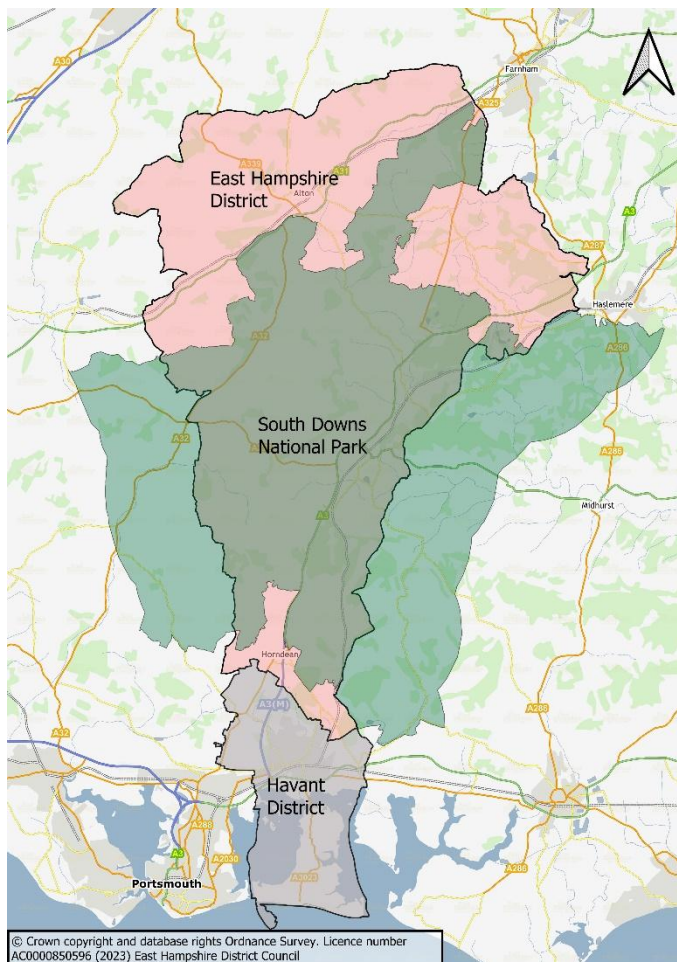


Havant Borough Local Plan: Building a Better Future Plan Consultation Regulation 18 consultation (6 May to 1 July 2025)

Response from East Hampshire District Council (EHDC)

East Hampshire District Council (EHDC) welcomes the opportunity to comment on Havant Borough's Regulation 18 stage Local Plan: Building a Better Future. As neighbouring local planning authorities with a close working relationship, we value the dialogue that has happened up to this consultation, with the opportunity now to formally respond. This response focusses particularly on issues of unmet needs; those of Havant Borough and potentially those in East Hampshire also.

The southern boundary of East Hampshire District adjoins Havant Borough. The boundary cuts across a built-up area, dissecting streets in the Cowplain, Lovedean and Waterlooville area. Both administrative areas are within Hampshire County (see map below).



Duty to Co-operate

The East Hampshire [Duty to Co-operate Framework 2022](#) forms part of the East Hampshire Local Plan evidence to help demonstrate that the council is engaging constructively, actively and on an on-going basis. It identifies the strategic cross boundary matters that relate to Havant and East Hampshire for plan making. The Duty to Co-operate Framework 2022 will be updated in 2025. This response links in parts to those identified strategic cross boundary matters.

Havant Borough Council and East Hampshire District Council have been conversing on matters relating to the preparation of both Local Plans since their early stages.

In 2022, we responded to the Havant Borough Local Plan Regulation 18 consultation, welcoming the call for sites and supporting the approach to use of brownfield land and densities. We met in October 2023 to further discuss the Local Plans, focussing on housing need/supply position, emerging findings of the Havant constraints analysis and meeting the need for Traveller accommodation.

A statement of common ground was not signed in support of East Hampshire's draft Local Plan 2024, but Havant did respond to the consultation. That consultation response stated, "there is a clear functional geography between East Hampshire's southern parishes and that of Havant for which there is a significant unmet housing need." And continues to say, "Havant Borough will require assistance from our neighbouring authorities to provide a meaningful contribution towards its housing need if it is to get anywhere close to meeting its needs in full. The letter formally asks whether your authority is able to accommodate any of Havant Borough's unmet housing need."

We subsequently met to discuss Havant's constraints and then met recently in May 2025 to discuss this consultation, and the extent of unmet needs. At that meeting we also raised our potential unmet need in relation to Traveller accommodation.

We wish to continue to work closely with Havant Borough Council on the issue of unmet needs, and strategic cross boundary matters, to ensure a Statement of Common Ground can be signed ahead of both authorities' Regulation 19 consultations.

Unmet needs (timeline)

An email was received from Havant Borough Council on 15 November 2021, explaining that it was unlikely that the Havant Local Plan would be able to meet the housing needs for the area up until 2037. Meetings and workshops have since been held with the Council agreeing to look at the potential for addressing the unmet needs through its Sustainability Appraisal process.

The Council met with Havant Borough Council on 3 December 2021 and 27 January 2022 to discuss the potential for sites within southern parts of East Hampshire to deliver unmet housing needs. The South Downs National Park Authority also attended the workshop on 27 January 2022, due to its interest in the potential landscape impacts of further development. It was agreed that East Hampshire District Council would use the workshop outcomes to inform its reasonable alternatives for the strategy of the emerging Local Plan and future cooperative working with Havant Borough Council.

The existence of potential unmet needs emanating from Havant have been known of in recent years, and it is documented in East Hampshire Duty to Co-operate Framework 2022. As well as meetings, there was an exchange of letters in 2024.

The most recent discussion was on 15 May 2025, with a subsequent letter sent to EHDC on 12 June 2025 seeking assistance with unmet housing need, as well as employment need under the Duty to Cooperate.

Constraints Study

We acknowledge that Havant Borough Council has produced a Constraints Study, as evidence base for the Local Plan. This is a factual study from which it is clear that Havant has a number of NPPF, footnote 7 specific constraints, which include flood risk, National Landscape and setting, and ecology.

However, the constraints study highlights a number of 'Areas of Least Constraint'. These areas include 'Land West of A3(M)', as well as 'Hayling Island North and South'. Despite these areas being identified as least constrained, there are no proposed allocations or broad locations within the Draft Local Plan. Further, consideration should be made within these areas, particularly on Hayling Island, where the SHELAA identifies numerous sites as being suitable, available and achievable.

It is acknowledged that the Draft Local Plan expresses concern at developing greenfield land on Hayling Island on the basis of the flood risk to the single access road on and off the island. EHDC considers further evidence should be sought on this matter to confirm whether sites are deliverable or if evidence is available, further explanation of that.

Havant unmet housing needs

EHDC supports the sentiment of the spatial strategy, particularly, Policy 1 a), which expresses a strategy that meets local development needs as far as is sustainable within environmental and infrastructure limits. This will be similar to the approach taken by EHDC when determining the quantum and location of development within its emerging local plan. It is also agreed that development should be maximised in established urban and developed areas, but considered the high levels of need, it is inevitable that greenfield sites are required.

However, despite the above, EHDC is concerned at the amount of unmet housing need identified within the Havant Borough Draft Local Plan. We note a significant increase in unmet housing needs from previous correspondence in March 2024, which identified a potential unmet housing need of 4,309 dwellings to at least 9,292 dwellings. It is understood that unmet need could be as much as 10,622 dwellings depending on Winchester City Council's Local Plan, currently at Examination.

As drafted, there appear to be various discrepancies throughout the Draft Local Plan in terms of the quantified amount of unmet need and sources of housing supply. The 'Key Diagram' sets out the Government expectation for housing need, as derived from the

standard method, to be 17,840 homes up to 2043. It then identifies that 8,548 homes could be delivered to meet that need, which means 52.1% of the local housing need is not met. This represents 9,292 homes, equivalent to 465 homes per annum.

Despite the above, paragraph 2.83 notes that only 40% of the Borough's local housing need will be met and the shortfall is equivalent to 10,650 dwellings.

In addition, the 'Key Diagram' notes 8,548 homes could be delivered, however, Policy 5 and supporting Table 5 (page 54) outline the amount of supply expected over the plan-period is 7,218 dwellings. Whilst it is explained (paragraph 2.85) that further supply, totalling 1,330 dwellings, is identified in Winchester City Council's Proposed Submission Plan, this is not clear from the 'Key Diagram'. Despite the unknowns associated with Winchester City Council's Local Plan examination, there should be consistency made throughout the draft Local Plan when referring to supply.

As noted within the constraints study, there are areas identified as 'least constrained' on Hayling Island that have not been allocated for development. The primary reasons for this are the flood risk to the single access road on and off the island. It is considered further evidence is needed to support this approach. Whilst it is acknowledged that development on Hayling Island may not directly align with the strategic aim to ensure good accessibility by non-car modes; such a location is more sustainable from a transport perspective than some of the 'least constrained' areas identified in neighbouring authorities.

We note the request to East Hampshire to consider the unmet housing need of Havant Borough in its Local Plan, made formally in 2024 in Havant's response to East Hampshire's Draft Local Plan, and made again in a letter dated 12 June 2025 (post increased housing numbers of December 2024). The unmet need from Havant Borough that is identified in the letter dated 12 June 2025 is 9,292 dwellings (or 465 homes per year), subject to the outcome of Winchester City Council's examination. EHDC understands that its Local Plan evidence base will need to clearly document that we have fully considered the extent to which we could meet the unmet development needs of Havant Borough, and the needs of others, and ultimately set out how much of any unmet needs can be met within the remit of 'sustainable development'. As such, our Integrated Impact Assessment will assess reasonable alternatives that includes meeting unmet needs.

Havant unmet employment needs

EHDC acknowledges that there is an identified lack of employment sites allocated within the Havant Draft Local Plan to meet the assessed need. Policy 6 states that the Employment Land Review (ELR) recommends the combined employment net need of the borough is 176,000 sqm, but that the Draft Local Plan makes provision for 123,500 sqm, resulting in a shortfall in supply of 52,500 sqm of employment floorspace.

To support the evidence base of the EHDC emerging Local Plan, the Council is currently obtaining a revised and updated Housing and Economic Development Needs Assessment (HEDNA) and ELR. The updated evidence will reflect the supply and needs of housing and employment development relating to the updated standard method as published in the NPPF 2024. EHDC is therefore currently unaware of its own employment need, but it is anticipated

that the employment need for the district will increase to reflect the increased housing requirement produced from the new standard method. Until EHDC receive the updated HEDNA and ELR, and understood our own employment need, the Council is not in a position to state whether it can or cannot support the unmet employment need of the Havant Draft Local Plan.

EHDC is mindful that if it were capable of supporting Havant with unmet employment needs, the employment floorspace should be located in the southern parishes of EHDC, so as to ensure the most accessible and sustainable travel patterns can be utilised between place of residence and workplace.

EHDC potential unmet Traveller accommodation needs

The Duty to Co-operate Framework 2022 says, “Havant borough has a low need for Traveller accommodation. Responding to an email sent to all neighbouring councils in June 2020 providing an update on the East Hampshire GTAA, it stated that the borough is constrained in terms of sites with the Borough being built up and those areas that remain identified for greenfield bricks and mortar housing development. Updating our GTAA and looking at links to Havant”

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 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? The forthcoming update to the East Hampshire GTAA will consider household connections to Havant Borough, as evidence to support that possibility.

Infrastructure

We note the Infrastructure Plan supporting the consultation.

It is acknowledged that the Havant Borough Draft Local Plan does not include a specific policy regarding the new reservoir at Havant Thicket. Due to the site already benefitting from

planning permission, EHDC supports the approach to not include a related policy. However, it should remain a key piece of infrastructure identified within the supporting Havant Infrastructure Plan, which EHDC note it is.

The Havant Infrastructure Plan does not identify any infrastructure in East Hampshire that requires contributions for works to support the Havant Local Plan.

Transport

EHDC would like to be made aware of any known cumulative transport impacts that may arise from the Draft Local Plan on the EHDC local transport network. EHDC will aim to provide the same when consulting on the Regulation 19 submission version of the Local Plan.

Of particular interest are potential impacts from any large developments close to the southern boundary of the district, specifically Broad Location 5 and Allocation 1 – Southleigh. Due to the proposed quantum of the allocation, (2,100 dwellings but 1,650 in the plan period), not only are any cross boundary highway impacts of interest, but also any enhancements or implementation of networks for non-motorised users in the vicinity of the EHDC/Havant boundary. It is acknowledged that the access points of the allocation are not provided, however, any proposed additional highway trips travelling on the B2148 will need to be understood due to the committed Land East of Horndean (LEOH) development (up to 800 dwellings) also being located on the B2148/ B2149 corridor. The LEOH development has associated committed highway and non-highway transport schemes. All committed transport elements of the LEOH development should be taken into consideration when assessing the Southleigh allocation independently, as well as cumulatively with the Draft Local Plan development.

A holistic approach to improving the transport network across the boundary of the two authorities is advocated, specifically in relation to non-motorised uses as reducing the use of the private car is an objective of both emerging Local Plans.

Open Space

We are updating our Open Space Strategy, which is currently dated 2018. Through this study, we are looking to identify where an open space is serving a wider area beyond the local planning authority boundary strategy and would be keen to engage with you at an appropriate time on this.

We have previously identified an issue with regards to cemetery space, with the Duty to Co-operate Framework 2022 saying, “Examples of these are that East Hampshire has considered land close to Havant Borough for additional cemetery space as there is a shortage within Havant Borough”. Note from the Havant Infrastructure Plan, that “new cemetery space will be required during the period of the Local Plan 2043 although there is no clear direction on this yet”. We are happy to continue this dialogue.

Achieving nutrient neutrality - the potential impacts of development on water quality in the Solent and Habitats/Biodiversity

Although the Council does not work directly with Havant Borough Council on these issues, both authorities are members of the Partnership for South Hampshire Natural Environment Group. The Natural Environment Group meetings are held regularly and members work together towards strategic approaches to address environmental issues, such as nutrient neutrality and biodiversity net gain.

Comments on specific policies

Commentary on Policy 1 is already outlined above in regard to unmet housing needs.

With regards to Policy 2 Defined Urban Areas, we would recommend giving some consideration to how that policy would apply to Traveller accommodation proposed outside of the urban area and whether that complies with Planning Policy for Traveller Sites (Para 26, which doesn't rule out sites outside the settlement).

Part d) of Policy 2 requires that residential development outside of defined urban areas does not lead to a net increase in homes. This appears to be inconsistent with the NPPF's presumption in favour of sustainable development, which requires that the adverse impacts of development would significantly and demonstrably outweigh the benefits in situations where objectively assessed needs are not being met (see paragraph 11, part b) ii)). In this context, it is wrong to assume that any increase in housing numbers would necessarily have an adverse impact outside of urban areas, for this will be a site-specific consideration to be determined on a case-by-case basis. In relation to part d), the plan only notes that sites beyond the urban areas are not generally rural in character. This means that principles of paragraphs 82-84 of the NPPF would not apply, but it does not demonstrate that proposals for additional housing would be contrary to the *relevant* policies of the NPPF. Indeed, it may be appropriate to support community-led, self-build and custom-build housing in these locations as part of an approach to support small and medium-sized house builders and the contribution that they can make towards meeting housing needs (see paragraph 73, NPPF). Part d) is therefore too inflexible and should be re-written to the note (e.g.) the importance of high-quality design and layout for mitigating potential adverse impacts, rather than preventing *any* increase in housing density beyond the urban areas.

With regards to Policy 5 Loss of dwellings, EHDC supports the resistance to loss of net dwellings. It is paramount that housing stock remains to accommodate the Borough's housing needs, especially where the local plan proposes a high amount of unmet need.

EHDC supports the additional clarity given in Policy 7, should Havant Borough Council be unable to demonstrate a five year supply of deliverable housing sites. Whilst the policy builds upon Paragraph 11 of the NPPF, it remains consistent, clearly identifying within the justifying text how significant and demonstrable adverse effects will be considered.

Considering the high amounts of unmet need, it is imperative that homes are built in a timely manner to meet needs. As a result, EHDC supports the pragmatic approach taken in Policy 11 in order to set out Havant Borough Council's expectations from the development industry in delivering homes and their role as applicants.

Other

Plan Period

EHDC questions starting the plan-period in 2023 when more recent commitment data is known for the base period 1st April 2024. The standard method takes account of past under delivery within its calculations, so it would be beneficial to represent a more up-to-date position and bring forward the start of the plan.

Non-implementation discounts

It is noted that 15% discounts for non-implementation are made to many components of the housing supply, which includes large site commitments; older persons' commitments; broad locations; allocations; as well as 'Other SHELAA sites within the urban area. There is also an additional 5% discount applied for non-implementation to small site commitments (9 dwellings or less). It is unclear where the justification for such high non-implementation discounts comes from and EHDC considers this matter should be relooked at to ensure that housing delivery is not underestimated within the Borough. Monitoring data within East Hampshire shows that lapse rates are only relevant on smaller sites (up to 5%) and non-implementation on larger sites is less of an issue.

Whilst EHDC acknowledges revisions to non-implementation discounts would still leave a considerable amount of unmet need, it is considered that housing delivery should be as realistic as possible to ensure the correct amount of infrastructure is provided to facilitate growth.

Windfall

EHDC supports the use of a windfall allowance to ensure that the number of homes expected over the plan period is not underestimated. It is unclear from the 'Windfall Housing Development Analysis (December 2024) if any thresholds have been applied to the analysis and subsequent allowance.

The paper notes (paragraph 2.5) that a windfall delivery has been projected to commence from year 4 of the plan period, yet the conclusion (paragraph 4.1) notes that windfall development will be counted from year 3 of the plan period. The windfall total of 1,360 dwellings appears to be consistent with commencement from year 3. This should be made clearer in the supporting analysis.

Evidence Base

It is acknowledged that there is limited transport related evidence to support the Draft Local Plan. This evidence is crucial when determining the amount of development proposed within the Borough to support any allocations and the required mitigation. Paragraph 4.469 of the Draft Local Plan states that "In developing this Local Plan and selecting the development sites within it, the Council has carefully considered the accessibility of housing sites by non-car modes." There is no supporting evidence documenting this process or the methodology utilised. EHDC would advocate that the stated assessment is published alongside the Draft

Local Plan, and if not, a suitable style of accessibility study is undertaken to enhance the robustness of site selection, especially given the strategy relies on reducing use of the private car. Paragraph 4.480 of the Draft Local Plan states “A Strategic Transport Assessment for the Local Plan has predicted the likely impacts of the proposed quantum and distribution of development in this plan and has set out mitigation measures to address the cumulative effects.” Again, there is no such supporting evidence published alongside the Draft Local Plan. Is it that this evidence is scheduled to occur to support a Regulation 19 submission version of the Plan? Transport evidence will be a key supporting function to the Local Plan and will help ensure robustness of the Plan.

The Playing Pitch Strategy review appears to be up-to-date, however, the ‘Indoor Facility Strategy’ and ‘Open Space Strategy’ were both published in 2018 and may not represent the true needs of the Borough over the plan-period. Further consideration should be made on updating this evidence as it will be almost a decade old once adopted.

We wish to thank you for your commitment to continued engagement and look forward to further dialogue as our plans progress.