Appendix 4.
- 4.53 This confirms that contracts were not engaged with a preferred developer identified before the market downturn in 2022. In relation to this phase, and marketing of a second phase in late 2022, the County Council has confirmed In January 2023 the Executive Member for Hampshire 2050 approved the removal of both phases from the market until conditions improved. Contrary to Eastleigh Borough Council's assessment the County Council's response only indicates that this will be undertaken 'in due course' following recent approval of a revised disposal strategy.

- 4.54 No decisions arising from this process have been published on the County Council's website.
- 4.55 There has been no indication of residential development or reserved matters (RM) applications for dwellings linked to the 605 units proposed in the original hybrid application. The two reserved matters applications have been approved to date. These applications do not pertain to dwellings:
- Reserved matters application RM/20/87347, approved on 18 May 2020, pertains to the construction of three noise bunds and associated acoustic fencing along the western edge of Woodhouse Lane.
 - Reserved matters application RM/20/89363, approved on 11 March 2021, involves formal community sports provision alongside public open space, landscaping, and the establishment of two public rights of way.
- 4.56 The Deer Park Secondary School, which is part of the hybrid application, has been fully completed. The land remains under the ownership of Hampshire County Council.
- 4.57 While Eastleigh Borough Council refers in its schedule of sites to progress such as the completion of the Deer Park Secondary School and first phase of the Botley Bypass this is not clear relevant information regarding a realistic prospect for residential development. This is reflected in significant delays to disposal of the site..
- 4.58 No firm progress has therefore been made towards the submission of reserved matters applications or confirmation of timescales for residential development from the development. The site is not deliverable and 122 units should be removed from the supply.

e) RESOLUTION O/19/86980 Land West of Allbrook Way, Knowle Hill (Appellant forecast 35 dwellings – difference of -17 dwellings)

- 4.59 The Council forecast the delivery of 52 units in its 2022 assessment of housing land supply, which was disputed by the Appellant. At the 1 April 2024 base-date the site comprised allocated land without planning permission but subject to a resolution to permit application O/19/86980. The Council's schedule of sites confirms an expectation of outline permission being granted in 2024/25 and submission of approval for reserved matters thereafter.
- 4.60 This is not clear evidence of deliverability. The Council has provided no clear relevant information regarding details of the named developer or expected site assessment requirements or development timescales in order to inform its assessment at the base-date.
- 4.61 It is noted that in the information exchanged on 21 November 2024 the Council has confirmed outline permission was granted on 5 June 2024 and application RM/24/98388 validated on 22 October 2024 consistent with its expectations at the base-date.
- 4.62 The applicant for the site is stated as Bargate Homes. Detailed approval is sought for 49 dwellings not 52 dwellings as covered by the outline permission.
- 4.63 Detailed planning permission has yet to be secured and there is presently no separate applications for the discharge of relevant Planning Conditions. The Planning Statement for the Reserved Matters applications states that some information has been provided regarding conditions imposed but *"separate applications for the formal discharge of these conditions will be submitted shortly."*
- 4.64 At the time of writing the Reserved Matters application is subject to requests for further information from the LLFA (15 November 2024) (copy at Appendix 13) requiring the submission of further information. Further details have also been requested in terms of affordable housing unit mix and highways.
- 4.65 Therefore, there is no timescale for detailed permission being secured. While there is some evidence of progress this is not sufficient clear evidence for a realistic prospect of completions within five years. Nevertheless, in the event the site was assessed as deliverable the Council has not provided any clear relevant information to support its assumptions for first completions in 2026/27.
- 4.66 This scheme has taken over 5 years to secure outline permission. Analysis in the third edition of Lichfields' Start to Finish Report is that schemes of 50-99 dwellings have a 3.8 year timeframe for submission to first completions (including 2.3 years from detailed approval to delivery of the first dwellings). This would be an appropriate timescale to apply given the points noted above and the absence of local evidence provided by the Council.
- 4.67 Mean built rates from a site of this size are stated as 20 dwellings per annum by Lichfields. In the alternative scenario the site is found deliverable only a very small number of units should be forecast within the five year period. In the event that Reserved Matters are approved before 31 March 2025 first completions for the site should not be forecast until the 2027/28 monitoring year. Allowing for approximately 9 months' completions the first year an alternative forecast of deliverable supply based on the Lichfields analysis would be 35 dwellings by 2028/29.

Table 9. Land West of Allbrook Way, Knowle Hill

Year	Initial Projection (2024 HLS)	Revised Projection (SPRU)	Difference
2024/25	0	0	0
2025/26	0	0	-0
2026/27	10	0	-10
2027/28	42	15	-27
2028/29	0	20	20
Total	52	35	-17

f) RESOLUTION O/20/89498 Land West of Horton Heath (Appellant forecast 0 dwellings – difference of 486 units)

- 4.68 In the information exchanged on 21 November 2024 the One Horton Heath site comprises two entries in the 1 April 2024 schedule of sites but is dealt with under a single heading on pp.4 of its summary letter (under the heading for Strategic Allocation HH1). The commentary below addresses the remainder of the site (excluding Lower Acre discussed above (under disputed site (b))).
- 4.69 Both the outline and full application were made by Eastleigh Borough Council and the land was and remains in the ownership of Eastleigh Borough Council. Evidence of firm progress in relation to development timescales and rates of delivery has not been provided and this reflects barriers to achievability and disposal of the site.
- 4.70 For the remainder of the site under this record the original outline application is still undetermined, with a resolution to grant being issued on 23 June 2023.
- 4.71 In the letter provided from One Horton Heath dated 21 November 2024 (copy at Appendix 3) the Council treats delivery from the overall site as a single total in terms of delivery against related triggers from the planning obligation. For example under point 9 the trajectory forecasts delivery of the 400th dwelling in 2028, which is reliant on delivery assumptions from this part (b) element of the site, together with delivery from Lower Acre, as summarised in the combined trajectory below:

Table 10. One Horton Heath – Combined Trajectory

Year	F/20/89500 - Lower Acre	O/20/89498 - Horton Heath (Resolution)	Total	Appellant (Lower Acre Only)
2024/25	0	0	0	0
2025/26	48	0	48	0
2026/27	117	99	216	49
2027/28	216	211	427	49
2028/29	0	176	176	49
Total	381	486	867	147

- 4.72 The Appellant disputes the inclusion of any contribution to supply from the O/20/89498 element of the site and clear evidence has not been provided for a realistic prospects of completions from this part of the site beginning within five years.
- 4.73 Taking the trajectory for O/20/89498 in isolation the Council forecasts 486 completions from 2026/27 at an average of 162dpa and a peak build rate of 211dpa based solely upon delivery on behalf of the Council using the Eastbrook Homes product. The Council has provided no relevant clear evidence to support these assumptions for build rates from this part of the site.
- 4.74 However, when considered together with the Council's trajectory for the Lower Acre part of the site, which the Appellant also disputes, the forecasts for delivery relied upon by the Council are wholly unrealistic for a strategic allocation that has yet to deliver a single dwelling. When considered in-tandem with the 381 units forecast from the detailed element over the same time period average delivery from 2026/27 with both elements of the site producing dwellings, would be 273 units per annum.
- 4.75 This is within the context, as confirmed at paragraphs 8 to 11 of the Council's 5 December Cabinet Report (copy at Appendix 29), of formal approvals on currently being in place for the

Lower Acre element and the feasibility and viability of self-delivery of future elements remaining under review. The nature of clear evidence that is required to support the prospect of any completions from the O/20/89498 element without planning permission under the trajectory proposed would need to be comparable with the arrangements for funding, disposal and aware of contracts applicable to the Lower Acre element of the site.

4.76 When compared with the circumstances for the Lower Acre part of the site (for example utilities only being implemented for the first 46 plots in parcel 1 (see December 5 Report paragraph 30) and future decisions on house types contingent on the future award of grant funding beyond the 2026 programme (see paragraph 50) it is evident that there is no clear evidence or commitment to phasing of the remainder of the site. The trajectory as currently proposed will simply not occur and this part of the site cannot currently be regarded as deliverable.

4.77 The Council's 5 December 2024 Cabinet Report (paragraphs 63 to 65) further confirms that the expected trigger for delivery of the Primary School is thus not expected to be realised until at least 2028. This has implications for issuing any planning permission for the remainder of the site, as stated in paragraph 64:

"Based on the current trajectory, and the s106 trigger of 400 eligible dwellings, it is likely that the school will not need to be ready to open until September 2028 at the earliest. The completion date will flex depending on the final agreed trajectory. However, a firm decision on delivery needs to be made before the OPA s106 can be finalised."

4.78 This is significant because the Lower Acre element of the site is itself for 381 dwellings trajectory from 21 November shows the entire total being built by 2027/28 (and a total of 691 dwellings from both elements – see Table 9 above). This is a significant discrepancy in phasing, which is being successively pushed back, but could ultimately mean that delivery of the Primary School is necessary solely on the basis of delayed delivery from Lower Acre.

4.79 Conversely, as part of the information exchanged on 21 November the Council has provided no written evidence of progress with planning obligations or details of two parcels allegedly subject to requests for pre-application advice ahead of the grant of Outline planning permission.

4.80 The S106 agreement is still awaiting completion for the outline proposals. It should be noted that there were significant delays to issuing the Deed of Variation to exclude affordable housing from the obligations related to the detailed element of the scheme took over 18 months and the same approach is proposed to exclude the provision of affordable housing from the remainder of the site. The same implications for phasing and viability therefore apply to this record and the Council has not provided the clear evidence required to support its assessment of deliverability on this basis.

4.81 No firm progress has therefore been made demonstrated of a realistic prospect of completions being achieved within five years The site is not deliverable and 486 units should be removed from the supply.

**g) PRIOR APPROVAL PN/21/91216 Bursledon Hall, Blundell Lane, Bursledon
(Appellant forecast 0 dwellings – difference of 16 units)**

- 4.82 The information relied upon in the schedule of sites refers to Prior Notification reference PN/21/91216 with an expiry date of 24 September 2024. The Appellant provides clear evidence that completions will not begin with five years from this record based on its assessment of deliverability at the base-date. The Council has not provided any further clear relevant information in the material exchanged on 21 November despite significant changes in the planning history and ongoing active use of the site.
- 4.83 Within the delegated Report for PN/21/91216 the use of the site was noted as "academic medical statistical research purposes" based on conditions imposed upon the record assessed by the Council. The site remains in these active uses.
- 4.84 Further to the Prior Notification record application reference F/23/96407 was validated on 17 November 2023. This remains undetermined and there are outstanding objections from the Environmental Health Officer requiring submission of an Air Quality Assessment..
- 4.85 The Planning Statement for the 2023 application notes (Appendix 15):
"Prior approval has already been granted for development in the terms now sought; however the terms of that approval require completion of development within 3 years. Given the imposition of pre-commencement conditions requiring investigation of any potential contamination arising from the historic hospital use, and the need to finance the necessary nitrate mitigation, this timeframe now proves challenging. This application for full planning permission therefore seeks permission for exactly the same development as has already been authorised, to ensure the development can be funded and implemented in the required timeframes."
- 4.86 This provides clear evidence, for the purposes of a site falling under part (a) of the NPPF definition of deliverable, that completions will not begin within five years for the application record applicable at the base-date. The extract above illustrates that there was no ability to implement that scheme applicable at the base-date. The Council has not disclosed these details and availability and viability constraints relevant to determining a realistic prospect of deliverability as part of its own assessment.
- 4.87 A further Prior Notification Application Under Class MA for the change of use from offices to 16no. dwellings (PN/24/97248) was approved in June 2024 (Appendix 28), after the base-date. A covering Letter was submitted noting the 2021 permission had not been implemented (copy at Appendix 27). While PN/24/97248 preserves a consent upon the site there is clear evidence (via the above quoted Planning Statement see paragraph 3.11) that due to the time and costs involved in complying with pre-commencement conditions and nutrient mitigation securing full planning permission represents the applicant's preferred route.
- 4.88 The 2024 Decision Notice also includes pre-commencement conditions regarding contamination. The Council has provided no written agreement or indication of timescales for this part of the site assessment process.
- 4.89 The site should therefore be removed from the supply.

**h) ALLOCATIONS Land south of Maddoxford Lane and east of Crows Nest Lane
(Appellant forecast 0 dwellings – difference of 30 units)**

- 4.90 At the base-date the site comprised land in private ownership and allocated in the development plan for 30 residential dwellings, without planning permission, and falling under part (b) of the NPPF definition. The site was not forecast as deliverable in the previous 2022 assessment of Housing Land Supply.
- 4.91 The Council has not provided clear evidence for the 30dwellings forecast as deliverable at the base-date. The information relied upon in the schedule of sites refers merely to the site's allocated status and a summary of a request for pre-application advice. No further details are provided in the information exchanged on 21 November 2024.
- 4.92 There is no clear, relevant information provided in relation to written agreement with the developer regarding timescales for submission of an application and the development period. This is not representative of firm progress consistent with the Council's expectations at the base-date.
- 4.93 It is further noted that the allocation of land within the development plan does not, as the Council states, provide sufficient certainty of completions beginning within five years. In this instance the Appellant understands from the submission of representations to the Botley Neighbourhood Plan in October 2024 that allocation BO1 remains under the control of Bloor Homes (Copy at Appendix 16). The Council's assessment conversely provides no details of the developer or clear evidence of engagement as part of the assessment of deliverability
- 4.94 These representations provide no indication of timeframes for an application upon the extant allocation only and confirm that Bloor Homes continues to maintain objections to several policies within the emerging Neighbourhood Plan and particularly in the context of its control of a larger area extending east of the land currently allocated. Paragraph 1.8 of the representations states the promoter's position that the Parish Council, via the Neighbourhood Plan, has sought to frustrate the potential of the wider site to provide for development and notes the consequences of this that include the ongoing early review of the Local Plan.
- 4.95 There is no written agreement with the developer with the Council's current assessment of deliverability firstly to indicate whether an application would be brought forward in advance of the Neighbourhood Plan being made and secondly whether the proposals will be brought forward on the allocated site only.
- 4.96 The Council's evidence fails to satisfy the relevant test to demonstrate a realistic prospect of completions within five years and the site should be removed.

i) ALLOCATIONS Kings Copse Avenue, Botley (Appellant forecast 0 dwellings – difference of 95 units)

- 4.97 The Council forecast 35 units (of a total 120 dwellings) in its 2022 assessment of Housing Land Supply and this was disputed in the Appellant's Hearing Statement in the absence of clear evidence being demonstrated.
- 4.98 The site remains disputed following the information exchanged by the Council in November 2024 and based on its assessment of deliverability as at 1 April 2024. At the base-date the site remained allocated land without planning permission falling under part (b) of the NPPF definition.
- 4.99 The Council cites a change in ownership from Hampshire County Council to Eastleigh Borough Council and indicates that a confidential request for pre-application advice has been prepared alongside undertaking site surveys. The capacity of the site has been reduced by 25 dwellings. No details have been provided in relation to the site assessment work, failing to satisfy the firm progress expected within examples cited in the PPG.
- 4.100 The Council's 'commitment' to the scheme as developer and landowner is not relevant clear evidence of deliverability. This is not clear relevant information regarding viability and ownership. The Council has provided no written agreement of its proposed timescales for delivery or arrangements for appointing a contractor to deliver the scheme. It is particularly significant that the Council has not indicated a proposed tenure mix for the scheme and whether the site will be provided as open market housing (with or without policy—compliant contributions towards affordable housing under S106) or 100% affordable homes (and whether this would be dependent on grant funding).
- 4.101 Notwithstanding the Council states an application is not expected until mid-2025 in year 2 of the five year period.
- 4.102 Analysis in the third edition of Lichfields' Start to Finish Report is that schemes of 50-99 dwellings have a 3.8 year timeframe for submission to first completions (including 2.3 years from detailed approval to delivery of the first dwellings). This would be an appropriate timescale to apply given the points noted above and the absence of local evidence provided by the Council.
- 4.103 Using the Council's own submission date for an application there is no realistic prospect of completions within five years. Furthermore, the Council forecasts 80 completions from this site in 2028/29. This is wholly unevidenced. Mean built rates from a site of this size are stated as 20 dwellings per annum by Lichfields. In the alternative scenario the site is found deliverable only a very small number of units should be forecast within the five year period.
- 4.104 The Council's evidence fails to satisfy the relevant test to demonstrate a realistic prospect of completions within five years and the site should be removed.

j) ALLOCATIONS Land north of Myrtle Cottage, Winchester Road (Appellant forecast 0 dwellings – difference of 22 units)

- 4.105 At the base-date the site comprised land in private ownership and allocated in the development plan for 22 residential dwellings, without planning permission, and falling under part (b) of the NPPF definition. The Council has not provided clear evidence for the 22 dwellings forecast as deliverable at the base-date. The information relied upon in the schedule of sites refers merely to the site's allocated status.
- 4.106 The site has a history of planning permission being refused prior to the adoption of the Local Plan. A first application for 31 dwellings, F/19/85604 was appealed on grounds of non-determination. The appeal was dismissed in October 2021. A revised planning application for 25 dwellings, F/21/89989 was refused by Eastleigh Borough Council in March 2023. Amongst 7 reasons for refusal on the 2023 Decision are reason 3 (impact on important trees) and reason 4 (insufficient evidence regarding drainage).
- 4.107 In the information exchanged on 21 November the Council cites receipt of an application on 1 August 2024 (ref. F/24/97945) for 52 retirement apartments. The application remains undetermined with no Committee date listed. The Council states, contrary to the entries in its schedule of sites, that a request for pre-application advice for this proposal was being considered at the base-date.
- 4.108 Regardless of whether the submission of an application is indeed consistent with expectations at the base-date these proposals do not constitute clear evidence of deliverability. At the time of writing there are outstanding holding objections from the Tree Officer dated 14 November stating *"the applicant has not demonstrated that the proposal can be implemented without harm to the trees to the north. The proposal is, therefore, contrary to policy DM1 and the Trees and Development SPD."* (Copy at Appendix 17)
- 4.109 Furthermore, correspondence from the LLFA (Hampshire County Council) dated 16 September requires the submission of further information. At the time of writing this has yet to be received. (Copy at Appendix 18)
- 4.110 Both issues pertain to the refusal of previous applications at the site.
- 4.111 The land is not allocated for specialist housing for older people. There is no written agreement from the applicant (McCarthy Stone) providing clear evidence of matters such as development timescales or how previous reasons for refusal might be overcome while seeking to bring forward alternative proposals for the site.
- 4.112 Even should the principle of development be supported and the application recommended for approval there is still significant uncertainty of when detailed permission will be in place and development capable of commencing. No clear relevant information has been provided in relation to viability, for example. This is significant, in the context of the specific proposals. The response from the Council's Housing Enabling Specialist dated 29 August confirms eligibility of the proposals to provide contributions towards affordable housing but receipt of a viability assessment from the applicant confirming insufficient headroom to enter into relevant obligations (Copy at Appendix 19). The Council is awaiting a review of this position. In our experience this is typical of issues that could result in a significant delay to permission being issued, if at all.
- 4.113 Clear evidence has therefore not been provided and the site should be removed at 1 April 2024.

k) ALLOCATIONS 0 Land north of Providence Hill (Appellant forecast 0 dwellings – difference of 19 units)

- 4.114 At the base-date the site comprised land allocated for development, in private ownership, and without planning permission; falling under part (b) of the NPPF definition. The Council has not provided clear evidence for the 19 dwellings forecast as deliverable at the base-date.
- 4.115 Following the information exchanged by the Council in November 2024 the Council has indicated that a scheme under application reference F/24/97312 for a for a 69-bedroom care home and 5 age restricted dwellings (Applicant: Colten Care) received on 29 April 2024 was recommended for approval at the 21 November Local Area Committee (copy at Appendix 20).
- 4.116 The Council has provided no details of written agreement with the developer (Colten Care) in terms of its anticipated timescales for Discharge of Conditions, Site Assessment and delivery to supersede the forecast of 19 dwellings at the base-date.
- 4.117 This scheme is not consistent with the Council's expectations at the base-date and does not provide clear evidence of a realistic prospect of completions within five years. The application was recommended for approval subject to completion of a S106 agreement.
- 4.118 Due to the C2 Use Class of the majority of the proposed development for a Care Home it is uncertain whether the Council's proposed items for securing planning contributions (e.g., Public Art and Sustainable Transport) as referred to at paragraphs 211 and 212 of the Committee Report would have, for example, led to extended timeframes for negotiation.
- 4.119 In any case the site was subsequently refused permission due to reasons including excessive height and bulk, insufficient parking, potential pressure on healthcare services, highway safety risks and lack of developer contributions for infrastructure. The Decision Notice confirms that the site is not deliverable, with no clear evidence at the 1 April 2024 base-date to suggest otherwise (Copy at Appendix 21).

**I) EBC HOUSING Q/22/92640 - F/23/96224 Land at 30-32 Queens View, Netley
(Appellant forecast 0 dwellings – difference of 18 units)**

- 4.120 The Council forecast 20 units in its 2022 assessment of Housing Land Supply and this was disputed in the Appellant's Hearing Statement in the absence of clear evidence being demonstrated.
- 4.121 The site remains disputed following the information exchanged by the Council in November 2024 and based on its assessment of deliverability as at 1 April 2024. At the base-date the site remained unallocated land without planning permission falling under part (b) of the NPPF definition.
- 4.122 The Council had previously indicated that demolition and construction had been scheduled to begin in Spring 2024, following approval for progress by the EBC Housing Programme Board (July 2022) and submission of a request for pre-application advice in 2022.
- 4.123 The site is now at least one year behind the expectations of the Programme Board. Detailed permission was not secured until 6 months (31 October 2024) after the intended start date on site and the scheme total reduced from 20 to 18 units. There were extensive delays to determination of proposals (not submitted until October 2023) including as a result of additional survey requirements.
- 4.124 The Council's assessment of deliverability at 1 April 2024 now forecasts a start of site in February 2025. The Council has provided no clear evidence to support this assessment for a site falling under part (b) of the NPPF definition of deliverable at the base-date.
- 4.125 There is no recorded Discharge of Conditions activity on the site including pre-commencement Conditions regarding Drainage (Condition 7).
- 4.126 The site is in the ownership of Eastleigh Borough Council, but the Council's evidence provides no details of disposal or appointment of a development partner. This Council has failed to provide clear relevant information regarding ownership and the relationship with development timescales including current expectations for a revised start date and demolition of the existing building (prior to which a final Construction Environmental Management Plan must be submitted under Condition 3).
- 4.127 In relation to viability the Committee Report at Paragraph 98 records that no affordable housing provision could be secured via planning obligations and *"the provision of affordable housing within the scheme would make the development financially unviable. No affordable housing is therefore proposed. However, as Eastleigh Borough Council is the applicant, there is the possibility that affordable housing could be provided as part of the development if future external grant funding can be obtained."* (Copy at Appendix 22)
- 4.128 The proposed tenure mix and delivery model for the site is therefore unknown until the Council can provide details for appointment of a contractor and its proposed approach to delivery or disposal. The Council has further failed to disclose whether these decisions will be determined under the current programme of grant funding or deferred until future allocations beyond 2026 are announced.
- 4.129 It is noted that paragraph 143 of the Committee Report sought that financial contributions for this development would be secured by direct upfront payment should permission be granted but in the October 2024 Committee Update this was amended to payment prior to commencement. This indicates that appointment of a contractor and arrangements for starting on site will need to be considered alongside payment of relevant planning contributions.
- 4.130 The grant of planning permission is therefore consistent with the Council's revised expectations at the base date but does not provide clear evidence of deliverability.

**m) EBC HOUSING Q/21/90499 Land at 237 Chamberlayne Road, Eastleigh
(Appellant forecast 0 dwellings – difference of 11 units)**

- 4.131 The Council forecast 11 units in its 2022 assessment of Housing Land Supply, and this was disputed in the Appellant's Hearing Statement in the absence of clear evidence being demonstrated.
- 4.132 The Council has provided no further relevant clear evidence in the information exchanged in November 2024 or its assessment at 1 April 2024. The information exchanged with the Council indicates that the site's urban location provides 'sufficient certainty' of completions within five years. This is not the relevant test to demonstrate a realistic prospect that the site is deliverable. The site is subject to both ownership and land use constraints to its development not addressed in the Council's assessment. While the Council indicates that this site is available it now states that disposal will be achieved by way of auction thus there is no clear relevant information of any development interest in the site.
- 4.133 While the Council continues to cite a request for pre-application advice from 2022 the site history includes application (F/23/95574) that was submitted for a three storey development of 12 dwellings on this site and subsequently refused on 04/10/2023 as being out of keeping with the neighbouring 2 storey terraced housing (Copy at Appendix 23). No clear evidence has been provided for how these constraints might be overcome by those with an interest in developing the site.
- 4.134 The Council's evidence fails to satisfy the relevant test to demonstrate a realistic prospect of completions within five years and the site should be removed.

n) EBC HOUSING Q/21/90496 Land at Station Road (Arch Theatre), Chandlers Ford (Appellant forecast 0 dwellings – difference of 17 units)

- 4.135 The Council forecast 17 units in its 2022 assessment of Housing Land Supply, and this was disputed in the Appellant's Hearing Statement in the absence of clear evidence being demonstrated.
- 4.136 The Council has provided no further relevant clear evidence in the information exchanged in November 2024 or its assessment at 1 April 2024. Indeed, the Council has not repeated its expectations from the 2022 assessment regarding One Public Estate Funding and it has now adopted a 'conservative' assessment of completions in 2028/29 having previously forecast a start on site in 2024/25. The application of a more conservative assessment is not clear evidence of deliverability.
- 4.137 Indeed, the Council now states that pre-application discussions (with no disclosed details of a developer) are ongoing and that the Arch Youth Theatre will not relocate until 2025. No details of the relocation arrangements are provided, and it is not specified whether the current pre-application proposals will make provision for community uses as per the 2021 request.
- 4.138 Centrestage Productions Youth Theatre (The Arch) is still based on the site and remains in operation.
- 4.139 The Council has provided no relevant clear evidence to support its assessment at 1 April 2024 or to indicate firm progress (for example in relation to availability, application activity and development timeframes) consistent with its expectations at the base-date. The Council's evidence fails to satisfy the relevant test to demonstrate a realistic prospect of completions within five years and the site should be removed.

o) Small Sites

- 4.141 In the information exchanged on 21 November the Council forecasts a total of 142 dwellings from small sites. Accepting the potential for some of these to lapse the council has noted a supply of 136. The Appellant does not apply a lapse rate but disputes individual records in the Council's net total.
- 4.142 The Council's evidence also records that for some replacement dwellings generating a net gain of 0 dwellings demolitions have been recorded previously leaving a positive total in the current supply. The Appellant has not been provided with past years' annual net completions to confirm this.
- 4.143 The Appellant has conducted a thorough assessment of the small sites identified by Eastleigh Borough Council to evaluate their deliverability based on the definition of 'part (a)' sites as outlined in national policy. This assessment was informed by various online data sources, including satellite imagery, Street View, and public access information such as Certificates of Lawful Development and subsequent applications.
- 4.144 It is accepted that there is some uncertainty in the monitoring of small sites. For some records the review indicates completion may well have occurred before 31 March 2024, but it is reasonable to accept that the Council has not previously monitored activity. For other records the absence of development activity has not in all cases been considered sufficient to rebut the presumption of a realistic prospect of completions on part (a) sites – for example where Certificates of Lawfulness can be identified and there is evidence of physical activity.
- 4.145 The local planning authority was provided with a draft list of disputed sites based on the following grouping by broad criteria.
- A net difference of 2 dwellings for identified sites considered to be miscalculations of capacity, including replacement dwellings counted in the net additional supply.
 - A net difference of 19 units are believed to have lapsed without commencement and no evidence of activity, warranting their removal from the supply.
 - A further 5 dwellings net difference for records with clear evidence suggesting there is no realistic prospect for development, such as changes in use.
 - Capacity for a further net additional 11 dwellings was considered but retained in the forecast supply; nine of these are from sites completed without proof of completion prior to the base date, and two have commenced development but are unlikely to be fully developed though foundations are in place.
- 4.146 Responses were received from the local planning authority confirming some details of previously recorded demolitions and agreement to the status of several records as lapsed. In some cases, details of commencement were provided and accepted by the Appellant but for a substantive number of records, exceeding the Council's lapse rate, the position remains disputed
- 4.147 The discrepancies highlighted in the final schedule of disputed Small Sites at Appendix 24 indicate that a **net total of 20 dwellings** should be removed and considered undeliverable within the five-year timeframe as stipulated by the NPPF.

iv) Summary

4.148 Based on the analysis of large sites and the variances in projected housing delivery it is evident that the Council's ability to meet its expectations on housing delivery, and its conclusions regarding the deliverability of supply, should be reconsidered. The current assessments provided by Eastleigh Borough Council (EBC) do not accurately reflect the realities on the ground, particularly regarding large site deliveries.

4.149 For the assessment with a 1 April 2024 base-date the comparison of the Council's assessment with SPRU's conclusions on disputed supply is as follows:

Table 11. Assessment Comparison – LPA and Appellant

Category	EBC 2024		SPRU 2024		Difference
	No Buffer	5% Buffer	No Buffer	5% Buffer	
Local Housing Need	729	729	729	729	
Buffer	0	182	0	182	
5-Year Requirement	3,645	3,827	3,645	3,827	
Supply					
Large Sites					
Full permission not started / under construction	810		523		-287
Outline permission not started / under construction	148		0		-148
Resolution to support in principle outline permission	538		35		-503
Reserved Matters	1,109		1,109		0
Prior approval not started / under construction	16		0		-16
Elderly Persons Housing	96		96		0
Local Plan Allocations	166		0		-166
Pre planning / EBC Housing	46		0		-46
Small Sites	136		120		-16
Windfall	162		162		0
New Sites Post 2022					
Total 5 Year Supply	3,227		2,045		
Five Year Land Supply	4.43	4.22	2.81	2.67	
Over/Undersupply	-418	-600	-1,600	-1,782	
Difference between EBC and SPRU Supply			-1,182	-1,182	

4.150 The assessment identifies a significant discrepancy in the anticipated supply of housing from large sites, with EBC projecting 2,929 units compared to the SPRU's forecast of 1,763 units. This variance results in a total 5-year supply of 3,227 units under EBC's assessment, whereas the revised supply under SPRU stands at only 2,045 units.

4.151 The difference in the overall projected supply signifies a critical undersupply of housing, particularly the 1,182-unit shortfall against the relevant five-year requirement under the SPRU assessment. This highlights the urgent need for a reassessment of the housing delivery trajectory and expectations of the Local Plan.

4.152 In conclusion, the findings assert that the realistic supply of housing over the next five years must consider the current delivery challenges identified in the large sites under review. Therefore, it is crucial to align expectations with the realities of site conditions and ongoing development progress. The Council can provide at best 2.81 years' deliverable supply against the minimum five-year requirement.

4.153 The Appellant's case by trajectory component and year is shown below.

Table 12. Summary of Appellant Position

	24/25	25/26	26/27	27/28	28/29	5-year Total
Large Sites						
Full permission not started / under construction	153	114	118	69	69	523
Outline permission not started / under construction	0	0	0	0	0	0
Resolution to support in principle outline permission	0	0	0	15	20	35
Reserved Matters	373	338	175	136	87	1109
Prior approval not started / under construction	0	0	0	0	0	0
Elderly Persons Housing	0	36	0	60	0	96
Local Plan Allocations	0	0	0	0	0	0
Pre planning / EBC Housing	0	0	0	0	0	0
Small Sites						
Small Sites						120
Windfall						162
Total Supply	526	488	293	280	176	2045
Annual Housing Requirement						729
Years Supply						2.81
Shortfall / Deficit						-1600
Annual Housing Requirement + 5% buffer						765
Years Supply						2.67
Shortfall / Deficit						-1782

4.154 Based on its revised assessment of supply the Appellant's case is that underperformance against the Local Plan trajectory will increase to -1,471 dwellings and that a shortfall of -687 dwellings will accrue against the average annual requirement of the Local Plan. This is summarised below:

Table 13. Comparison of Local Plan, Annualised and HLS2024 Cumulative Trajectories – Appellant’s Case

Year	Appellant Forecast Supply	Cumulative to 2028/29	Difference Appellant versus ED101 Trajectory	Diff. Difference Appellant versus LP Req.
2016/17	517	517	0	-212
2017/18	893	1410	0	-48
2018/19	1250	2660	88	473
2019/20	1223	3883	-19	967
2020/21	864	4747	-349	1102
2021/22	707	5454	-426	1080
2022/23	725	6179	-366	1076
2023/24	566	6745	-463	913
2024/25	566	7311	-616	750
2025/26	528	7839	-741	549
2026/27	387	8226	-1138	207
2027/28	334	8560	-1326	-188
2028/29	230	8790	-1471	-687

Source: Eastleigh Local Plan Examination Document 101; AMR; SPRU Analysis

5.0 AFFORDABLE HOUSING SUPPLY AND MARKET INDICATORS

a) The Council's Published Position

- 5.1 The most recent position regarding affordable housing was published in the Annual Monitoring Report (AMR), which focuses on the period 2020/2021. As part of information exchanged for the Appeal the Council has confirmed affordable housing completions up to 2023/24 consistent with the base-date for assessing housing land supply.
- 5.2 This section will indicate that the expectations of the Local Plan have fallen short and failed to satisfy growing demand for affordable housing.
- 5.3 Under Policy S2, the Council seeks to support the provision of 200 net new affordable homes per annum within the plan period from 2016 to 2036 (a total of 4,000 dwellings). The overall housing requirement is set at 729 homes per annum, implying that the proportion of affordable housing should be approximately 27%. This does not take account of, for example, the proportion of supply from minor development falling below the threshold for contributions towards affordable housing or the impact of any current or future commitments from major development that do not satisfy policy requirements for affordable housing provision.
- 5.4 However, five points should be noted.
- Firstly, the Local Plan only makes provision for a forecast 11,966 units in the period 2016-2036, generating a total shortfall of -2,614 dwellings (LP paragraph 4.12). Accordingly, net annual affordable housing needs are equivalent to over 33% of the provision identified in the Plan. The minimum 4,000 additional affordable homes required would represent 33% of the currently identified provision indicating that it is more unlikely that affordable housing needs can be met without the review of the Local Plan or identification of additional sites in the supply.
 - Secondly, the trajectory informing the adopted Local Plan (Appendix 1) forecasts very little supply beyond 2028/29 and the end of the current five-year period. Only a total of 1,705 units are forecast, of which 812 units represent unidentified 'other' windfall, and 273 units comprise small sites. In effect the trajectory forecasts an expectation that housing supply contributing towards the provision of affordable homes is 'front-loaded' in the Plan.
 - Third, the Council's evidence base is clear that the need for affordable dwellings is 4,000 units comprising a net addition to existing stock (ED102 paragraph 2.43). Any losses from the current stock (such as demolition or clearance, or sales through Right to Buy) would increase the number of affordable dwellings needed by an equivalent amount.
 - Fourth, the Council has confirmed its Authority Monitoring Report reports on development activity only (i.e., affordable housing completions less losses from demolition or change of use) and does not account for other net changes in stock.
 - Fourth, Paragraph 2.11 of the Local Plan refers to a 2016 total of 1,890 households registered who could not afford to buy or rent a property in the private sector, of which 1,690 households (90%) were in the 'reasonable preference' category as they fall into a specific category of housing need. While the Local Plan refers to details of the register remaining consistent with previous years the total number of households on the register, and average waiting times for applicants have increased markedly up to the Plan's adoption in 2022 and beyond.
- 5.5 Based on the information in Table 14, corresponding to the Council's most recent published AMR and data to 2023/24, since the beginning of the plan period the Council has exceeded this target in terms of affordable housing completions. However, the most recent two years' data show a downturn in completions activity. Furthermore, when comparing the Council's

data to Government monitoring data there are discrepancies, which raises questions about the reliability of the reporting.

- 5.6 The table below outlines the net affordable housing completions alongside the total housing completions for the years to 2023/24:

Table 14. Council's Completions Data

Year	Net Affordable Housing Completions	Net Total Housing Completions	Proportion of Net Completions (%)
2023/24	216	556	39%
2022/23	210	683	31%
2021/22	304	707	43%
2020/21	247	846	29%
2019/20	475	1,223	39%
2018/19	468	1,162	40%
2017/18	204	893	23%
2016/17	181	517	35%
2015/16	103	458	22%
2014/15	-48	145	0% (-33%)
2013/14	116	394	29%
2012/13	10	275	4%
2011/12	197	402	49%
2010/11	85	361	24%
2009/10	209	434	48%
2008/09	142	516	28%
2007/08	122	417	29%
2006/07	182	742	25%

Source: Authority Monitoring Report Data (2020/21) and additional years' reporting

b) Summary of Available Sources for the Stock and Supply of Affordable Housing

- 5.7 The Government releases data for indicators of new supply by tenure separately from reporting on total dwelling stock by tenure and total net additional dwellings. Indicators of new supply are a leading measure provided quarterly based upon returns from Building Control officers at the National House Building Council (NHBC), Local Authorities or Approved Inspectors. Not all development activity is recorded in this way and reports may not always capture the correct tenure of development activity.
- 5.8 Housing Flow Reconciliation data inform recorded annual change in net additional dwellings and represent total housing supply that comprises all new build, conversions, change of use, other gains/losses and demolitions but are not reported by tenure. However, this provides an accurate assessment of annual change in all housing stock and is the most comprehensive estimate of supply (prior to adjustments to reflect Census-based estimates in dwelling numbers as part of reporting total stock).
- 5.9 Overall affordable housing supply (new build and acquisition) forms part of a separate data return by tenure but not matched to components of net additional dwellings. These figures are a subset of total housing supply and provide the most complete estimate of affordable housing supply. The totals typically exceed indicators of new supply and more fully reflect housing secured under a full range of affordable tenures, including shared ownership. However, as a measure of gross supply these statistics exclude net impacts on the availability of affordable housing such as demolitions or change to market tenure (including Right to Buy).

- 5.10 No separate annual reporting of total net change in affordable housing supply exists as part of official statistics.
- 5.11 Total reporting by dwelling stock includes Local Authority Housing Statistics (LAHS) for local authority-owned stock. For registered providers total stock is formed of a statistical data return collected by the Regulator of Social Housing (RSH) (formerly a statutory regulatory committee within the Homes and Communities Agency (HCA)). These are completed by all PRPs every year in one of two variants; with larger PRPs completing a longer, more detailed form called the 'long form' and smaller PRPs completing the 'short form'.
- 5.12 Reporting by registered providers will therefore not necessarily match annual changes by monitoring year. Estimates of registered provider dwelling stock also only include affordable rented tenures, with shared-ownership properties represented within the total private stock. The private stock figure should be considered an estimate, derived by deducting full counts for the social tenures from the total estimate. As such the shared-ownership total is not reported separately and annual net changes (such as low-cost home ownership sales) cannot be captured.
- 5.13 While no overall data for net change in the stock of affordable housing is available at the local authority level open data for social housing sales and demolitions allows annual totals for these indicators (including low cost home ownership sales) to be offset against gross supply data.

c) Gross and Net Affordable Housing Supply

- 5.14 The implications of these different sources for total stock, new supply and net change are that different measures inevitably exist to compare the Council's performance against adopted requirements for affordable housing and other indicators of affordable housing need.
- 5.15 It should be noted that for the period from 2011 prior to the start of the plan period in 2016 the Council's own reporting records only 378 net additional affordable homes (23% of total net additional dwellings). This compares with what the Local Plan evidence acknowledges was a total objectively assessed need of 650 dwellings per annum. While there is no current adopted affordable housing target for this period the total would represent only 38% of the current total of 200 dwellings per annum applied over five years.
- 5.16 The AMR indicates completion of 1,575 'net' additional affordable homes since the start of the plan period in 2016. This would form 34% of the net additional dwellings recorded using the Council's data for the same period (4,641 dwellings). This broadly accords with the level of affordable housing that needs to be achieved as a proportion of total provision in the Plan in order to meet minimum needs. 2,305 net additional affordable housing *completions* have been recorded to 31 March 2024 (around 35% of 6,587 total net dwellings).
- 5.17 Government Live Table 1011 records additional affordable housing supply, detailed breakdown by local authority, inclusive of acquisitions and low cost home ownership / shared ownership. This is a gross measure of supply but reporting of completions may not directly correspond to planning monitoring. The Live Tables record two further years of data to 2022/23 which can be compared with the total net additional dwellings recorded over the same period.
- 5.18 When compared with gross supply from the Live Tables a clear trend emerges prior to 2015/16 the AMR records lower totals, indicating more adjustments for net supply have been applied. From 2016/17 the AMR records total net supply which exceeds gross reporting in official statistics for the same 2016-2023 period. This indicates that adjustments for net changes such as sales may not have been applied.
- 5.19 This is summarised in Table 15 below:

Table 15. Annual Affordable Housing Completions – AMR and Live Table 1011 Gross Supply

AMR Year	AMR Net Affordable Housing Completions	LT1011 Detailed AH Gross Supply
2011/12	197	200
2012/13	10	172
2013/14	116	109
2014/15	-48	162
2015/16	103	104
2016/17	181	139
2017/18	204	122
2018/19	468	470
2019/20	475	346
2020/21	247	298
2021/22	304	158
2022/23	210	91
2016-2023	2,089	1,624

Source: Gov.UK Live Table 1011; AMR; SPRU Analysis

- 5.20 For the period 2011-2021 the Live Tables record 2,122 affordable homes versus 1,953 from the AMR. However, for the 2016-2023 period the Live Tables record 1,624 gross supply of affordable homes compared to 2,089 from the AMR.
- 5.21 Live Table 1011 reporting relates to gross supply. The Council's monitoring only includes the net impact of demolitions and not sales. Open Data for social housing sales and demolitions indicates limited levels of physical losses but around 175 low cost housing sales and 60 other sales since 2016. These are summarised in Table 16 below:

Table 16. Imputed Net Annual Affordable Supply Including Sales and Demolitions – AMR and Live Table 1011 Gross Supply

AMR Year	SHSD Open Data - Demolitions	SHSD Open Data - LCHO Sales	SHSD Open Data - Other Sales	SHSD Open Data - Sale to Sitting Tenants	AMR Net of Sales	LT1011 Net of Sales
2016/17		31		13	137	95
2017/18		34	1	3	166	84
2018/19		25		7	436	438
2019/20		15		9	451	322
2020/21	3	15	6	1	225	276
2021/22		34	2	11	257	111
2022/23		20	3	3	184	65
2016-2023	3	174	12	47	1,856	1,391

Source: Gov.UK Live Table 1011; AMR; Social Housing Sales and Demolitions (SHSD) Open Data; SPRU Analysis

- 5.22 When applied to the respective Live Table 1011 figures indicate a total net change of 1,391 dwellings 2016-2023. For the AMR reporting this would represent a reduced net total of 1,856 dwellings 2016-2023.

- 5.23 The Council's gross and net indicators of affordable housing supply are further summarised in Table 17 below and reported as a proportion of total net additional dwellings. Applying the latest available sales data to 2023 indicates that the proportion of affordable housing delivered (31%) has fallen below the minimum amount of total provision necessary to meet affordable housing needs in full (33%)

Table 17. Imputed Gross and Net Affordable Supply as a Proportion of Net Additional Dwellings

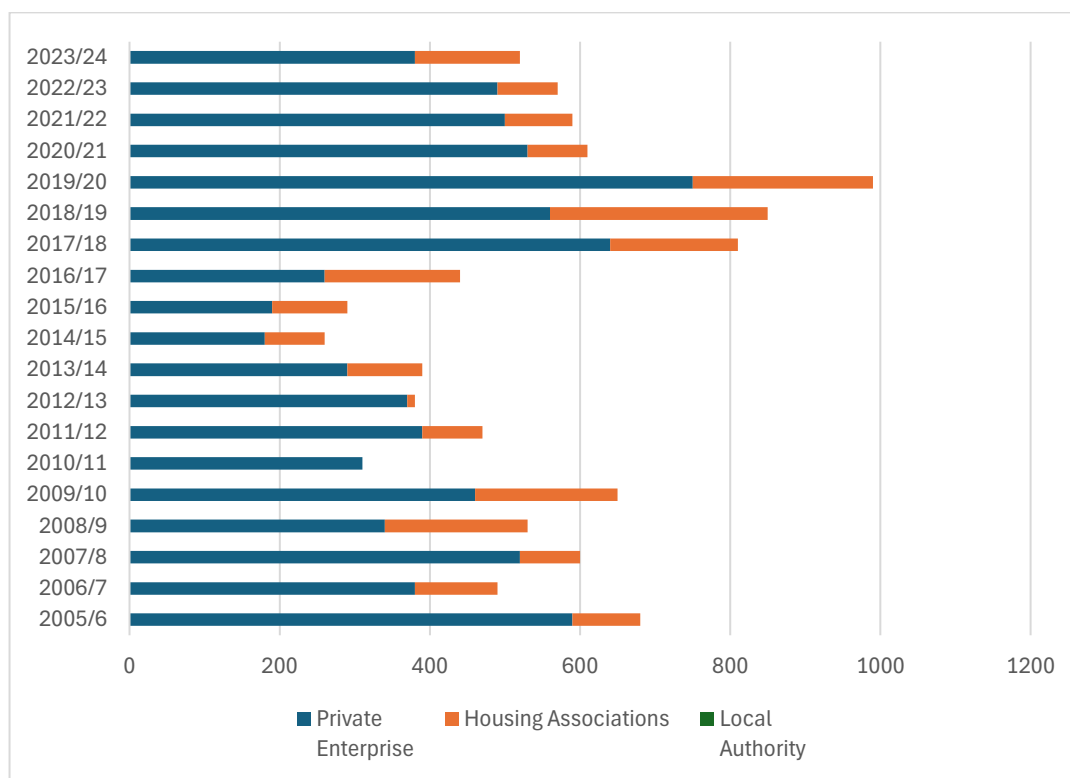
	Net Additional Dwellings	AMR		LT1011	
		Reported	Net less Sales	Reported	Net less Sales
2016-2023	6031	2,089	1,856	1,624	1,391
	% of Total	35%	31%	27%	23%

Source: Gov.UK Live Table 1011; AMR; Social Housing Sales and Demolitions (SHSD) Open Data; SPRU Analysis

d) Indicators of New Affordable Housing Supply

- 5.24 Indicators of new supply are a leading indicator of housing completions but will not necessarily record all development activity.
- 5.25 The total housing completions display fluctuations, with private enterprise consistently making up the majority of new homes. Despite a standout year in 2019/20 for private enterprises, recent years show a concerning downward trend, particularly when combined with the stagnation in housing association outputs for the delivery of affordable housing.

Figure 5. Dwelling Completions Per Year in Eastleigh (2005/06 – 2023/24)



Source: Gov.UK Live Table 253

- 5.26 Comparing the live tables to the council's completions data from the Annual Monitoring Report the years 2021/22, 2022/23 and 2023/24 have seen a significant drop in completions of affordable dwellings visible in Figure 5. Live Table 253 records 1,680 additional dwellings. The Council has since confirmed 1,956 net additional dwellings for the period 2021/22 to 2023/24, reflecting that the indicators of new supply dataset accurately predicts an overall reduction in completion activity.
- 5.27 More detailed analysis of the indicators of supply for the current plan period is shown in Table 18 below. Note Live Table 253 only records affordable rented housing within the affordable housing category.
- 5.28 The completion of affordable housing has demonstrated considerable fluctuations over the specified years, peaking at 41% in 2016/17 and falling to a low of 13% in 2020/21. Notably the delivery was particularly poor between 2020/21 and 2022/23.

Table 18. Percentage of Affordable Housing Completions (Live Tables)

Year	Affordable Housing Completions	Total Housing Completions	Proportion of Completions (%)	LT122 Net Additional Dwellings	LT1011 Affordable Housing Starts
2016/17	180	440	41%	420	158
2017/18	170	810	21%	796	490
2018/19	290	850	34%	1065	248
2019/20	240	990	24%	1126	191
2020/21	80	610	13%	749	125
2021/22	90	590	15%	707	77
2022/23	80	570	14%	683	145
2023/24	140	520	27%		
Plan Period Average	159	673	24%		

Source: Gov.UK Live Table 253; Live Table 123; Live Table 1011

- 5.29 It is clear that from 2020/21 net additional affordable housing recorded as a proportion of net additional completions reported by the indicators of new supply have fallen below 20% of the total, notwithstanding that completion activity overall has reduced.
- 5.30 Live Table 1011 also records a more comprehensive series of starts on affordable supply across all affordable tenures (including shared ownership). This similarly finds that starts have not exceeded 200 units per annum since 2018/19. It is thus highly likely that levels of additional affordable housing delivery will fall behind the 200 per annum necessary to provide for the Local Plan requirement in full,
- 5.31 Furthermore, it is important to highlight that the Council has not achieved the target of delivering 200 affordable dwellings in any single year since the adoption of the Local Plan, based on the data presented in the live tables. This trend raises concerns regarding the effectiveness of current strategies to meet affordable housing needs within the Borough.

e) Impact on Total Affordable Housing Dwelling Stock

- 5.32 Table 19 below summarises total estimates of dwelling stock for affordable rented housing, which comprises the registered provider, local authority and other public sector totals reported. The annual change calculated in this series represents sample data and not necessarily evidence of new supply in that monitoring year but are another method useful to indicate the potential effects of total net change in stock (allowing for sales, demolitions etc.).

- 5.33 Overall, while affordable dwelling stock has grown, the minimal role of local authorities and the decrease in other public sector stock underscore a growing reliance on housing associations and the private sector to meet housing needs.
- 5.34 Shared ownership dwellings form part of the owner occupied total reported in Live Table 100, so Live Table 1011 completions for affordable ownership categories have been included and are reported net of low cost home ownership sales reported in open data.

Table 19. Percentage of Affordable Housing Completions (Live Tables)

Year	Affordable Rented Stock LT100	Annual Change	LT1011 s/o Completions	LCHO Sales	Net Change s/o
2011/12	6384	-41	52	7	45
2012/13	6487	103	27	7	20
2013/14	6470	-17	31	14	17
2014/15	6575	105	25	9	16
2015/16	6645	70	29	85	-56
2016/17	6759	114	35	31	4
2017/18	6904	145	64	34	30
2018/19	7132	228	202	25	177
2019/20	7399	267	186	15	171
2020/21	7514	115	133	15	118
2021/22	7689	175	91	34	57
2022/23	7808	119	55	20	35
2016-2023		1,163	766	174	592

- 5.35 These data would suggest a slightly more favourable position on the total change in affordable stock and **a combined net additional total of 1,755 units** between 2016 and 2023. This is relatively similar to the 1,826 dwellings calculated by applying sales data to the Council's AMR. However, this would still represent only 29% of the net additional completions reported. This is below the 33% of affordable housing that would need to be achieved from provision identified in the Plan in order to meet needs in full.

f) Committed Affordable Housing Supply

- 5.36 The Council has already fallen behind the expected delivery of affordable housing required to meet affordable housing needs. Significantly fewer net additional affordable homes have been delivered than the 2,305 net completions total recorded by the Council to 2023/24 when sales and other losses are accounted for.
- 5.37 While delivering these needs will be sensitive to the overall level of deliverable housing supply in future years it is particularly important that committed supply reflects (or exceeds) expected policy contributions towards affordable housing for this to be achieved.
- 5.38 The Council has identified a total of 1.025 units committed affordable housing land supply at 1 April 2024. This reflects that a substantial proportion of forecast supply does not yet benefit from completed planning obligations or that contributions towards affordable housing have been removed. However, the Council nonetheless forecasts 514 of these affordable units on sites where the assessment of deliverability is disputed.
- 5.39 For these records the Appellant has excluded the delivery of affordable housing within the five year period as summarised in Table 20 below. The effect of this change in particular concentrated at the Botley Fields, Woodhouse Land and One Horton Heath sites where the Council has indicated affordable housing commitments despite known Grant Funding

challenges and knowledge that these contributions have been omitted from the planning obligation.

Table 20. Deliverability of Committed Affordable Housing by Disputed Sites

	Component	LPA ref:	Address	Capacity (Net)	LPA 5YHLS	LPA AH	Appellants' AH
A	FULL	F/17/80651	Land west and north of Waylands Place and Peewit Hill Close	106	106	37	37
B	FULL	F/20/89500	Land West of Horton Heath	381	381	134	0
C	OUTLINE	O/18/83698	Land to the North and East of Winchester Street, Botley	375	26	131	0
D	OUTLINE	O/18/83634	Land west of Woodhouse Lane	605	122	212	0
			Small Sites		136	2	2
			Sites Not Disputed		1766	511	511
		Total = Disputed Sites			1,461	514	37
		Total			3,227	1,025	548

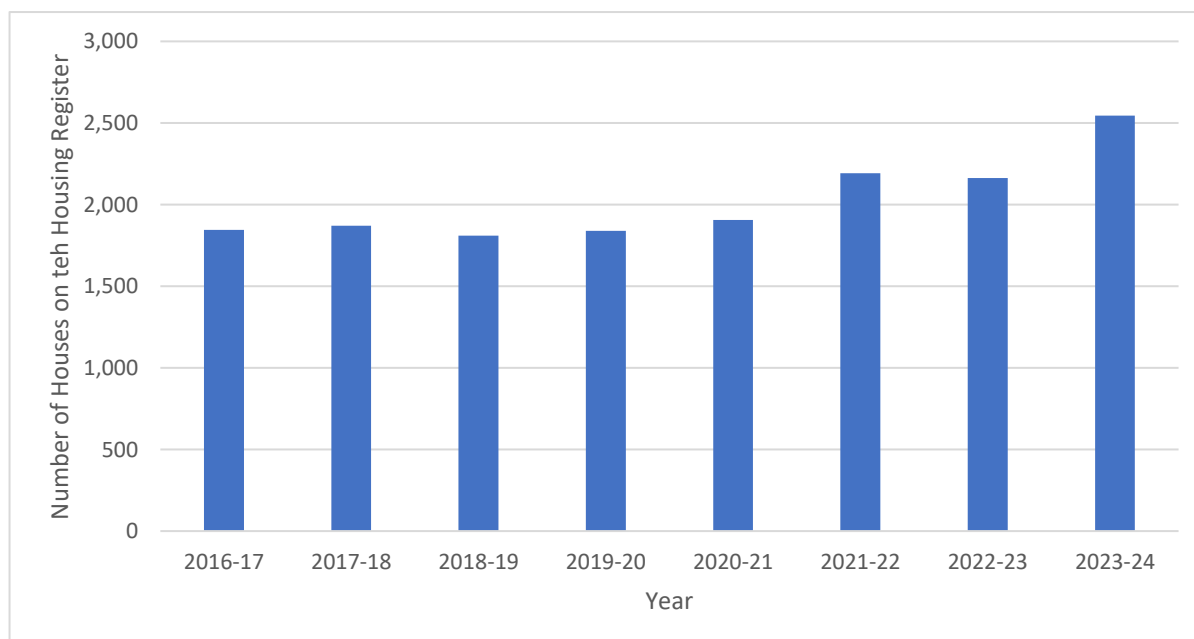
- 5.40 The Appellant therefore considers that there is only a deliverable supply of 548 additional affordable homes within the five year period. This may be reduced further by sales or demolitions elsewhere.
- 5.41 Taken together with completions to 2023/24 this would give a potential total of 2,853 affordable housing completions by 2028/29 (around 219dpa). This is compared to an expectation the Local Plan would deliver 10,261 completions by 2028/29 and expects the completion of most strategic sites having been achieved. If supply identified in the Local Plan had achieved a c.33% proportion of affordable housing against forecast completions to this date around 3,386 net additional affordable housing completions would be expected. It is therefore highly likely that due to delays to the delivery of several strategic sites, together with a reduction in the ability to support housing delivery, the minimum net additional need for 4,000 affordable homes will not be met,

6.0 INDICATORS OF HOUSING NEED AND SUPPLY

a) Affordable Housing Needs

- 6.1 illustrates the recorded number of households on the council housing waiting list for Eastleigh since the initiation of the plan period. Since 2016, the number of households on the register has escalated significantly by 700 households, rising from 1,845 to 2,545.
- 6.2 The 2016 total recorded by Government Statistics on Live Table 600 corresponds broadly to the 1,890 households cited in the Local Plan. The 2024 total corresponds exactly to details within the 2024 Hampshire Home Choice Report. This represents a 31.9% increase in the total number of households registered as needing accommodation. This upward trend clearly indicates a growing demand for affordable housing within the Borough, underscoring the pressing need to address housing shortages.
- 6.3 The increase in households on the housing waiting list signifies that, regardless of the progress made in delivering affordable housing and the relative affordability of private rented accommodation, the demand (in terms of those unable to access appropriate housing options including entry level market housing) has outpaced supply during the plan period.
- 6.4 Figure 6 illustrates the recorded number of households on the council housing waiting list for Eastleigh since the initiation of the plan period. Since 2016, the number of households on the register has escalated significantly by 700 households, rising from 1,845 to 2,545.
- 6.5 The 2016 total recorded by Government Statistics on Live Table 600 corresponds broadly to the 1,890 households cited in the Local Plan. The 2024 total corresponds exactly to details within the 2024 Hampshire Home Choice Report. This represents a 31.9% increase in the total number of households registered as needing accommodation. This upward trend clearly indicates a growing demand for affordable housing within the Borough, underscoring the pressing need to address housing shortages.
- 6.6 The increase in households on the housing waiting list signifies that, regardless of the progress made in delivering affordable housing and the relative affordability of private rented accommodation, the demand (in terms of those unable to access appropriate housing options including entry level market housing) has outpaced supply during the plan period.

Figure 6. Households on the council housing waiting list 2016-2024



Source: GOV.UK Live Table 600

- 6.7 Among the 2,545 households currently on the waiting list, they are classified into four distinct band categories, which reflect the urgency of their housing needs:
- Band 1 – urgent need
 - Band 2 – high need
 - Band 3 – medium need
 - Band 4 - low need
- 6.8 The most recent 2024 Hampshire Home Choice Report provides insight into the distribution of households across these band categories. The findings are as follows:

Table 21. Proportion of Households in each band

	Count	Percentage
Band 1	5	0.2%
Band 2	166	6.5%
Band 3	2,264	89.0%
Band 4	110	4.3%

Source: Hampshire Home Choice Report (2024)

- 6.9 The data reveals that 89.0% of the households registered in need of housing fall within Band 3, indicating a medium level of need. Whilst this is expected it still shows that the demand in housing is growing. Furthermore, Hampshire Home Choice Reporting confirms a significant increase in the average waiting time on the register for households bidding for properties in either Band 2 or Band 3, particularly for 3+ bedroom affordable family homes. The 2020 (Appendix 25) and 2024 (Appendix 26) Reports are compared below by bedroom number.

Table 22. Average Waiting Time by Band and Bedroom Requirements, 2020 and 2024

	2020		2024	
	Band 2	Band 3	Band 2	Band 3
1-bed	1 year	3yr 5 months	1yr 10 months	5yr 2 months
2-bed flat	8 months	1yr 2 months	7 months	1yr 11 months
2-bed house	6 months	3 years	1 year	3yr 2 months
3-bed	1yr 5 months	3 years	1yr 10 months	4yr 8 months
4+ bed house	1yr 8 months	3yr 9 months	2yr 2 months	No data

Source: Hampshire Home Choice Report (2024)

b) Homelessness

- 6.10 The data surrounding homelessness is often limited and fragmented, making it essential to derive insights from the available information. The UK government began recording homelessness data annually from 2019-20, focusing on "main duty decisions." These decisions represent the legal responsibilities of local authorities to assist households that are homeless or at risk of homelessness, based on criteria set out in the Housing Act 1996. Consequently, this data provides a measure of the extent of homelessness in a given area and reflects the effectiveness of local authorities in meeting the needs of vulnerable households.
- 6.11 The data for Eastleigh shows notable changes between the periods of 2019-20 and 2023-24, as presented in the table below:

Table 23. Statutory homelessness in Eastleigh Data: 2019-20, 2023-24

	Total Main Duty Decisions	Homeless + Priority Need + Unintentionally Homeless	Homeless + Priority Need + Intentionally Homeless	Homeless + No Priority Need	Not Homeless
2019-2020	9	7 (77.8%)	0 (0.0%)	2 (22.2%)	0 (0.0%)
2023-2024	33	25 (75.8%)	0 (0.0%)	7 (21.2%)	1 (3.0%)
Change (%)	+266.7%	-2.6%	0.0%	+250.0%	N/A

Source: Gov.UK Detailed local authority level tables: financial year 2019-20, 2023-24

- 6.12 The total number of main duty decisions increased significantly, from 9 in 2019-20 to 33 in 2023-24, representing a rise of **266.7%**. This trend indicates a growing demand for homelessness assistance within the community.
- 6.13 In terms of specific outcomes, the percentage of households accepted as unintentionally homeless decreased slightly from **77.8%** to **75.8%**. This **2.6%** reduction may reflect shifting demographics among applicants or an increase in overall cases affecting the established categories.
- 6.14 Furthermore, households assessed as homeless without priority need rose dramatically by **250.0%**, increasing from 2 in 2019-20 to 7 in 2023-24. This growth suggests that more applicants do not meet the criteria for priority need but still require support, highlighting the complexity of homelessness cases.
- 6.15 In summary, the analysis of main duty decisions regarding homelessness in Eastleigh reveals a significant escalation in the issue over recent years. These trends emphasise the need for effective strategies to address the diverse nature of homelessness, underscoring the importance of preventive measures and robust support systems to ensure housing stability for all households, particularly those classified as having no priority need. Continuous evaluation and adaptation of local housing policies will be vital in addressing the changing needs of the community.

c) Total Dwelling Stock versus Recorded Completions

- 6.16 Completions data are often recorded by Local Planning Authorities however these are not necessarily updated annually, whereas the government provides an update each year.
- 6.17 Live Table statistics on dwelling stock from 2009 to 2023 indicate an overall increase from 52,442 units in 2009 to 60,165 units in 2023, resulting in a total net change of 7,723 units. The first point to note is that these figures use Census-based estimates of dwelling stock for 2011 and 2021. Official statistics for total net change in dwellings are available to 31 March 2023 thus produce a slightly different time-period for comparison than completions recorded to 31 March 2024 prior to the base-date for the current five-year period.
- 6.18 Annual changes in net additional dwellings, recorded by Live Table 123 based on Council returns, are subject to revisions for the period 2011/12 to 2020/21. The annualised difference between the 2021 Census dwelling estimate and net change between 2011 and 2021 recorded in annual returns is thus subtracted from the other components of net additional dwellings. In Eastleigh this corresponds to a difference of -97 dwellings per annum.
- 6.19 Total change in stock for the period 2011-2023 is summarised in Table 24 below together with net additional dwellings recorded in Live Table 123 and compared with the Council's AMR series.

Table 24. Existing Dwelling Stock and Comparison of Net Change Series

Year	Total Stock	Monitoring Year	Annual Net Change	LT123	LPA AMR	LPA AMR minus Census Adjustment
2011	53,401		441			
2012	53,706	2011/12	305	305	402	305
2013	53,892	2012/13	186	186	275	178
2014	54,192	2013/14	300	300	394	297
2015	54,260	2014/15	68	68	145	48
2016	54,619	2015/16	359	359	458	361
2017	55,039	2016/17	420	420	517	420
2018	55,835	2017/18	796	796	893	796
2019	56,900	2018/19	1,065	1065	1162	1065
2020	58,026	2019/20	1,126	1126	1223	1126
2021	58,775	2020/21	749	749	846	749
2022	59,482	2021/22	707	707	707	
2023	60,165	2022/23	683	683	683	
2011-2021	5374		5,374	5,374	6,315	
Total 2016-2023	5546		5,546	5,546	6,031	

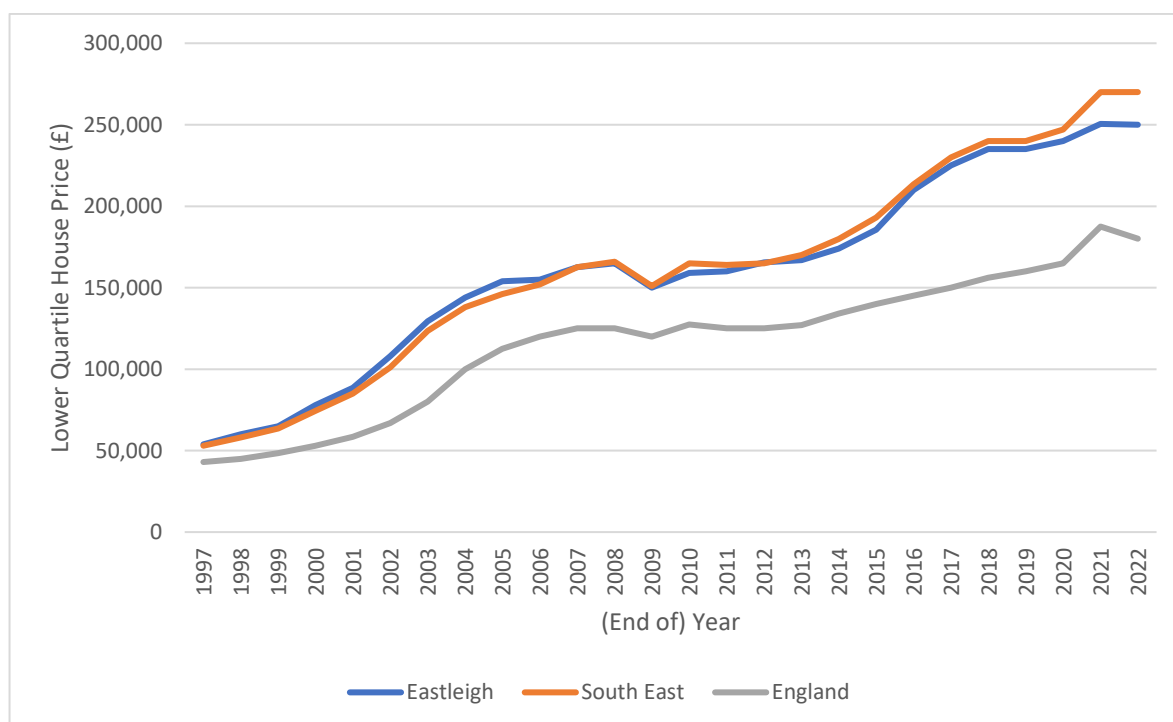
- 6.20 The Government's official position on dwelling stock is therefore that this has not increased as sharply as the Council's planning monitoring data for supply versus the Local Plan requirement would suggest. From 2016/17 onwards the Council's AMR total exactly corresponds to the Live Table 123 figure prior to application of the Census adjustment. There are further slight discrepancies over and above the Census revision in earlier years.
- 6.21 The official Census figure for dwelling stock is considered to provide the most accurate estimate of total dwelling stock. Official statistics record a change of 5,374 dwellings between 2011 and 2021, compared to 6,315 reported by the Council. The Council reports 6,031 net additional dwellings (excluding dwelling-equivalent supply from communal establishments) compared to 5,546 dwellings recorded by the Government.
- 6.22 Due to the different sources of information the reasons for the difference cannot be ascertained definitively but in the event there is any double-counting in the Council's reporting of net additional completions the AMR reporting does not reflect the Census-based dwelling stock revisions where this may be one of the factors leading to the adjustment being applied.

d) Market Signals

- 6.23 Figure 7 shows the average lower quartile housing prices from 1997 to 2022 in Eastleigh, compared to regional and national levels, and indicate several important trends.
- 6.24 In Eastleigh, the lower quartile price has increased from £53,850 in 1997 to £250,000 in 2022, showcasing a significant upward movement over the 25-year period. The most considerable price growth occurred between 2001 and 2007, where values soared from £88,500 to £162,500. However, after reaching a peak in 2018 at £225,000, prices have since stabilised, remaining at £250,000 in both 2021 and 2022.

- 6.25 The South East region also demonstrates strong growth in lower quartile prices, rising from £53,000 in 1997 to £269,950 in 2022. This growth trajectory aligns closely with that of Eastleigh, though the regional prices consistently remain higher, particularly around 2018, when they peaked at £270,000.
- 6.26 At the national level, the lower quartile prices increased from £43,000 in 1997 to £180,000 in 2022. Although this represents steady growth, it is more modest compared to the increases observed in Eastleigh and the South East. The early 2000s saw a notable rise, but subsequent years, particularly post-2008, show more restrained growth prior to sharper increases in price between 2015 and 2017 and immediately following the Coronavirus pandemic.
- 6.27 Overall Eastleigh has experienced significant increases in lower quartile prices, with these remaining much higher than national trends while remaining slightly below the South East average in recent years. This indicates a strong local market, though the periods of stabilisation and increase observed in the last few years may also suggest broader economic factors influencing pricing dynamics.

Figure 7. Lower Quartile House Price: Eastleigh compared to South East of England and England

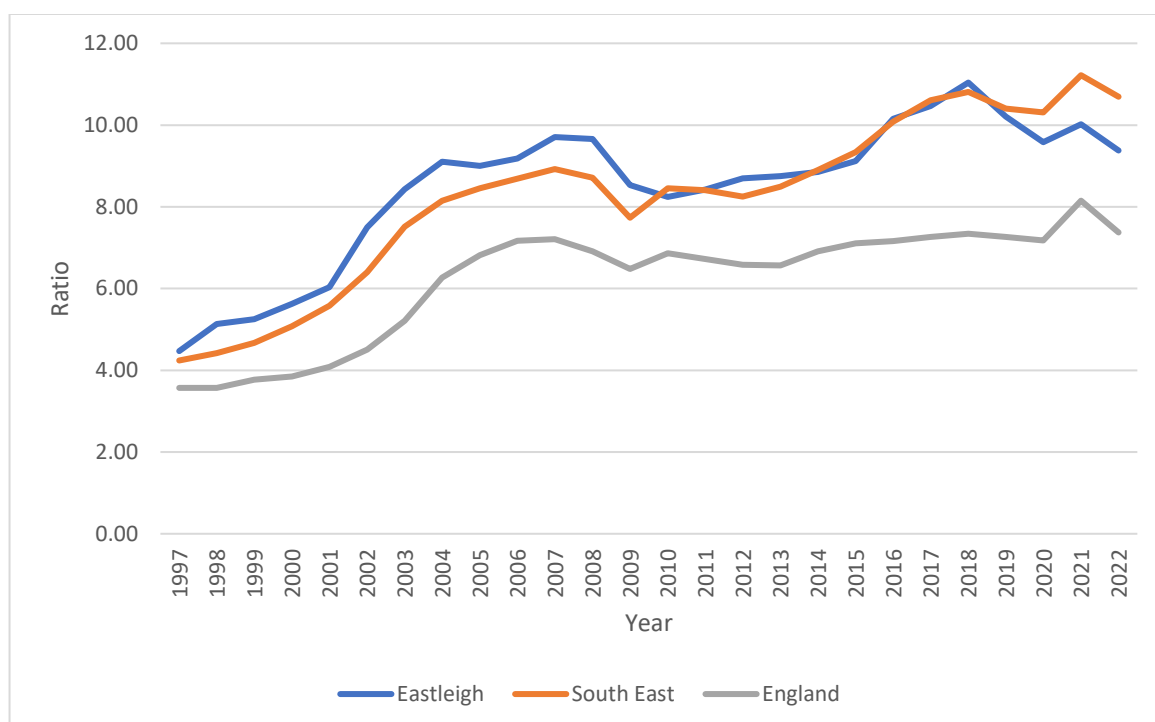


Source: *Ratio of house price to workplace-based earnings (lower quartile and median), ONS*

- 6.28 Figure 8 shows the affordability ratio for the lower quartile from 1997 to 2022 in Eastleigh, the South East, and England highlights significant trends regarding housing affordability.
- 6.29 Eastleigh's affordability ratio began at 4.47 in 1997 and has fluctuated over the years, peaking at 11.04 in 2018 before declining to 9.38 in 2022. The consistently high ratio indicates that housing remains relatively unaffordable, particularly surpassing the threshold of 4, which is generally considered the benchmark for affordability.
- 6.30 The South East presents a similar trend, starting at an affordability ratio of 4.24 in 1997 and rising to 10.69 in 2022. Like Eastleigh, it has remained above the affordability threshold for most of the period, reflecting ongoing challenges related to housing costs in the region.

- 6.31 At the national level, the affordability ratio has also increased from 3.57 in 1997 to 7.37 in 2022. While this ratio is below Eastleigh and the South East, it signifies a growing concern for housing affordability across England.
- 6.32 Overall, all three areas have experienced rising affordability ratios over the years, highlighting a persistent issue of housing affordability. Eastleigh's ratio, while improving from its peak in 2018, remains significantly above the acceptable threshold, suggesting that access to entry level market housing for sale continues to be a challenge for lower quartile households.

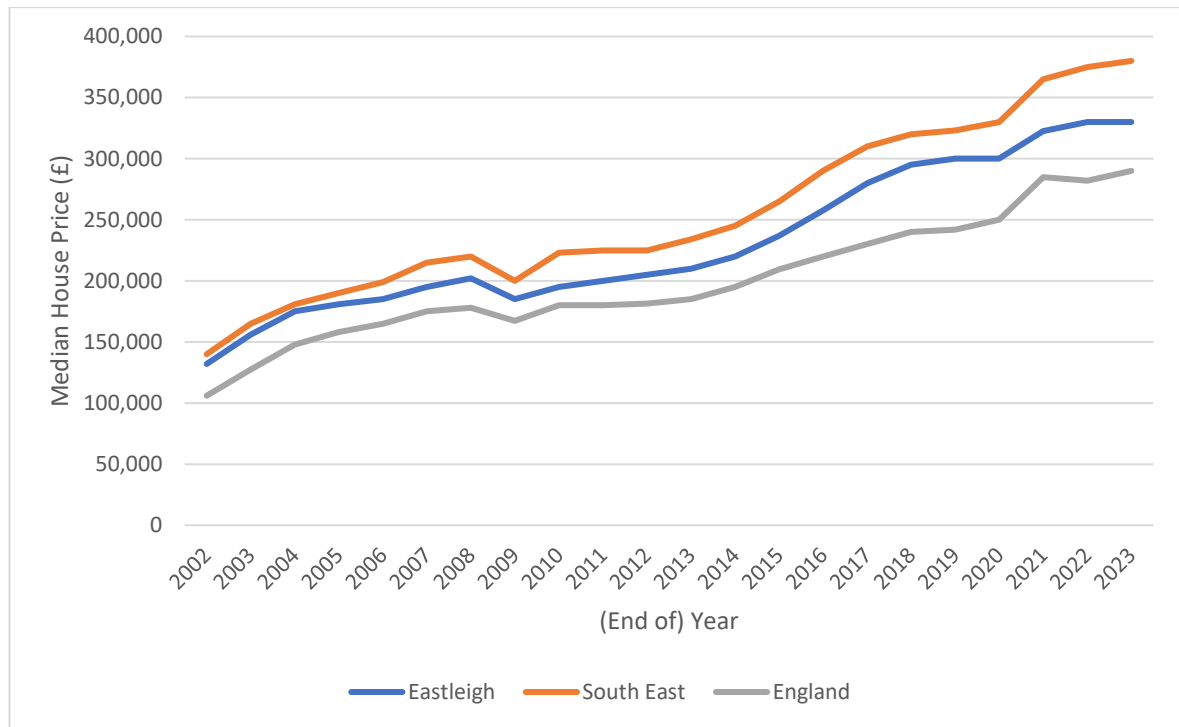
Figure 8. Lower Quartile Affordability Ratio: Eastleigh compared to South East of England and England



Source: Ratio of house price to workplace-based earnings (lower quartile and median)

- 6.33 In Eastleigh, the median house price (Figure 9) has steadily increased from £131,995 in 2002 to £330,000 in 2023. This significant growth reflects strong demand in the local housing market, particularly marked by consistent annual increases, with notable jumps in prices occurring between 2014 and 2018, when the median rose from £237,000 to £295,000. After reaching a plateau at £300,000 in 2020 and 2021, the price remained stable before increasing to £330,000 in 2023.
- 6.34 The South East region presents a similar upward trend, with median prices rising from £140,000 in 2002 to £380,000 in 2023. This increase has generally outpaced Eastleigh, particularly in the years following 2018, when prices rose sharply from £320,000 to £375,000.
- 6.35 At the national level, median house prices increased from £106,000 in 2002 to £290,000 in 2023. While this represents steady growth, it falls well below the rates observed in Eastleigh and the South East, indicating that affordability remains a considerable issue across England.

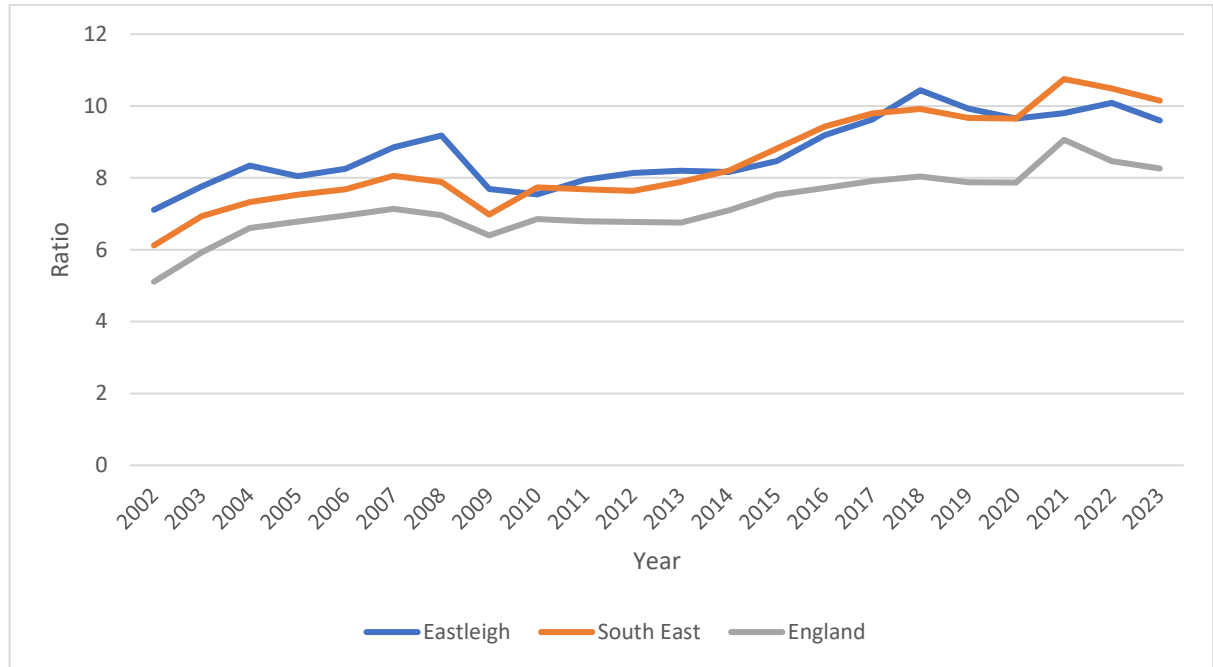
Figure 9. Median House Price: Eastleigh compared to South East of England and England



Ratio of house price to workplace-based earnings (lower quartile and median)

- 6.36 Figure 10 shows median house price ratio, Eastleigh's ratio increased from 7.11 in 2002 to 9.6 in 2023, indicating that median house prices relative to income have risen significantly. This trend suggests growing affordability challenges for residents, particularly as it exceeds the level generally regarded as affordable.
- 6.37 The South East's median house price ratio also shows an increase, from 6.12 in 2002 to 10.15 in 2023, pointing to similar affordability pressures in the region. Meanwhile, England's ratio escalated from 5.11 to 8.26 over the same period, illustrating that affordability challenges are becoming more widespread but remain particularly acute in the South East.
- 6.38 Overall, while all three areas exhibit rising median house prices, Eastleigh's growth trajectory and higher price ratio indicate increasing affordability challenges, reflecting broader trends within the South East and nationally.

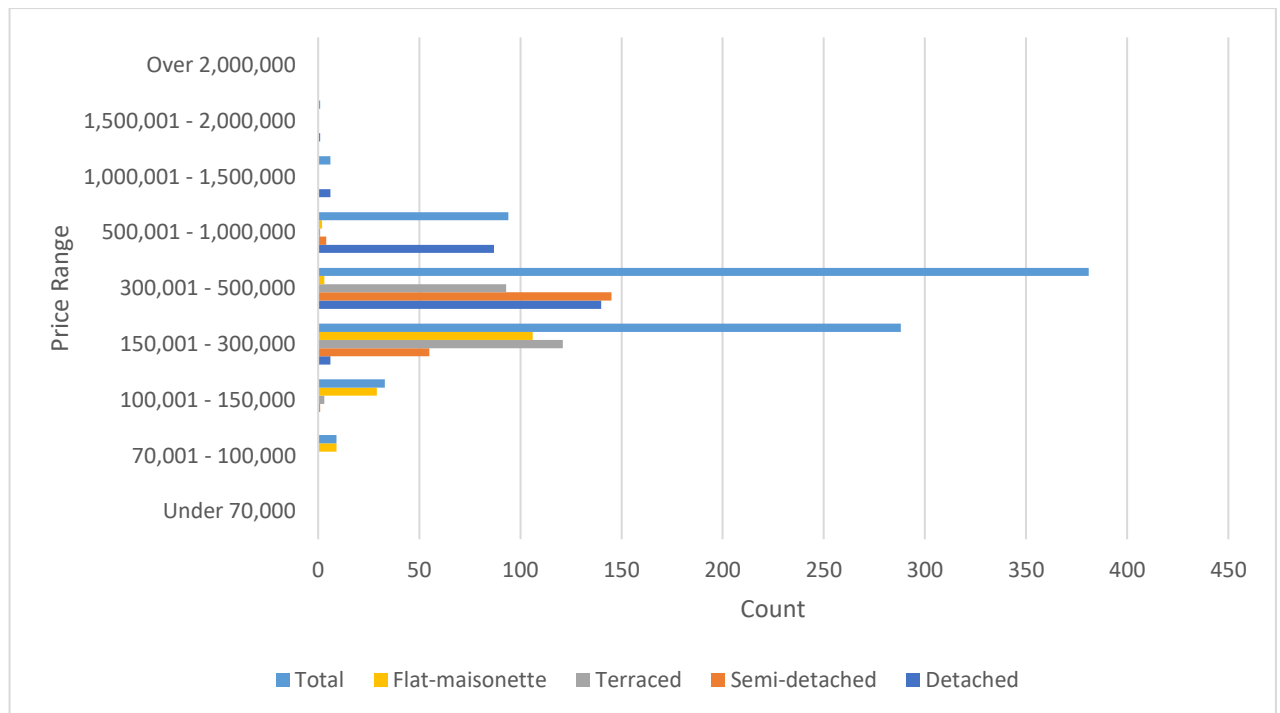
Figure 10. Median Affordability Ratio: Eastleigh compared to South East of England and England



Source: Ratio of house price to workplace-based earnings (lower quartile and median)

e) Transactions Data

Figure 11. Price Data, Eastleigh



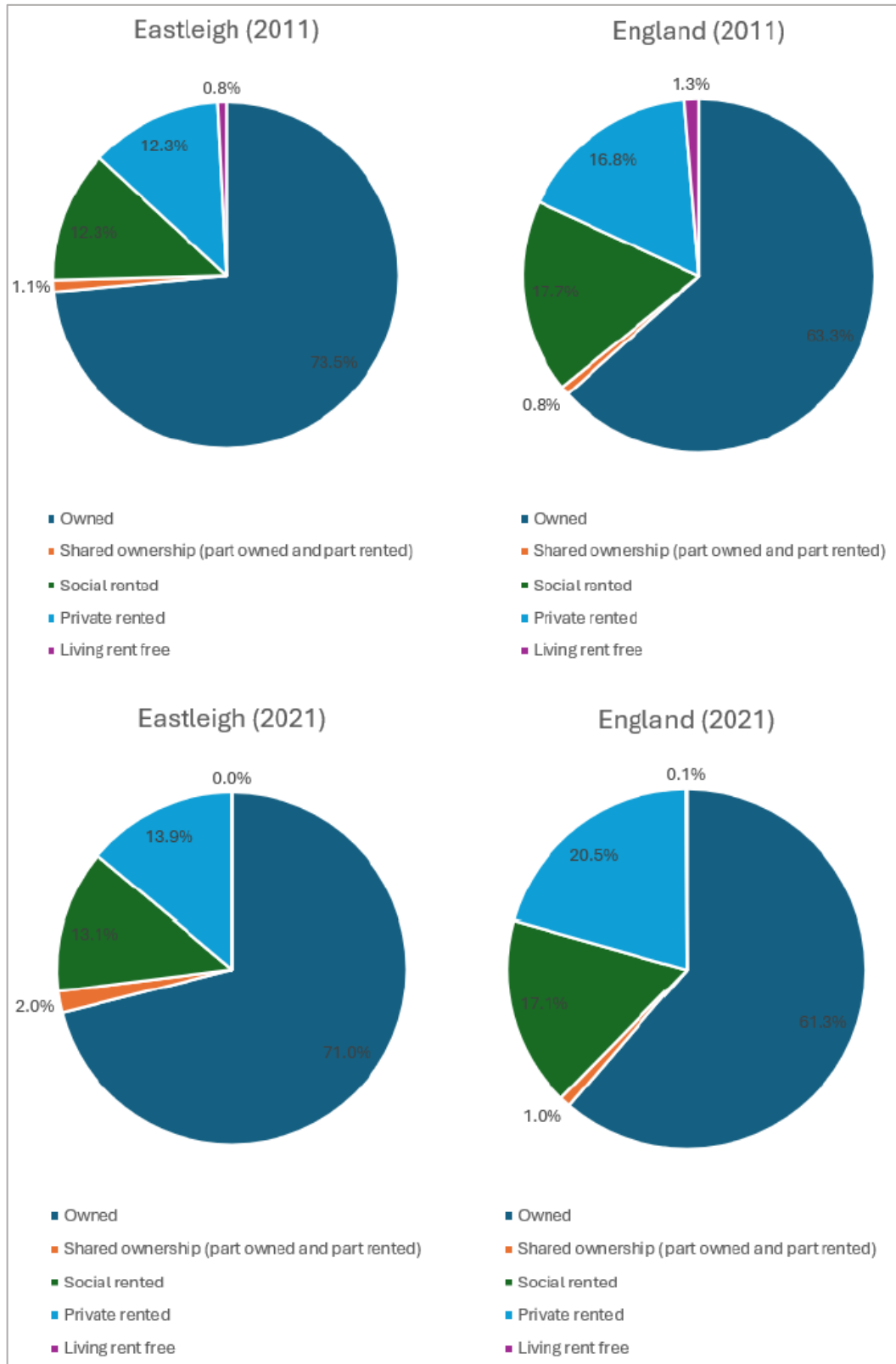
Source: HM Land Registry Price Paid Data, 2024

6.39 Figure 11 shows the sale data for Eastleigh indicates that the market is predominantly focused on mid-range properties.

- 6.40 Taking all property types and detailed price bands together there are 330 of 821 transactions recorded under £300,000, which can be compared with the lower quartile price of £250,000. This represents around 40% of the total (though some transactions will exceed £275,000) but activity is highly concentrated amongst flats (144) and terraced (124) properties compared to only 62 detached or semi-detached homes within these price points.
- 6.41 The most commonly sold type is the terraced home, with 121 sales in the £150,001 - £300,000 range and 93 sales in the £300,001 - £500,000 range. This suggests a strong demand for affordable, family-sized homes.
- 6.42 Semi-detached properties also show significant activity, with 55 sales in the £150,001 - £300,000 bracket and 145 in the £300,001 - £500,000 range. This positions semi-detached homes as a popular choice among buyers seeking more space.
- 6.43 Conversely, detached homes and high-value properties face limited activity, with only 6 sales in the £150,001 - £300,000 range and just 87 in the £300,001 - £500,000 category. The absence of sales in the under £70,000 segment highlights a lack of entry-level housing options, which may indicate affordability challenges for first-time buyers.

f) Tenure Profile Data

Figure 12. Tenure: Eastleigh and England, 2011 and 2021



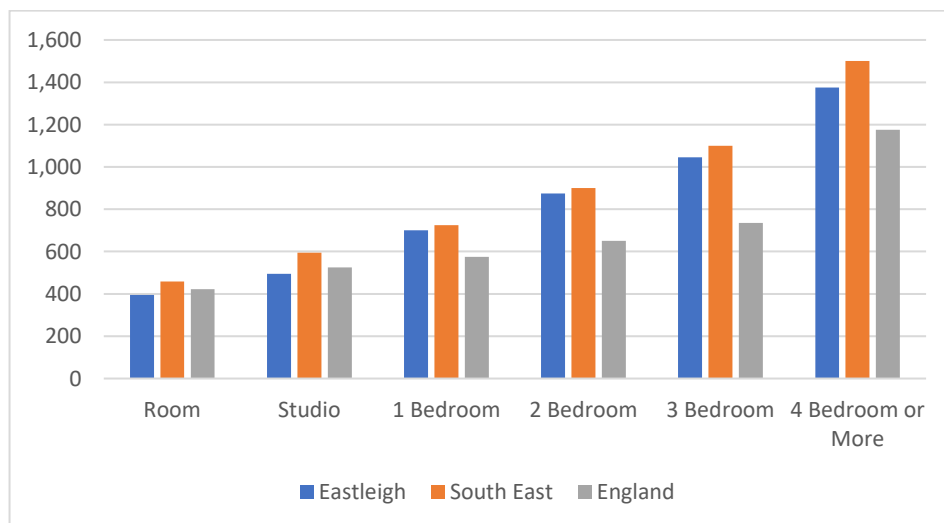
Source: Gov.UK Census 2021 and 2011 *Tenure all households*

- 6.44 In 2011, the proportion of owned homes in Eastleigh was 73.5%, significantly higher than the national average of 63.3%. By 2021, this figure decreased to 71.0%, reflecting a trend towards a slight reduction in home ownership. Despite this decline, Eastleigh still maintained a higher ownership rate than both the South East (65.7%) and England overall.
- 6.45 The shared ownership category in Eastleigh increased from 1.1% in 2011 to 2.0% in 2021, suggesting a growing interest in this model as a way to support affordability in the housing market. This percentage also exceeds the national average of 1.0% in 2021, indicating a relatively proactive approach to mixed-tenure solutions in Eastleigh but dependent on consistent sources of new housing supply.
- 6.46 The percentage of social rented housing in Eastleigh saw a slight increase from 12.3% in 2011 to 13.1% in 2021. This figure is consistent with the South East (13.6%) and lower than the national average of 17.1%, suggesting that Eastleigh may have a somewhat more limited availability of social housing compared to the broader national and South East context.
- 6.47 Private renting in Eastleigh rose from 12.3% in 2011 to 13.9% in 2021, reflecting a growing reliance on the rental market. However, this remains below the national average, which increased to 20.5%, highlighting that Eastleigh has a comparatively lower proportion of private renters.
- 6.48 The share of residents living rent-free in Eastleigh fell from 0.8% in 2011 to 0.0% in 2021, indicating a shift in housing arrangements, possibly due to improved housing stability or reduced informal housing situations.

g) Private Rent Data

- 6.49 shows the lower quartile rent price per tenure. Eastleigh's rents are noticeably lower across all property types. A room rents for £395 in Eastleigh, significantly lower than the South East average of £459 and the England average of £422. For studios, the price in Eastleigh is £495, again undercutting both the South East (£595) and national (£525) averages. This trend continues with one-bedroom flats at £700 and two-bedroom properties at £875, both below the South East averages of £725 and £900 respectively. The four-bedroom category in Eastleigh is priced at £1,375, which remains lower than the South East average of £1,500, though higher than the England average of £1,175.

Figure 13. Lower Quartile Private Rental Market Statistics: Eastleigh and England

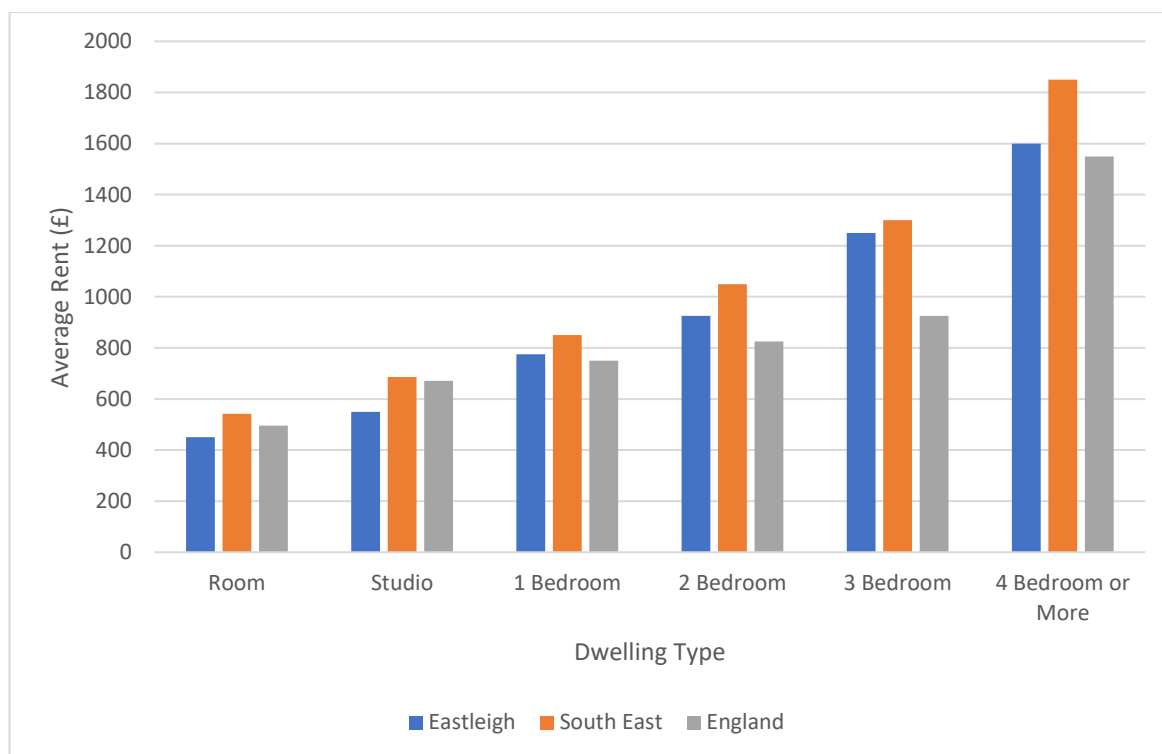


Source: Private Rental Market Statistics, ONS - 1 September 2022 to 30 September 2023

6.50

- 6.51 Figure 14 shows Median rents per tenure. Eastleigh consistently shows lower prices compared to the South East, while being competitive with national figures. The median rent for a room in Eastleigh is £450, compared to £542 in the South East and £495 across England. For studios, Eastleigh's median of £550 is lower than both the South East (£686) and England (£671) averages.
- 6.52 In the one-bedroom category, Eastleigh's median rent of £775 is less than the South East average of £850, and comparable to the national median of £750. This pattern continues for two-bedroom properties, where Eastleigh's average of £925 is lower than the South East (£1,050) but higher than the England average (£825). For three-bedroom rentals, Eastleigh's median is £1,250, slightly below the South East (£1,300), but higher than the England median of £925. Lastly, the four-bedroom median in Eastleigh is £1,600, again lower than the South East (£1,850) but higher than the national average (£1,550).

Figure 14. Median Private Rental Market Statistics: Eastleigh and England



Source: *Private Rental Market Statistics, ONS - 1 September 2022 to 30 September 2023*

h) Conclusion on Housing Market Indicators

6.53 In summary, the affordable housing market in Eastleigh presents significant challenges and opportunities. Key themes include:

- **Volatility in Completions:** Private sector completions peaked at 750 in 2019/20 but fell to 380 in 2023/24, indicating instability influenced by economic factors and policy changes.
- **Limited Local Authority Role:** With no reported completions from local authorities, there is an increasing reliance on private enterprises and housing associations to meet housing demand.
- **Affordability Concerns:** The lower quartile affordability ratio remains high, peaking at 11.04 in 2018 and recent data showing 9.38 in 2022, suggesting ongoing difficulties for lower quartile households.
- **Rising Private Rental Market:** Although Eastleigh's lower quartile rent prices are generally lower than regional and national averages, they are still increasing, impacting overall affordability.
- **Decline in Home Ownership:** The proportion of owned homes has decreased from 73.5% in 2011 to 71.0% in 2021, reflecting a shift toward shared ownership and private renting, which may affect long-term stability in the housing market.

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