Statement of Common Ground Portsmouth City Council & East Hampshire District Council

July 2024





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1. Introduction

What is a Statement of Common Ground?

- 1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between Portsmouth City Council (PCC) and East Hampshire District Council (EHDC). It sets out the position and understanding with respect to key cross boundary strategic issues between the two authorities. It is not binding on either party but sets out a clear and positive direction to inform ongoing strategy and plan making. It should be noted that this is a bilateral agreement between these two authorities only.
- 1.2 The Planning and Compulsory Purchase Act 2004 introduced the Duty to Cooperate which placed a legal duty on local planning authorities, and other prescribed bodies to engage constructively, actively and on an ongoing basis to develop development plan documents, in respect of strategic matters. The Levelling Up and Regeneration Act (LURA) was enacted in November 2023. When its secondary legislation is implemented, the Duty to Cooperate will be removed. It is not yet clear what if anything will replace it. The Duty to Cooperate remains in place until the secondary legislation is implemented.
- 1.3 Section 33A of the Localism Act 2011 specifically relates to strategic matters. Despite the removal of the Duty to Cooperate by the LURA, PCC and EHDC agree on the importance of continuing to work on their strategic cross boundary issues.
- 1.4 This SCG has been prepared in accordance with the NPPF and guidance prepared by the Planning Advisory Service (PAS) on this matter. It has been prepared in parallel with both the Draft East Hampshire Local Plan (Regulation 18) and Portsmouth Pre-Submission Local Plan (Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012¹).

What does this document include?

- 1.5 Section 2 outlines the strategic geography of Portsmouth City and East Hampshire District
- 1.6 Section 3 sets out the key cross boundary strategic issues addressed by this SCG with an agreed position between the two Councils on each issue. Where relevant areas of disagreement are also set out.

2. Strategic Geography

2.1 Portsmouth City lies adjacent to the Solent on the southern coast of England. The majority of the City's landmass is on Portsea Island and therefore it has a unique geographic location and relationship to the sea. The authority comprises approx. 40.1 square kilometres and is home to approx. 208,100 people, with a population density higher than some parts of London.

¹<u>The Town and Country Planning (Local Planning) (England) Regulations 2012 (legislation.gov.uk)</u>

- 2.2 The district of East Hampshire covers approximately 514km₂ of the eastern part of the county of Hampshire. There are roughly 120,000 people living in the district, part (57%) of which benefits from being in the South Downs National Park. The district is home to more than 6,000 businesses (most of which are small businesses) and is mostly rural with the largest towns being Petersfield (in the South Downs National Park) and Alton. The A3 running through the district provides good access to Guildford and on to London, and to the south to Portsmouth. There are also good connections to Winchester and Farnham via the A31. The South Downs National Park is its own planning authority area, and as such prepares its own Local Plan. East Hampshire District Council plans for the area in East Hampshire outside of the South Downs National Park.
- 2.3 East Hampshire District lies inland and to the north of Portsmouth. The two authorities are not immediate neighbours with parts of Havant Borough lying in between the two; the two authorities are approximately three miles apart at the closet point. The southern parishes of East Hampshire District, south of the South Downs National Park, form part of the wider Portsmouth housing market area.
- 2.4 Portsmouth is significantly constrained in terms of geographical area, with the Solent to the south and the large natural Harbours to the east and west. This limits the space for potential development in the City to largely brownfield land. Most of the brownfield sites in the City have significant constraints such as contamination, historic structures and complicated ownership.
- 2.5 The planning area of East Hampshire is split into three distinct areas, separated by the South Downs National Park. In the East Hampshire Draft Local Plan, the distinct areas are referred to as the North, the North-East and the South. The areas are shown in green on the map below.



- 2.6 East Hampshire is a rural district, consisting of countryside land surrounding villages and settlements. Areas are constrained by environmental and heritage considerations such as Special Protections Areas, Special Areas of Conservation, Sites of Special Scientific Interest, Scheduled Ancient Monuments, Ancient Natural Woodland, Registered Parks and Gardens and areas of medium and high Flood Risk.
- 2.7 This SCG relates to the cross boundary strategic matters between PCC and EHDC as shown on the map below.

Partnership for South Hampshire

2.8 Portsmouth City and East Hampshire District are active members of the Partnership for South Hampshire (PfSH), which was originally formed in 2003 as the Partnership for Urban South Hampshire (PUSH). It is a partnership of district and unitary authorities, together with Hampshire County Council and the New Forest National Park Authority, working together to support the sustainable growth of the South Hampshire sub-region. The area covered by PfSH and the authorities involved is shown in figure 1.



Figure 1: Map of the Partnership for South Hampshire sub-region

- 2.9 The Partnership has a strong track record in collaborative working to achieve common goals in South Hampshire. The Partnership was heavily involved in the production of a sub-regional strategy for development that formed part of the South East Plan. This strategy was tested through public examination and when adopted by the Secretary of State, formed part of the development plan at that time and informed the production of local plans.
- 2.10 The ethos of collaborative cross boundary working continued in South Hampshire after the abolition of regional planning and the revocation for the South East Plan in 2013. As well as joint working between member authorities, PfSH works with partner agencies in the sub-region and Government departments to deliver joint strategies and pool resources. PfSH has successfully developed a number of innovative solutions to challenging issues and thus unlocked development in the sub-region whilst recognising its constraints.
- 2.11 A number of Statements of Common Ground have been produced by PfSH over the years. The last one was signed by Joint Committee, which includes leaders or representatives of all authorities, in September 2023^[1]. It sets out the key strategic cross-boundary planning issues including housing needs and the methodology and framework for the preparation of the new Spatial Position Statement published in December 2023. It set out a snapshot of housing need and supply in the sub-region divided up between its constituent local authorities from 2022-36. The overall deficit was estimated to be 14,531 homes at that time. The Statement of Common Ground states that the shortfall is best defined as need that is not yet planned for, rather than need that it is definitively unmet. It states that the shortfall would diminish over time as local plan reviews get underway and emerging plans are progressed.

- 2.12 The Statement of Common Ground identifies six local planning authorities that are less likely/unlikely to meet their housing needs: New Forest District, New Forest National Park Authority, Southampton, Gosport, Portsmouth and Havant. It states that the PfSH authorities are taking a two-stage approach to addressing the needs of those authorities that are unable to meet their housing needs in full. In the first stage, the following authorities are identified as more likely to be able to meet and potentially exceed their housing need: East Hampshire, Eastleigh, Fareham, Test Valley and Winchester. The precise contribution from each authority will be determined through their respective local plan processes.
- 2.13 In the longer term and in stage two, Broad Areas of Search for Growth identified in the Spatial Position Statement will be considered through Local Plans. These were identified by considering the combination of a relative absence of strategic constraints, relative proximity to opportunities and services, and their scope in principle for good public and active travel connectivity. The broad areas would require further investigation and technical work to determine their suitability as specific locations for development, and to test their capacity, deliverability, infrastructure and mitigation needs to achieve allocations in Local Plans. A preliminary assessment suggests that the areas of search have a combined capacity for around 7,500 dwellings, subject to deliverability, infrastructure and mitigation.
- 2.14 Growth in the sub-region is constrained as it is bounded by two national parks, an Area of Outstanding Natural Beauty, the coast/estuaries, a range of international, national and local biodiversity designations and it needs to accommodate land for biodiversity mitigation and net gain. South Hampshire is already heavily built up in places, with areas of valued countryside often important in landscape terms or as settlement gaps protecting the identity of individual towns and villages. Some areas are less accessible by public transport. The Statement of Common Ground states that the need to accommodate significantly more homes for people in the medium and longer term, including in the areas of search, will need to be carefully tested through local plans against all of these important characteristics to achieve the optimum solution.
- 2.15 The PfSH Spatial Position Statement^[2] was approved by Joint Committee in December 2023. It aims to provide guiding principles for local plans to help deliver sustainable development within South Hampshire. It should be noted that it is not an upper tier plan with which future local plans will need to conform. It does, however, help inform the preparation and strategic co-ordination of local plans under the duty to cooperate. Table 1 of the Spatial Position Statement compares housing need and supply along with shortfalls and surpluses for each local authority in PfSH as a snapshot in time. On this basis the latest shortfall is 11,771 dwellings (2023 2036). Several evidence based documents^[3] supporting the Spatial Position Statement were published at the same time including the Broad Areas of Growth Assessments.
- 2.16 The Spatial Position Statement retains the strategic principle of focusing growth on cities/urban areas first to maximise housing delivery within existing urban areas and identifies a number of existing strategic development locations in SPS7. It also identifies new Broad Areas of Search for Growth in SPS8 as follows:
 - South-east/east of Eastleigh Town (Eastleigh)
 - Havant Town Centre (Havant)
 - Waterlooville Town Centre (Havant)
 - Southleigh (Havant)
 - East of Romsey (Test Valley)

- South-west of Chandler's Ford (Test Valley)
- East of Botley (Winchester)
- 2.17 The sites that fall within the broad areas of search will need to be tested through the local plan preparation process, including against other sites that may be available or promoted within individual local planning authority areas. The local plan process will also need to resolve the quantum and form of development on sites and the infrastructure that will need to be provided to support development and make it sustainable. It should be noted that no new Broad Areas of Search for Growth were identified in East Hampshire.

3. Key Cross boundary Strategic Matters

3.1 This section sets out where agreement has been reached on cross-border strategic matters, or where further work to reach common ground is required. It should be noted that all the figures relate to the plan period for the Portsmouth Local Plan of 2020-2040.

Housing

Portsmouth City Council's Position

Housing Need	Housing Supply	Unmet need
17,980 2020-40	13,603	• 4,377
		• 800 from FBC)
		 3,577 outstanding
899 per year	680 per year	219 per year

PCC position

- 3.2 Portsmouth City Council has recently prepared its Regulation 19 Local Plan for consultation. The plan is currently expected to go out to consultation in spring of 2024 and be submitted to the Secretary of State in Autumn 2024. The Local Plan will cover the period to 2040.
- 3.3 The standard method sets a housing need of 899 homes per year for the City. The Council commissioned a Housing and Economic Development Needs Assessment (HEDNA), which forms part of the evidence base for the Local Plan. The HEDNA assessed data relating to demographic trends and economic growth scenarios that point to Portsmouth's housing need being much lower than the standard method. This is due to household and population growth being far weaker than was projected in the 2014-based projections; analysis of past housing completions does not point to this lower growth being attributed to reduced housing delivery. The HEDNA found that an estimate of housing need based on trend-based population projections point to a need of up to 655 dwellings per annum. If this is set against job growth scenarios then a housing need ranging from 431 to 634 dwellings per annum is produced. These alternative analyses of housing need suggest that actual housing need for Portsmouth is in a downward direction to levels which are clearly below the standard method figure. It is not, however, definitively clear that exceptional circumstances exist for the Local Plan to adopt a

housing need figure lower than the standard method. The HEDNA also identifies a need for 851 affordable homes per year.

- 3.4 To meet the full housing need set by the standard method of 899 homes per year is extremely difficult in the context of Portsmouth and its geography. Portsmouth is a physically compact City with many constraining factors, including its wealth of nature and heritage designations, that limit space for development growth. The reality is that land availability and housing delivery in the City is a major challenge, which means that the Local Plan has an important role to play in balancing the wide range of competing development needs and the need to protect or enhance the quality of the environment, in order to plan for the long-term sustainable growth of the City. Despite this challenge, however, the Council has sought to plan positively and to establish through its Housing and Economic Land Availability Assessment (HELAA) the level of housing delivery that could be achieved based upon the capacity of the City.
- 3.5 Based upon the assessment carried out through the HELAA, the Local Plan has set a housing target for Portsmouth of 13,603 new homes from 2020 to 2040 or approximately 680 new homes per year. This figure is a 'capacity-based' target based on the level of housing that can be realistically achieved within the plan period having regard to Portsmouth's constraints, land availability, and development capacity. Nevertheless, the Council has sought to leave 'no stone unturned' in robustly and positively identifying all sources of potential housing supply, whilst being pragmatic in its assessment of delivery from permitted sites and HELAA sites through the application of a 'non-implementation discount'.
- 3.6 Whilst the housing target does not meet the standard method housing need in full, it does meet and exceed the level of housing need that may actually exist as assessed through the HEDNA of up to 655 dwellings per annum (if solely using the trend-based population projections) or the range of 431 to 634 dwellings per annum (if set against job-growth scenarios). The NPPF states that the outcome of the standard method is an advisory starting point for establishing a housing requirement. The City Council therefore considers that the housing target set in the emerging Local Plan as both justified and consistent with Government policy.
- 3.7 The City Council has an unmet housing need of 4,377 dwellings against its housing need. The City Council has written to its immediate neighbours (Gosport Borough Council, Havant Borough Council, Fareham Borough Council, and Winchester City Council, as well as non-immediate neighbours East Hampshire District Council) to ascertain if they are able to accommodate its unmet need. Fareham Borough Council confirmed through its Local Plan that it would accommodate 800 dwellings of the City's unmet need.

Housing Need	Housing Supply	Unmet need
9082, 2021-2040	9,725	0
478 per year		

East Hampshire District Council's Position

3.8 EHDC's Draft Local Plan (2024) identifies a housing need of 9,082 dwellings over the plan-period (2021-2040), which is equivalent to 478 dwellings per annum (dpa). This draft requirement figure is based on taking a disaggregated approach to the local housing need derived from the standard method. Based on this approach, the local

housing need for the local planning authority area that lies outside the National Park is 8,816 dwellings (464 dpa). However, the Draft Local Plan (2024) has taken a pragmatic approach in regard to potential unmet need associated with the South Downs National Park based on historic agreements and past delivery trends, which suggests unmet needs of 14 dpa (266 dwellings over the plan period). This results in a total housing need of 9,082 dwellings.

- 3.9 In terms of housing supply, the Draft Local Plan notes that current supply is 6,225 dwellings once completions (2021-23), commitments and a windfall allowance has been taken into account. This leaves a residual requirement of 2,857 dwellings. However, the Draft Local Plan has proposed a further 3,500 dwellings via allocations, representing a total supply of 9,725 dwellings and an identified surplus of 643 dwellings. Whilst there may appear to be some overprovision, the Draft Local Plan makes clear that there needs to be some allowance for flexibility and to allow for sites allocated not coming forward during the Plan Period. Therefore, sites capable of supplying a further 643 dwellings are proposed for allocation to create a buffer. Draft Local Plan Policy S1 acknowledges that no assumptions are made on the unmet needs of other neighbouring local planning authorities (with the exception of the SDNPA), but any dwellings surplus to the identified requirements could be attributed to any future identified unmet need.
- 3.10 PCC wrote to EHDC on the 31st of January 2024 requesting that EHDC help meet Portsmouth City Council's unmet housing need.
- 3.11 On EHDC wrote back on 6th March 2024 to confirm that 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 the Interim Housing and Economic Needs Assessment (HEDNA, 2018), East Hampshire has housing market area relationships with both Portsmouth and Havant to the south and historic work to define housing market areas has previously identified land in East Hampshire to the south of Petersfield as forming part of a Portsmouth Housing Market Area. 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)
- 3.12 The East Hampshire Draft Local plan 2040 identified land that would provide additional homes to meet the housing needs of the planning area, noting however potential unmet needs from the SDNP in East Hampshire. This provides flexibility, but is also mindful of the emerging unmet needs elsewhere, particularly in relation to the South Hampshire subregion. East Hampshire is likely to be asked to help meet unmet needs from other areas, and already has been asked by Havant Borough Council, which is neighbour to East Hampshire, and separates East Hampshire from Portsmouth City.
- 3.13 East Hampshire District Council is carefully considering the responses to the recent consultation on the Draft Local Plan and will consider further the deliverability of sites and potential unmet needs identified. East Hampshire expects to accommodate some unmet needs from areas that can evidence a functional relationship with areas of the district but the extent of that has not yet been evidenced with deliverable sites within the plan period or agreed. The amount of unmet housing need identified in Portsmouth City (3,577 homes) exceeds the number of new homes that new land is being identified for as allocations in the East Hampshire Draft Local Plan (3,500 homes), which already

represents a surplus of 643 dwellings when compared to the identified local housing need. To fully assist with Portsmouth City's unmet needs would double the amount of land that has been allocated in the East Hampshire District Draft Local Plan, which cannot be done without significant harm to the District, and would unlikely be deliverable in the plan period.

Agreed Position

- 3.14 EHDC is not able to fully meet the unmet housing needs of Portsmouth City. Whilst East Hampshire has housing market relationships with Portsmouth and Havant to the south, this is confined to the southern parishes of Horndean, Clanfield and Rowlands Castle. Further land to the north falls within the SDNP, a separate planning authority, which would be restricted to the principles associated with a National Park designation. Whilst there are a number of sites promoted for development in the southern parishes (as evident in EHDC's Land Availability Assessment (LAA)), many have been considered unsuitable for development when further assessed as part of the emerging evidence base for the new Local Plan.
- 3.15 The PfSH Spatial Position Statement (2023) outlines a number of key principles in regard to meeting the development needs of the South Hampshire region. There is an emphasis on a cities/urban areas 'first' approach, maximising development potential within cities and urban areas. East Hampshire is a predominantly rural area, with limited Brownfield opportunities, especially in the southern parishes.
- 3.16 The Position Statement also seeks to focus development in locations which will help provide the opportunity for travel by sustainable modes, and which can help to support strategic investment in improving public transport, walking and cycling infrastructure. It also seeks to protect and enhance countryside gaps in order to maintain the distinct identity of settlements and avoid urban sprawl. The Southern Parishes within East Hampshire are considered relatively inaccessible and there are also large areas falling within strategic/settlement gaps. This is evident in the PfSH 'Broad Areas of Search for Growth Assessments', which highlighted that sustainable growth in South Hampshire was challenging, especially in the parts of East Hampshire that fall within the PfSH area. This resulted in no 'Broad Areas of Search for Growth' being identified in the district.
- 3.17 Although no 'Broad Areas of Search for Growth' were identified in East Hampshire, it is noted that the emerging East Hampshire Local Plan will need to conduct further detailed work in terms of environmental and transport constraints and the suitability of allocating potential sites for development, which could include some potential unmet need. EHDC will work with the Highway Authority for the planning area (Hampshire County Council) to ensure that the relevant objectives of the Hampshire Local Transport Plan 4 for development and masterplanning are capable of being met. These objectives include locating new development to reduce the need to travel and to reduce dependency on the private car. In this context, the East Hampshire Accessibility Study (January 2024) demonstrates that few LAA sites within the southern parishes perform very well in respect of their accessibility to facilities and services by active modes of transport (see Figure 4.5 and Table 4.1 of the study).
- 3.18 EHDC will consider the identified unmet needs of Portsmouth City (and Havant Borough Council) as it continues preparation of its Local Plan. This will be done through evidence base work and the Integrated Impact Assessment.

- 3.19 To appropriately meet unmet needs in another area, there must be a functional relationship with that area. The areas in East Hampshire identified as the North and the North East do not have a functional relationship with Portsmouth City, and are not suitable to meet unmet needs of Portsmouth City. If unmet needs of Portsmouth City were to be accommodated by East Hampshire, this could only potentially be possible in the East Hampshire Southern Parishes ("the South").
- 3.20 EHDC and PCC will continue to work collaboratively to address strategic cross boundary planning matters, both through PfSH and, as necessary, on a bilateral basis.

Differences in position

Employment

PCC Employment position

Employment Need	Employment Supply	Unmet need
138,800 sqm	138,429 m ²	0

EHDC Employment position

Employment Need	Employment Supply	Unmet need
28,500 sqm	28,500 sqm	0

PCC position

- 3.21 Much of the evidence on economic development that supports the Local Plan both in regard to the need and the supply of employment land is provided by the HEDNA. This analysed the outlook for employment growth up to 2040 in Portsmouth and the results of the analysis were used to inform the employment floorspace and land needs forecasts. Oxford Economics forecasts were used as a baseline and these were adjusted as an alternative, drawing on policy initiatives, stakeholder engagement and sector analysis. The Council's employment targets set out in the Economic Development and Regeneration Strategy are for 7,000 jobs between 2017 and 2036. Oxford Economics forecast 10,500 jobs (net) over this period which suggests the target is wholly achievable. The HEDNA considered that notwithstanding the impacts of Brexit and the Covid-19 pandemic that overall the employment outlook in terms of total jobs remains positive.
- 3.22 The Council's HELAA identified and appraised all possible sources of new economic land in the City. The supply of new employment sites in the HELAA is very limited due to the constrained geography of Portsmouth. A number of low quality employment sites identified in both studies were considered and some found suitable for housing.
- 3.23 Drawing the need (42,500m2) and supply (58,645m2) positions from the HEDNA and HELAA together there is indication of a potential small over-supply of office floorspace subject to a more pronounced return to office usage in the future. The position in terms of combined manufacturing, warehousing and research and development need (96,300m2) and supply (79,784m2) is that there is a small under-supply. It should be

noted that there is flexibility between the E class uses of offices and research and development. Overall there is an approximate balance between all types of employment need and supply.

EHDC position

- 3.24 EHDC commissioned a HEDNA to inform preparation of its Local Plan, this was published in May 2022. The HEDNA covers both EHDC and SDNP LPA's and concluded that there was a gross employment land need of 28,500sqm or 5.7ha of land over the plan period. This quantum however, represents as relatively stable position given changes in industrial and office demand and that the need identified would be met through the implementation of existing sites allocated for employment uses and sites with planning permission for such purposes.
- 3.25 In terms of EHDC LPA area the HEDNA acknowledged the pipeline of supply for employment development on sites with planning consent for 21.5ha, most of which is focussed at Bordon with some in Alton.

Agreed Position

3.26 Both Councils agree to liaise on future employment supply and demand, and will continue to engage through the Partnership for South Hampshire on employment needs and the distribution of economic development between authorities and within the wider South Hampshire sub region.

Transport

PCC position

- 3.27 The majority of Portsmouth is located on Portsea Island which has three road and one rail link to the mainland. Portsmouth is home to an international ferry port with connections to the Continent and Channel Islands, as well as links to the Isle of wight by ferry and hovercraft. As a unitary authority Portsmouth is also the Transport Authority and adopted its Local Transport Plan 4 (LTP4) in October 2021 which details the Council's vision for travel in Portsmouth until 2038. In February 2024 Portsmouth City Council received their Strategic Transport Assessment. The study identified a number of junctions where congestion issues were expected. Seven road junctions in the city were identified for mitigation. The results of modelling show that the preferred mitigations generally impact the trip distribution across the Portsmouth network positively.
- 3.28 LTP4 sets out our priorities towards sustainable travel such as cycling, walking and public transport, which will help us to develop cleaner air and healthier lifestyles for everyone who lives, works, visits and studies here.
- 3.29 The City Council has undertaken a Transport assessment that shows that the preferred mitigations included in the study generally impact the trip distribution across the Portsmouth network positively.

EHDC position

- 3.30 To support the Draft Local Plan consultation 2024, East Hampshire District Council prepared a <u>Transport Background Paper</u>, which details the current provision of road, rail, bus, walking and cycling infrastructure in East Hampshire. The Background Paper also provides evidence regarding existing transport related carbon emissions, travel patterns, air quality, accessibility, road safety and parking standards. Current transport issues are identified as well as how these could be addressed by the East Hampshire Local Plan. This document sets out East Hampshire District Council's current travel patterns and provision of transport networks.
- 3.31 A transport assessment for the East Hampshire Local Plan has commenced with the first stage being the production of an accessibility study for the planning area (as noted above). This study identifies the relative accessibility of facilities and services across the planning area by walking and cycling modes, indicating the strengths and weakness of different locations for 'living locally' and supporting modal shift towards more sustainable forms of transport. East Hampshire District Council will use the results of its accessibility study, as part of its emerging transport assessment and in conjunction with other evidence base studies, to understand where future growth could and should be focused. This accords with strategic principle 5 of SPS1 of the PfSH Spatial Position Statement 2023.
- 3.32 The second stage of the transport assessment to support the East Hampshire Local Plan is currently planned to commence Summer 2024. This second part of the transport assessment aims to provide evidence of the forecast cumulative highway impacts, in the district, from proposed Local Plan development. Any required mitigation, in the form of highway and/or sustainable transport interventions, will also be included.
- 3.33 To note, Hampshire County Council LT4 has now been adopted.

Agreed Position

3.34 The two authorities are separated by Havant Borough (who also have acknowledged a high level of unmet need), however there are good road and rail links from Portsmouth to the southern and eastern parts of East Hampshire District. The two authorities will work together and with Hampshire County Council to promote improved sustainable transport connections.

Differences in position

HRA (including Nitrates)

PCC Position

3.35 PCC approved its updated Interim Nutrient Neutral Mitigation Strategy for New Dwellings, in 2022. The Strategy to date focused on the use of mitigation credits largely accumulated from water efficiency upgrades to the Council's housing stock to ensure there is no net increase in nitrogen output from the City. The credits created through

water efficiency measures have been used to create a credit bank the council uses to enable housing delivery in the City.

3.36 The Council has also purchased credits to enable the equivalent to approximately 1,000 dwellings worth of credits from the Hampshire and Isle of Wight Wildlife Trust (HIOWWT) The HIOWWT has developed a nature-based solution to provide nitrogen mitigation. The City Council is also working closely with PfSH to ensure future long term nitrate credit delivery.

EHDC position

3.37 The Council unlike Portsmouth City Council falls within both the Solent and the Test/Itchen catchment and is therefore affected by nitrogen and phosphorus pollution. Although the Council does not own any off-site mitigation scheme itself, it has signed up to others so that developers are able to purchase credits when required for nitrogen mitigation. However, although this does not affect Portsmouth City Council, there are currently no known phosphorus mitigation schemes available which can assist the small part of the Planning Authority area which falls within the Itchen catchment affected by phosphorus pollution. Unfortunately, the area in question lies at the headwater of the River Itchen hence no mitigation is available. PfSH, however, through recent available funding are looking into possible solutions which may help to mitigate this issue.

Agreed Position

3.38 The two authorities will continue to work together through the PfSH SEPO to identify opportunities for nutrient offsetting in Hampshire.

4. Signatories

- 4.1 Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.
- 4.2 Both parties agree that they have engaged positively on an ongoing basis both bilaterally and multilaterally through the Partnership for South Hampshire and that on this basis the Duty to Cooperate has been met.
- 4.3 Both parties agree that there are no substantial areas of disagreement between the parties relating to the emerging Portsmouth Local Plan and will both continue to work proactively on the key strategic cross boundary issues identified int this SCG.

Signed:	Signed:	
androgen	Angela S.L. Glass	
Name: Lucy Howard	Name: Cllr Angela Glass	
Position: Head of Planning Policy	Position: Portfolio Holder, Regulation and Enforcement	
Portsmouth City Council	East Hampshire District Council	
Date: 03.07.2024	Date: 04.07.2024	