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Dear Jayson,

Thank you for your letter dated 2 July 2025 and constructive discussion held on 6 June 2025 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 needs in Gosport Borough.

### **Gosport Borough unmet development needs**

East Hampshire District Council (EHDC) acknowledges the significant development constraints facing Gosport Borough and the associated unmet housing needs you have identified through the information presented in our meeting and the slides you have shared with us. We note that you last formally consulted in 2021 (Regulation 18), following which viability challenges were identified and more recently, you are awaiting flood risk evidence base for a key site, however you intend to consult on Pre-Submission Local Plan (Regulation 19) in early 2026.

As we know, recently, the goal posts 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 Gosport Borough, we note your formal request under the Duty to Cooperate for assistance in addressing an unmet housing need of just over 4,800 dwellings over the plan period to 2042. Please note that our housing number has hugely increased too (at a much greater % than yours), 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.

We are both yet to consult on a Draft Local Plan that relates to the new standard method and higher housing number. 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 339 homes a year to 434 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, *“our current supply is 2,538 which means that over the plan period to 2042 the Borough would have an unmet need of just over 4,800 dwellings”*.

We acknowledge your “no stone unturned approach”, and locational specific constraints you have, particularly in relation to the MoD and flood risk. Whilst we fully appreciate the issues you face, we must re-emphasise that any authority seeking assistance with unmet needs must continue in its efforts to leave “no stone unturned”. However, we do acknowledge that there are significant constraints to development in Gosport 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 Gosport 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 this 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 Gosport Borough, please do note, we have also been formally asked to assist with Havant Borough (a direct neighbour) and Portsmouth City Council. Havant Borough has asked us to assist with their unmet need of at least 9,292 dwellings and an unmet employment floorspace need of 51,424 sqm over the plan period to 2043.

We are aware that there are also unmet needs in Chichester District (at examination) and potentially emerging from Waverley Borough (our Surrey 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 all the local authorities in the Portsmouth Housing Market Area (HMA). As such, we would appreciate it if you could keep us updated on the extent of your unmet housing need. It is also worth noting that only a small part of our local planning authority (LPA) area falls within the Portsmouth HMA, which is limited to the southern parishes of Clanfield, Horndean and Rowlands Castle. The remainder of East Hampshire is disaggregated by the South Downs National Park; with other parts of the LPA better related to other HMAs,

In terms of 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, and yourselves are seeking assistance with just over 4,800 homes – totalling at least 14,092 homes (greater in total than our own disaggregated housing need). 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.

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 on your website a Gosport Borough GTAA completed in 2017, and query whether a new one is being prepared to ensure a Regulation 19 consultation is supported by up-to-date, robust evidence. Our GTAA

update will look at householder links to other local authorities, to provide evidence to support our likely requests for assistance with meeting an unmet need for Traveller and Travelling Showpeople accommodation. We would like to see the same 'no stone unturned' approach if there is a need identified in Gosport, and the same willingness to consider assistance with unmet need when requested.

### **Future Dialogue**

Like you, we acknowledge the role of PfSH and the potential extent of unmet housing needs in the Portsmouth HMA. We wish to continue our 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

A handwritten signature in black ink that reads "Adam Harvey". The "A" is stylized with a small star-like shape above it.

Adam Harvey  
Planning Policy Manager