

**Eastleigh Borough Local Plan:  
Proposed Main Modifications consultation**



**Consultation 9 June – 21 July 2021**

**Consultation form**

The Council is inviting responses on the Main Modifications to the Eastleigh Borough Local Plan. These will be considered by the Local Plan Inspector as part of the examination in the Local Plan.

The Main Modifications documents and further information on the Local Plan is available at [www.eastleigh.gov.uk/localplan2016-2036](http://www.eastleigh.gov.uk/localplan2016-2036)

**Part A – Contact details**

*Your address/ other contact details will be treated as confidential. However, please note that your name and your comments will be open to view by the general public.*

**Who is making this representation?**

Name:

.....

Organisation (if you are commenting on behalf of an organisation):

.....

.....

E-mail

.....

Address:

.....

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.....

.....

Telephone (optional):

.....

Part B - Representation

Name/Organisation Name:

.....

What are you responding to?

Document:		Reference:
Main Modification Schedule	<input type="checkbox"/>	
Proposed Policy Map changes	<input type="checkbox"/>	
Sustainability Appraisal Addendum	<input type="checkbox"/>	
Habitats Regulations Assessment	<input type="checkbox"/>	

Do you support or object (tick box)?       Support       Object

Is the Main Modification legally compliant (tick box)?       Yes       No

Is the Main Modification sound (tick box)?       Yes       No

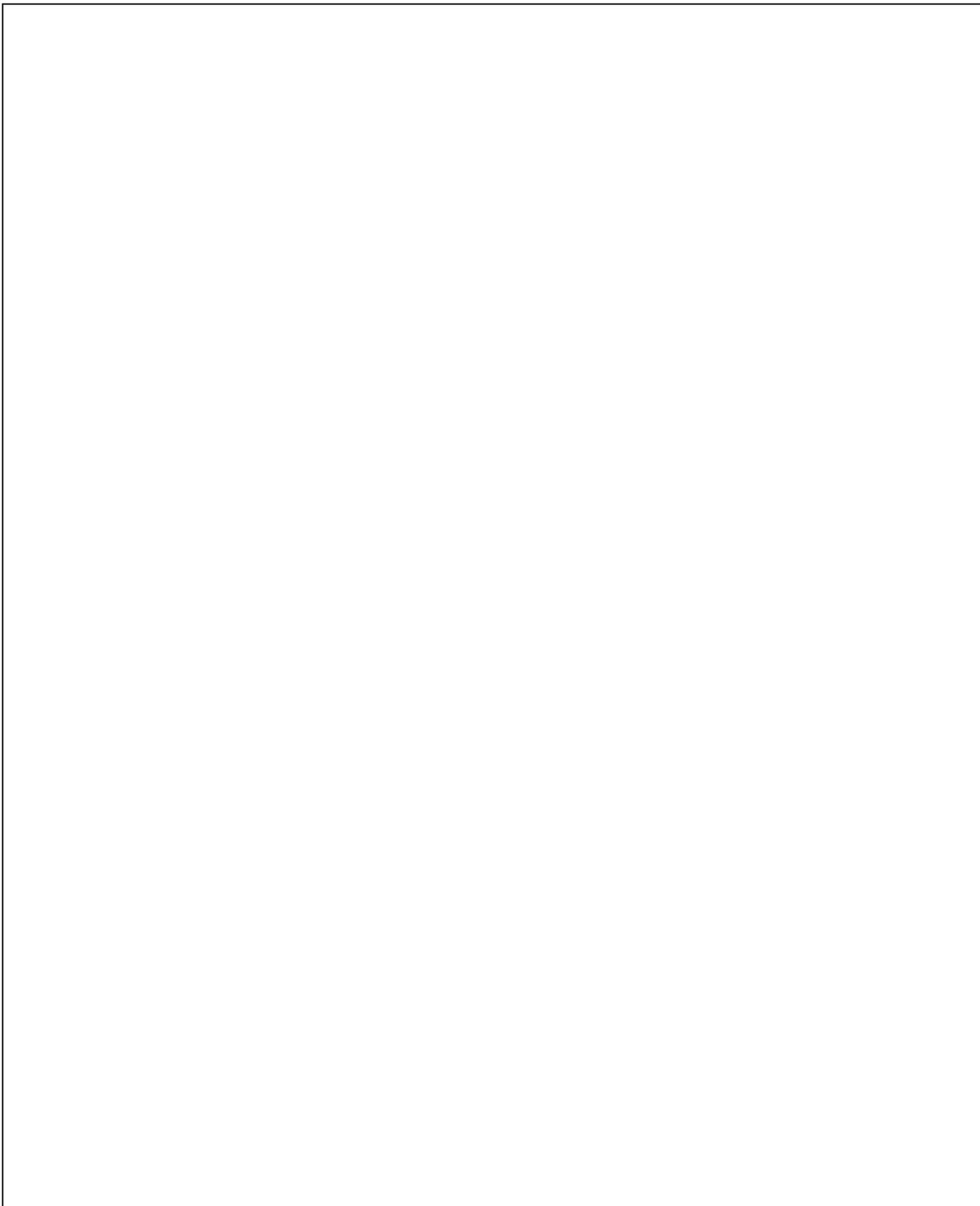
If you do not consider the Local Plan to be sound, please specify on what grounds (tick all that apply):

Positively prepared     Justified     Effective     Consistent with National Policy

**Response to the Main Modification**

*Please explain your comments, including any changes you think are necessary and revised wording (continue overleaf/attach further sheets if necessary)*

**Response continued**



**Please return this form by 21 July 2021**

**You can e-mail it to:** [localplan@eastleigh.gov.uk](mailto:localplan@eastleigh.gov.uk)

**Or return it to:** Local Plan Team, Eastleigh Borough Council, Eastleigh House,  
Upper Market Street, Eastleigh, SO50 9YN

**EASTLEIGH BOROUGH LOCAL PLAN 2016-2036 EXAMINATION**  
MAIN MODIFICATIONS, POLICY MAP MODIFICATIONS, SUSTAINABILITY  
APPRAISAL ADDENDUM, EXAMINATION DOCUMENTS AND ADDITIONAL  
MODIFICATIONS CONSULTATION STATEMENT  
**BLOOR HOMES LTD**  
JULY 2021



EASTLEIGH BOROUGH LOCAL PLAN 2016-2036 EXAMINATION  
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**BLOOR HOMES LTD**  
 JULY 2021



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## Contents

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- 1.0 Introduction
- 2.0 Response to Main Modifications
- 3.0 Additional Modifications
- 4.0 Conclusions

Appendix 1 Land south of Maddoxford Lane and west of Westfield site location plan

Appendix 2 Illustrative Master plan for allocation BO1

Appendix 3 EBC Affordable Housing Delivery Note

## 1.0 Introduction

- 1.1 This consultation response is submitted on behalf of Bloor Homes Ltd (Bloor) in respect to the current Eastleigh Borough Council (EBC) Local Plan 2016-2036 Main Modifications, and their land at Maddoxford Lane. Bloor continues to strongly object to the plan on the basis that it is not legally compliant or sound, on account of:
- Failure to allocate the necessary additional housing sites (including affordable) to meet the substantial shortfall (131 dpa) against the plan's identified need
  - The flawed and biased approach to identifying housing sites, which means significant question marks remain over the sustainability and deliverability of the proposed allocations
  - The continued disproportionate and inconsistent use of settlement gap policy, and flaws with the additional Settlement Gap Study
  - Substantial deficiencies with the Sustainability Appraisal (SA), including an inequitable approach to site assessment.
- 1.2 The first phase of examination hearings was held during November 2019 and January 2020. Following this, the appointed Planning Inspector outlined their initial conclusions (ED71) including in relation to the Strategic Growth Option (SGO), housing trajectory and settlement gaps.
- 1.3 Accordingly, EBC has reviewed its position and updated and supplemented the evidence base, and is now running a consultation on the following:
- Proposed Main Modifications (MM) to the draft plan
  - Policy maps
  - SA addendum
  - Habitat Regulations Assessment
  - Updated and new examination documents
  - Additional modifications.
- 1.4 Bloor retains land interests in the land to the south of Maddoxford Lane and has promoted the south of Maddoxford Lane and west of Westfield land through the plan-making process, on the basis that the whole site, both western and eastern parcels represent a sustainable, appropriate and available site for residential development.
- 1.5 The site is in a demonstrably sustainable location for residential growth; immediately south of the Boorley Park development site and east of the Boorley Gardens site, and well related to additional permitted residential development and public transport network, including Hedge End railway station.
- 1.6 As outlined in Bloor's examination matter statement submissions, the land forms part of the 'strategic development area' previously allocated in the South East Plan. This development area is already part implemented with much of the land having been granted planning permission or allocated. Collectively, these permitted / allocated developments will provide over 3,000 homes together with a wide and comprehensive range of services and infrastructure, as confirmed in the matter statements.

- 1.7 Bloor supports the proposed allocation of the land to the south of Maddoxford Lane referenced under policy BO1. In addition, it promotes the extension of the allocation to the east with an increase in the capacity of the site to deliver circa 90 homes to meet local housing need and make best use of the land available.
- 1.8 It is confirmed that all of the land set out within the red line at Appendix 1 is secured under option with the current landowners. The site is unconstrained and available now. The whole site is currently subject of a written representations appeal (APP/W1715/W/20/3265838) for 92 homes, which was submitted by Bloor and is currently being determined by the Planning Inspectorate. The planning application and subsequent appeal documentation confirms that the site is suitable and available for residential development, being free of technical constraints. The only in principle objection to the application, for EBC officers, is a policy one – which clearly can be easily resolved through this local plan process.
- 1.9 Bloor considers that the additional land would fully accord with the spatial strategy of the Plan and that there is nothing within the draft plan and it's supporting evidence base that would indicate that the eastern parcel of land was inappropriate for the sustainable delivery of housing, noting that, the western parcel (policy BO1) is determined to be a sustainable site for development. The adjacent eastern parcel extends this allocation in a logical manner, within clearly defined and justifiable allocation boundaries, and is considered as sustainable as the land immediately to the west.
- 1.10 Bloor continues to strongly believe that there is no reason as to why the eastern part of the site should have been discounted from consideration for allocation, other than the LPA's prejudiced scoring within the SA.

## 2.0 Main Modifications

- 2.1 Bloor welcomes the Inspector's findings following the initial examination. However, they strongly object to the proposal to progress the plan to adoption with a substantial shortfall in deliverable and sustainable housing sites. The Inspector has suggested in their post hearing note (ED71, paragraph 42) that the shortfall could be identified through a review of the plan as a pragmatic way forward. However, EBC has not made rapid progress to address matters, and a five year review process from later this year, following potential point of adoption, would now take the new plan base-date to April 2027. The shortfall is substantially higher and the shortfall arises earlier, leaving the position untenable. As shown below, the time period for adoption of a five year review plan lies now beyond the time at which planned delivery of sites, to meet the need, is at risk of not meeting need. At that time, reliance would then be placed yet again on speculative applications and the early release of emerging (untested) allocations.
- 2.2 To support the case, Bloor would point to EBC's poor track record in progressing a new plan, the history of undersupply against a much lower housing OAN, their dismal record of delivering affordable housing and their flawed and biased approach to site selection, further highlighted by the lack of robust evidence supporting the submitted plan (as exposed during the examination process).
- 2.3 The matters now raised, and additional evidence submitted, do need careful examination and Bloor considers that the retrospective fitting of evidence, including with respect to settlement gaps, does justify further hearing sessions to explore these matters further.
- 2.4 In any event, given the time that has passed and ongoing shortfall in allocations to meet the need, Bloor considers that there is a real risk the housing needs of Eastleigh Borough will not be met. We understand that it is desirable to put a plan in place, but the reality is that almost all of the allocations have been granted consent already and therefore the plan takes provision no further forward. It would be better at this point in time, if the current plan is to progress, to make additional housing allocations.
- 2.5 Bloor continues to have concerns with the evidence base surrounding housing need and the housing trajectory as well as the continued biased and unjustified approach to site selection, including the inconsistent application of settlement gap policy and SA scoring. Bloor respectfully does not consider that the plan can be found sound.

### ***Strategic Growth Option (MM13 and MM14)***

- 2.6 Bloor Homes welcomes the Inspector's conclusions on the SGO and its associated link road, and EBC's removal of draft policies S5 and S6 as outlined in MM13 and MM14. These modifications are fully supported.
- 2.7 However, the removal of the SGO will lead to a shortfall of 2,614 homes (130.7dpa) against the plan's overall housing need. Given the LPA's poor track record with housing delivery and bringing forward sound plans, Bloor does not consider it a sound approach to progress the plan on the basis of the LPA identifying further sites through a five year review process post adoption.

2.8 The examination identified that the LPA’s approach to identifying the SGO was both flawed and biased. Bloor considers that this approach is also the case in respect to wider proposed site allocations, inclusive of the SA which should be examined now, with sites identified to meet the housing shortfall, in order to be certain that the plan is sound and deliverable.

**Housing need and trajectory (MM10, MM11 and MM13)**

2.9 MM10 relates to strategic policy S2 (approach to new development) and sets out the policy and revised housing supply figures for the plan period. Paragraph 4.11 sets out that the pattern of delivery proposed results in a shortfall of 2,614 dwellings (18% of the OAN) against a target of 14,580. This equates to 130.7 dpa and would result in a significant shortfall if left to accrue.

2.10 Moreover, it is now too late to leave this position to be redressed through a five year review. Had the Council acted quickly on the post hearing actions there may have been time, but this is no longer the case. The section below demonstrates the point, relative to the point in time when a five year housing land supply shortfall arises (in 2026, before a new local plan would be adopted under a five year review process).

2.11 The risk is further highlighted, if there is no policy requirement to review (i.e. only a mention in the supporting text) and no policy consequence, if a review is not progressed. There is a need for a policy leading to the release of additional sustainable sites, on the edge of the urban area, in circumstances where a review has not taken place.

2.12 EBC’s response to Action 4.4 ‘Consider need to introduce a Policy or supporting text on 5YS in the local plan’ fails to engage with the question, merely referencing the national requirement to monitor five year HLS.

2.13 This position is highlighted by the updated trajectory (ED101) which confirms that there will be a five year supply shortfall emerging at a point before a five year review plan would be adopted (say 1 April 2027 – just over five years from now). The below table highlights the position at 1 April 2026 (using the EBC’s assumptions regarding delivery), highlighting that there would be a significant five year HLS shortfall at 1 April 2026, a year before the next plan would be adopted. This shortfall will only get worse in the years following.

**Trajectory position at 1 April 2026**

<b>Requirement</b>	
5*729	3,645
Surplus (delivered pre 1 April 2026)	914
Sum	2,731
Plus 5%	2,868
<b>Completions per annum</b>	
2026/27	784
2027/28	522

2028/29	375
2029/30	345
2030/31	325
Total	2351
Supply	-516.55
<b>HLS</b>	<b>4.09 years</b>

- 2.14 In short, the position can no longer be left to plan review if a plan-led approach is to be put in place in Eastleigh Borough. The situation should be addressed now, through allocation of sites or a permissive policy towards the release of additional sites in sustainable locations adjacent to the urban area.
- 2.15 Further, MM11 and strategic policy S3 (location of new housing) appear to be in conflict with EBC's evidence base. Specifically, draft policy S3, section 1a, lists the sites that will deliver 5,960 homes against the identified need set out in policy S2. When comparing the housing numbers listed in draft policy S3 with Table 4 of ED101 (EBC Housing Supply update July 2020), it appears that there is a shortfall of 336 net available dwellings, as set out in Table 1 below. If this is the case, the sites listed in draft policy S3, section 1a, are in fact only capable of delivering 5,624 dwellings, meaning that the plan's housing shortfall is even greater. Bloor considers that this reinforces the need for the Inspector to fully review the housing numbers and allocated sites now, as well as requiring EBC to clarify the full extent of the housing shortfall and identify appropriate sites to address this need.

**Table 1: Policy S3 against Table 4 of ED101 (EBC Housing Supply update July 2020)**

Site	Policy allocation (from draft policy S3, MM11)	Table 4 ED101 Net available dwellings	Difference
South of Chestnut Avenue, Eastleigh at Stoneham Park	1,150	1,131	-19
West of Horton Heath	1,500	1,400	-100
West of Woodhouse Lane, Hedge End	605	605	0
Land north and east of Boorley Green and Botley	1,400	1,190	-210
Land north-west of Hedge End Station	680	680	0
Land at Pembers Hill Farm	250	243	-7
Land north and east of Winchester Street (Uplands Farm)	375	375	0
<b>Total</b>	<b>5,960</b>	<b>5,624</b>	<b>-336</b>

- 2.16 Bloor's lack of confidence in EBC's housing numbers is further supported with reference to the site to the north and east of Winchester Street (Uplands Farm), which is proposed to deliver 375 homes. Within draft policy S3, section 1 part a (vii), the site is referred to as a strategic site with planning permission. However, this is not the case and planning permission is yet to be achieved (O/18/83698). This reduces, somewhat, the certainty that this site can be relied upon to deliver the quantum suggested.

- 2.17 Further the land west of Horton Heath (1,400 homes) and west of Woodhouse Lane (605 homes) are yet to receive reserved matters consent. There is therefore currently no certainty that the 2,005 homes proposed across both sites can be achieved as the sites have not been subject to detailed design through the reserved matters process to establish the final development quantum.
- 2.18 The revisions to draft policies S2 and S3 as set out within MM10 and MM11 are unhelpful in the way they present the housing numbers across the policies and within the housing trajectory table. Whilst the numbers achieve the same totals, they are not easily comparable. It is also important to note that the housing trajectory date is based from April 2019, which is over two years old and does not appear to align with the most up to date trajectory data provided within EBC's Five-Year Housing Land Supply statement (May 2021).
- 2.19 If these levels of uncertainty and inconsistencies are still apparent within the draft plan and associated evidence base, then Bloor considers that there is a pressing need for the Inspector to further examine the robustness of the housing numbers and proposed allocations. Greater flexibility and resilience is required, through additional allocations.
- 2.20 Bloor also notes that paragraph 31 of ED101 is incorrect in its reference to site BO1, allocated for 30 dwellings and which the document states is currently subject to an application for full planning permission (F/19/85178) submitted on behalf of Bloor and proposing 104 dwellings. The application proposed 92 dwellings on an extended site, and was refused by EBC on 9 November 2020. It is currently subject to a planning appeal (APP/W1715/W/20/3265838).

***Affordable housing (MM10)***

- 2.21 MM10 sets out that the Council will support the provision of an average of 200 (net) new affordable dwellings per annum as part the overall net additional homes provided each year from 2016 to 2036 (4,000 affordable homes over the plan period). This is up from 165 dpa originally proposed in the draft plan, which was based on a previous OAN figure.
- 2.22 The ORS 'Assessment of Affordable Housing Update July 2020' (ED102) calculates affordable housing need 2016-2036 using the OAN of 729 dpa, which now aligns with the target set in the emerging local plan, and identifies an average need of 200 dpa.
- 2.23 However, this only equates to 27% of the overall housing total, which does not align with EBC's 35% affordable housing requirement. If basing on the draft policy requirement, 5,103 affordable homes would be needed over the plan period, which equated to 255 dpa. This failure to meet the 35% affordable housing target will result in a shortfall of 1,103 affordable homes over the plan period (55 dpa). Accordingly, Bloor sees no reason as to why the draft plan should not be looking to deliver 255 affordable dwellings per year. This demonstrates the plan's deficiencies and shows that it has not been positively prepared to meet affordable housing requirements.
- 2.24 Further, the ORS 2020 update confirms that the figure is a net need and assumes that the level of housing benefit remains constant, so any losses from the current stock (such as demolition or clearance, or sales through Right to Buy) would

further increase the number of affordable dwellings required by an equivalent amount. The ORS 2020 update implies that a higher level of gross need is required on new sites to ensure the target is met.

- 2.25 The ORS 2020 update rightly confirms that not every site in Eastleigh will be capable of delivering affordable housing. In light of this, and in order to meet the plan's proposed target of 200 dpa, it is important to note that the update outlines that a level of provision greater than 27% will be needed on the sites that are capable of delivering affordable housing.
- 2.26 Data relating to affordable housing completions and the proportion of net completions between 2011 and 2020 was provided by EBC as part of their Statement of Case for the appeal at land south of Maddoxford Lane and west of Westfield (ref: APP/W1715/W/20/3265838). It shows that EBC has met or exceeded the 35% target in 3 of the last 5 years (years 2017/18, 2018/19 and 2019/20) and that the emerging target of 200 dpa was achieved. However, between 2012/13 to 2016/17 EBC's affordable housing target was not met and highlights significant historic under delivery, with the average rate from 2012/13 through to 2019/20 being just 24%. This is well below the 35% requirement and shows that on average EBC has also failed to meet its latest 27% figure for affordable housing.
- 2.27 Bloor considers that the future delivery of affordable housing is highly uncertain. Past delivery has fluctuated considerably, and the delivery of a high number of affordable homes one year does not guarantee this will continue for future years. The supply of affordable housing is affected by local market factors, including the number of sites with planning permission as well as wider national factors including availability of public funding.
- 2.28 EBC's Housing Supply Update (ED101) sets out a revised housing trajectory table including five year land supply calculation (April 2019 base date), with large commitment sites outlined at Table 4 (p.13) and sites subject to resolution to grant planning permission at and post 1 April 2019 at Table 5 (p.27).
- 2.29 Appendix 3 of this report sets out the affordable housing contributions from each of the sites included at Tables 4 and 5 of ED101. It identifies that out of the 58 large sites included in the forward supply, 25 do not meet the target for 35% and 15 of these are not providing any affordable housing at all. Two sites exceeded the target (with 40% contributions) and 7 sites provided an off-site financial contribution.
- 2.30 The permissions for the Table 4 site commitments total 2,784 affordable houses. This total increases to 2,956 affordable homes when including the applications with a resolution to grant in Table 5, well under the lowest level of identified need of 4,000 homes and highest level of need of 9,060 dwellings identified within the 2016 OAHN update (HOU003). Bloor therefore concludes that without the release of additional greenfield sites affordable need will not be met.
- 2.31 Whilst the above housing supply figures are based upon the data provided within ED101, it should be noted that there are inconsistencies between the housing land supply table provided within ED101 and the supply table provided within EBC's latest five year housing land supply statement (May 2021). It is

questionable, therefore, as to why EBC did not update ED101 to reflect the latest data ahead of the current consultation.

- 2.32 Subject to planning permission being granted, the land to the south of Maddoxford Lane and west of Westfield, which is currently at appeal, is deliverable (by NPPF definition – given that there will be a full consent) and proposes 35% affordable housing in line with the adopted and emerging policies, comprising 32 affordable homes. In the context of EBC accepting the development on the western part in principle, and with the eastern part demonstrating very limited impacts, the site's ability as a whole to provide a significant early boost of additional affordable housing within the next five years of the plan period, is a benefit of substantial weight.
- 2.33 Overall, the totals for affordable housing contributions from permissions and applications with a resolution to grant within EBC's five year housing land supply now fall even further short of the latest identified need which, as already highlighted, does not reflect the total need over the plan period. The shortfall demonstrates an ongoing need for more affordable housing in the borough and this is an issue that should not be ignored.

#### ***New development in the countryside (MM26 – Strategic Policy S7)***

- 2.34 Policy S7 is a strategic countryside policy of general restraint and Bloor welcomes the more positive policy emphasis on appropriate development in the countryside. Having said this, to ensure the policy is in accordance with paragraph 152 of the NPPF, Bloor would request that the wording at Section 2a of MM26 includes the word 'significant' as follows:

*In permitting new development in the countryside the Borough Council will seek to:*

*avoid significant adverse impacts on the rural, woodland, riparian or coastal character, the intrinsic character of the landscape including the avoidance of adverse landscape impacts on areas adjoining national parks and their settings, the significance of heritage assets and on the biodiversity of the area;*

- 2.35 This would better reflect the requirement of the NPPF where paragraph 152 states that in plan-making, significant adverse impacts on any of the economic, social and environmental dimensions of sustainable development should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

#### ***Settlement Gaps (MM27 and associated map)***

- 2.36 The Inspector outlines in ID27 significant concerns relating to settlement gaps, specifically, the supporting evidence base, the approach to site selection and the detailed policy wording. The Inspector concludes in paragraph 32 that there is a need for a further detailed paper on settlement gaps to address the plan's significant shortcomings on this matter.
- 2.37 EBC has produced a Settlement Gap Study (SGS) (ED84) which seeks to address the fundamental concerns identified. MM27 sets out the revisions to the draft

settlement gap policy (S6), which states that development within a settlement gap will be permitted provided that:

- a. *it would not diminish the physical extent and/or visual separation of settlements; and*
- b. *it would not have an urbanising effect detrimental to:*
  - i. *The character of the countryside; or*
  - ii. *The separate identity of the adjoining settlements.*

- 2.38 Bloor does not consider the study to represent a robust and appropriate response to the concerns set out by the Inspector in ED71. Significantly, with regard to the Hedge End - Horton Heath Gap, the policy is clear that the gap is between Horton Heath and Hedge End, yet the study refers to a gap between Horton Heath, Boorley Green and Hedge End. The starting point in itself is wrong, and perversely the gap study concludes that land between Hedge End and the Winchester Road (not even between Hedge End and Boorley Green) is more important as part of the gap than land actually located between Hedge End and Horton Heath – the named gap (e.g. D3, D4 & D5, all of which are proposed to be removed from the gap). Meanwhile, land not falling between the named settlements, (e.g. parcels D11, D10, D15 & D16) are considered as being more important on the basis of their contribution to visual and physical separation. This cannot possibly be the case.
- 2.39 It is also considered that there are limitations and shortcomings in the methodology adopted. The study is not considered to be robust or fully transparent on account of its approach to defining the criteria and evaluating the settlement gaps having a number of significant anomalies.
- 2.40 As such, Bloor has concerns relating to the proposed settlement gap policy, and its application. As with EBC's approach to site assessment within the SA, Bloor considers that the settlement gap policy is being used as an anti-development and anti-growth tool that will prejudice specific sites. It is also important to remind the Inspector that EBC has a long track record of disregarding its own gap policies to support development.
- 2.41 In this context, Bloor notes that the Area H gap boundary (Horton Heath, Fair Oak, Bishopstoke) has been amended to exclude the area south of sub area H2, referred to within the SGS, as this area is part of the West of Horton Heath development allocation and has an extant planning permission. The SGS outlines the pressure for these areas to prevent further coalescence between Horton Heath, Fair Oak and Bishopstoke and Fair Oak/Horton Heath with further recognition that the emerging development at One Horton Heath, if it comes forward, is likely to increase the size of the Horton Heath settlement significantly and place further pressure on the sense of separation. This reiterates the point made above, as it is apparent that EBC is looking to remove settlement gap to accommodate this preferred site, which does not reflect a robust approach to site selection.
- 2.42 Given this context, it is unclear why a gap policy is needed in addition to the draft countryside policy (S7).
- 2.43 The settlement gap map included in MM27 continues to demonstrate that it is possible and acceptable to have relatively small and narrow settlement gaps, and

the additional evidence document (ED84) does nothing to justify the need for such a large settlement gap between Hedge End and Horton Heath in comparison to other locations. As such, Bloor does not conclude that the Inspector's significant concerns have been addressed by ED84.

**Settlement hierarchy (MM4, MM5, MM7, MM8 and MM9)**

- 2.44 Bloor considers that the LPA's application of the settlement hierarchy remains flawed. As with the ongoing inconsistent proposals for settlement gaps, certain settlements have been assigned lower status within the hierarchy to prejudice the development of sustainable and deliverable housing sites.
- 2.45 MM4 and MM5 includes criteria for determining the distribution of development. Section B of MM5 states:
- "The borough's settlement hierarchy should be the main consideration in making decisions about the spatial distribution of new development to ensure that development is located in areas which provide the widest range of employment opportunities, community facilities and transport infrastructure and in order to support, enhance and reinvigorate those areas"*
- 2.46 Bloor continues to consider that this highlights the flawed and unsound approach to identifying sustainable housing sites, on the basis that settlements have and continue to be incorrectly allocated.
- 2.47 MM8 clarifies that Boorley Green is classified as a category 4 settlement, being a settlement with a more limited range of services and facilities. MM7 proposes the inclusion of a new paragraph to explain the position in respect to settlement hierarchies, and states that the hierarchy will be updated in future local plans to reflect Boorley Green and Horton Heath's respective growth. MM9 proposes to add a footnote to Table 1 to state that the development planned or under construction will affect Boorley Green and Horton Heath's position in the settlement hierarchy, when this development is delivered.
- 2.48 Whilst Bloor considers this is a sensible approach for Horton Heath, given that this proposed development site is yet to commence, the approach remains incorrect for Boorley Green. As outlined in Bloor's examination matter statement (October 2019) and Regulation 19 report (ref: EBCLP-XS-9), the Boorley Green context has already changed. It is quite clear looking at satellite imagery, as well as the Defra MAGIC map application, that a substantial amount of the Boorley Park development is complete. This is also reflected on EBC's own website press release (6 July 2021) which celebrates the completion and opening of a new play park and MUGA within the Boorley Park development, that will also be used by the in situ Boorley Park Primary School. In addition to this, the Boorley Gardens development (ref: O/15/75953, RM/17/81628, RM/18/84466, RM/19/86658) for a further 680 homes, has been implemented with development coming forward from 2022.
- 2.49 This clearly highlights that Boorley Green is already a level 3 settlement, and should be listed as such in Table 1.

### ***LUC Sustainability Appraisal addendum***

- 2.50 Bloor is extremely pleased to note that the Inspector shares a number of their concerns in respect to the sustainability work; in particular that the assessment of the reasonable alternatives and possible mitigation measures has not been undertaken on a comparable basis, specifically in relation to the issue of settlement gaps (paragraph 40, ED71). It is a positive outcome that the Inspector's concerns over the inadequate consideration of the alternative options within the SA have led to the deletion of policies S5 and S6 relating to the SGO, as its justification was considered to be insufficiently robust (paragraph 41, ED71).
- 2.51 Whilst the Inspector's identification of the SA's significant flaws is heartening, due to the scope of the examination undertaken to date, they are considered in only in the context of the SGO. The evidence presented by Bloor Homes in its Regulation 19 report (ref: EBCLP-XS-9) and examination matter statement (October 2019) clearly demonstrate that the same fundamental inconsistencies in the assessment approach also occurred at the site assessment and selection stage of the SA process. As such, the justification for the specific housing sites allocated within the draft local plan is likewise insufficiently robust and must be reviewed prior to adoption and allocation. There is currently no certainty that the sites allocated and proposed to deliver a significant proportion of the plan's housing need are sustainably located, deliverable or will provide the quantum suggested in draft policies S2 and S3.
- 2.52 It is noted that the Inspector identified that the deleted SGO policies would result in a shortfall of housing numbers and uncertainty in housing supply, especially during the latter years of the plan period (paragraph 42, ED71). The Inspector goes on to suggest that given legislation requires a review of the plan to take place within 5 years from date of adoption, the housing supply position could be addressed at this point. As already outlined, Bloor Homes has a number of serious concerns with this approach. In respect to the SA, this centres on the fact that the biased approach to site selection cannot be adequately addressed at the 5-year review point.
- 2.53 If the current local plan is adopted, any subsequent site allocation process is likely to be based on the current SA which underpins the local plan process, as the presumption would be that the SA process was sound. However, the SA approach to the assessment process has been shown to be biased and subjective (as confirmed by the Inspector), thus any sustainable and deliverable sites which had erroneously been scored poorly in the site assessment process, such as the land north of Hedge End, would be heavily prejudiced at the 5-year review stage. It is therefore highly questionable as to whether any 5-year review and further site allocations would be sufficiently robust and justified. The only way to ensure a sound and deliverable plan, is to progress further examination now, including a full review of the SA. The LUC SA Addendum does not deal with all of these issues, and therefore further full review is needed.

### ***Strategic Policy S1 – delivering sustainable development (MM6)***

- 2.54 Bloor objects to the proposed revisions to strategic policy S1, on the basis that EBC's definition of sustainable development far exceeds that set out in the NPPF (2012).

**Policy HH1 – land west of Horton Heath (MM73)**

- 2.55 The land to the west of Horton Heath has been promoted for residential development for a significant period of time with a scheme being granted planning permission. However, to date the scheme has not been deliverable on account of viability issues, and Bloor does not consider that the draft plan and its accompanying evidence base has demonstrated that this site is now deliverable. As such this highlights the need for the examination process to resume in order to look at proposed allocations as well as identifying new housing sites to meet the identified shortfall.

**Policy DM2 - Environmentally Sustainable Development (MM36)**

- 2.56 Bloor welcomes the amendments made following the hearing sessions with regards to greater clarification on requirements set out and changes to policy text wording to reflect the optional technical standards and Building Regulations on water use.
- 2.57 Bloor does however continue to object to increasing environmental requirements beyond the standards set nationally through Building Regulations, and it does not appear that the specific and detailed requirements under section 1a (i) and section 2 (e) have been fully justified for the borough in departing from national standards. The policy requirements are too onerous and Bloor is concerned these could lead to the delivery of much needed new homes being made unviable during the plan period.
- 2.58 The NPPG states that whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver. In some instances, draft policy DM2 seeks much higher sustainability standards from residential developments than Building Regulations standards without any clear evidence to justify this position. For instance, the policy requires a 19% improvement in predicted carbon emissions, compared with the building regulations standard current at the time.
- 2.59 Further, the Council's Viability Study (DEL004a) states in paragraph 3.4.59 in relation to the use of passivhaus standards:
- "... we offer an observation that we are uncertain that this policy is required or necessary bearing in mind the currently established national policy approach; based on building regulations and their progression over time, generally with a move away from locally specific policies aside from the optional standards relating to space, water usage and accessibility where needs and viability evidence supports the inclusion of those (all included as standard assumptions across this assessment)."*
- 2.60 The Building Regulations are robust and Bloor considers there is still no specific need or justification in Eastleigh for departing from national standards for the points referred to above. As such, Bloor would request that the Council comply to the already set and effective Building Regulations.

### ***Policy DM6 - Sustainable surface water management (MM40)***

- 2.61 Bloor is pleased to see further clarification with regards to discharge rates as discussed within the hearing sessions. It is noted however that the requirement for three forms of naturalised filtration for sites of 1 hectare or more, or within 100m of the River Itchen SAC or Solent Maritime SAC, still does not appear to be justified or required for any other sites considered within the HRA Report for the Proposed Main Modifications May 2021 (ED107). Previously the HRA Assessment Update (ED12A) suggested three forms of filtration for the SGO, which has now been deleted.
- 2.62 Bloor is concerned that the policy has gone further than is required by the latest evidence base, and that over the course of the plan period these requirements could make the delivery of much needed new homes unviable, especially in relation to sites where such a requirement is not feasible based upon site characteristics. As a result, Bloor concludes that the proposed approach to surface water management is still not justified and as the Inspector rightly stipulated at the hearing session, evidence is required to support the policy and requirement for three forms of naturalised filtration.
- 2.63 Further, Bloor considers that the proposed approach can in some instances contradict the technical requirements of key stakeholders and service providers, who will ultimately be responsible for agreeing details of the drainage infrastructure, and which could in turn impact upon the viability of delivering new homes. The NPPG outlines that it is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies (NPPG Paragraph: 002 Reference ID: 10-002-20190509).
- 2.64 In order to be justified and effective, the policy wording should include flexibility within the requirement for forms of naturalised filtration where this is feasible and agreeable to the relevant service providers and key stakeholders, as discussed and agreed at the examination.

### ***Policy DM8 - Pollution (MM41)***

- 2.65 Bloor welcomes the amendment to Section 2a to include reference to development being adversely affected by pollution. However, there is still concern regarding the policy wording which requires development to not be approved if there is a loss of amenity from pollution. Bloor considers that the policy does not provide an appropriate basis for the assessment of pollution impacts in this regard as this is a test that sets the bar too high. It is not currently clear how this policy would be measured and applied. Proposals may have a minor impact on a single dwelling but be caught by this policy wording which could restrict the delivery of much needed new homes.
- 2.66 Paragraph 109 of the NPPF (2012) notes that the planning system should contribute to and enhance the natural and local environment by: "... *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of pollution...*"

- 2.67 In this context the policy is considered ineffective and inconsistent with national policy. The reference to “*loss of amenity*” should be amended to make it clear that development will not be permitted where there is an unmitigated, adverse effect, in accordance with national policy.

***Policy DM26 - Creating a mix of housing (MM54)***

- 2.68 Bloor is pleased to see that clarification on the implementation of the policy with regard to determining appropriate housing mix now reflects the context and character of the site as requested.
- 2.69 However, it is noted that the supporting text still refers to criteria which was based largely on what is now a 7 year old Strategic Housing Market Assessment (SHMA 2014), published by PUSH. The text needs to enable flexibility in the approach as demand may change over time to reflect market conditions and the economic climate and should be sufficiently justified by an up to date evidence base.

***Policy DM31 - Dwellings with higher access standards (MM58)***

- 2.70 Bloor welcomes the provision of flexibility within the supporting text in recognition that some sites and homes are unable to meet higher standards. However, Bloor continues to object to the policy requirement to meet higher access standards, as these are set nationally through Building Regulations and local policy should not repeat or increase the standards. The NPPG is clear that whilst there is scope for local plan policy to make use of the ‘optional’ technical housing standards, planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors (Paragraph: 009 Reference ID: 63-009-20190626).
- 2.71 The Accessible Housing and Internal Space standards background paper (June 2018, HOU013) outlines in paragraph 10.7 that the viability report undertaken to support the document had concerns with draft policy DM31 iii which required the following:
- “For major development new-build of 40 residential units and above, ii should include at least 2 dwellings or 7% (if higher number) of all market housing; at least 1 dwelling or 8% (if higher number) of all affordable housing; and 100% of all specialist housing for older people and adults with disabilities meet the Part M building regulations M4(3) standard (Wheelchair user dwellings).”*
- 2.72 In response, EBC has proposed that the affordable housing units continue to meet the M4(3)(2)b standard (wheelchair accessible dwellings) while the market housing would only be required to meet the M4(3)(2)a standard (wheelchair adaptable). However, it is clear that concerns raised through the viability report have still not been fully addressed and site-specific factors are not set out within the main policy text as a consideration which Bloor considers should be addressed in line with national policy guidance. As it stands, the policy is unjustified and ineffective.

***Policy BO1 - Land south of Maddoxford Lane and east of Crows Nest Lane (MM116)***

- 2.73 Bloor retains land interest in the land to the south of Maddoxford Lane and has promoted this site through the plan-making process, on the basis that the whole site, both western and eastern parcels represent a sustainable, appropriate and available site for residential development.
- 2.74 The whole site is currently subject of a written representations appeal (APP/W1715/W/20/3265838) for 92 homes, which was submitted by Bloor and is currently being determined by the Planning Inspectorate.
- 2.75 As Bloor has set out within their Regulation 19 consultation response (EBCLP-XS-9), and examination matter statements (October and November 2019), Bloor supports the proposed allocation of the land to the south of Maddoxford Lane referenced under policy BO1. In addition, it promotes the extension of the allocation to the east with an increase in the capacity of the site to deliver circa 90 homes to meet local housing need and make best use of the land available.
- 2.76 In this case, Bloor is pleased to note that the policy wording of the allocated site has been amended, as requested at the hearing session, for the development of ‘at least’ 30 dwellings to ensure effective use of the site.
- 2.77 Having said this, it is noted that criteria 2(e) in MM116 under policy BO1, states that *“to preserve water quality and flows into Ford Lake details of Sustainable Urban Drainage shall be provided in accordance with policy DM6 as part of any application for outline or full planning permission”*.
- 2.78 Bloor continues to consider the proposed approach to surface water management is not justified. As set out under MM40 above, there is still concern that policy DM6 has gone further than is required by the latest evidence base in its request for three forms of filtration for every site that is over 1 hectare or within 100m of the River Itchen SAC or Solent Maritime SAC. This does not provide enough flexibility and could in turn make the delivery of much needed new homes unviable where such a requirement is not feasible. Bloor considers the policy wording should be amended to include flexibility within the requirement for forms of naturalised filtration where this is feasible and agreeable to the relevant service providers and key stakeholders.
- 2.79 Further, requirement 2(i) stipulates that *“occupation of the development is phased to align with the delivery of wastewater network reinforcement, in liaison with the service provider.”* Bloor is concerned that this requirement could unnecessarily delay the occupation of development, for instance if an onsite treatment works was to come forward, this requirement would be unnecessary. Bloor considers the wording of the policy should be amended to include “as necessary, unless on-site infrastructure provision is made” in order to incorporate all wastewater scenarios that could potentially serve the site. This amendment was discussed at the examination and EBC set out that they would agree the policy wording with Bloor with regard to flexibility for wastewater infrastructure, however this has not yet been undertaken.
- 2.80 The supporting policy states that the site would provide an effective edge of the settlement, and therefore a lower density than the adjacent consented

developments would “allow a softer rounding-off of the settlement”. However, there are other design tools that can be used to create and soften the transition to the edge of the development that would ensure the efficient use of the site and would not compromise unduly the capacity of the site.

- 2.81 The lower density proposed by the supporting text within the allocation is also in conflict with policy DM1 of the plan which requires that “*all new development should make efficient use of the site, maximise opportunities to increase density and have regard to potential development opportunities on adjoining land*”. This stance should be reflected in the allocation of this site. It is also in conflict with DM23 that requires a minimum density of 40 dpa (net) and a higher density in areas where there is good access to public transport and other services.
- 2.82 Bloor has carried out detailed design work as part of the recent full planning application for the site which demonstrates that as a whole (including the additional land to the east), it is capable of delivering 92 homes, including 32 affordable homes in compliance with EBC’s design and space standards.
- 2.83 The developable area of the site (including the additional land to the east) is approximately 2.68 hectares (excluding open space and green buffers). The resulting average density of 34 dph (net) is proposed and is reflective of the development approved to both the north and west of the site. This is shown on the illustrative masterplan included as Appendix 2 for information. Although this density is still low in comparison to policy DM23, this is a gross density and reflects the unusual constraint on the site of the existing pipe line and easements. The scheme has sought to optimise density which is a benefit.
- 2.84 In addition, delivering circa 90 dwellings on the site, as opposed to a lower density of around 30 in the plan, would significantly increase the affordable housing provision, which in accordance with policy DM30 would increase from 10 units to 32. The site (including the land to the east) would provide sustainable development important to the boost of housing land supply in the district.
- 2.85 With regards to transition, looking north to the Boorley Park development, where it borders the Ford Lake corridor and open countryside, it transitions with the use of densities clearly similar to that proposed at the allocated site. EBC’s approach to these transitional issues is inconsistent and unjustified.
- 2.86 The supporting text that refers to envisaging the site as having a lower density than the adjacent consented sites for a softer rounding off of the settlement should be removed, with the wording of the policy updated along with the relevant plan in the policy text/proposals map amended to include the additional land to the east.
- 2.87 The whole site is in a demonstrably sustainable location; immediately south of the Boorley Park development site and east of the Boorley Gardens site, and well related to additional permitted residential development and public transport network. Increasing the capacity of the site would help EBC meet increased housing numbers and contribute towards its housing delivery over the next 5-year period, issues raised under MM10 and MM11 above. If the Inspector is not minded to allocate the site, it could be identified as a safeguarded site for future housing need to meet any unmet future need.

- 2.88 It is confirmed that all of the land set out within the red line at Appendix 1 is secured under option with the current landowners. The site is unconstrained and available now. There are no technical constraints to the site and the studies undertaken to date provide confidence that the site is 'deliverable', robustly demonstrating that the land can be brought forward to deliver new homes in the next five years.
- 2.89 Bloor considers that the additional land would fully accord with the spatial strategy of the plan and that there is nothing within the plan and its supporting evidence base that would indicate that the eastern parcel location was inappropriate for the sustainable delivery of housing, further noting that the western parcel (Policy BO1) is determined to be a sustainable site for development and that the eastern parcel can be added within the context of clearly defined and logical site boundaries. The adjacent eastern parcel extends this allocation in a logical manner and is considered as sustainable as the land immediately to the west.

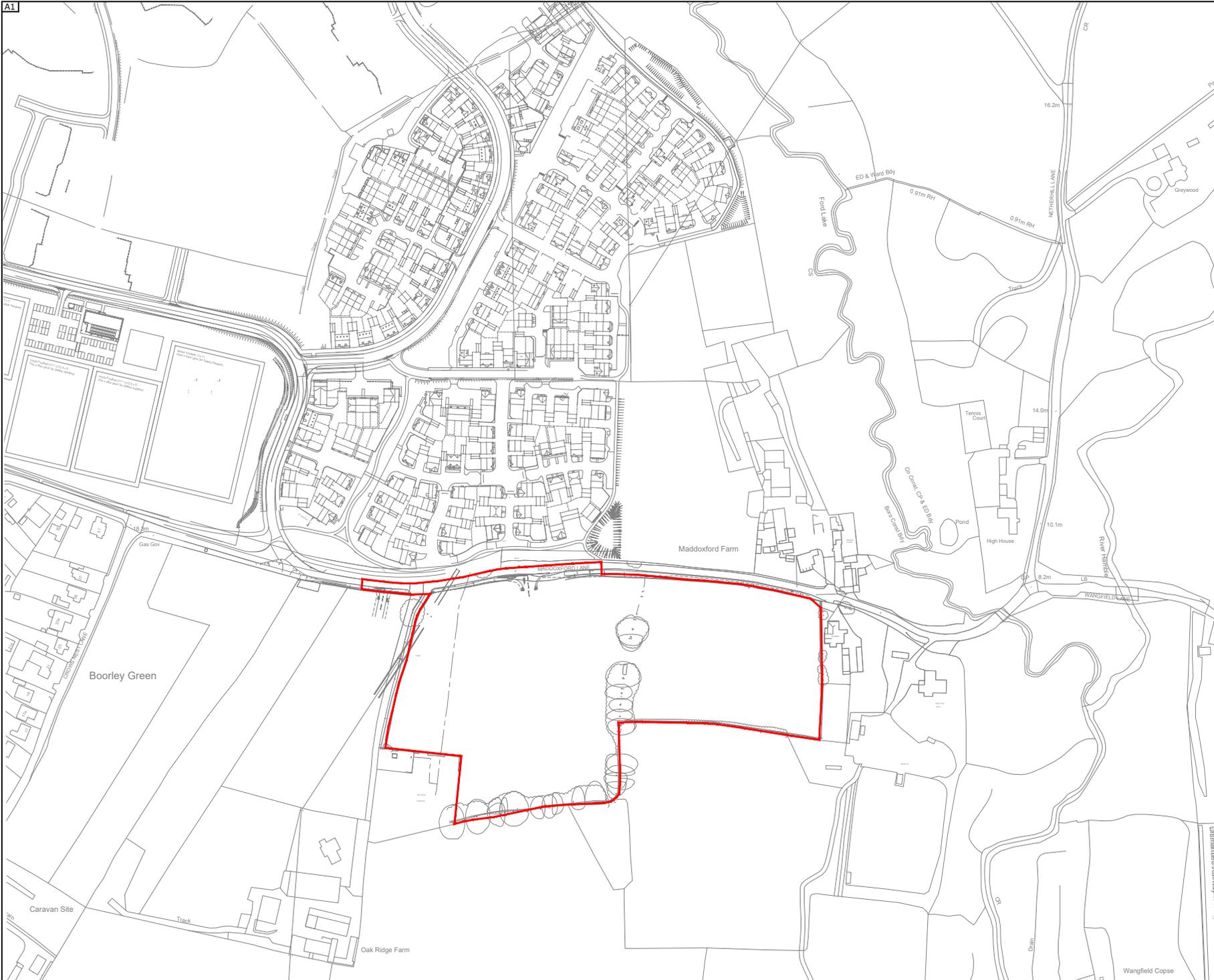
### **3.0 Additional Modifications**

- 3.1 Bloor welcomes the amendment (AM107), which seeks to address a text correction required at paragraph 6.5.74 of the draft plan to correctly refer to allocated site BO1 'Land south of Maddoxford Lane and east of Crows Nest Lane'.

### **4.0 Conclusions**

- 4.1 In conclusion, Bloor continues to have significant concerns regarding the emerging Eastleigh Borough Local Plan 2016-2036. The proposed MM and updated evidence base, do not overcome these concerns, and it is considered that they do not sufficiently address the Inspectors issues set out in ED71.
- 4.2 This highlights the inherent need for further examination into the soundness and deliverability of the plan, which should occur ahead of adoption.
- 4.3 Further, Bloor continues to consider that the eastern parcel of land from the site they are promoting to the south of Maddoxford Lane and west of Westfield, directly adjacent to significant housing schemes in the process of being delivered, represents a highly sustainable and appropriate location for housing as a natural extension to the allocated parcel of land to the west (BO1).

**Appendix 1 Land south of Maddoxford Lane and west of Westfield site location plan**



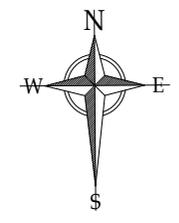
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 Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

REV	DESCRIPTION	DATE	AUTHOR	CHKD
A	Planning Issue	06.02.19	AS	

**SITE LEGEND:**

 Development Boundary



**PLANNING**



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**PROJECT**  
 Land at Maddoxford Lane  
 Boorley Green, Botley  
 For: Bloor Homes (Newbury)

**DRAWING**  
 Location Layout

SCALE	DATE	AUTHOR	CHKD
1:1250@ A1	01.02.19	AS	
JOB NO.	DRAWING NO.	REV	
BLOO180133	LP.01	A	
CLIENT REF.			

Discontinued/Retired/Cancelled

## Appendix 2 Illustrative Master plan for allocation B01



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 Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

REV	DESCRIPTION	DATE	AUTHOR	CHK'D
A	Planning Issue	30.01.19	AS	GR
B	Pumping station, Plots 61-63 and 13.05.19	69-74 repositioned.	AS	GR
C	Layout re-designed to meet planning comments	19.08.19	RT	
D	Layout adjusted to accommodate Makenzie house type in place of 350 house type.	30.08.19	RT	
E	Plots 32-35 & 92-95 (Flat Blocks) 18.09.19		MS	GR
F	1BF01 & 2B4P) adjusted Bins/Bikes store added.			
G	Layout adjusted to accommodate corrected affordable mix and tenure.	30.09.19	RT	GR
H	Drainage proposal overlay.	20.05.20	RT	GR
I	Attenuation pond enlarged, units surrounding amended to suit.	01.06.20	MWP	GR
J	Plot 90-91 parking area rearranged.	03.06.20	MS	GR
K	Plots 1-2 repositioned to allow for fire access, turning area introduced in front of plot 62, minor adjustments made to parking, plots 67 and 89-90	04.06.20	RT	GR
L	Landscape detail updated.	11.06.20	MS	GR
M	Affordable Tenure amended, schedule updated.	21.08.20	FK	RT
N	BHS Plans Rev A x-ref added. Minor adjustments made to fence lines and unit positions to comply with garden area calculations and back to back distances.	02.10.20	MWP	RT

**SITE LEGEND:**

- Development Boundary
- Affordable Housing Rented
- Affordable Housing Shared Ownership
- Fence Line - Ref Boundary Materials Layout and details for detailed specification
- Boundary Walling - Ref Boundary Materials Layout and details for detailed specification
- Rumble Strip / Surface Change
- 3m x 2m timber shed for 4 bed houses
- 2.4m x 1.8m timber shed for 2 & 3 bed houses
- Parking Space
- Wheelchair accessible parking space
- Casual visitor parking spaces (15 spaces)
- Allocated visitor parking spaces (23 spaces)
- Proposed Tree
- Root Protection Area
- Bin Collection Point

*Note:* For detailed landscaping and surface materials proposals refer to WYG Landscape drawings.

**PLANNING**

**thrive.**  
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PROJECT  
**Land at Maddoxford Lane**  
 Borley Green, Botley  
 For: Bloor Homes (Newbury)

DRAWING  
**Colour Site Layout**

SCALE	DATE	AUTHOR	CHK'D
1:500 @ A1	17.10.18	RT	GR
JOB NO.	DRAWING NO.	REV	
BLO0180133	CSL.01	N	
CLIENT REF.			



## Appendix 3 EBC Affordable Housing Delivery Note



## Table 1: Affordable Housing Contribution Table

This table is based upon the sites within Table 4 and 5 of the Eastleigh Borough Council's Housing Supply Update, July 2020 (ED101).

Status for affordable housing contribution is identified by the following:

35% affordable housing target met - green

35% affordable housing target not met - red

35% target exceeded - blue

Affordable housing number not confirmed - orange

Table 4 – HOU021 HOUSING TRAJECTORY TABLE 8: UPDATED TO BE CONSISTENT WITH ED61B - 5YS AT APRIL 2019							
Site ref	Address	Application reference	Total net dwellings	Net avail	5 year supply	Affordable housing contribution	TOR Commentary
0306	ADJ Penarth House. Otterbourne	F/15/77022	20	0	0	Off-site contribution of £86,000	<p>35% target not met within the proposal however off-site affordable housing contributions agreed as proposal relates to supported apartments</p> <p>Amount of affordable housing to be delivered through off-site contributions does not appear to be outlined by EBC in any documentation online</p> <p>Complete prior to GLH 5YS Trajectory</p>



0166	The Mount Hospital, Church Road, Bishopstoke, Eastleigh	O/12/7100 7; F/13/73226 ; F/14/75061 F/17/80513	217	75	53	<p>The following information is outlined within the relevant S106 agreements:</p> <p>O/12/71007: Off-site contribution of £956,122</p> <p>F/13/73226: Off-site contribution of £433,797</p> <p>F/14/75061: No new legal agreement as changes (slight reduction in units) result in an overpayment from previous S106 contribution</p> <p>F/17/80513: Off-site contribution of £26,250</p>	<p>35% target not met within the proposal however off-site affordable housing contributions agreed as proposal relates to development at a care retirement community</p> <p>Amount of affordable housing to be delivered through off-site contributions does not appear to be outlined by EBC in any documentation online</p>
0317	Land West & North of Church Road/Breach Lane	O/13/7289 2 R/15/77507	85	57	6	35% (outlined within S106 agreement)	<p>35% target met</p> <p>30 affordable dwellings</p>
0345	Land at Fair Oak Road	O/14/7508 6 RM/17/808 62	16	16	0	35% (outlined within S106 agreement)	<p>35% target met</p> <p>6 affordable dwellings</p> <p>Complete prior to GLH 5YS Trajectory</p>
0358	Land North of Church Road	O/16/7946 9 RM/17/819 69	27	27	27	35% (outlined within S106 agreement)	<p>35% target met</p> <p>9 affordable dwellings</p>
0315	Land north and east of Boorley Green, Winchester Road, Botley	O/12/7151 4 R/14/74872 R/15/77552 R/15/77595 R/16/79470	1330	1,190	951	30% (outlined within S106 agreement)	<p>35% target not met</p> <p>35% of 1330 = 466</p> <p>420 affordable units provided (stated within RM apps)</p>



							46 homes under affordable target
0338	East of Sovereign Drive & Precosa Road	F/13/73606 APP/W1715/W/14/3001499	103	0	0	35% (outlined within S106 agreement)	Permission lapsed on 21 October 2017  36 affordable dwellings lost
0354	Crows Nest Lane, Boorley Green	O/16/78389	50	50	50	35% (outlined within S106 agreement)	35% target met  18 affordable dwellings
0364	Braxells Farmhouse Winchester Road Boorley Green	F/17/80382	14	14	14	20% (outlined within S106 agreement)  The application triggers a 20% affordable housing requirement	35% target not met  2 affordable units provided (to meet with 20% required)
0348	Land north west of Boorley Green, Winchester Road, Botley	O/15/75953 RM/17/81628	680	680	333	35% (outlined within S106 agreement)	35% target met  238 affordable dwellings
0320	Land at Hamble Lane	O/12/71828 R/15/76830	150	113	9	35% (outlined within S106 agreement)	35% target met  53 affordable dwellings
0324	Land at Bridge Road/ Blundell Lane	O/13/73701 R/15/75967	90	26	0	35% (outlined within S106 agreement)	35% target met  31 affordable dwellings
0340	Rear of Orchard Lodge, Windmill Lane	C/14/74932 C/16/77959 F/16/79496	32	32	24	40% (outlined within S106 agreement)	35% target exceeded  35% of 33 = 11 40% of provided = 12 (1 home over the affordable target)
0365	Land south of Maddoxford Lane, Boorley Green	O/16/79600	50	50	50	35% (outlined within S106 agreement)	35% target met  18 affordable dwellings



0316	Land east of Dodwell Lane/North of Pylands Lane, Bursledon	O/12/7152 2 R/14/75595 R/15/76606	249	212	104	35% (outlined within S106 agreement)	35% target met 88 affordable dwellings
0355	Land south of Bursledon Road, Bursledon	O/15/77121 F/18/82322	200	200	130	35% (outlined within S106 agreement)	35% target met 70 affordable dwellings
276	Stewart House Sycamore Avenue	F/13/73298	2	2	0	No contribution agreed due to scheme falling below threshold for affordable housing contribution	35% target not met as scheme is below affordable housing contribution threshold Complete prior to GLH 5YS trajectory started
0309	Draper Tools Limited, Hursley Road	O/10/6697 8 RM/17/809 52	130	130	0	35% (outlined within S106 agreement)	35% target met 46 affordable dwellings Site phased beyond GLH 5YS
0349	Woodhill School 59-61 Brownhill Road	F/16/77901 F/17/80370	12	8	0	The following information is outlined within the relevant S106 agreements:  F/17/80370: £90,000 towards Off-site Affordable Housing	35% target not met within the proposal however off-site affordable housing contributions agreed  Amount of affordable housing to be delivered through off-site contributions does not appear to be outlined by EBC in any documentation online  Site complete prior to GLH 5YS trajectory
0249	Allotment Gardens, Kipling Road/Woodside Avenue	O/13/7369 8 R/15/77726	94	94	0	35% (outlined within S106 agreement)	35% target met 33 affordable dwellings Site complete prior to GLH 5YS trajectory



0352	Land north of Cranbury Gardens, Bursledon	O/15/7688 3 RM/19/848 02	45	45	45	35% (outlined within S106 agreement)	35% target met  16 affordable dwellings
0327	Land at Providence Hill, Bursledon	O/14/7432 2	62	62	40	35% (outlined within S106 agreement)	35% target met  22 affordable dwellings
0341	Berry Farm Hamble Lane, Bursledon	F/15/76582	165	131	92	40% (outlined within S106 agreement)	35% target exceeded  35% of 165 = 58 40% provided = 66 8 homes over the affordable target
0339	North Stoneham Park, Chestnut Avenue, Eastleigh	O/15/7602 3 R/17/79892 F/17/81165 F/17/81167 RM/18/845 37	1074	1,131	803	35% (outlined within S106 agreement)	35% target met  378 affordable dwellings
0250	Land at Toynbee Road	F/14/74873	120	3	0	24% (outlined within S106 agreement)	35% target not met  27 affordable units provided  35% would have provided 42  Site complete prior to GLH 5YS trajectory
0329	10-20 Romsey Road, Eastleigh	F/16/77785	49	49	49	Off-site contribution of £250,000 (outlined within Unilateral Undertaking)	35% target not met within the proposal however off-site affordable housing contribution agreed.  Proposal is a redevelopment of a mixed use building and lack of provision relates to the cost of providing the on-site accommodation for the charities  Amount of affordable housing to be



							delivered through off-site contributions does not appear to be outlined by EBC in any documentation online
0336	Eastleigh College Annexe, Cranbury Road	O/15/75750	10	10	0	No contribution agreed due to scheme falling below threshold for affordable housing contribution	Permission lapsed on 7 April 2018  Scheme is below affordable housing contribution threshold
F/18/84679	4-6 High Street, Eastleigh	F/18/84679	10	10	10	No contribution agreed due to scheme falling below threshold for affordable housing contribution	35% target not met as scheme is below affordable housing contribution threshold
0330	St. Swithun Wells Church and Adjacent Land, Allington Lane, Fair Oak	O/13/72471 RM/17/81871	72	72	72	35% (outlined within S106 agreement)	35% target met  25 affordable dwellings
0343	Mitchell House, Southampton Road	J/16/78227	67	67	0	0% (outlined within committee report). PD conversion.	35% target not met as scheme is PD and affordable contribution not required  35% would have provided 67
0357	Rivendale 38 Leigh Road	PN/17/81079	10	10	0	0% (outlined within committee report. PD conversion	35% target not met as scheme is PD and affordable contribution not required  Complete prior to GLH YS Trajectory
Not provided	John Darling Mall Selbourne Drive	CS/18/82602	18	10	10	0% - application was a consultation. No decision notice or legal documents online to say it was determined.	35% target not met



0326	Land off Winchester Road	O/13/7370 7 R/14/75539 R/15/76118 R/15/77067 R/15/77100 R/16/78543	330	115	0	35% (outlined within S106 agreement)	35% target met  116 affordable dwellings  Site complete prior to GLH 5YS trajectory
0332	Corner of Knowle Lane/ Mortimers Lane (East Side)	O/13/7249 0 R/15/77751	73	6	0	35% (outlined within S106 agreement)	35% target met  26 affordable dwellings  Site complete prior to GLH 5YS trajectory
0356	Land to the west of Hammerley Farm, Burnetts Lane, Horton Heath (phase 1)	F/15/77500	67	66	66	35% (outlined within S106 agreement)	35% target met  23 affordable dwellings
Not provided	Land to the west of Hammerley Farm, Burnetts Lane, Horton Heath (phase 2)	F/16/79704	37	37	37	21% (8 affordable units sought from S106 agreement)  A reduction on the 35% policy due to the application of the Vacant Building Credit	35% target not met as Vacant Building Credit applied  8 affordable units provided  35% would have provided 13  A reduction of 5 affordable units due to Vacant Building Credit
0359	Fir Tree Farm and Victoria Farm, Fir Tree Lane, Horton Heath	O/16/7935 4	450	450	0	35% (outlined within S106 agreement)	35% target met  158 affordable dwellings
0363	Land east of Knowle Lane, Fair Oak	F/17/80640 RM/18/837 37	34	34	34	Off-site contribution of £81,000 (outlined within S106 agreement)	35% target not met within the proposal however off-site affordable housing contribution agreed.  It appears this is due to the costs associated with the



							<p>redevelopment of a brownfield site</p> <p>Amount of affordable housing to be delivered through off-site contributions does not appear to be outlined by EBC in any documentation online</p>
0362	CWM, Corner of Mortimers Lane and Knowle Lane, Fair Oak	F/16/78074	27	27	27	Off-site contribution of £58,000 (outlined within S106 agreement)	<p>35% target not met within the proposal however off-site affordable housing contribution agreed.</p> <p>It appears this is due to the costs associated with the redevelopment of a brownfield site</p> <p>Amount of affordable housing to be delivered through off-site contributions does not appear to be outlined by EBC in any documentation online</p>
Not provided	Pembers Hill Farm, Mortimers Lane, Fair Oak	O/15/77190 RM/18/84195	242	243	243	35% (outlined within S106 agreement)	<p>35% target met</p> <p>85 affordable dwellings</p>
0350	Long View, Bursledon Road	F/16/77413 F/16/79326	12	11	11	<p>0% (outlined within S106 agreement)</p> <p>The application triggers a 20% affordable housing requirement</p> <p>Off-site contribution of £107,871</p>	<p>35% target not met.</p> <p>20% requirement on site also not met.</p> <p>Off-site affordable housing contribution agreed.</p> <p>Amount of affordable housing to be delivered through off-</p>



						(outlined within S106 agreement)	site contributions does not appear to be outlined by EBC in any documentation online
0323	Land at St Johns Road & Foord Road and West & North of Waylands Place and Peewit Hill Close	F/15/76804 F/17/80651	106	106	106	35% (outlined within S106 agreement)	35% target met  37 affordable dwellings
0351	Land at Home Farm, St John's Road	F/15/76447	14	14	0	20% (outlined within S106 agreement)  The application triggers a 20% affordable housing requirement	35% target not met  3 affordable units provided (20% triggered)  Complete prior to GLH 5YS trajectory
Not provided	Land north of Mortimers Lane, Fair Oak (Phase 1)	F/17/82099	59	59	59	35% (outlined within S106 agreement)	35% target met  21 affordable dwellings
Not provided	Fair Oak Lodge, Allington Lane	O/17/8186 4 RM/18/841 95	48	49	49	35% (outlined within S106 agreement)	35% target met  17 affordable dwellings
HE1	Land west of Woodhouse Lane	O/18/8363 4	605	605	150	35% (outlined within S106 agreement)	35% target met  212 affordable dwellings
0361	Land North of Grange Road, Netley Abbey	O/16/7801 4	89	89	89	35% (outlined within S106 agreement)	35% target met  31 affordable dwellings
0318	Abbey Fruit Farm, Grange Road, Netley Abbey	O/16/7946 6 O/13/7289 5	93	93	93	18% (outlined within S106 agreement)	35% target not met  This is based on submitted viability evidence which was accepted by EBC



							17 affordable units provided 35% would have provided 33 A reduction of 16 affordable units due to viability issues
F/17/82001	Osbourne Quarters Policy Training Centre	F/17/82001	30	30	30	0% (outlined within committee report)  Conversion so does not trigger affordable housing requirement	35% target not met.
337	Land at Dog Kennel Farm, Telegraph Road	F/14/74943	14	10	10	20% (outlined within S106 agreement)  The application triggers a 20% affordable housing requirement	35% target not met 3 affordable units provided (20% triggered)
0342	Moorgreen Hospital, Botley Road	F/15/77247	121	43	11	30% (outlined within S106 agreement)	35% target not met 36 affordable units provided 35% would have provided 42
0353	Land at Hatch Farm, North of Barbe Baker Avenue	F/15/77718	98	98	52	15% (outlined within S106 agreement)	35% target not met 15 affordable units provided. 35% would have provided 34
0347	Land off Botley Road, West End	O/15/76418 RM/18/82821	100	100	100	35% (outlined within S106 agreement)	35% target met 35 affordable dwellings
0360	Land West and South of Horton Heath	O/14/75735	950	950	210	35% (outlined within S106 agreement)	35% target met 333 affordable dwellings



**Table 5: Table 9 of HOU021 updated consistent with ED61B: Resolutions to grant planning permission at and post 1.4.2019**

BU1 O/17 /808 99	Land Adjoining 4 Brookfield, Providence Hill, Bursledon, Southampton SO31 8AU	O/17/8089 9	20	20	20	35% (outlined within committee report)	Application was withdrawn on 08/10/20  7 affordable dwellings lost as application withdrawn
FO2 O/17 /811 66	Land north of Mortimers Lane & West of Hall Lands Lane	F/18/83986	26	26	26	35% (outlined within Section 106)	35% target proposed  9 affordable dwellings
BU3 O/17 /811 66	Land Off Providence Hill, Bursledon	O/17/8116 6	92	92	92	35% (outlined within committee report)	35% target proposed  32 affordable dwellings
BO2 O/18 /836 98	Land to The North and East of Winchester Street, Botley	O/18/8369 8	375	375	50	35% (outlined within committee report)	35% target proposed  131 affordable dwellings