

## **PCC response to WCC's Inspectors Note ED37.**

Thank you for providing an opportunity to respond to Document ED37 (Inspector Note 15) of the Winchester District Local Plan Examination. This letter forms the response from Portsmouth City Council.

### **Statement of common Ground (SoCG)**

Portsmouth City Council and Winchester City Council have cooperated throughout the preparation of the Winchester District Local Plan and there are two statements of common ground (SCG) signed by the two authorities. The second of these is SD08i in the WCC examination library. The two authorities have also worked with Havant Borough Council in respect of unmet housing needs. A separate Statement of Common Ground is in place between Havant Borough Council and Winchester City Council.

The SCG (between PCC and WCC) agreed an apportionment of the unmet need allowance in the Proposed-Submission Winchester Local Plan to Portsmouth and Havant as follows:

- To Portsmouth City Council: 30% apportionment of the unmet need housing allowance in the Winchester District Local Plan.
- To Havant Borough Council: 70% apportionment of the unmet need housing allowance in the Winchester District Local Plan.

This apportionment was agreed based upon the 1,900 figures from the submitted local Plan whilst cognisant of the fact that it could change in the course of the examination.

The SCG also highlighted that there was a 3,577 dwelling unmet need (accounting for the 800 dwellings from Fareham BC) from Portsmouth. The City Council is currently in the process of revising its housing numbers, and the exact final figure is to be confirmed however the Council still has a significant unmet need (significantly in excess of 1,900) due to physical capacity constraints in the City as set out in the SCG. It is positive therefore, that the Winchester District Local Plan makes provision for accommodating a proportion of both Havant Borough and Portsmouth City's unmet housing need. Whilst this contribution by no means accommodates the full unmet need, it is a positive step in addressing it.

### **ED25 / ED34a**

ED25 and ED34a set out the housing number available for unmet needs under each of the proposed plan periods, which are as follows:

2020-2040 figure is **1,900**

2022-2040 figure is **1,099**

2023-2040 figure is **714**

**ED34a = 2024 -2040 figure is 290**

All of the figures for a start date of 2022 onwards are below the 1,900-figure indicated as available for meeting some of Portsmouth's unmet needs from the submitted WCC Local Plan. These options would therefore reduce the contribution of Winchester District to accommodate its neighbours' including Portsmouth's unmet housing need.

Portsmouth City Council supports the submitted Winchester Local Plan period of 2020-2040, as of all the options it gives the greatest contribution towards unmet need outside of Winchester District including Portsmouth. The City Council notes and agrees with WCC that there is not a prescribed approach through the NPPF or PPG which sets out how Local Plan start periods should be set. It is for the professional judgement of each Local Planning Authority to determine what an appropriate start date should be.

It is not for Portsmouth City Council to conclude that any one particular approach is sound or unsound. However, the impact of the different plan periods on meeting Portsmouth's unmet need means that Portsmouth City Council's preference is for a 2020 start date.