

Lucy Howard  
Head of Planning Policy  
Portsmouth City Council

By email only

**Enquiries to:** Adam Harvey  
**Direct line:** 07341462872  
**Email:** [adam.harvey@easthants.gov.uk](mailto:adam.harvey@easthants.gov.uk)

**Date:** 6<sup>th</sup> March 2024

Dear Lucy,

**Response to Portsmouth City Council's request to help meet unmet housing need under the Duty to Cooperate**

Thank you for your letter dated 30 January 2024 requesting assistance from East Hampshire District Council (EHDC) to meet potential unmet housing needs from the Portsmouth City area. We understand from your letter that the request is for EHDC to identify land in its emerging Local Plan to assist with provision of 3,577 homes up to 2040. We also understand that you are seeking the same assistance from your neighbouring local planning authorities, although we understand Havant Borough to be in a similar situation and unable to assist.

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 our [Interim Housing and Economic Needs Assessment \(HEDNA, 2018\)](#), East Hampshire has housing market area relationships with both Portsmouth and Havant to the south, but 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)

We are currently consulting on a Draft Local Plan 2021-2040, which identifies land that would provide additional homes to that which is required. This provides flexibility for our plan, but also is mindful of the emerging unmet needs elsewhere, particularly in relation to the south-Hampshire subregion. Following previous discussions, we are likely to receive formal requests for assistance to meeting housing needs from both Havant Borough Council and Chichester District Council, whilst already accounting for some unmet needs from SDNP. Your request is in addition.

As we consider the responses to our current Draft Local Plan consultation (closing 8 March) we need to look carefully at sites, deliverability and potential unmet needs identified elsewhere. We expect to accommodate some unmet needs from areas that can evidence a functional relationship with areas of our district but have not yet agreed the extent of that. The total amount of unmet needs you have identified (3,577 dwellings)

exceeds the number of new homes we are identifying new land for through proposed allocations in our draft Local Plan (3,500 dwellings), so to fully assist with your unmet needs would double the amount of allocated land in our plan, which we cannot do without significant harm to our rural district.

As stated in the [Partnership for South Hampshire Spatial Position Statement](#) (December 2023), local planning authorities will have to consider greenfield locations for development, but PfSH recognise that it is more sustainable to focus on strategic scale sites (areas of search for growth) as these bring the benefit of infrastructure delivery. The Spatial Position Statement does not advocate any existing strategic development locations in East Hampshire, nor does it identify locations as broad areas of search for sustainable strategic-scale development. However, it is acknowledged that small and medium sized development sites will be allocated in the emerging Local Plan that will contribute towards overall housing delivery, which could include unmet needs of neighbouring authorities, where reasonable to do so.

Until we have been through the representations to our recent consultation, we are unable to offer further clarity on our position to potentially assist with unmet needs. However, it is useful to understand the extent of Portsmouth's unmet needs, and we acknowledge that we have a duty to consider that in our plan making process. We will also need to consider unmet needs from elsewhere, which is likely to include Neighbouring Havant Borough.

We also look forward to the publishing of Portsmouth City Council's Housing and Economic Land Availability Assessment (HELAA), as well as the updated Housing and Economic Development Needs Assessment, which are key documents when identifying need and how it could potentially be met. Until such time, and when responses to our consultation have been analysed, it is difficult for EHDC to engage in any pragmatic discussions associated with potential unmet needs. However, as a way forward, we suggest further conversations in due course, with further consideration of housing market areas, perhaps collectively with other neighbouring authorities. This is particularly important as we progress towards the next iteration of the Local Plan (Regulation 19), and we can agree a Statement of Common Grounds in due course. We understand following our meeting that your team would draft an initial SOCG based on our discussion, for us to consider.

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

I trust this is a reasonable way forward.

Kind Regards,

**Adam Harvey**  
**Planning Policy Manager**  
**East Hampshire District Council**