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**Enquiries to:** David Hayward
[redacted]
**My reference:**
**Your reference:**
**Date:** 10 September 2025

Dear Adam

**RE: UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE**

Thank you for meeting us to discuss unmet housing and employment need at our Duty to Cooperate meeting on the 15th May 2025, and your subsequent response dated 21st July 2025.

I can confirm that we have now concluded the most recent set of Duty to Cooperate discussions, which included a formal request to accommodate unmet housing and employment need, with all authorities in the Portsmouth Housing Market Area[1], as well as the South Downs National Park Authority.

We also note your formal request for assistance with unmet need for traveller accommodation, and are pleased to provide the Council's response to this matter below.

**Havant Borough unmet development needs**

Thank you for confirming East Hampshire District Council (EHDC)'s commitment to positively engaging and cooperating with neighbouring authorities to plan strategically for housing and employment growth across the wider area. We welcome your acknowledgement of the significant development constraints facing Havant Borough and the associated unmet housing and employment needs.

Housing

We are mindful that the majority of housing need figures for each local authority in South Hampshire have significantly increased as a result of the 2024 changes to the standard method. It is acknowledged that this represents a significant challenge for Local Plans across the sub-region. We also note that your housing need has also significantly increased and that your draft Local Plan pre-dated this change.

[1] For avoidance of doubt, as well as yourselves this is Gosport Borough Council, Fareham Borough Council, Portsmouth City Council, Winchester City Council and Chichester District Council.

Havant Borough has seen an increase from 516 dwellings per annum to 892 dwellings per annum (an increase of 72%). We have recently set out the implications of the increase to our standard method figure and the impact that this has had on our unmet need position in response to Winchester's Local Plan examination[2]. In effect, our unmet housing need position has more than doubled from 4,309 to 9,292 dwellings.

We also note your response to our recent Draft (Regulation 18) Local Plan consultation which includes a number of suggested measures to increase the amount of housing that can be planned for in Havant Borough. We have set out our initial thoughts on these matters below.

*Plan period*

EHDC queries whether 2023 is the most appropriate start date for the plan period when more recent commitment data is known for the base period 1st April 2024. In this respect, we are keen ensure that our unmet housing need position is not overestimated. We will be reviewing the implications for changing the start of the plan period, and will be happy to share the results of this analysis with you in due course. An amended plan period start date will also be informed by the timescales for our Pre-Submission Regulation 19 consultation.

Please note however, this is unlikely to have a significant impact on the high level of unmet need that exists within Havant Borough. The precise amount of unmet need will of course further fluctuate between now and the examination due to, for example, annual data returns on housing completions. But it is unlikely this will change the overall picture of unmet need.

*Non-implementation rates*

We note your comments relating to the 15% non-implementation discount applied to larger sources of housing land supply, and the 5% non-implementation discount applied to small sites – the latter of which is consistent with East Hampshire's approach.

Given the Council is not able to address its housing needs in full, it has proposed a housing requirement based on development capacity. The housing requirement is based on the total number of homes (7,218 new homes (net)) that can be provided across a 20 year period, equivalent to around 361 dwellings per annum. However, this does not provide for any flexibility in the event that housing does not come forward at the expected rate, and/or for any non-implementation of sites. The alternative would be to set a housing requirement below the identified development capacity. However, this would not be effective or be positively prepared.

We will further consider the approach to the non-implementation rates applied, and whether any evidence is required to support this approach for the Pre-Submission Regulation 19 Plan. We would be happy to discuss this further through our Duty to Cooperate discussions.

[2] https://www.localplan.winchester.gov.uk/examination-page/responses-to-inspector-note-15-implications-of-changing-the-local-plan-period

*Windfall*

You will be aware that an updated Windfall Analysis paper was published alongside the Draft Regulation 18 Local Plan. Compared to earlier iterations of this analysis, an additional stage of analysis was undertaken to reflect key principles of the development strategy. However, it also removed any study threshold, as all sites delivering a net gain of 1 dwelling or more were included in the analysis. The spreadsheet detailing the past windfall rates between 1st April 2013 to 31st March 2024 can be provided on request.

Thank you also for identifying the discrepancy in the Windfall Analysis paper in terms of when windfall delivery is due to commence. I can confirm that windfall delivery is projected to commence from year 4 of the plan period as set out in paragraph 2.5 of the analysis.

Employment

Thank you for acknowledging our unmet need position on employment need. We note that East Hampshire District Council is not currently able to offer a position on whether it is able to assist with unmet employment needs. I also note that the Council has just commissioned an updated Housing and Economic Development Needs Assessment (HEDNA). I should be most grateful if you could please keep me updated on the progress of this study. In particular, it would be helpful to understand whether an updated position will be available in advance of consultation on East Hampshire's Regulation 19 Local Plan. Perhaps we could convene a further meeting once there are draft results of the study?

**East Hampshire Local Plan**

Thank you for setting out the process by which you will be responding to unmet development needs in the preparation of your Local Plan, which will include the preparation of key evidence base including the Integrated Impact Assessment. We appreciate the need for you to have first fully considered your ability to meet your own identified development needs, before considering whether unmet needs of neighbouring areas can be planned for. We strongly support your proposal to assess the District's ability to assist with unmet development needs through an Integrated Impact Assessment (IIA). In particular, we welcome confirmation that the IIA will assess reasonable alternatives that include meeting unmet development needs. We would recommend that this approach is reflected in the Transport Assessment and other evidence base studies.

Indeed, we are acutely aware of the wider unmet need arising out of southeast Hampshire having received similar Duty to Cooperate requests from Portsmouth City Council and Gosport Borough Council. We also note that the South Downs National Park Authority's commitment to leaving no stone unturned in meeting identified development needs.

**Gypsy, Traveller and Travelling Showpeople need**

Thank you for updating us on the forthcoming review of the East Hampshire Gypsy and Traveller Accommodation Assessment (GTAA). We will be very pleased to discuss this with you, as well as providing any information or data that the Council or its consultant may require to update this part of your evidence base.

We also note your formal request under the Duty to Cooperate for assistance with unmet needs for Traveller accommodation, and questions in relation to whether two of the larger development sites in Havant Borough could accommodate Traveller accommodation to assist with East Hampshire's unmet needs.

By way of background, the Council's 2024 Gypsy and Traveller Accommodation Assessment concludes that there is no identified unmet need for Gypsy and Traveller pitches or Travelling Showpeople plots within Havant Borough. Though the 2017 joint GTAA did identify that Havant Borough had a need to provide 1 pitch, this need has now been met through a permission for 2 pitches at a site in Long Copse Lane in northern Emsworth. The Draft Local Plan proposes to safeguard this site for current need.

Thank you for acknowledging the significant constraints that affect Havant Borough's ability to meet general housing need. To confirm, the Council has not had any sites proposed to meet gypsy and traveller needs. The only option that Havant Borough would have would be to explore whether unmet need for gypsy and travellers from neighbouring areas general housing allocations.

In this regard, we note your specific request as to explore the potential for gypsy and traveller pitches as part of Allocation 1: Southleigh and potentially Allocation 25: Campdown which are proposed housing allocations Council's Draft Local Plan. In terms of the latter, there is a currently a live planning application reference APP/23/00488 on land at Campdown. Given this scheme is relatively advanced in the planning system, it unlikely that the Borough Council will be able secure any gypsy and traveller accommodation in that location.

The majority of the land included within the Southleigh allocation is being promoted by Bloor Homes who have recently undertaken some public consultation events with a view to submitting an outline planning application later this year. Given that we do not yet have a formal planning application for Southleigh, we would be happy to explore whether the site promoter would consider the provision of gypsy and traveller pitches as part of the overall development.

However, clearly there is a deliverability question in terms of whether part(s) of the site would be available for that purpose, and the provision of such pitches which would inevitably reduce the amount of available developable land. This in turn would negate our ability to address our own housing need within the Borough's boundary. This in turn, would potentially increase the extent of our unmet need, and 'ask' of our neighbouring authorities including East Hampshire. We would obviously wish to avoid such a situation.

**Future dialogue**

We welcome the District Council's willingness to continue dialogue with us and wider Duty to Cooperate partners to understand the scale and spatial distribution of unmet need across the sub-region.

I look forward to continuing our constructive and active discussions to effectively address unmet needs and look forward to prepare a Statement of Common Ground to support our Regulation 19 Local Plan consultations in due course.

Yours sincerely

[redacted]

Strategic Planning Manager