

February 2024

Addendum to
October 2023
East Hampshire
Five-Year Housing
Land Supply
Position Statement
(For the period 2023/24 to 2027/28)

1. Introduction

- 1.1 This addendum has been updated to inform an ongoing appeal at 46 Lymington Bottom, Four Marks (APP/M1710/W/23/3329928) and in light of the Government update to its planning guidance to clarify that ‘four year’ authorities under NPPF 77 and 226 should demonstrate (for decision making) a four year supply measured against a five year requirement.
- 1.2 In October 2023, East Hampshire District Council (EHDC), as the relevant local planning authority, published its Five-Year Housing Land Supply position. The Five-Year Land Supply position set out that at 1st April 2023, EHDC did not have a five-year housing land supply. At that point in time there was 4.5 years supply, an equivalent shortfall of 238 dwellings. Since then, the government has revised the National Planning Policy Framework (NPPF), which as a consequence impacts how EHDC demonstrates its land supply position. In certain circumstances, local planning authorities will now only be required to identify a four-year supply of housing. This change is applicable to East Hampshire and therefore this addendum will set out the new land supply position, based on four-year supply measured against a five-year period. Furthermore, the updated NPPF no longer requires authorities to apply an additional 5% buffer to housing land supply calculations.

2. Background

- 2.1 The NPPF at the time of the October 2023 Five Year Housing Land Supply position stated that local planning authorities (LPAs) should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies. It further requires an additional buffer of 5% to ensure choice and competition in the market for land or 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply. Where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, a 10% buffer should be applied to account for any fluctuations in the market during that year.
- 2.2 The October 2023 report set out the housing supply position in East Hampshire District (not including the area within the South Downs National Park) at 1st April 2023. Using the net housing figures, the assessment demonstrated that at 1st April 2023 East Hampshire did not have a five-year land supply. At that point in time there was **4.5 years supply** and an equivalent shortfall of **238 dwellings** once an additional 5% buffer had been taken into account to ensure choice and competition in the market for land.
- 2.3 On 20 December 2023, the NPPF was revised in response to the Levelling-up and Regeneration Act. Paragraph 77 states “*In all other circumstances, local*

planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing, or a minimum of four years' worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period)."

- 2.4 Paragraph 226 states *"From the date of publication of this revision of the Framework, for decision making purposes only, certain local planning authorities will only be required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing (with a buffer, if applicable, as set out in paragraph 77) against the housing requirement set out in adopted strategic policies, or against local housing need where the strategic policies are more than five years old, instead of a minimum of five years as set out in paragraph 77 of this Framework. This policy applies to those authorities which have an emerging local plan that has either been submitted for examination or has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need. This provision does not apply to authorities who are not required to demonstrate a housing land supply, as set out in paragraph 76. These arrangements will apply for a period of two years from the publication date of this revision of the Framework."*
- 2.5 A Draft Local Plan (Regulation 18) was consulted on in early 2019, which included both a policies map and proposed allocations to meet housing need. It is considered that paragraph 226 requirements are fulfilled and that from the 20th December 2023 (publication of the NPPF) the operation of the NPPF (paragraphs 77 and 226) would require EHDC to identify a four-year supply of housing land (and update the same annually). On 22nd January 2024, EHDC published another Draft Local Plan (Regulation 18), which also contains a Policies Map and proposed allocations to meet housing need. Further endorsing the requirement to demonstrate a four-year supply of housing land.
- 2.6 Previous iterations of the NPPF required the inclusion of a 5% buffer to ensure choice and competition in the market for land. A 10% buffer was required where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan. Furthermore, a 20% buffer should be applied where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply. This is to be measured by the Housing Delivery Test (HDT). Based on the latest HDT (2022) result of 112%, the October 2023 housing land supply position required East Hampshire to apply a 5% buffer to the housing requirement.

- 2.7 The latest changes to the NPPF (December 2023) remove the need to add additional buffers unless delivery is below 85% of the housing requirement. Therefore, the revised calculations in this addendum will also take into account these changes and not include a buffer.
- 2.8 On 5th February 2024 the Government updated its planning guidance to clarify that ‘four year’ authorities under NPPF 77 and 226 should demonstrate (for decision making) a four year supply measured against a five year requirement:

“Both the 5 year housing land supply and the 4 year housing land supply that authorities should demonstrate for decision making should consist of deliverable housing sites demonstrated against the authority’s five year housing land supply requirement, including the appropriate buffer.” (PPG ID 68-055-20240205)

Housing Need

- 2.9 For the purposes of this report and calculating land supply in East Hampshire (outside the SDNP), the Local Housing Need figure used will be the same as that outlined in the [HEDNA](#) (2022) of 464 dwellings per annum. Further information on East Hampshire’s housing need can be found in the [Five-Year Housing Land Supply Position Statement](#) (October 2023), as well as the [Updated Technical Note](#).

Housing Supply

- 2.10 The components that have been included towards the land supply within East Hampshire are the same as that in the Five-Year Housing Land supply position statement as published in October 2023.

3. Five Year Housing Land Supply Assessment

- 3.1 As stated in Section 2, it is considered that EHDC fulfil the requirements of paragraph 226 and as confirmed by changes to the PPG, are required to identify a four-year supply of housing land.
- 3.2 Using the net housing figures, the assessment demonstrates that at 1st April 2023 East Hampshire can demonstrate **4.74 years supply** now a buffer is no longer applicable. For decision-making purposes only, this is an equivalent over-provision of **342 dwellings**. The five-year housing land supply figures across East Hampshire (not including the SDNP) are summarised in Table 1 below:

Table 1: EHDC - Five Year Housing Land Supply (reflecting NPPF changes)

Requirement		Total	Annual
A	East Hants Housing Requirement 2023-27	2,320	464
Supply			
B	Large site detailed planning permissions	1,096	
C	Large site outline planning permissions	416	
D	Small site planning permissions	231	
E	Local Plan Allocations	147	
F	Neighbourhood Plan Allocations	15	
G	Other Identified Deliverable Sites	94	
H	C2 Uses	87	
I	Windfalls	112	
J	Total Supply	2,198	
Shortfall/Over Provision			
K	Applying NPPF Para. 226	342	
L	Five-Year Requirement	122	
No. of years' supply			
M	Against requirement	4.74 Years	

3.3 Further information on East Hampshire's phasing associated with its housing land supply position can be found in the [Five-Year Housing Land Supply Position Statement \(October 2023\)](#).