EAST HAMPSHIRE DISTRICT COUNCIL

EHDC | PO Box 310 | Petersfield | GU32 9HN
Phone 01730 266551 | Email info@easthants.gov.uk
easthants.gov.uk

David Hayward
Public Service Plaza
Havant
Hampshire
PO9 2AX

Enquiries to: Simon Jenkins
[redacted]
Reference:
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Dear David,

Thank you for your letter dated 12 June 2025 and constructive discussion held on 15 May regarding our respective local plans. We appreciate the clarity with which you have updated us on progress with your Local Plan and seeking assistance with unmet housing and employment needs in Havant Borough.

Havant Borough unmet development needs

East Hampshire District Council (EHDC) acknowledges the significant development constraints facing Havant Borough and the associated unmet housing and employment needs you have identified through your Regulation 18 consultation and supporting evidence base. We also note that you originally formally sought assistance with your unmet needs when you responded to our Draft Local Plan consultation in 2024, but since then the goal posts have significantly changed, with the uplift in housing numbers published in December 2024, because of the updated standard method. As a result of these changes and the constraints associated with Havant Borough, we note your formal request under the Duty to Cooperate for assistance in addressing an unmet housing need of at least 9,292 dwellings and an unmet employment floorspace need of 51,424 sqm over the plan period to 2043. Please note that our housing number has hugely increased too, due to the new standard method, with a district-wide housing need of some 1,124 homes per year, compared to 575 homes per year under the previous methodology.

Like us, you have consulted on a draft Local Plan, to which we have just responded (June 2025). However, we note that your draft Local Plan consultation relates to the new standard method and higher housing number, yet ours predated that change. The increase in the housing number in December 2024 has significant implications for East Hampshire, and the level of development that is expected to be delivered over the emerging plan period (at least 15 years). We are already experiencing many speculative applications for new homes due to the local planning authority's housing land supply position.

However, first and foremost, we want to be clear that we are committed to preparing a new Local Plan in accordance with the timescales set out in our Local Development Scheme (LDS), which sees us at Regulation 19 consultation next summer. We also want to be clear that we are taking our responsibility to the delivery of new homes seriously, acknowledging the revised housing number and planning to meet our housing needs. We are also about to publish a Housing Delivery Test Action Plan, which sets out the actions we will be taking to increase the delivery of new homes in East Hampshire. We recognise the Government's commitment to

growth, and will play our part, increasing the number of new homes as much as possible, whilst recognising the environmental constraints present in some areas of our district.

As a local planning authority, EHDC is committed to positively engaging and cooperating with neighbouring authorities to plan strategically for housing and employment growth across the wider area. We recognise the importance of considering unmet needs from neighbouring authorities as part of the evidence base for our emerging Local Plan and as a key aspect of meeting national policy requirements.

We note your housing number has increased from 516 homes a year to 892 homes a year. As mentioned, the East Hampshire district-wide requirement has increased from 575 homes a year to 1124 homes a year. Based on these numbers, in your letter you state, *"there is therefore an unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year). The submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance' of 1,900 dwellings – of which 70% equivalent to 1,330 dwellings would be apportioned to Havant Borough. This would increase overall supply to 8,548 dwellings over the plan period, and reduce unmet need to 9,292 dwellings (or 465 homes per year)".*

In our response to your draft Local Plan consultation, we identify some measures that could help increase the amount of housing that can be planned for in Havant Borough, such as reviewing implementation rates. Every effort should be made to maximise how much housing can be delivered within the constraints that exist – however we do acknowledge that there are significant constraints to development in Havant Borough, the unmet need number is large, and that it is unlikely that there is to be a substantial change to that figure going forward.

East Hampshire Local Plan

East Hampshire is equally not without its constraints and does have some NPPF Footnote 7 constraints, such as SPA and flood zones. Our Local Plan review is progressing, and as part of this process, we will assess our own development capacity in the context of identified needs and constraints. This includes consideration of:

- Local housing and employment needs across the district;
- Environmental and infrastructure constraints;
- The implications of national planning policy and guidance;
- Opportunities to support sustainable patterns of development and effective cross-boundary planning.

We will give due consideration to the unmet needs arising from Havant Borough, alongside other requests from neighbouring authorities, as part of the preparation of our spatial strategy and the development of our Regulation 19 Local Plan. Our approach will be informed by the Integrated Impact Assessment (IIA), infrastructure evidence and site assessments currently in progress.

Although unknown at his time, it is likely that EHDC will be able to meet our own disaggregated housing needs and therefore through due assessment (set out further on) will need to consider to what extent we can meet unmet needs from elsewhere in our Local Plan. We expect to have to meet some proportion of unmet need from the SDNP in East Hampshire, but in addition to Havant Borough, please do note, we have also been formally asked to assist with Portsmouth City Council and Gosport Borough Council's unmet housing needs. We are aware that there are also unmet needs in Chichester District (at examination) and potentially emerging from Waverley Borough (our neighbour) and other Surrey authorities. We will need to consider the extent to which there is a housing market area with these authorities as we consider these requests.

We note that you have also sought assistance from other areas and note Winchester's pending position that is currently being assessed at examination. As such, we would appreciate it if you could keep us updated on the extent of your unmet housing need.

In terms of employment, at present, we have not been asked to meet unmet employment needs from any other authority other than Havant Borough (51,424 sq. m) but appreciate that with additional housing comes employment needs. We have just commissioned an update to our Housing and Economic Development Needs Assessment (HEDNA), so at present, we cannot identify a definitive amount for employment needs in East Hampshire, and as such cannot offer a position on assistance with unmet employment needs from elsewhere. We will be interested to see the outcome of our updated HEDNA and have further discussion with our economic development colleagues to better understand the market for employment land use, as at present, delivery timescales are lengthy.

You specifically ask how we will respond to unmet development needs in the preparation of our Local Plan, noting that Havant Borough is seeking assistance to meet at least 9,292 homes. As noted, we are currently preparing key evidence base to support our Local Plan, including the Integrated Impact Assessment (IIA). Through the collection of information for the Duty to Co-operate, we will identify the amount of unmet development needs that East Hampshire is formally being asked to assist with, and assess our ability to assist with that additional need through the IIA. We will also closely look at housing market areas, and functional economic areas, in relation to the area for which we are being asked to assist. We understand that we will need to clearly document in our Local Plan evidence base that we have fully considered the extent to which we could meet identified unmet development needs, and ultimately set out how much of this need we can meet within the remit of 'sustainable development'. As such, our IIA will assess reasonable alternatives that includes meeting unmet needs.

Gypsy, Traveller and Travelling Showpeople need

Whilst there is a focus by other authorities on East Hampshire to help meet unmet development needs, East Hampshire is likely to have its own unmet need for Traveller accommodation (this is for Traveller pitches and Travelling Showpeople plots), on which it will be seeking assistance.

On 18 August 2023, EHDC contacted Havant and all neighbouring councils asking for assistance with meeting potential unmet Traveller accommodation needs, supported by evidence showing our assessment of sites. Havant Borough Council responded in October 2023, saying *"in terms of our ability to assist with the need for meeting GTAA – the ability to accommodate further pitches in the Borough is likely be challenging. As alluded to the email exchange with Adam last week, the emerging Constraints Study confirms the Borough is exceptionally constrained which will significantly limit our ability to meet general housing need. Within the update to your GTAA, it would be useful to understand whether there is any indication of the geographical spread in terms of the need for pitches particularly within the southern parishes. We have just received an update of our GTAA, and whilst we've yet to review in detail - the expectation is that need and supply for the Borough will remain at 1 pitch".*

Our GTAA is dated 2024, and we are pursuing an update to support our Regulation 19 consultation. Our need for Traveller accommodation (including Travelling Showpeople accommodation) is higher than we can likely accommodate. We note the inclusion of two large development sites in the Havant Borough Local Plan, particularly one for over 2000 homes, and formally ask Havant Borough to consider whether Traveller accommodation could be provided on that site to help meet unmet needs in East Hampshire? (A model of delivery being pursued by many authorities; to make provision for Traveller accommodation on strategic sites as part of the housing mix).

The forthcoming update to the East Hampshire GTAA will consider household connections to Havant Borough, as evidence to support the possibility of provision on large sites in Havant Borough. We wish to continue to discuss this with Havant Borough and seek your co-operation with the update of our GTAA when our consultant attempts to liaise with you. Please consider this a formal request from East Hampshire for your assistance with unmet needs for Traveller accommodation, and a specific request with regards to Site allocation 1 (Soughleigh) and potentially Allocation 25: Campdown.

Future Dialogue

Like you, we acknowledge the close working relationship that has long been established between our two authorities, through previous joint working practices and PfSH. We wish to continue that dialogue with you and our wider Duty to Cooperate partners to understand the scale and spatial distribution of needs across the sub-region, and to explore potential areas of alignment. We would also welcome continued collaboration on the preparation of a Statement of Common Ground at the appropriate time to support Regulation 19 consultations.

We look forward to further conversations as our plans progress towards Regulation 19 stage, and thank you for your positive engagement and co-operation so far. Please do not hesitate to contact us if you would find it helpful to arrange a further meeting.

Kind Regards

Simon Jenkins
Planning and Special Projects Lead