EAST HAMPSHIRE DISTRICT COUNCIL

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Alex Robinson
Executive Head of Place
Havant Borough Council
Sent VIA Email

Enquiries to: 0
[redacted]
My reference:
Your reference:
Date: Monday 22nd April 2024

Dear Alex,

Response to Havant Borough Council's request to help meet unmet housing need under the Duty to Cooperate

Thank you for your letter dated 5 March 2024 requesting assistance from East Hampshire District Council (EHDC) to meet potential unmet housing needs from Havant Borough (currently identified as 4,309 homes).

It is not clear from your correspondence whether you are seeking the same assistance from other neighbouring local planning authorities, although we understand Portsmouth City Council to be in a similar situation to you and unable to assist. EHDC agrees that we should ensure compliance with existing legislation regarding the Duty-to-Cooperate, until such point that the process changes.

EHDC advocates the approach taken by Havant Borough Council (HBC) that the starting point should be that no stone will be left unturned and we welcome seeing further work on the matter supporting the emerging Havant Borough Local Plan.

We note the letter asks us whether we can meet 'any' of the need and it is therefore assumed it is not expecting us to meet all the need. The total amount of unmet needs you have identified (4,309 homes) exceeds the number of new homes we are identifying new land for through proposed allocations in our draft Local Plan (3,500 homes). East Hampshire cannot meet all this unmet need, either sustainably or practically during the plan period (2021-2040). To do so would cause significant harm to our district and simply would not be deliverable over the plan period.

We note that the figure of 4,309 homes is identified as unmet needs, but not confirmed, as the capacity work is ongoing (not yet published), and "All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply" and a further call for sites is planned. Therefore, as we understand it, the figure of 4,309 is unconfirmed, but that a significant amount of unmet need is expected from Havant Borough.

East Hampshire is primarily a rural district, which is significantly affected by the presence of the South Downs National Park (SDNP), which covers 57% of the total area. As a result, this effectively splits the local planning authority and associated Local Plan area into three separate 'islands'. As evident in our Interim Housing and Economic Needs Assessment (HEDNA, 2018), East Hampshire has housing market area relationships with both Havant and Portsmouth to the south, but due to the presence of the SDNP, it is considered any requests to meet unmet need could reasonably only relate to land within our southern parishes, namely Horndean, Clanfield and Rowlands Castle. This is further endorsed by these areas forming the only part of the local planning authority that falls within the Partnership for South Hampshire (PfSH). This limits the amount of land available to meet such unmet needs.

Whilst our recent Draft Local Plan consultation (Reg.18, 2024) identified sites to deliver above our housing requirement, as you say in your response to our consultation, it is only 643 homes in excess. Following previous discussions, we have/are likely to receive formal requests for assistance to meeting housing needs from both Portsmouth City Council and Chichester District Council, whilst already accounting for some unmet needs from the SDNP. Your request is in addition.

Our recent consultation on the Draft Local Plan 2021-2040 has raised many issues to consider further. We are currently reviewing those representations to further understand our future land supply position. As we consider the responses, we need to relook carefully at sites, deliverability and potential unmet needs identified elsewhere. We also need to carefully assess constraints ourselves, as we are not without constraints (including showstopper environmental constraints). As the responsible planning authority preparing a new Local Plan, whilst recognising the NPPF requirement to meet housing needs, and boost housing supply, we must balance this with what is right for our local area, and it would not be reasonable to expect East Hampshire to mop up unmet needs from many other areas to the detriment of our own area (particularly in relation to the environment and infrastructure).

That said, we accept the need to carefully consider this when preparing our plan and would expect to accommodate some unmet needs from areas that can evidence a functional relationship with areas of our district, subject to the outcome of our Integrated Impact Assessment and other supporting evidence base. We are not yet able to agree the extent of that.

As stated in the Partnership for South Hampshire Spatial Position Statement (December 2023), local planning authorities will have to consider greenfield locations for development, but PfSH recognise that it is more sustainable to focus on strategic scale sites (areas of search for growth) as these bring the benefit of infrastructure delivery. The Spatial Position

Statement does not advocate any existing strategic development locations in East Hampshire, nor does it identify locations as broad areas of search for sustainable strategic-scale development. However, it is acknowledged that small and medium sized development sites will be allocated in the emerging Local Plan that will contribute towards overall housing delivery, which could include unmet needs of neighbouring authorities, where reasonable to do so. Until we have been through the representations to our recent consultation, we are unable to offer further clarity on our position to potentially assist with unmet needs.

It is useful to understand the likely extent of Havant Borough's unmet needs, and we acknowledge that we have a duty to consider that in our plan making process. We will also need to consider unmet needs from elsewhere.

We also look forward to the publishing of Havant's constraints study, and the outcome of the further site assessment and call for sites. It is noted that a windfall allowance has been taken into account, however, the windfall allowance supporting the withdrawn Havant Local Plan only considered sites of four dwellings or less. It is considered further work is needed to support the potential for a windfall allowance, especially on sites of five dwellings or more. This is even more apparent if housing delivery from Havant and Waterlooville town centres are disregarded. If not, the amount of development in Havant Borough until 2043 could be underestimated, having an adverse impact on infrastructure provision.

Until such time, and when responses to our consultation have been analysed, it is difficult for EHDC to engage in any pragmatic discussions associated with potential unmet needs. However, as a way forward, we suggest further conversations in due course, with further consideration of housing market areas, perhaps collectively with other neighbouring authorities. This is particularly important as we progress towards the next iteration of the Local Plan (Regulation 19), and we can agree a Statement of Common Grounds in due course.

Please note that this response has been endorsed by the Portfolio of Regulation and Enforcement, Cllr. Angela Glass.

I trust this is a reasonable way forward.

Yours sincerely

[redacted]

Natalie Meagher
Director of Regulation and Enforcement

Cc Adam Harvey
Heather Stevens