



## Partnership for South Hampshire

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The Right Hon Christopher Pincher MP  
Minister of State for Housing  
Ministry of Housing, Communities and Local Government  
Fry Building  
2 Marsham Street  
London SW1P 4DF

By email and post

7 December 2020

Dear Minister,

### **Request for the temporary suspension of the five-year housing land supply requirement across the South Hampshire sub-region.**

Further to representations made to MHCLG both in 2019 and earlier this year. I write to reiterate the request, on behalf of our 12 member authorities, for a temporary suspension of the five-year housing land supply requirement across the South Hampshire sub-region.

Those representations set out the issues our local authorities are grappling with in respect of the requirement that all new housing should be 'nutrient neutral' - which has led to thousands of new homes being held up in the planning system until solutions to the ongoing situation are agreed and implemented. If a temporary suspension is not forthcoming, our councils will automatically fail to meet the requirement to demonstrate a five-year housing land supply due to the nitrate situation - resulting in a major restriction in granting permissions that would form part of that supply. This, in turn, will open the door to speculative development resulting in planning permissions potentially being granted on appeal and on unsuitable sites. This will make certain important policies in local plans totally ineffective during the time when the five-year housing land supply is not being achieved, and particularly when short- and medium-term solutions to the nitrate issue have been agreed and are available for implementation. This unsatisfactory situation is solely due to factors beyond our councils' control.

In their responses to our previous representations to MHCLG, Ministers have said the situation will continue to be monitored and have stressed that MHCLG, DEFRA and others (Natural England, Environment Agency) are and will continue to work with us to resolve the situation. This is certainly true, and we that accept that our successful bid 'in principle' to the recent Getting Building Fund for nutrient mitigation measures, and the announcement of DEFRA's online nitrate trading portal represent significant medium-term solutions. However, the implementation of these measures is likely to take many months or more before they have an impact on improving the situation. It would be inappropriate that development that would otherwise be contrary to planning policy could gain permission through the appeal system and potentially utilise limited mitigation solutions in place of policy compliant development. On that basis, the temporary suspension continues to be needed.

In his letter of 23 July 2019, your predecessor advised that solutions to the problem should be looked at 'in the round' when referring to the range of solutions possible to address this ongoing issue. We ask that you consider our councils' inability to meet the five-year housing land requirement at this time as a significant causal effect of the same issue and of huge concern to us. A temporary suspension of the requirement should be included as part of the mitigation that will alleviate the breadth of the problems we currently face.

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I reiterate what I have stated in in my previous representations, that finding both short and medium/long-term solutions to the problems is a shared objective. It is in all our interests to ensure that sensible and holistic measures are taken to address the wider impact of the ongoing problems faced now, and in the same way that we will all approach implementing solutions.

I look forward to your reply.

Yours sincerely,

A handwritten signature in black ink that reads "Sean Woodward". The signature is written in a cursive, flowing style.

Councillor Sean Woodward  
Chairman, Partnership for South Hampshire