EAST HAMPSHIRE DISTRICT COUNCIL

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

Enquiries to: [redacted]

Lucy Howard, Head of Planning Policy (Portsmouth City Council)

David Hayward, Strategic Planning manager (Havant Borough Council)

Jayson Grygiel, Manager of Planning Policy (Gosport Borough Council)

11 November 2025

Dear Lucy, David and Jayson,

Re: Formal Response to Request for Assistance with Unmet Housing and Employment Needs – Duty to Cooperate

Thank you for your joint letter dated 13 October 2025, and for the constructive discussions held at the Duty to Cooperate meeting on 9 October 2025. East Hampshire District Council (EHDC) welcomes the opportunity to continue working collaboratively with neighbouring authorities to address strategic planning matters across South East Hampshire.

We acknowledge the significant unmet housing need of **18,347 homes** and employment floorspace deficit of **19,973 sqm** identified across Gosport, Havant and Portsmouth, as set out in your letter and supporting evidence. We appreciate the comprehensive analysis undertaken and recognise the shared challenges posed by land constraints and environmental considerations.

East Hampshire Context

EHDC is currently preparing a new Local Plan, with Regulation 19 consultation scheduled for summer 2026. The uplift in housing need resulting from the 2024 standard method has had a substantial impact on our district. The district-wide housing need has increased from **575 homes per annum** to **1,124 homes per annum**, representing a **95% increase**. This is one of the highest percentage increases nationally.

Our district is further complicated by the presence of the South Downs National Park (SDNP), which covers approximately **57% of East Hampshire's geographical area** and is a separate local planning authority. Based on joint work with the SDNPA and other similarly affected authorities, recent evidence supports disaggregating housing need based on housing stock. With **26% of East Hampshire's housing stock** falling within the SDNP, the residual housing need for the EHDC Local Planning Authority area is approximately **828 homes per annum**, equating to **14,904 homes** over the emerging plan period (2025–2043).

The SDNPA has consulted on a Regulation 18 draft Local Plan proposing up to **90 homes per annum** in East Hampshire, leaving a shortfall of **206 homes per annum** or **3,708 homes** over the plan period.

Consideration of Unmet Needs

EHDC is committed to positively engaging with neighbouring authorities under the Duty to Cooperate. We recognise the development constraints faced by Gosport, Havant and Portsmouth, and the efforts made to identify and quantify unmet needs. We also acknowledge the advice from the Planning Inspectorate regarding the importance of timely engagement.

As part of our Local Plan preparation, we will give due consideration to the unmet housing and employment needs of your authorities. This will be informed by:

- Our Integrated Impact Assessment (IIA), which will assess reasonable alternatives including meeting unmet needs;
- Infrastructure evidence and site assessments currently in progress;
- The identification of housing market areas and functional economic market areas (FEMA), including the limited extent of the Portsmouth HMA within East Hampshire (primarily the southern parishes of Clanfield, Horndean and Rowlands Castle);

We are also mindful of potential unmet needs emerging from Chichester District, Waverley Borough and other Surrey authorities, and will assess the extent to which these relate to East Hampshire's housing market geography.

At this time, it is currently unknown whether EHDC will be able to meet its own disaggregated housing needs and therefore through due assessment will need to consider to what extent we can meet unmet needs from elsewhere in our Local Plan. Should a surplus of housing capacity be identified as part of a suitable development strategy, it is envisaged that unmet needs from the SDNP in East Hampshire would be prioritised.

Employment Needs

To date, Havant Borough is the only authority to have formally requested assistance with unmet employment needs. However, we support the positive joint working between your authorities that has reduced the amount of unmet employment needs but appreciate there remains a modest deficit. EHDC has commissioned an update to its Housing and Economic Development Needs Assessment (HEDNA) and Employment Land Review (ELR), which will inform our position on employment land provision and any potential capacity to assist neighbouring authorities.

Traveller Accommodation

EHDC is likely to have its own unmet need for Traveller and Travelling Showpeople accommodation. We will be seeking assistance from neighbouring authorities, including those within the Portsmouth HMA, and would welcome reciprocal consideration of this matter.

Next Steps

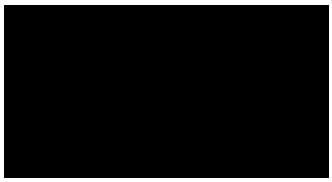
We acknowledge that the same letters have also been sent to Winchester City Council and Fareham Borough Council due to their links within the wider HMA and FEMA; but consider it is important that approaches are made to local planning authorities beyond those areas due to the substantial amount of unmet need.

We wish to continue our dialogue with you all 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 Statements of Common Ground at the appropriate time to support Regulation 19 consultations and beyond.

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

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.

Yours sincerely,



Adam Harvey

Planning Policy Manager