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By email only
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Enquiries to: Alex Robinson
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Date: 5th March 2024

Dear Natalie

HAVANT BOROUGH'S EMERGING LOCAL PLAN – DUTY TO COOPERATE

Many thanks to your officers who met with my colleagues on 18 October 2023 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of Havant Borough's Local Plan, and its housing need and supply position. This follows the approval of the Partnership for South Hampshire (PfSH) Spatial Position Statement (SPS) at Joint Committee on 6 December 2023.

As you are aware, Havant Borough Council is currently preparing a new Local Plan. We recently published an updated Local Development Scheme (LDS) which indicates that we will be publishing a draft (Regulation 18) Local Plan in Quarter 4 of 2024.

The LDS can be viewed here: https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-development-scheme-lds.

Havant Borough Council is a pro-development local authority with an ambitious regeneration agenda. We are keen to deliver this alongside other objectives such as delivering more affordable housing for our communities and addressing international issues such as climate change. Havant Borough values partnership working through PfSH which allows us to work positively and proactively on cross boundary issues, including the sufficient provision of housing and employment across the sub-region. The PfSH SPS confirms the Council's commitment to delivering sustainable development in the most sustainable locations, and meeting housing need where possible.

As with most urban local planning authorities in the Southeast, one of the biggest challenges for the new Local Plan will be to meet Havant's own development needs. The Inspectors' Interim Findings[1] in respect of the previous Local Plan acknowledged that Havant may be an authority that cannot sustainably meet its housing needs in accordance with paragraph 11 b)

[1] https://www.havant.gov.uk/media/8718

of the National Planning Policy Framework (NPPF) (see paragraph 52). Nevertheless, the Council's starting point is that no stone will be left unturned in order to meet its own need.

Whilst Havant's evidence base on housing supply is emerging, the attached plan from the Council's draft Constraints Study illustrates the very constrained supply of land in Havant Borough. The least constrained areas shown are already identified for development, notably that of the Dunsbury Park tax site which is part of the Solent Freeport, and Havant Thicket Reservoir which serves a sub-regional function, stretching far beyond Havant Borough's boundaries.

Housing Need and Supply

The NPPF makes clear that in order to significantly boost housing supply, the standard method is an advisory starting-point for establishing a housing requirement for an area. Applying a housing need figure of 516 dwellings[2], there is a need for 10,320 dwellings in Havant Borough over a Local Plan period to 2043 (see table below).

The Council has undertaken a comprehensive and robust assessment of the following sources of supply to assess how far it is able to meet its own housing need:

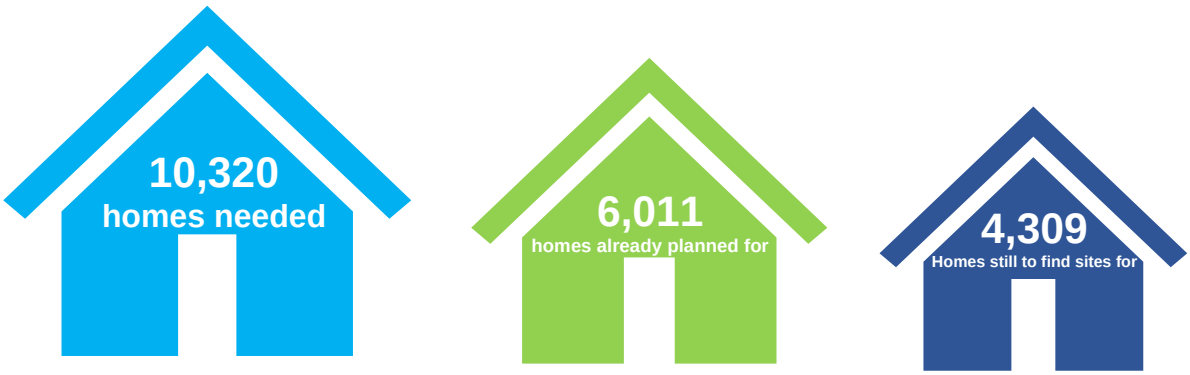
- Outstanding planning permissions as of 1 April 2023;
- Adopted Local Plan allocations without planning permission;
- Potential housing sites[3]; and
- Windfall development[4].

Our work on the previous Local Plan and the Inspectors' interim findings report clearly signal a need for robust evidence and including that sites should meet the NPPF definition of 'developable'. For this reason, it will not be possible to rely on any housing delivery from Havant and Waterlooville town centres until evidence of deliverability is more advanced. In any case, development in these locations will be unlikely to be sufficient in scale to close the gap between the Borough's objectively assessed need and identified housing supply. The Council will keep all sources of housing supply up to date and robust in order to demonstrably ensure that every effort is made to address housing need within the Borough's boundary.

[2] The standard method calculation of 516 dwellings per annum (dpa) is used from 2022, though the standard method need calculation for 2024 is 512 dwellings per annum prior to the publication of the 2023 affordability ratio which is due to be published in March 2024. The former is used as a worst case scenario.
[3] Identified by Table 1 of the Council's Housing Delivery Position Statement
[4] The Council's evidence on windfall development will be updated to inform the new Local Plan.

	Identified housing need (2022/23-2042/43)	Net Dwellings Completed or Committed
	10,320	
Completions 2022-23		495
Outstanding planning permissions at 1/4/23		1,524
Allocations in Adopted Local Plan without planning permission		606
Potential housing sites		1,524
Potential housing sites where previous Inspectors' raised deliverability concern		700
Windfall Development		1,162
Total		**6,011**
Remaining objectively assessed housing (unmet need)	**4,309**	

Against a standard method figure of 10,320 dwellings, the Council is only able to identify a supply of 6,011 dwellings over the plan period. **This results in an unmet housing need figure of 4,309 dwellings.**



All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply. We will be continuing to reach out to the development industry and landowners to ascertain whether there are any further sites which could be available for development and be assessed as part of the plan-making process – our Call for Sites has recently been relaunched on our website. However, given the very constrained supply of land, there will likely be insufficient capacity to meet objectively assessed need within the Plan area.

Employment Need and Supply

Havant's constrained land supply will also mean it is extremely challenging for the Borough to identify sufficient sites to meet employment need. The Council has commissioned an

Employment Land Review, building upon the 2021 PfSH Economic, Employment and Commercial Needs Study[5]. This will confirm whether Havant has sufficient employment land to meet its own development needs or will need to formally request assistance from its neighbours to accommodate any unmet need. We will keep you up to date with the progress of our evidence base on employment land supply.

East Hampshire Local Plan 2021-2040 Regulation 18

Alongside this letter, we have submitted representations on your Draft Local Plan consultation and are continuing to engage on a Statement of Common Ground.

Joint working

The PfSH Spatial Position Statement (SPS) is of course a useful starting point in demonstrating compliance with the duty to cooperate. However, given the scale of unmet need that exists within the sub-region, it is important that there continue to be constructive and active discussions to effectively address this matter. It is Havant Borough Council's position that relying solely on the PfSH SPS will not demonstrate compliance with the duty to cooperate. As such, ongoing discussions and a bi-lateral statement of common ground will need to be agreed in order to demonstrate that this matter is appropriately addressed by our respective local plans.

Planning Practice Guidance on plan-making[6] sets out that strategic policy-making authorities should cooperate in meeting housing need, using the most appropriate functional geographical area, such as a housing market area (HMA). That being a case, there is a clear functional geography between East Hampshire's southern parishes and that of Havant for which there is a significant unmet housing need.

We are conscious of the proposed repealing of the duty to cooperate and its proposed replacement with an alignment policy. Whilst the detail of such a test is not yet known, the Government has made clear that cross-boundary working on strategic priorities, including unmet need will remain. Therefore, the Borough Council's position is we should ensure compliance with the existing legislation up to the point that the process changes.

You will be aware of the work that has been undertaken between our two authorities to address the duty to co-operate in recent years. Moving forwards, we seek to undertake a series of detailed discussions with yourselves as our respective plans progress, in order to ensure that unmet need and other cross-boundary matters are robustly addressed. It is the Council's ambition to agree a statement of common ground prior to any Regulation 19 consultation on either of our plans thereby minimising soundness and legal compliance issues for both plans.

The NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. Havant Borough will require assistance from our neighbouring authorities to provide a meaningful contribution towards its housing need if it is to get anywhere close to meeting its needs in full. I am therefore formally

[5] push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf

[6] Plan-making - GOV.UK (www.gov.uk) Paragraph: 017 Reference ID: 61-017-20190315 Revision date: 15 03 2019

writing to ask whether your authority is able to accommodate any of Havant Borough's unmet housing need?

I would like to request a meeting to discuss how this matter can be resolved and would be grateful if you could please advise of your availability by return. I look forward to hearing from you on this important issue and would be grateful for a response by **28 March 2024**.

Yours sincerely



Alex Robinson
Executive Head of Place

cc Adam Harvey