

BUILDING A BETTER FUTURE

Statement of Cooperation

Duty to Cooperate

June 2026



Contents

Page

EXECUTIVE SUMMARY	2
1. INTRODUCTION	5
2. STRATEGIC CONTEXT	6
3. KEY STRATEGIC ISSUES	25
APPENDIX 1 SCHEDULE OF MEETINGS AND OUTCOMES	
APPENDIX 2 REGULAR DUTY TO COOPERATE MEETINGS	
APPENDIX 3 KEY CHANGES TO THE BUILDING A BETTER FUTURE PLAN PRIOR TO REGULATION 19	
APPENDIX 4 LETTERS TO AND FROM NEIGHBOURING AUTHORITIES	
APPENDIX 5 – LETTERS TO AND FROM AUTHORITIES IN THE HAMPSHIRE AND SOLENT DEVOLUTION AREA	

Executive Summary

1. This Statement demonstrates how Havant Borough Council has maintained strategic cooperation across local planning authorities under the duty-to-cooperate throughout in the preparation of the Building a Better Future Plan. Although recent legislative changes have removed the Duty to Cooperate as a legal compliance requirement, the Council has continued to prioritise effective cross-boundary to ensure the plan is 'positively prepared' and 'effective' under the tests of soundness and complies with the 2024 National Planning Policy Framework (NPPF).

Strategic Context and Key Challenges

2. Havant Borough is mainly urban in nature, has multiple environmental designations and its land supply is significantly constrained. Since the start of the plan making process, the Council's housing need figure has risen significantly. However, the significant constraints and limited land supply mean that Havant will be an authority which will be unable to sustainably meet its housing and employment needs. The Council has left no stone unturned to meet as much need as sustainably possible within its environmental limits. This has led the Council to establish capacity-based development requirements, with a development strategy which has had to leave no stone unturned to identify all possible sources of housing and commercial supply. In tandem with this, the Council has taken robust and extensive collaboration and engagement with its neighbouring authorities particularly in respect of unmet development needs.

Approach to Duty to Cooperate

3. The Borough Council has approached the Duty to Cooperate (DtC) and maintained effective cooperation in three main ways:
 - a. Sub-regionally through the Partnership for South Hampshire (PFSH)
 - b. Individual discussions with neighbouring authorities and other authorities in the same Housing Market Area (HMA)
 - c. Individual discussions with statutory consultees
4. This work is evidenced through formal correspondence between these authorities, Statements of Common Ground (SoCG) as well as joint evidence base studies at a sub-regional level.

Key Cross-Boundary Outcomes

Housing need and supply

5. Where the Havant Borough is unable to sustainably accommodate its full housing need within its administrative boundary, it has worked with other authorities to consider whether any unmet housing need can be met elsewhere within those authorities' areas.
6. Key policy outcomes relating to housing include:
 - The Winchester District Local Plan commits 70% of its unmet housing needs allowance to Havant Borough (346 of 495 dwellings)

- Whilst East Hampshire District had been progressing a Local Plan along a similar timetable to Havant Borough, as of May 2026, the authority has decided to realign the Local Plan timetable and prepare a Local Plan under the new plan-making system.
- Ongoing dialogue with Portsmouth City and Gosport Borough which are similarly constrained authorities and are unable to meet their own housing need, and so are therefore unable to assist Havant with its unmet housing need.

Employment need and supply

7. Havant Borough is similarly unable to meet the need for employment need, it has therefore worked with neighbouring authorities to consider whether any unmet housing need can be met elsewhere within those authorities' areas.
8. Key policy outcomes relating to employment include:
 - Portsmouth City Council has offered surplus office floorspace of 31,261 square metres to help meet Havant Borough's unmet office needs
 - Fareham Borough Council has committed 19,973 square metres of floorspace towards Havant Borough's remaining unmet employment need
 - Sub-regional work was used to update the Council's evidence on local employment need

Environment

9. Joint working with neighbouring authorities has addressed various environmental matters, including the following key policy outcomes:
 - Nutrient neutrality, through the development of the Council's own strategic mitigation scheme supported by third party mitigation schemes identified by the Solent Mitigation Partnership
 - Initial work to support Biodiversity Net Gain (BNG) delivery including the exploration of the potential for Council owned land to BNG
 - Recreational disturbance mitigation which is provided by Bird Aware Solent

Transport and Infrastructure

10. Collaboration with Hampshire County Council, Solent Transport, and neighbouring authorities has supported the following key policy outcomes:
 - The production of a Strategic Transport Assessment which has been prepared in collaboration with National Highways and Hampshire County Council as the Local Highways Authority.
 - The 'decide and provide' approach advocated by Hampshire County Council's Local Transport Plan (LTP) 4 has informed the Publication Building a Better Future Plan.

Ongoing Cooperation

11. The Council will continue to work collaboratively with neighbouring authorities and partners to:
 - Address remaining unmet housing and employment needs within the South East Hampshire Housing Market Area
 - Support delivery of sub-regional environmental mitigation and infrastructure to support growth through the Partnership for South Hampshire

- Provide input and actively contribute to devolution in the Hampshire and Solent devolution area, and the emerging Spatial Development Strategy.

Summary

12. This Statement provides an overview of the effective joint working that Havant Borough Council has undertaken throughout the preparation of the Publication Building a Better Future Plan, both on a bi-lateral basis and sub-regionally through PfSH which has enabled the development of a shared evidence base as part of the Spatial Position Statement, alongside a coordinated approach to the delivery of environmental mitigation and infrastructure delivery across the sub-region.
13. The Council has demonstrated effective strategic planning across neighbouring authorities to effectively address key strategic issues including housing and employment development, environmental matters and transport and infrastructure. Cross boundary agreements are documented in Statements of Common Ground, which are supported by ongoing arrangements for continued discussions and engagement to ensure that strategic matters are effectively addressed going forwards.

1. Introduction

- 1.1. This Statement outlines how Havant Borough Council (HBC) has maintained effective cooperation across local planning authority boundaries on strategic matters, under the 'duty to cooperate'. It is supported by Statements of Common Ground with neighbouring authorities and other statutory consultees. It has been published to support the Publication Building a Better Future Plan.

Duty to Cooperate

- 1.2. On the 25 March 2026, a number of new provisions from the Levelling Up and Regeneration Act came into force. These regulations provide for the transition to the 'new style' plan making system, whilst importantly saving the relevant Town and Country Planning (Local Planning) (England) Regulations 2012 enabling development plans to progress to adoption under transitional arrangements. HBC will submit its Local Plan under the legacy plan making system, to be examined under the 2024 National Planning Policy Framework (NPPF).
- 1.3. Significantly however, the regulations do not 'save' the Duty to Co-operate in relation to planning of sustainable development, set out in Section 33A of the Planning and Compulsory Purchase Act 2004. Although the legislative requirements remove the duty to cooperate have removed the Duty to Cooperate as a legal compliance requirement, paragraph 24 of the 2024 National Planning Policy Framework (NPPF) indicates that local planning authorities continue to be under a duty to cooperate with each other on strategic matters.
- 1.4. The Building a Better Future Plan has been prepared in accordance with the 2024 version of the NPPF and will be submitted for Examination under the legacy plan making system. Therefore, all references to the NPPF in this document relate to the 2024 version. The NPPF emphasises the need for cross boundary cooperation, this Statement therefore sets out how Havant Borough Council has undertaken that cooperation. The Council considers that its cross boundary strategic work has been effective and robust.
- 1.5. For a Local Plan to be found sound under the 2024 NPPF it needs to be 'justified' and thus 'based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.'

Purpose of this Statement

- 1.6. The purpose of this Statement is to demonstrate that Havant Borough has complied with the duty to cooperate throughout the preparation of the Local Plan and in line with the NPPF and National Planning Practice Guidance.
- 1.7. Throughout the preparation of the Building a Better Future Plan, the Council has actively and constructively engaged with key partners on strategic cross-boundary issues. This Statement documents those activities and highlights the outcomes of such activities, demonstrating how the Council has maintained effective cooperation.

2. Strategic Context

Strategic Geography

- 2.1. Havant Borough is located on the coastal plain between the South Downs and the Solent, within the southeast of Hampshire. Havant Borough covers the market towns of Havant and Waterlooville, Leigh Park which is a suburb to the north of Havant town, Emsworth a historic coastal town on the border with West Sussex, and Hayling Island which is connected to the mainland via a bridge. Figure 1 shows Havant Borough and the neighbouring Districts of Portsmouth City, Winchester, East Hampshire, Chichester and the South Downs National Park Authority.

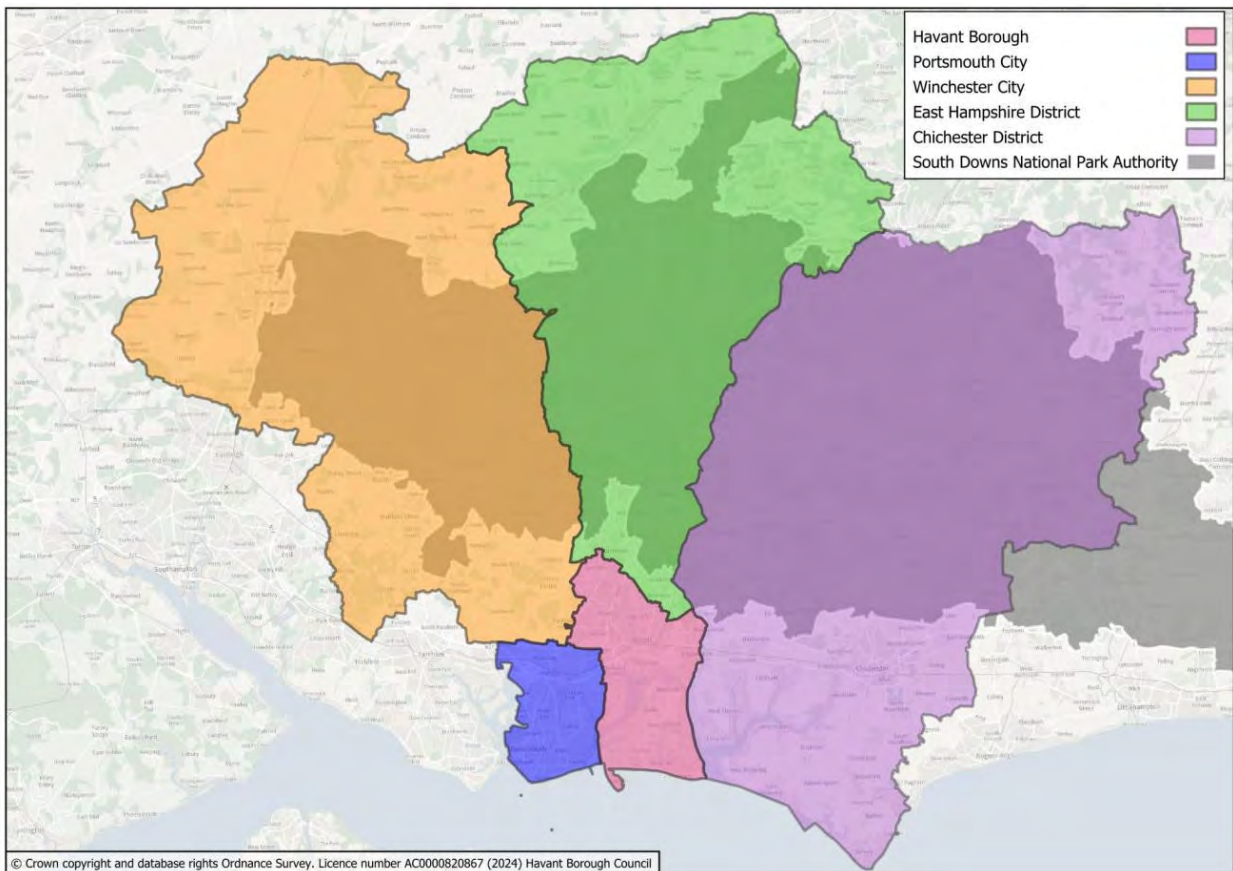


Figure 1: Havant Borough and its neighbouring areas

- 2.2. Havant Borough is mainly urban in nature though there are some areas which are more rural in character, notably that of Hayling Island. Since the Borough's designation in 1973, the Borough has seen extensive growth that has pushed the extent of the built-up area to most of its administrative boundary. The Borough has multiple competing constraints including the Chichester Harbour National Landscape which encompasses the eastern edges of Hayling Island and the southern part of Emsworth; and the northern part of the Borough which adjoins and falls within the setting of the South Downs National Park. In combination with this the southern part of the Borough is affected by coastal constraints including flood risk and ecology where land is functionally linked to the Chichester and Langstone Harbours Special Protection Areas. The Borough's constrained geography mean that are few areas that are left to develop, and those areas of least constraint – Southleigh and Dunsbury Park already identified for development.

- 2.3. The previous Local Plan indicated how Havant Borough could just about meet overall housing need at the point of submission in 2021. This relied on a significant source of housing supply being delivered from town centre regeneration, but the Inspectors' report identified concerns about the deliverability of housing supply (paragraph 51)¹ prior to the Plan's withdrawal from Examination in 2022. Since then, Havant Borough has seen further rises to its housing need figure based on the Government's standard method. As of 2026, Havant Borough has a local housing need figure of 879 dwellings per annum.
- 2.4. The previous Local Plan Inspectors' highlighted that Havant Borough may be an authority that cannot sustainably meet its housing needs (paragraph 52). Indeed the land supply in Havant Borough is significantly constrained. The Borough is already heavily built up with only limited land outside of the existing urban area remaining available for development. However, the Council is a pro-development authority with an ambitious regeneration agenda, and the Council is keen to deliver this alongside other objectives including delivering more affordable housing for the Borough's residents and addressing international issues such as climate change. The Borough's development strategy therefore seeks to focus as much development as possible on the existing urban areas, brownfield sites and regeneration in the town centres.
- 2.5. A comprehensive review of all sites and broad locations was therefore undertaken as part of the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA). This included a comprehensive desktop review to ensure that it fully examined all opportunities for development, including land not actively promoted. Despite this, the Borough Council is unable to meet its full development needs and instead the Local Plan proposes realistic capacity-based development requirements for both housing and employment.
- 2.6. Throughout the plan's preparation, Havant Borough Council has undertaken extensive collaborative working with its neighbouring to accommodate its unmet development needs. This has resulted in Winchester City Council (WCC) agreeing to accommodate some of Havant Borough's unmet housing need and Portsmouth City Council and Fareham Borough Council agreeing to accommodate Havant Borough's unmet employment need.
- 2.7. The unmet housing need allowance set out within the Adopted Winchester Adopted Local Plan 2020-2040² can contribute to meeting the needs of the adjoining authorities of Havant and Portsmouth. This is confirmed in a Statement of Common Ground between the two authorities³. The Adopted Local Plan apportions an unmet needs allowance of 495 dwellings between Havant (70%) and Portsmouth (30%), 346 and 149 dwellings respectively.
- 2.8. Portsmouth City Council has formally offered its surplus of office floorspace which will largely address Havant Borough's unmet office unmet need. This is set out in in Paragraph A214 and table 7.1 of the Portsmouth Local Plan Addendum where it is noted that there is an oversupply in overall employment development of 31,261 square metres. This will reduce Havant Borough's unmet office demand to 2,498 sq. m, leaving 17,655 sq. m of industrial demand to be addressed. This is set out in the Statement of Common Ground⁴.
- 2.9. Fareham Borough Council has subsequently offered Havant Borough formal assistance with its unmet employment need and is willing to commit 19,973 square metres of employment floorspace.

¹ <https://www.havant.gov.uk/media/8718/download?inline>

² <https://www.localplan.winchester.gov.uk/local-plan-2020-2040/adopted-local-plan-2020-2040>

³ <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

⁴ ibid

Whilst the Council is not in a position to include any wording within the adopted Fareham Local Plan 2037, this position has been formalised as part of a Statement of Common Ground between the South East Hampshire authorities⁵.

Plan to date

- 2.10. Following on from two Regulation 18 consultations, the Borough Council is now moving ahead with its Local Plan. The Plan is being considered by Full Council on 15 July 2026 for Publication consultation and then submission for examination. Table 1 sets out the stages of formal consultation undertaken on the Plan to date and the Local Plan timetable for going up to adoption as set out in the Local Development Scheme (December 2025)⁶.

Table 1: Building a Better Future timetable for production

Timetable for production		
Initial consultation Regulation 18	Consultation on the Building a Better Future Plan contents	✓ October 2022
	Consultation on the Draft Local Plan	✓ June 2025
Publication Regulation 19	Consultation on the Publication Local Plan	Q2/Q3 2026
Submission Regulation 22	Submission of Plan to Secretary of State	Q4 2026
Examination Regulation 24	Examination of the Plan by an appointed Inspector	Q1-4 2027 (dates TBC from Secretary of State)

⁵ <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

⁶ <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-development-scheme-lds>

How we have approached the Duty to Cooperate

- 2.11. The Borough Council has approached the Duty to Cooperate (DtC) and maintained effective cooperation in three main ways:
- a. Sub-regionally through the Partnership for South Hampshire (PfSH)⁷
 - b. Individual discussions with neighbouring authorities⁸ and other authorities in the same Housing Market Area (HMA)⁹
 - c. Individual DtC discussions with statutory consultees
- 2.12. There is overlap between these three strands. For example, the neighbouring authorities with whom there are individual SoCG are also members of PfSH. The Council has also taken part in collective discussions with South East Hampshire authorities (including Gosport Borough Council and Portsmouth City Council) as all three authorities have unmet development needs in the same housing market area.
- 2.13. The Council's approach has been to focus discussions with its neighbours and other authorities in the same the HMA. However, given the scale of unmet housing need that exists, it has been necessary to engage with other authorities in the Hampshire and the Solent devolution area, as these will be covered by the same Spatial Development Strategy in due course.
- 2.14. Further detail on how the Council has undertaken engagement is found at Appendix 2 of this Statement which provides a record of engagement and their outcomes in support of the Building a Better Future Plan. Appendix 3 of the Statement provides further detail on partnership meetings of which Havant Borough Council is a member.

The Partnership for South Hampshire (PfSH)

- 2.15. Havant Borough Council is an active member of PfSH, which was originally formed in 2003 as the Partnership for Urban South Hampshire (PUSH). It is a partnership of district and unitary authorities, together with Hampshire County Council (HCC) and the New Forest National Park Authority, working together to support the sustainable growth of the South Hampshire sub-region. The area covered by PfSH and the authorities involved is shown in Map 2.

⁷ An explanation of PfSH can be found on page 7 of the Development Capacity Background Paper

⁸ East Hampshire District, Chichester District, Portsmouth City, South Downs National Park, and Winchester District

⁹ Fareham Borough and Gosport Borough



Map 2: Partnership for South Hampshire

2.16. The members of PfSH are as follows:

- Eastleigh Borough Council
- Fareham Borough Council
- Gosport Borough Council
- Hampshire County Council
- Havant Borough Council
- New Forest District Council
- New Forest National Park Authority
- Portsmouth City Council
- Southampton City Council
- Test Valley Borough Council
- Winchester City Council

2.17. In addition, joint working through PfSH has been undertaken in conjunction with the following bodies:

- Enterprise M3 LEP (now disbanded)
- Environment Agency
- Hampshire and Isle of Wight Local Nature Partnership
- Highways England

- Homes England
- Natural England
- Solent LEP (now disbanded)
- Solent Transport
- Portsmouth Water
- Southern Water

PfSH Structure

- 2.18. PfSH operates around the key principle of ‘subsidiarity’. PfSH is a strategic partnership and deals with genuinely strategic/sub-regional matters, where it can add value to the efforts of the individual partners.
- 2.19. PfSH does not get involved in direct service delivery – or the statutory service roles of our member local authorities. PfSH’s key role is in co-ordination and oversight of both policy development and delivery at a strategic level.
- 2.20. The partnership has a published constitution and operates at both an officer and political level. The Joint Committee is the decision making body of the partnership and consists of an elected representative of each of the authorities – usually the Leader.
- 2.21. PfSH also has an Overview and Scrutiny Committee consisting of a councillor from each member authority, to consider referred matters on behalf of the Joint Committee and to make recommendations to it. The Joint Committee itself is the decision making body for PfSH. The membership consists of the leaders (or nominated representative) of the twelve councils, supported by their chief executives and the PfSH executive director.
- 2.22. In addition to the committees there are several officer groups which develop policy, discuss cross boundary issues and provide advice to the committees. The PfSH Chief Executives Group meets regularly and provides strategic officer overview of the partnership and its work. PfSH Policy Officers Group (PfSH POG) comprises policy officers from all of the PfSH authorities to discuss amongst other items, findings of studies commissioned collectively by PfSH, such as the Strategic Flood Risk Assessment, for the area. In addition there are sub groups such as the Natural Environment Group and East Hants Catchment Partnership that focus on addressing specific issues. A record of PfSH meetings and events with their outcomes is set out in Appendix 1 of this document and Appendix 2 sets out all the PfSH groups that meet regularly.

Collaborative Working

- 2.23. The Partnership has a strong track record in collaborative working to achieve common goals in South Hampshire. The Partnership was heavily involved in the production of a sub-regional strategy for development that formed part of the South East Plan. This strategy was tested through public examination and when adopted by the Secretary of State, formed part of the development plan at that time and informed the production of local plans.
- 2.24. The ethos of collaborative cross boundary working continued in South Hampshire after the abolition of regional planning and the revocation for the South East Plan in 2013. As well as joint working between member authorities, PfSH works with partner agencies in the sub-region and Government departments to deliver joint strategies and pool resources. PfSH has successfully developed a number of innovative solutions to challenging issues and thus unlocked development in the sub-region whilst recognising its constraints.

- 2.25. A number of SoCGs have been produced by PfSH over the years. The last one was signed by Joint Committee¹⁰, which includes leaders or representatives of all authorities, in September 2023. It sets out the key strategic cross-boundary planning issues including housing needs and the methodology and framework for the preparation of the new Spatial Position Statement (SPS)¹¹ published in December 2023. It set out a snapshot of housing need and supply in the sub-region divided up between its constituent local authorities from 2022-36. The overall deficit was estimated to be 14,531 homes at that time. The SoCG states that that the shortfall is best defined as need that is not yet planned for, rather than need that it is definitively unmet. It states that the shortfall would diminish over time as local plan reviews get underway and emerging plans are progressed.
- 2.26. The SoCG identifies six local planning authorities that are less likely/unlikely to meet their housing needs: New Forest District, New Forest National Park Authority, Southampton, Gosport, Portsmouth and Havant. It states that the PfSH authorities are taking a two-stage approach to addressing the needs of those authorities that are unable to meet their housing needs in full. In the first stage, the following authorities are identified as more likely to be able to meet and potentially exceed their housing need: East Hampshire, Eastleigh, Fareham, Test Valley and Winchester. The precise contribution from each authority will be determined through their respective local plan processes.
- 2.27. In the longer term and in stage two, Broad Areas of Search for Growth identified in the SPS will be considered through Local Plans. These were identified by considering the combination of a relative absence of strategic constraints, relative proximity to opportunities and services, and their scope in principle for good public and active travel connectivity. The broad areas would require further investigation and technical work to determine their suitability as specific locations for development, and to test their capacity, deliverability, infrastructure and mitigation needs to achieve allocations in Local Plans. A preliminary assessment suggests that the areas of search have a combined capacity for around 7,500 dwellings, subject to deliverability, infrastructure and mitigation.
- 2.28. Growth in the sub-region is constrained as it is bounded by two national parks, an Area of Outstanding Natural Beauty, the coast/estuaries, a range of international, national and local biodiversity designations and it needs to accommodate land for biodiversity mitigation and net gain. South Hampshire is already heavily built up in places, with areas of valued countryside often important in landscape terms or as settlement gaps protecting the identity of individual towns and villages. Some areas are less accessible by public transport. The SoCG states that the need to accommodate significantly more homes for people in the medium and longer term, including in the areas of search, will need to be carefully tested through local plans against all of these important characteristics to achieve the optimum solution.
- 2.29. The PfSH SPS was approved by Joint Committee in December 2023. It aims to provide guiding principles for local plans to help deliver sustainable development within South Hampshire. It should be noted that it is not an upper tier plan with which future local plans will need to conform. It does, however, help inform the preparation and strategic co-ordination of local plans under the duty to cooperate. Table 1 of the SPS compares housing need and supply along with shortfalls and surpluses for each local authority in PfSH as a snapshot in time. On this basis the latest shortfall is

¹⁰ <https://www.push.gov.uk/wp-content/uploads/2023/09/ITEM9-1.pdf>

¹¹ <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

11,771 dwellings (2023 – 2036). Several evidence based documents¹² supporting the SPS were published at the same time including the Broad Areas of Growth Assessments.

2.30. The SPS retains the strategic principle of focusing growth on cities/urban areas first to maximise housing delivery within existing urban areas and identifies a number of existing strategic development locations in SPS7. It also identifies new Broad Areas of Search for Growth in SPS8 as follows:

- South-east/east of Eastleigh Town (Eastleigh)
- Havant Town Centre (Havant)
- Waterlooville Town Centre (Havant)
- Southleigh (Havant)
- East of Romsey (Test Valley)
- South-west of Chandler's Ford (Test Valley)
- East of Botley (Winchester)

2.31. The Statement sets out that the sites that fall within the Broad Areas of Search for Growth will need to be tested through the local plan preparation process, including against other sites that may be available or promoted within individual local planning authority areas. The local plan process will also need to resolve the quantum and form of development on sites and the infrastructure that will need to be provided to support development and make it sustainable.

2.32. Since this Statement was approved, the Government's standard method for calculating housing need has changed from a population based to a housing stock-based algorithm, and the affordability ratio has also changed. As a result, the housing need figures for the PfSH area as a whole have increased. PfSH Joint Committee approved the following Statement in December 2025:

"PfSH approved a Spatial Position Statement in December 2023. It sets out strategic principles to guide development. It also sets out the balance between the need and supply of new dwellings across the sub region, identifying a shortfall in supply still to be planned for of 11,771 dwellings to 2036. It recognises that some authorities are at an early stage in plan preparation, and that as part of this plan making work additional sites will be identified to meet unmet needs. The Statement sets out a two stage process to addressing needs, first identifying the authorities which should be able to meet or exceed their needs, and second by identifying broad areas of search for growth to be considered further through local plans.

Since this Statement was approved, the Government's standard method for calculating housing need has changed from a population based to a housing stock based algorithm, and the affordability ratio has also changed. As a result the housing need figures for the PfSH area as a whole have increased.

The national proposals to reintroduce statutory strategic planning will require the preparation of a Spatial Development Strategy by the proposed Mayoral Combined Authority for Hampshire and the Solent. A key output of this work will be meeting housing need. In light of this, PfSH do not intend to update the Spatial Position Statement. However, in the meantime PfSH continue to discuss the latest position to inform the preparation of each authority's local plan in accordance with the 'duty to

¹² <https://www.push.gov.uk/work/planning-and-infrastructure/push-position-statement/>

co-operate'. This is supplemented by the preparation of Statements of Common Ground between individual authorities and groups of authorities as relevant."

PfSH Collaborative Working with External Partners

2.33. The core membership of PfSH comprise the local authorities in the sub-region. However, in addition statutory undertakers and other organisations have undertaken joint working with PfSH on specific projects and are represented in the different PfSH officer groups. Examples of this joint working are provided below:

- Environment Agency - The Environment Agency is a standing member of the PfSH Natural Environment Group and provide input and steer into the work being undertaken by that group.
- Homes England - Homes England is represented on PfSH Joint Committee as observers.
- Natural England - Natural England is a standing member of the PfSH Natural Environment Group and provide input and steer into the work being undertaken by that group. Natural England also regularly attend and input into PfSH Joint Committee.
- Solent LEP - PfSH worked with the Solent LEP (since disbanded) as part of the Southern England Local Economic Partnership. The LEP has been replaced by the Solent Growth Partnership.
- Solent Transport - Solent Transport worked as part of the steering group for the development of the PfSH SPS (2023) alongside the LPA's and Transport Authorities. The Solent Transport Model developed by Solent Transport was used in the evidence supporting the development of the SPS.
- Portsmouth Water - Portsmouth Water is a standing member of the PfSH Natural Environment Group and provides input and steer into the work being undertaken by that group.
- Southern Water - Southern Water is a standing member of the PfSH Natural Environment Group and provides input and steer into the work being undertaken by that group.
- The PfSH Statement of Common Ground (2023) also states an ambition to work with further partners including the Hampshire and Isle of Wight Local Nature Partnership and National Highways, going forward.

Further PfSH Joint Work

2.34. In addition to the SPS and SoCG, PfSH has successfully tackled a number of complex sub-regional issues particularly relating to nature conservation through joint working. Indeed, it is the only area of the country to have developed a successful solution to nutrient neutrality.

2.35. In 2018, PfSH formed a Water Quality Working Group to coordinate a PfSH-wide response to water resource issues including nutrient pollution in the Solent. This followed on from the completion of the Integrated Water Management Study 2018¹³ and the advice from Natural England on nutrient neutrality for new housing development. The group also includes local authorities from beyond the PfSH boundary, but within the Solent catchment that need to address this issue such as Chichester District Council.

2.36. PfSH employed a Strategic Environmental Planning Officer (SEPO) whose initial objective was to provide a strategic response to the issue of nutrient neutrality across the impacted areas of the

¹³ <https://www.push.gov.uk/wp-content/uploads/2021/08/Integrated-Water-Management-Study-2018.pdf>

Solent. The role has since evolved and now sits under the umbrella of the Solent Mitigation Partnership (SMP). The SMP has a team of officers working on nutrient issues and Biodiversity Net Gain in the Solent. Their work streams include facilitating the development of a nutrient mitigation market in the Solent and conducting supply and demand analyses to identify areas most in need of mitigation.

- 2.37. PfSH and the SMP has been proactive in solving nutrient neutrality in the Solent¹⁴ since the introduction of the requirement in 2019. Through effective communication and collaboration with stakeholders across the catchment, PfSH has kept on top of the issue and ensured that new homes and overnight accommodation can be built without an adverse impact on the water quality of international nature conservation designations in the Solent¹⁵. PfSH has ensured that nutrient mitigation has been available across the catchment since 2021 with further mitigation sites in the planning pipeline for the future. The work that PfSH has done on nutrients means that it is far ahead of other areas and catchments in delivering a solution for nutrient neutrality.
- 2.38. Phosphorus mitigation is now a requirement in the Itchen catchment within the Solent following the publication of nutrient neutrality guidance in March 2022 by Natural England. There is already some mitigation in the area and projects in the pipeline, but a larger solution is still needed to meet the demand.
- 2.39. As well as providing a single point of contact to the development industry and landowners who may be able to offer mitigation solutions, the SMP also monitors the supply and demand relating to nutrient neutrality mitigation and engages with stakeholders to facilitate mitigation schemes coming forward to satisfy demand.
- 2.40. The SMP are carrying out significant work in the preparation for the national implementation of Biodiversity Net Gain (BNG), including co-ordination of a PfSH wide piece of work looking at the potential for BNG on Council owned land. The SMP has in addition to its nutrients work focused on supporting the PfSH authorities in the preparation for mandatory BNG.
- 2.41. The SMP team have most recently been focusing upon delivering a supply of sites in the sub region to deliver nutrient mitigation for the PfSH authorities. This includes sites at Stubbington and in the Meon Valley. These sites will be owned and managed on the behalf of PfSH. The PfSH SMP is working with the LPAs including Havant Borough to decide on how credits created through these sites will be priced and distributed. The sites in some instances also have the potential to deliver offsite BNG.
- 2.42. In December 2025 the SMP took a report to PfSH Joint Committee. The report set out an analysis of nutrient supply and demand across the PfSH region, divided between the river catchments in the area.
- 2.43. The PfSH authorities have carried out significant joint working to address issues arising from recreational disturbance impacts on protected Brent Geese and Waders that overwinter in the Solent on mudflats and supporting habitat across the Solent. Bird Aware Solent¹⁶ was set up as a joint initiative between the South Hampshire local authorities including HBC in order to lessen potential recreational impacts from increased local housing development. The initiative is run by the

¹⁴ <https://www.push.gov.uk/our-partnership-and-nutrient-neutrality/>

¹⁵ This includes Chichester and Langstone Harbours Special Protection Area (SPA)/Ramsar, Solent and Southampton Water SPA/Ramsar, Solent Maritime Special Area of Conservation (SAC), Portsmouth Harbour SPA/Ramsar.

¹⁶ <https://birdaware.org/solent/>

Solent Recreation Mitigation Partnership (SRMP), which is made up of 19 organisations and funded by contributions from all new residential dwellings within 5.6km of the SPAs.

- 2.44. The Bird Aware Partnership has gone from strength to strength first winning two awards at the Royal Town Planning Institute South East annual awards in 2018. The first award was for 'excellence in planning for the natural environment'. This award was given in recognition of work that helps to protect iconic bird species such as the curlew and the brent goose. Bird Aware Solent also received the prestigious award for overall regional winner. In 2019 Bird Aware Solent won the "Planning and the Natural Environment" category at the National Planning Awards and in 2020 it also received the 'Sustainability Campaign' public sector winner from the Institute of Environmental Managers and Assessors. Following these successes, Bird Aware has extended its influence to other parts of the country most notably through the creation of Bird Aware Essex Coast.
- 2.45. Detail of the mitigation measures is set out in the Solent Recreation Mitigation Strategy. The main measures being implemented through the Solent Recreation Mitigation Strategy comprise a team of rangers to work with coastal visitors and communities to educate them about the birds and the adverse impact of recreational disturbance on them. Additional work is taking place to encourage responsible dog walking and visits to less sensitive parts of the coast. This work is particularly important as research shows that around 40% of bird disturbance occurs as a result of interactions with dogs. The Bird Aware Solent Strategy¹⁷ was published in September 2024. This includes mitigation measures for the impact of recreational disturbance upon summer breeding birds and has an end date of 2050.
- 2.46. The East Hampshire River's Catchment partnership is another PfSH sub group. The group is primarily concerned with nutrient neutrality and Biodiversity Net Gain impacting the rivers of the Eastern part of Hampshire and feeding into the Solent.

South East Hampshire Local Planning Authorities Joint Working

- 2.47. GBC, PCC and HBC have been working together since May 2025 to address cross boundary strategic issues in SEH. The initial focus of their work was to identify a robust combined unmet housing and employment need position. This work was initiated as all three LPAs were at a similarly advanced stage of plan making namely approaching Pre Submission. Furthermore, the three local authorities are located entirely in the same housing market area and functional economic market area of SEH. The three authorities are all constrained in their ability to deliver housing growth by their physical geography and considerable constraints as identified through the PfSH SPS.
- 2.48. As a result of these constraints the three authorities have unmet housing needs which they needed to ask their more rural neighbours (EHDC, FBC and WCC) to their north to help accommodate. The SEH authorities established a combined housing and employment need, supply and unmet need position in October 2025. This showed that there was an unmet housing need figure for the three local authorities of 18,347 homes and 19,973m² of employment floorspace. This work provided clarity on unmet need in SEH and provided a basis for joined up discussions with neighbouring LPAs as they progressed their plans.
- 2.49. The unmet housing need figure for SEH is considerably higher than the shortfall of 11,771 identified for the whole of South Hampshire in the SPS published by the PfSH in 2023. The main driver for
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this increase is the change of the standard method from being population based to stock based and the calculation over a longer timeframe, based on emerging local plans for those areas.

- 2.50. A positive outcome of joint working over the summer of 2025 has been that a surplus of office floorspace in Portsmouth has been committed to Havant.
- 2.51. GBC, HBC and PCC formally requested EHDC, FBC and WCC to assist in meeting the unmet housing need of 18,347 homes and unmet employment need of 19,973 m² of new employment floorspace with joint letters having been sent in October 2025 to this effect. The letters were supported by appendix tables which set out the following:
- The housing and employment need and supply in the local authority areas of Portsmouth, Gosport and Havant
 - A summary of the key constraints and Local Plan approaches for the three LPAs
 - A summary of the Local Planning Authorities approached by the three LPAs in respect of accommodating unmet housing and employment.
- 2.52. EHDC, FBC and WCC are all partially located in SEH and so share the same housing market area and functional economic market area as the SEH Authorities. They are at different stages of plan making.
- 2.53. The three authorities of EHDC, FBC and WCC all responded to request to assist in meeting unmet housing need. EHDC confirmed that due consideration would be given to the unmet needs of the SEH Authorities but that they were currently uncertain if they could meet their own needs
- 2.54. FBC's response identified that their 2037 Local Plan had identified a 900-home allowance for the unmet need from PfSH. 800 dwellings had previously been agreed to meet the needs of Portsmouth however there were another 100 homes for the SEH authorities to divide up as was seen fit. The response also highlighted that FBC had an oversupply of employment floorspace. FBC confirmed that it was willing to commit 19,973m² of its employment floorspace to HBC (as the SEH authority with a shortfall) for its unmet employment need.
- 2.55. WCC's response stated that the SEH authorities should do more to approach other LPAs outside of the HMA in order to evidence that they had left 'no stone unturned'. The response also asked for the provision of further detail on the employment request, specifically in regard to the type of employment need arising from the SEH authorities.
- 2.56. The three SEH authorities responded to WCC. The letter highlighted the FBC response to the letter sent in October 2025 in regards to employment and the position set out by PfSH at the December 2025 Joint committee in the respect of not updating the PfSH Spatial Position Statement. Due to these factors the SEH Authorities reiterated that WCC should address the issue of unmet need from SEH more robustly in its emerging Local Plan.
- 2.57. WCC responded further in January 2026 reiterating that its position remains unchanged highlighting Winchester City Council's response to their Inspector led public consultation.

Joint SEH Working

- 2.58. Following the positive response to the request to help meet unmet housing and employment needs from FBC, the four authorities have been working together. It was decided that this was the best approach due to the joint issues faced by the four authorities and the likelihood of them forming a new unitary authority under future Local Government Reorganisation proposals.

- 2.59. The four SEH authorities met in January 2026 and discussed the housing and employment needs positions in SEH and agreed the following:
- That the Fareham local Plan provides 900 homes for unmet need. 800 homes were already agreed to go to PCC. The remaining 100 were agreed to be provided to GBC.
 - That FBC and PCC are able to assist HBC in meeting their unmet employment needs.
 - That the four authorities will work closely together to on future ecological network, environmental mitigation and other greening and biodiversity opportunities in the area. They agreed to set up an officer group comprising planning and ecology representatives from the four authorities to deliver this.
 - That the four authorities would enter into a multi-lateral SCG to confirm the points of agreement and future working agreed.
- 2.60. In March 2026 the four SEH authorities (as shown on map 3 below) agreed a joint SCG⁴³. The main points of agreement in the SCG were that:
- FBC would provide 900 homes for unmet need of which 800 were for PCC and 100 for GBC.
 - That FBC and PCC would provide 51,234m² (31,261m² from PCC and 19,973m² from FBC) of employment floorspace for HBC's unmet need.
 - The four authorities would undertake future joint working on environmental issues.

Bi-lateral working with neighbouring authorities

- 2.61. The Borough Council has worked on a bi-lateral basis with all its neighbours in South East Hampshire. This is in addition to the SoCG and cooperation being undertaken by the local planning authorities through PfSH. The Borough Council has agreed SoCGs with the following neighbouring authorities:
- Chichester District Council (CDC)
 - Portsmouth City Council (PCC)
 - South Downs National Park Authority (SDNPA)
 - Winchester City Council (WCC)
- 2.62. In addition, the Borough has signed a SoCG with Gosport Borough Council as it falls within the same housing market area. Fareham Borough Council was also part of a joint statement of common ground between the SEH Authorities.
- 2.63. These SoCGs are jointly agreed statements between the Council and the neighbouring authorities. They set out the position and understanding with respect to key cross boundary strategic issues between the two authorities. The SoCGs are not binding on either party but set out a clear and positive direction to inform ongoing strategy and plan making.
- 2.64. Each SoCG focuses upon the key cross boundary issues between the two local authorities in question, however, they also cover the key cross boundary issues of:
- Housing
 - Employment
 - The natural environment
 - Transport

- 2.65. These key cross boundary issues were decided in reference to paragraph 20 of the NPPF¹⁸ which states that strategic policies should set out an overall strategy for but not limited to the pattern, scale and design quality of places and make sufficient provision for housing; infrastructure for transport; community facilities; and conservation and enhancement of the natural, built and historic environment.
- 2.66. The individual SoCGs represent the culmination of ongoing discussions between Havant Borough and the neighbouring authorities over a number of years. In many instances there have been a series of SoCGs between Portsmouth and the neighbouring LPAs, which have been changed and updated as the two LPAs have progressed their respective Local Plans. In addition, the LPAs have in many instances made representations on each other's draft plans in order to address key cross boundary issues, for example, the representations on the emerging Winchester District Local Plan at several stages between 2022 and 2024 resulted in WCC agreeing to provide a proportion of its unmet need allowance towards Havant borough's unmet housing need.
- 2.67. The SoCGs outline the strategic geographies of Havant Borough and the neighbouring authority, showing the interrelationship between the two. The SOCG then sets out the key cross boundary strategic issues addressed with an agreed position between the two councils on each issue. Where relevant, areas of disagreement are also set out.

Letters to neighbouring authorities requesting assistance with unmet housing needs

- 2.68. Havant Borough Council wrote letters to neighbouring authorities at key stages in the plan making process.

March 2024

- 2.69. In March 2024, Havant Borough Council (HBC) wrote to the neighbouring authorities of CDC, EHDC, PCC, SDNPA and WCC to request formal assistance with unmet housing need. Additionally, HBC also wrote to FBC and GBC given that these authorities fall within the same HMA.
- 2.70. The Borough Council received responses from these neighbouring authorities, except for FBC who had recently adopted their local plan (at the time). These set out that CDC, PCC and GBC were unable to assist with Havant Borough's unmet housing need due to physical constraints within these administrative areas meaning they are unable to accommodate their own housing need. In addition, PCC's response to HBC requested that the Borough Council helps meet the City Council's unmet housing needs. HBC responded to indicate that it is unable to meet its own housing need, and so cannot help Portsmouth City with its unmet housing need.
- 2.71. EHDC stated that they expect to accommodate some unmet needs from areas that can evidence a functional relationship with areas of their district but have not yet agreed the extent of that. They said they were unable to help HBC meet the whole identified unmet need without significant harm to their rural District. Furthermore, until they have been through the representations to their recent

18

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

consultation, they were unable to offer further clarity on their position to potentially assist with unmet needs.

- 2.72. In response to letters and consultation responses from HBC and PCC, WCC agreed to earmark 70% of their unmet housing need's allowance to HBC (SoCG), the remaining 30% to be earmarked to PCC.
- 2.73. The SDNPA response highlights that it is unlikely that the South Downs National Park will be able to accommodate any unmet need arising in Havant Borough. This reflects the advice in the PPG that national parks "*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*" (Paragraph 041 Reference ID: 8-041-20190721).

June 2025

- 2.74. During the Council's Regulation 18 Draft Local Plan consultation. HBC wrote to neighbouring authorities of CDC, EHDC, PCC, SDNPA and WCC in addition to FBC and GBC (as set out above). This provided an update on the Council's housing need and supply position, and to formally request assistance with unmet employment need following the publication of the Employment Land Review.
- 2.75. Responses from CDC, PCC and GBC reaffirmed their position(s) that they could not accommodate any unmet housing need arising from Havant Borough. In addition, PCC and GBC's responses to HBC requested assistance from Havant Borough with unmet housing needs arising from their authorities. HBC responded to indicate that it is unable to meet its own housing need, and so cannot help Portsmouth City nor Gosport Borough with their unmet housing need. Significantly, PCC's response also formally offered assistance with meeting unmet employment needs.
- 2.76. EHDC response in return highlights the significant uplift in housing numbers because of the updated standard method. It highlights that their development capacity will be assessed as part of their Local Plan. It is noted that consideration will be given to the unmet needs arising from Havant Borough through the Integrated Impact Assessment. This will inform the extent of which unmet development needs and how much of this need can be met within the remit of sustainable development.
- 2.77. EHDC's response also formally requested assistance with unmet need for traveller accommodation and specifically asks Havant Borough to consider whether traveller accommodation could be provided on some of the larger housing allocations its Local Plan. HBC responded to indicate that it would be happy to explore whether the Southleigh site promoter would consider the provision of gypsy and traveller pitches as part of the overall development but highlighted that that it would inevitably reduce the amount of developable land. This in turn would negate HBC's ability to address housing need within the Borough's boundary.
- 2.78. WCC responded to confirm that the Winchester Regulation 19 Local Plan includes an unmet need allowance, a proportion of which is assigned to HBC. It highlights the increase to Winchester's housing requirement under the standard method. It is noted that WCC are unable to agree Havant Borough's unmet need figure of 9,292 until further information is provided confirming that future development cannot take place on Hayling Island. WCC state that HBC have a responsibility to have discussions with all neighbouring local planning authority in terms of unmet housing need. In terms of employment supply, WCC's letter notes that it does not currently have any capacity to assist HBC but WCC will be commissioning an updated Employment Land Review which is not yet started.
- 2.79. FBC's response notes that the adopted Fareham Local Plan includes a 900 dwelling commitment towards wider PfSH need, of which 800 dwellings are specifically allocated towards PCC. Their

letter also notes they have yet to begin a review of the Local Plan and they are unable to provide a firm commitment to meeting further unmet needs from neighbouring authorities at the time.

- 2.80. The SDNPA response confirms the National Park is unable to accommodate any unmet needs arising from Havant Borough.
- 2.81. These letters have been collated by authority in chronological order and are attached at Appendix 4.

Joint letters to authorities in the same housing market area

- 2.82. During the Summer of 2025, HBC met with PCC and GBC to establish collective unmet development needs in Southeast Hampshire. The joint working has been extremely successful and has resulted in a formal offer from PCC which will largely address the Havant Borough's unmet office need.
- 2.83. In October 2025, a joint letter from HBC, GBC and PCC was sent to EHDC, FBC and WCC (the other three authorities in the same HMA) formally requesting assistance with collective unmet development needs arising from the three authorities.

Fareham Borough Council

- 2.84. FBC's response notes their adopted local plan's commitment of 900 dwellings towards PfSH unmet need, 800 of which are specifically allocated to PCC. The remaining 100 dwellings is identified towards wider unmet needs in the area. FBC suggest it would be appropriate for GBC, HBC and PCC to discuss and agree how the 100 dwellings are apportioned, to be agreed formally with FBC in due course.
- 2.85. It also notes FBC's proactivity to deliver ecological infrastructure to facilitate development in neighbouring areas including GBC, HBC and PCC.
- 2.86. Significantly, their response also notes the deficit of employment floorspace (arising out of HBC) and that the Fareham Local Plan 2037 identifies an excess of 119,790 square metres of floorspace compared to the requirement. FBC's letter formally commits 19,973 square metres of employment floorspace towards Havant Borough's unmet need.

East Hampshire District Council

- 2.87. EHDC's response indicates that they are committed to positively engaging with neighbouring authorities under the DtC. As part of their Local Plan preparation, EHDC will give due consideration to the unmet housing and employment needs through the Integrated Impact Assessment which will assess reasonable alternatives including meeting unmet needs; infrastructure evidence and site assessments currently in progress; the identification of housing market areas and functional economic areas (FEMA), including the limited extent of the Portsmouth HMA within East Hampshire. Note potential unmet needs emerging from Chichester District, Waverley Borough and other Surrey authorities, and will assess the extent to which these relate to East Hampshire's housing market geography. At this time, it is not known whether EHDC will be able to meet its own disaggregated housing needs and therefore to what extent we can meet unmet needs from elsewhere. Should a surplus of housing capacity be identified, it is envisaged that unmet needs from the SDNP in East Hampshire be prioritised. EHDC consider it is important that approaches are made to LPAs beyond the HMA and FEMA due to the substantial amount of unmet need.
- 2.88. EHDC has commissioned an update to its Housing and Economic Development Needs Assessment (HEDNA) and Employment Land Review (ELR) which will inform our position on employment land provision and any potential capacity to assist neighbouring authorities.

- 2.89. EHDC is likely to have its own unmet need for Traveller and Travelling Showpeople accommodation. EHDC will be seeking assistance from neighbouring authorities, including those within the Portsmouth HMA, and would welcome reciprocal consideration of this matter.
- 2.90. More recently on the 17 June 2026, EHDC wrote to HBC to draw attention to a recent decision and explain the Council's stated position following changes to national planning policy and local government arrangements. EHDC has formally agreed that it will no longer seek to submit a Local Plan under the 'legacy' planning system by the Government's deadline of 31 December 2026. The reasons for this are set out in a report presented to Cabinet¹⁹ on the 28 May 2026. At the time of writing, HBC will continue to engage with EHDC regarding their new style Local Plan. However, it is not anticipated that EHDC will be able to commit to accommodating any unmet need prior to the examination of the Building a Better Future Plan.

Winchester City Council

- 2.91. WCC's response states that it is agreed that the unmet housing need requires a coordinated and strategic approach, but this responsibility does not rest solely with WCC and nor should it be constrained to HMAs. WCC strongly encourage Portsmouth, Gosport and Havant to be proactive and to approach other LPAs in Hampshire outside of your HMA. Given the scale of unmet housing need, WCC strongly encourages the three authorities to respond to any Local Plan consultations in Hampshire as this is a joint issue that all local authorities need to approach in a consistent way given the importance of the issue. This is important to demonstrate to a Local Plan Inspector that you have left 'no stone unturned' in responding to the significant unmet need you have identified.
- 2.92. WCC's letter raises various questions in relation to unmet employment need, and in particular, what type of employment need. This is necessary to understand whether the surplus currently identified in Portsmouth and Fareham could meet unmet needs in Havant.
- 2.93. WCC's response notes the team are now working on two Local Plans. The primary focus is to move the emerging Local Plan to the Main Modifications consultation and then onto subsequent adoption as soon as possible next year. Currently priority to ensure the emerging LP moves swiftly towards adoption. WCC has also committed to undertake work on the next Local Plan which cover the period up to 2044. No detailed work on how to meet the increased standard method has been undertaken, and therefore what contribution WCC are able to make from unmet needs from neighbouring authorities is unknown. Notes that various workstreams have been commissioned including an Integrated Impact Assessment/Habitats Regulations Assessment and update to Employment and Retail Assessment for the Local Plan review. Early process of identifying and scoping the key issues and we will need to prepare a project plan (for the next Local Plan). Confirms commitment to working collaboratively with all authorities across Hampshire but premature to make any firm commitments regarding accommodation of unmet housing or employment need at this time as WCC have not yet mapped out the process.
- 2.94. These letters have been collated by authority in chronological order and are attached at Appendix 4.

¹⁹ <https://easthants.moderngov.co.uk/ieListDocuments.aspx?CId=126&MId=4503>

Letters to authorities in the Hampshire and Solent devolution area requesting assistance with unmet housing needs

- 2.95. As set out above, the Council's approach has been to focus discussions with its neighbours and other authorities in the same the HMA. However, given the scale of unmet housing need that exists, it has been necessary to engage with other authorities in the Hampshire and the Solent devolution area, as these will be covered by the same Spatial Development Strategy in due course.
- 2.96. This initially took the form of representations to Test Valley Borough Council, Basingstoke and Deane and New Forest District's Regulation 18 Local Plans in September 2025, January 2026 and February 2026 respectively. Havant Borough Council subsequently formally requested assistance by letter from Eastleigh Borough Council, Hart District Council, Isle of Wight Council, Rushmoor Borough Council and Southampton City Council in March 2026.

Basingstoke and Deane Borough Council

- 2.97. Basingstoke and Deane Borough Council (BDBC)'s response sets out that it is unclear what proportion of need that Havant Borough has specifically requested the borough to accommodate, and that Havant Borough is some distance from the borough.
- 2.98. BDBC is in the early stages of updating its Local Plan and the Council's priority must be to meet the Borough's own needs first, for which a high level of growth is needed. The increases of BDBC's own housing number means that there is difficulty in accommodating further additional homes from neighbouring areas. Finally, the letter confirms that there is not any scope to accommodate any unmet housing need from Havant Borough.

Eastleigh Borough Council

- 2.99. Eastleigh Borough Council's response sets out that the Council is in the process of establishing whether it can make any contribution to wider unmet housing needs through its local process. However, in the event it were able to do so it would be unlikely that such a contribution would assist Havant Borough's unmet need.

Hart District Council

- 2.100. Hart District Council (HDC)'s response indicates that it cannot agree to meet any unmet housing needs. HDC does not consider Havant to be a 'neighbouring area' under the NPPF. The letter indicates that it consider that Hart is under no obligation to consider unmet housing need arising from Havant.

Isle of Wight Council

- 2.101. The Isle of Wight Council's response states that the island would not be able to assist in meeting unmet housing need from Havant Borough. The island itself is also facing a significant increase in the standard method housing need figure, and at this stage, the Council is unable to confirm whether the island can meet its own housing need

Rushmoor Borough Council

- 2.102. Rushmoor Borough Council's response sets out that the Council is preparing a new Local Plan under the new plan-making system. The letter indicates that is not able to accommodate any unmet housing needs of Havant Borough Council. Rushmoor already has an increased housing requirement using the Standard Method and has a land supply shortfall. The letter sets out that the

highly constrained and urban nature of Rushmoor mean that an oversupply of housing land is unlikely to be identified.

Southampton City Council

- 2.103. Southampton City Council (SCC) is not in a position to support (HBC with unmet housing need) at this time. Evidence base work is ongoing but SCC has not yet undertaken the necessary assessment of sites or viability testing to confirm likely housing delivery numbers. At this stage, it is expected that SCC will also have an unmet housing need and so will not have any surplus to support unmet need of our neighbours.

3. Key Strategic Issues

3.1 The key strategic issues for Havant Borough are identified as:

- Housing need and supply, including accommodating the Borough’s unmet need
- Employment need and supply
- The natural environment
- Infrastructure, including transport

3.2 There is a range of other matters that have been raised by neighbouring authorities and prescribed bodies. Where appropriate these have been dealt with on a pragmatic basis with amendments as necessary to the Local Plan during its preparation. The following section of this report addresses each key strategic matter in turn. For each of these, a brief background, actions undertaken, and a summary of outcomes is provided.

Housing need and supply

3.3 Paragraph 11 of the NPPF requires strategic policies, as a minimum to provide for their area’s objectively assessed need for housing as well as any needs that cannot be met within neighbouring authorities unless:

(i) The application of policies in the Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

(ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework when taken as a whole.

3.4 Paragraph 61 of the NPPF states that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted by the standard method. The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. Local Planning Authorities should then establish a housing requirement figure, which shows the extent to which their identified housing need can be met over the plan period.

3.5 Based on the new standard methodology for calculating housing need, Havant Borough has an indicative local housing need figure of 887 dwellings per annum with a base date of 2025. This equates to 15,966 dwellings over the plan period from 2025/26 to 2042/43. A copy of the Council’s housing need assessment using the standard method is provided at Appendix 1 of the Strategic Housing and Economic Land Availability Assessment (SHELAA). The Council’s Housing Needs Analysis separately identifies a need for 601 affordable homes per annum.

3.6 The table below provides a comparison of the difference between the housing need figure calculated using the Government’s standard methodology, the housing requirement figure in the Draft Regulation 18 Building a Better Future Plan. This shows there is an unmet housing need figure of 531 dwellings per year compared to the standard method figure.

Table 3: Havant Borough Housing Need and Supply at Draft Regulation 18 Local Plan stage

Housing need	Housing requirement	Unmet need
17,840	7,218	10,622
892 dwellings per year	361 dwellings per year	531 dwellings per year

3.7 Relevant Statements of Common Ground with neighbouring authorities acknowledge that whilst the precise unmet need arising from Havant Borough will evolve as the Local Plan is finalised as

housing completions figures are released and updated affordability; but this is unlikely to materially alter the level of unmet housing need. Indeed, the final unmet figure in the Publication Plan is as follows:

Table 4: Havant Borough Housing Supply and Unmet Need at Publication Regulation 19 Local Plan stage

Sources of housing supply against housing requirement during the Plan period (2025/2026-2042/2043)	Number of homes
2024 Standard method requirement*	15,822
Planned housing supply, including:	6,215
Planning permissions	984
Broad locations	1650
Allocations	2276
Small sites within urban area	30
Windfall	1275
Non-implementation discount**	-304
Duty to co-operate unmet need allowance in the Winchester City Council's adopted Local Plan	345
Total housing supply	6,256
Unmet Need	9,566

*879 dwellings x 18 years of the Plan period.

** Application of a non-implementation discount of 7% for all forms of major development and 15% for minor development except from implemented planning permissions (works are under construction) and planning permissions where some/all conditions have been already discharged or are in the process of being discharged.

- 3.8 The total housing supply figure differs from that included in Table 5 under Policy 6 (Amount of Housing) in the Publication Plan. This reflects the exclusion of (1,179 dwellings) from supply from the early years of the plan period since the standard method includes an affordability adjustment to take account of past under-delivery. This results in an unmet need of 9,566 dwellings, equivalent to 531 dwellings per annum.
- 3.9 The need identified through the standard method represents a significant increase from the housing requirement set out in the Core Strategy (2011) of 315 homes per year and from past delivery rates of housing. Past delivery rates of housing net completions (excluding C2 completions) in the Borough between 2006/07 and 2024/25 averaged 392 dwellings per annum, or 346 dwellings per annum over the last five years (2020/21-2024/25).
- 3.10 The Borough's objectively assessed housing need is substantially higher than the capacity-based housing requirement. The Borough is exceptionally constrained, and land availability significantly limits its ability to address its development need within its administrative boundary. The Council has left no stone unturned to meet as housing need as sustainably possible within its environmental limits.
- 3.11 The development strategy maximises development in established and urban areas and on brownfield sites; and development on greenfield sites where it has no unacceptable impacts on international, national or local environmental designations. The Plan also seeks to respond to the effects of climate change by not adding to the level of flood risk through a presumption against new housing in areas at risk of flooding, now or in the future. Due to the flood risk to the single access road on and off the island, this includes greenfield sites on Hayling Island, which may not

themselves be at risk. Brownfield development on the island would continue to be acceptable if the site itself is safe. To balance these objectives, the Plan identifies a capacity-based housing requirement, resulting in a very high unmet need figure. The figures set out in the table above were used as the starting point to inform discussions with neighbouring authorities between the Regulation 18 and Regulation 19 stages of the Local Plan.

- 3.12 Portsmouth’s Housing and Economic Development Needs Assessment (December 2023)²⁰ re-examined previous work undertaken by GL Hearn in 2014²¹ which examined Housing Market Areas (HMAs) covering the Partnership for Urban South Hampshire (PUSH) area. The 2014 study identified a Portsmouth HMA which included all of Portsmouth, Gosport and Havant as well as the eastern wards of Fareham Borough, the southern wards of Winchester and part of East Hampshire district.

Gypsies, Travellers and Travelling Showpeople

- 3.13 National planning policy sets out that the housing needs of different groups should be assessed and reflected in planning policies, including for gypsies, travellers and travelling show people. The overarching aim is to ensure fair and equal treatment, in a way that facilitates the traditional and nomadic life of travellers while respecting the interests of the settled community.
- 3.14 To help achieve this aim, local authorities are required to assess need for Gypsies and Travellers for the purposes of planning, work collaboratively to develop fair and effective strategies to meet identified need, seek to reduce tensions between settled and traveller communities and ensure Local Plans include fair, realistic and inclusive policies. Table 5 of this Statement sets out in detail the key strategic issues in respect of Gypsies and Traveller and how the Borough Council has addressed these in discussions with neighbouring authorities.
- 3.15 The Council’s 2024 Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken in accordance with Government planning policy. The GTAA concludes that there is no identified unmet need for Gypsy and Traveller pitches or Travelling Showpeople plots within Havant Borough. Though the 2017 joint GTAA did identify that Havant Borough had a need to provide 1 pitch, this need has now been met through a permission for 2 pitches at Long Copse Lane in northern Emsworth. The Building a Better Future Plan will safeguard this site for current need.
- 3.16 The GTAA found that there was not a need for any formal transit provision nor any plots for Travelling Showpeople are needed during the plan period.

Table 5: Evidence of the cooperation with neighbouring authorities in regards to housing

Strategic issues	<ul style="list-style-type: none"> • The appropriate provision of housing towards meeting local needs, including affordable housing within the Portsmouth HMA and South Hampshire sub region • Where it is demonstrated that housing development cannot be sustainably accommodated in the Borough, the Borough Council will work with neighbouring authorities needs to consider whether any unmet need can be met elsewhere within those authorities' areas. • Where it is demonstrated that Gypsy & Traveller and Travelling Showpeople sites cannot be sustainably accommodated, the Borough Council will work with adjoining authorities to consider whether unmet need can be met elsewhere within the locality.
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²⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

²¹ <https://www.push.gov.uk/wp-content/uploads/2018/06/SHMA-2014-1.pdf>

	<ul style="list-style-type: none"> • Successful delivery of affordable housing relies on Registered Providers and Portsmouth City Council as the Council does not own any housing stock.
Partners	<ul style="list-style-type: none"> • All Local Authorities falling within the PfSH with specific emphasis on those LPA's in the Portsmouth HMA, which comprise: East Hampshire, Fareham, Gosport, Portsmouth and Winchester. • PfSH's wider membership/ LPAs within the Hampshire and the Solent devolution area.
Actions/outcomes	<p>Joint Working Arrangements</p> <p>The Borough Council has worked as part of the PfSH in the preparation of the 2016 and 2023 Spatial Position Statements and supporting Evidence Base Documents. HBC officers and members take an active role in a number of PfSH groups including Joint Committee, Chief Executives Group and Planning Officers Group.</p> <p>In September 2025, PfSH Planning Officers considered the appropriate approach to monitoring/reviewing the PfSH Spatial Position Statement (2023) prior to the preparation of a statutory Spatial Development Strategy by the proposed Mayoral Combined Authority for Hampshire and the Solent. The matter was then discussed at PfSH Joint Committee who approved a statement in December 2025, stating that the intention at this time was to not update the Spatial Position Statement.</p> <p>Collective discussions South East Hampshire Group Since June 2025 the Council has been working closely with PCC and GBC to assess the unmet housing need arising within SE Hampshire. The information collated has been used as the basis for discussions with the neighbouring authorities of EHDC, FBC and WCC who have been asked to help accommodate the unmet need arising.</p> <p>Since January 2026 FBC has joined the group of SEG authorities and the four authorities have produced a joint SoCG (March 2026) setting out the agreed housing distribution.</p> <p>Jointly Prepared Evidence Base - Housing Market Assessments</p> <p><i>South Hampshire Strategic Housing Market Assessment, January 2014²², and Appendices (2014).</i> This report is a Housing Market Assessment setting out the housing market requirements of the PfSH sub region.</p> <p><i>Objectively Assessed Housing Need Update, Partnership for Urban South Hampshire, (April 2016).</i>²³This report is an</p>

²² <https://www.push.gov.uk/wp-content/uploads/2018/06/SHMA-2014-1.pdf>

²³ <https://www.push.gov.uk/wp-content/uploads/2018/06/Housing-need-update-2016.pdf>

	<p>assessment of housing need assuming a “policy off” basis, as required by national policy / guidance.</p> <p><i>Reviewing Potential Rates of Housing Delivery, Partnership for Urban South Hampshire, (April 2016).</i> ²⁴This report includes a review of housing delivery performance historically at a national level, explores potential benchmarks in terms of the pace at which housing development can come forward, and considers past housing delivery performance within the PUSH area.</p> <p>Jointly Prepared Evidence Base - Other Housing related PFSH studies</p> <p><i>Statement of Common Ground – Broad Areas of Search for Growth Assessments, (PFSH December 23)</i>²⁵. This report carried out an assessment of areas for potential large scale housing delivery across the sub region.</p> <p>Spatial Position Statements</p> <p><i>PUSH Spatial Position Statement, Partnership for Urban South Hampshire, (June 2016).</i> ²⁶ This Position Statement has been developed to inform long-term decisions about the level and distribution of development in the area over the period from 2011 to 2034.</p> <p><i>Partnership for South Hampshire Spatial Position Statement, (December 2023).</i> ²⁷ This document helps to inform the preparation of and strategic co-ordination of local plans.</p> <p>Statements of Common Ground with individual LPAs</p> <p><i>Statement of Common Ground between Chichester District Council and Havant Borough Council (June 2026).</i> This SoCG was prepared to support the Regulation 19 Havant Building a Better Future Plan. The Statement notes that HBC is not proposing to meet its local housing need in full, due to constraints and that CDC has not objected to HBC’s Local Plan on that basis. CDC’s housing need for the next Local Plan is still being determined.</p> <p><i>Statement of Common Ground between Gosport Borough Council and Havant Borough Council May 2026).</i> This SoCG was prepared to support both the Pre-Submission Havant Borough Building a Better Future Plan and the Publication Gosport Borough Local Plan 2042. The two authorities note their respective positions on housing need and supply in that they are unable to meet its housing need in full, and it is agreed that</p>
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²⁴ <https://www.push.gov.uk/wp-content/uploads/2018/05/Rates-of-housing-delivery-2016.pdf>

²⁵ <https://www.push.gov.uk/wp-content/uploads/2024/01/Broad-Areas-of-Search-for-Growth-Assessments-6.12.23.pdf>

²⁶ <https://www.push.gov.uk/wp-content/uploads/2022/05/PUSH-Spatial-Position-Statement-2016.pdf>

²⁷ <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

	<p>neighbouring can assist the other with accommodating unmet need arising out of each Local Plan.</p> <p><i>Statement of Common Ground between Portsmouth City Council & Havant Borough Council (February 2026).</i> This SoCG was prepared to support both HBC's Pre-Submission Building a Better Future Plan and PCC's Pre-Submission Local Plan under Regulation 19. The two authorities note their respective positions on housing need and supply in that they are unable to meet its housing need in full, and it is agreed that neighbouring can assist the other with accommodating unmet need arising out of each Local Plan.</p> <p><i>Statement of Common Ground between South Downs National Park Authority & Havant Borough Council (April 2026).</i> This SoCG was prepared to support the Publication Havant Borough Building a Better Future Plan and the Proposed Submission South Downs Local Plan. The two authorities are satisfied that each other are leaving no stone unturned to meet their own housing need. It is agreed that neither authority can assist the other with accommodating unmet need.</p> <p><i>Statement of Common Ground between Winchester City Council and Havant Borough Council (April 2026).</i> This SoCG was prepared to support Pre-Submission Havant Borough Building a Better Future Plan (Regulation 19) and to reflect the adoption of the Winchester District Local Plan 2040 on 24 March 2026. In regard to housing the SOCG identifies that the Winchester District Local Plan 2020-2040 includes an allowance towards unmet need in Havant Borough, but there remains a large amount of unmet need to be addressed arising out of Havant Borough and the wider Housing Market Area. The Winchester District Local Plan 2044 is at an early stage and detailed work on how the increase in the standard method might be accommodated in Winchester District has not yet been undertaken.</p> <p>Representations on Neighbouring LPA's Local Plans.</p> <p><i>Representation on the East Hampshire – Local Plan 2021-40 (March 2024).</i> This representation covered: unmet housing need arising out of Havant Borough and the sub-region, allowance for unmet need within East Hampshire's housing land supply is not sufficient to address Havant's unmet need and welcomes discussions with EHDC to ensure that cross-boundary issues are robustly addressed. Notes that the two sites: HDN1 Land at Woodcroft Farm and RLC4 Land at Little Farm are close to Havant and Portsmouth HMA and looks forward to working with EHDC to refine these allocations.</p> <p><i>Representation on the Test Valley Draft Local Plan 2042 (September 2025).</i> This representation principally covered the previous request from HBC which formally asked for a commitment from TVBC to accommodate unmet need from Havant Borough, highlights the Draft Local Plan does not acknowledge any current requests to help with unmet need, and includes a further formal request to accommodate unmet need.</p>
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	<p><i>Representation on the Portsmouth Pre-Submission Local Plan Addendum (January 2026).</i> This representation covered: PCC's and HBC's strong history of successful collaboration, commends Portsmouth's Local Plan for setting out high quality placemaking around key sites, expresses disappointment around the IROPI decision, confirms the Borough Council is satisfied that the City Council has done all it can to address the need for development, notes the collective discussions including Gosport Borough Council which has resulted in an up-to-date picture of unmet need situation in the HMA and thanks PCC for its positive contribution towards HBC's unmet employment need which is a tangible and demonstrable outcome of positive and collaborative working between respective authorities.</p> <p><i>Representation on the Winchester Proposed Main Modifications (January 2026).</i> This representation covered: the Solent Mitigation Partnership, and the reduction in the unmet needs allowance (from 1,900 dwellings to 495 dwellings through the examination process) which is apportioned 30% to Portsmouth City Council and 70% to Havant Borough Council, and the collaboration with GBC and PCC to identify the level of unmet housing and employment need arising from South East Hampshire.</p> <p><i>Representation on the Basingstoke Local Plan Update Regulation 18 (January 2026).</i> This representation covered HBC's unmet housing need position and formally requested BDBC to assist with meeting unmet housing need.</p> <p><i>Representation on the New Forest Spatial Issues and Options Regulation 18 (March 2026)</i> This representation covered HBC's unmet housing need position and formally requested NFDC to assist with meeting unmet housing need.</p> <p>Letters / requests from Neighbouring LPA's</p> <p><i>Letter from Winchester City Council requesting help meeting gypsy and traveller needs (August 2023).</i> This letter requested that the Borough Council help meet Winchester's unmet gypsy and traveller needs (200 pitches for gypsies and 27 plots for travelling showpeople).</p> <p><i>Email from East Hampshire District Council requesting assistance with delivery of traveller and travelling showpeople sites (August 2023).</i> This letter requests assistance with the delivery of traveller and travelling showpeople sites.</p> <p><i>Letter from Gosport Borough Council requesting assistance with unmet housing need (July 2025).</i> The letter provides an update on the Borough's housing need and supply position and formally requests assistance from HBC to assist with the unmet need of Gosport Borough.</p> <p><i>Letter from East Hampshire District Council requesting assistance with gypsy, traveller and showpeople needs (July 2025).</i> This letter responds to Havant Borough's unmet development needs and formally requests assistance with Traveller accommodation and asks whether Havant Borough</p>
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	<p>could consider the inclusion of Traveller accommodation on the allocation sites at Southleigh and Campdown.</p> <p><i>Letter from Portsmouth City Council (August 2025) requesting assistance with unmet housing need.</i> This letter provides an update on the City’s housing need and supply position, including the contribution towards unmet need from the Fareham Local Plan and formally requests assistance from HBC to assist in meeting the unmet need of Portsmouth.</p> <p><i>Letter from South Downs National Park Authority (November 2025) requesting assistance with unmet housing need, and gypsy and traveller needs.</i> This letter provides an update on its housing need evidence and notes that it will be able to meet a housing need figure of 323 homes per year, but not 1,048 homes per year and formally requests help with unmet housing need if the Planning Inspectorate prefer this figure. In addition, the SDNPA asks for help with unmet needs of gypsies and travellers in the National Park (73 gypsy and traveller pitches and 11 travelling showpeople plots).</p>
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Key Policy Outcomes for Housing

- 3.17 Policy H1 of the Adopted Winchester Local Plan 2020-40¹ includes an unmet needs allowance of 495 dwellings as a contribution towards the unmet needs of neighbouring areas in South Hampshire. 70% of this unmet housing needs allowance is apportioned to Havant Borough equivalent to 346 dwellings. This is set out in the Statement of Common Ground between Havant Borough Council and Winchester Borough Council (October 2024).
- 3.18 At this stage, East Hampshire District Council has yet to confirm whether they are able to meet their housing need figure under the new standard method, and therefore whether they are able to assist Havant Borough with its unmet housing needs. as of May 2026, the authority has decided to realign the Local Plan timetable and prepare a Local Plan under the new plan-making system.
- 3.19 Havant Borough has received requests for assistance with unmet housing need from Gosport Borough (July 2025) and Portsmouth City Council (August 2025) respectively. However, as Havant Borough is unable to meet its own housing need, it is unable to assist GBC and PCC with unmet housing need.
- 3.20 Havant Borough has received requests for assistance with unmet gypsy and traveller needs from East Hampshire (July 2023 and November 2025), Winchester (August 2023) and South Downs National Park (November 2025) respectively. However, the Borough has been unable to assist due to land capacity constraints. Whilst East Hampshire have suggested that gypsy and traveller needs could be met through the provision of pitches on general housing allocations. However, this would negate the Borough’s ability to meet general housing needs and potentially increase the extent of unmet need.

Employment need and supply

- 3.21 The Borough has a diverse and varied industrial based economy supported by a wealth of micro sized enterprises. The Borough accommodates a small sub regional cluster of local construction and industrial businesses. Dunsbury Park is part of the Solent Freeport and is critical to delivering the aims of the Freeport Business Case in relation to advanced manufacturing. The development of the site is focused on a range of sectors including automotive and clean growth sectors.
- 3.22 Recent industrial demand has come from a range of sectors including retailers, e-commerce and manufacturers, but the market is constrained due to low levels of availability. Even though the Borough is home to a number of global manufacturing brands such as Kenwood, Lewmar, Lockheed Martin, it remains a relatively low-waged economy.
- 3.23 Havant Borough has a comparatively small office market or, that is likely to reflect the close proximity of other more attractive office locations. Occupiers are seeking smaller, high quality units due to a both a trend involving a large proportion of office workers moving to homeworking for part of the working week, as well as occupiers seeking sustainability and energy efficiency.
- 3.24 The Borough Council is working closely with authorities across the Solent through both PfSH and the Solent Growth Partnership to support joint economic goals for the Solent. The Solent is a prime location within the UK to deliver development to meet the pressing needs of the marine and maritime sector. This is recognised in its recent designation as a Freeport. The table below sets out in detail the key strategic issues in respect of the Borough’s economy and how the Borough Council has addressed these including with the Local Economic Partnership.

Table 6: Evidence of the cooperation with neighbouring authorities in regards to employment

Strategic issues	<p>Provision of at least 123,750 sqm of employment land floorspace (net) across the Borough between 2023-2043.</p> <p>The delivery of the Dunsbury Park Freeport Tax site (as part of the Solent Freeport) as a key employment site for specialised industry and technology companies.</p>
Partners	<ul style="list-style-type: none"> • All local authorities falling within PfSH • Solent Growth Partnership (replaces Solent LEP)
Actions/outcomes	<p>Joint Working Arrangements</p> <p>Former Solent Local Economic Partnership and Solent Growth Partnership</p> <p>The Solent LEP was created in 2010 following the abolition of regional development agencies as a non-statutory body responsible for economic development. Led by the business community and supported by three university partners, three unitary authorities (including Portsmouth), eight district councils and one county council, this partnership worked together to secure a more prosperous and sustainable future for the Solent area. In 2023 the Government confirmed its decision to cease LEP funding in the 2023/24 financial year moving to new devolved funding arrangements. In the absence of devolution locally the functioning economic area of the Isle of Wight, Portsmouth and Southampton was confirmed in March 24 and is working together as the Solent Growth Partnership. The Solent Growth Partnership produced the Solent Growth and Prosperity</p>

	<p>Strategy²⁸ in November 2024, which sets out the Partnership's agenda for economic growth in the Solent.</p> <p>PfSH Supporting evidence documents</p> <p><i>Economic, Employment and Commercial Needs (including logistics) Study (March 2021)</i> ²⁹ This report updates the 'economic need' for land and floorspace in South Hampshire. The report re-confirms the economic geography of South Hampshire – the Functional Economic Market Area (FEMA).</p> <p><i>Economic and Employment Land Evidence Base Paper, PfSH (May 2016)</i>³⁰ The purpose of this report is to draw together evidence regarding economic and commercial property market dynamics in South Hampshire and the Isle of Wight.</p> <p>Former Solent LEP supporting evidence documents</p> <p><i>Transforming Solent Growth Strategy (January 2015)</i>³¹ The Transforming Solent is the Solent region's Strategic Economic Plan for the period 2014 – 2020.</p> <p><i>Transforming Solent productivity and Growth Strategy update (February 2017)</i>³² This report updates the 2015 Transforming Solent Growth Strategy</p> <p><i>Transforming the Solent Strategic Economic Plan (2014)</i>³³ This report sets out a plan for growth which will see us build on the Solent's strengths and plan towards a more ambitious future. The report recognises and builds on our current strengths, harnesses the drivers for growth and addresses the barriers, which if not addressed, could constrain growth.</p> <p>Letters / requests from Neighbouring LPA's</p> <p><i>Letter from Portsmouth City Council (August 2025) responding to unmet housing and employment needs in Havant Borough</i> In Havant Borough's letter dated June 2025, it is stated that there is an unmet need of 51,424 sq. m of employment floorspace, of which 17,655 sq. m is industrial demand and 33,759 sq. is office demand. The City Council is happy to formally offer its surplus of 31,261 sq. m of office floorspace to meet unmet need in Havant Borough.</p>
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²⁸ <https://solentgrowthpartnership.co.uk/wp-content/uploads/2025/01/SGPS-Jan-2025.pdf>

²⁹ <https://www.push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf>

³⁰ <https://www.push.gov.uk/wp-content/uploads/2018/05/Economic-and-employment-land-2016.pdf>

³¹ https://solentlep.org.uk/media/1508/transforming_solent_growth_strategy_-_jan_2015.pdf

³² <https://www.lepnetwork.net/media/1126/solent-policy.pdf>

³³ <https://www.push.gov.uk/wp-content/uploads/2018/05/Transforming-Solent-Marine-and-Maritime-supp.pdf>

	<p><i>Letter from Fareham Borough Council (November 2025) responding to joint letter on housing and employment need in South-East Hampshire</i></p> <p>The remaining deficit of 19,973 square metres of employment floorspace across the three authorities. The adopted Fareham Local Plan 2037 identifies an excess of 119,790 square metres of employment floorspace compared to the requirement. Fareham Borough Council is willing to commit 19,973 square metres of its employment floorspace towards Havant Borough’s unmet need.</p> <p>Statements of Common Ground between individual LPAs</p> <p><i>Statement of Common Ground between the South East Hampshire local authorities of Fareham Borough Council, Gosport Borough Council, Havant Borough Council and Portsmouth City Council (March 2026).</i> This SoCG was prepared to support GBC, HBC and PCC’s emerging Local Plans. A key point in the agreement is that FBC would provide 19,973 square metres of employment floorspace for HBC’s unmet need, in addition to PCC’s contribution of 31,261 square metres.</p> <p><i>Statement of Common Ground between Portsmouth City Council & Havant Borough Council (February 2026).</i> This SoCG was prepared to support the both HBC’s Pre-Submission Building a Better Future Plan and PCC’s Pre-Submission Local Plan under Regulation 19. PCC has agreed to provide a total of 31,261 square metres employment floorspace towards HBC’s unmet employment needs.</p>
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Key Policy Outcomes in regards to employment

- 3.25 A214 of the Pre-Submission Portsmouth Local Plan Composite November 2025³⁴ refers to the office floorspace oversupply of 31,261 square metres and indicates that this can help to meet unmet need in the neighbouring area of Havant.
- 3.26 As the Fareham Borough Local Plan is adopted, the Council is not in a position to include any wording within the current Plan to commit some of this supply to unmet need. Instead this has been formalised as part of a Statement of Common Ground between the South East Hampshire authorities³⁵.
- 3.27 Work undertaken subregionally on employment need most notably in relation to the PFSH Economic, Employment and Commercial Needs (including Logistics) Study was used to update the Borough’s local employment need through the Employment Land Review.

³⁴ https://www.portsmouth.gov.uk/wp-content/uploads/2025/12/PLP-Composite-Nov_2025.pdf

³⁵ <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

The natural environment

Nutrient neutrality and Biodiversity Net Gain

- 3.28 The Council is working closely with neighbouring authorities and partners to deliver strategic scale solutions for Nutrient Neutrality. Natural England advise that the uncertainties regarding the impact of new development on designated sites must be recognised for all proposals that are subject to new planning permissions and have inevitable wastewater implications from additional overnight stays. Any increase is deemed significant, however small, due to the in-combination impacts. Natural England's stance is that the achievement of nutrient neutrality, with a calculated nutrient budget, if scientifically and practically effective, is a means of ensuring that development does not add to existing nutrient burdens and would enable appropriate assessments to conclude no adverse effects on international sites.
- 3.29 The Council has a published Position Statement and Mitigation Plan for Nutrient Neutral Development which is updated annually since 2020. This Position Statement sets out the Council's approach to new development which is likely to have a significant effect on the Solent European sites. It provides guidance on how the nutrient load of new development should be calculated, and how an increase in nutrients into the harbour should be mitigated for development to be 'nutrient neutral'. The statement also includes a 'Mitigation Plan' which sets out specific measures which will be implemented to mitigate development in Havant borough. It indicates how the scale of mitigation should be calculated. If mitigation is shown to be necessary this Position Statement will also allow applicants to calculate the level of mitigation, which will be required from the proposed development.
- 3.30 The PfSH Water Quality Working Group produced the PfSH 2018 Integrated Water Management Strategy (IWMS) which assesses the sensitivity of the whole catchment and address water resource capacity, supply and quality issues, and the 2020 update that tested some of the underlying assumptions in the original report. The jointly created evidence helps underpin the approach being taken in the Local Plan.
- 3.31 In September 2024 the PfSH Joint Committee agreed the principles of an Inter Authority Agreement related to the provision and sale of nutrient credits. This included agreement on the sales approach, including sales price and approach to allocation of credits. The Council's Executive Head of Place made a decision under delegated authority. The Council entered into the Inter Authority Agreement with the PfSH authorities enabling the Council to benefit from the Local Nutrient Mitigation Fund under delegated authority in November 2024.
- 3.32 The Solent Mitigation Partnership (SMP) is another delivery vehicle for nutrient mitigation in South Hampshire, operating under the umbrella of PfSH. PfSH provides strategic oversight and approval via Joint Committee, ensuring that the development and implementation of SMP projects follow the appropriate governance frameworks and align with regional planning and environmental objectives. The SMP team is working with landowners to deliver an ongoing supply of sites to provide nutrient offsetting in the Solent. The SMP maintains a live web page³⁶ that identifies the nutrient mitigation schemes that it is leading on; this is complemented by further schemes signposted by PfSH³⁷.
- 3.33 Since the update to the nutrient neutrality guidance in March 2023³⁸, the PfSH SMP have been looking for solutions in response to the demand for nitrate and phosphate credits. The team is currently helping to bring forward eighteen projects across South Hampshire and the Isle of Wight.
- 3.34 The PfSH SMP have more recently started to look at the potential for Biodiversity Net Gain (BNG) in the Solent including the stacking of nutrient and BNG credits. The SMP led a pilot piece of work on

³⁶ <https://solentmitigationpartnership.co.uk/schemes/>

³⁷ push.gov.uk/work/mitigation-schemes-available-to-developers/

³⁸ <https://www.push.gov.uk/wp-content/uploads/2023/03/Item-10-Nutrient-Neutrality-Update.pdf>

behalf of PfSH members. The work looked at Council owned land to assess the potential of the land to provide offsite BNG delivery to enable development to meet the mandatory minimum 10% net gain required by the Environment Act. PfSH members own a considerable number of green spaces, which could provide offsite BNG for developments. Whilst none of the land within HBC has been taken forward for assessment by the SMP, the Council is carrying out its own assessments via Coastal Partners.

- 3.35 The SMP team have recently initiated a cross-authority officer group focusing upon the delivery of BNG on council owned land. The group includes planning and ecological officers from seven local authorities. This group meets regularly to promote the delivery of BNG on council land.

South East Hampshire Environmental Work

- 3.36 The SEH local authorities agreed in February to begin working together through an Environmental Infrastructure Group on cross boundary environmental issues. The group is intended to:

- Bring together planning and ecology expertise across all four councils
- Look at cross boundary environmental issues and solutions
- Map and understand green infrastructure across all four council boundaries
- Work together on exploring off site BNG and other mitigation sites
- Look to see whether a Green Infrastructure Network can be created and protected across SEH
- Interpret and localise the Local Nature Recovery Strategy

- 3.37 The first meeting of the group took place in March 2026.

- 3.38 Table 7 of this Statement sets out in detail the key strategic issues in respect of nutrient neutrality and BNG and how the Borough Council has addressed these including with PfSH partners.

Recreational Disturbance - Bird Aware Solent

- 3.39 Recreational Disturbance affects protected wildfowl and wading birds that overwinter and breed in the Solent's coastal habitats as well as on terrestrial supporting habitat. Bird Aware Solent was set up as a joint initiative between the South Hampshire local authorities (including Havant BC), Chichester District Council (CDC) and the South Downs National Park Authority (SDNPA) to lessen potential recreational impacts from increased local housing development. The initiative is run by the Solent Recreation Mitigation Partnership (SRMP,) which is made up of 19 organisations and funded by contributions from all new residential dwellings within 5.6km of the SPAs.
- 3.40 The planned mitigation measures are set out in the Bird Aware Solent Revised Strategy (September 2024)³⁹, which was endorsed by PfSH. It adds further detail to the original strategy including a five-year plan and details on project costs and funding.
- 3.41 The main measures implemented through the strategy are a team of rangers to work with coastal visitors and communities to educate them about the birds and the adverse impacts of recreational disturbance. Additional work is taking place to encourage responsible dog walking and visits to less sensitive parts of the coast. This work is particularly important as research shows that around 40% of bird disturbance occurs as a result of interactions with dogs.

³⁹ <https://birdaware.org/solent/wp-content/uploads/sites/2/2024/09/PFSH-30-September-Strategy-Review.pdf>

- 3.42 PfSH provides governance to the Bird Aware Partnership, who mitigate recreational disturbance to overwintering and breeding SPA birds from additional pressures resulting from new house building. The Bird Aware partnership has won several Planning Awards and has expanded the Bird Aware Brand to other parts of the Country most notably Bird Aware Essex Coast and Bird Aware Severn Estuary. The Bird Aware Solent Revised Strategy sets out the findings in relation to summer breeding birds in the Solent and information about the latest developer contributions and spending by Bird Aware to provide the mitigation for recreational disturbance. The Strategy and its updates form the basis for Policy 23: Recreational disturbance on international sites in the Publication Local Plan. The policy requires that development includes new residential development provide a financial contribution to Bird Aware, with the exception of sites where the developer can prove that they can deliver their own bespoke onsite or offsite mitigation. Table 7 of this Statement sets out in detail the key strategic issues being addressed by the Bird Aware Partnership.

Supporting Habitat - Solent Waders and Brent Goose Strategy Partnership

- 3.43 HBC along with the other PfSH authorities has funded the Solent Waders and Brent Goose Strategy. This is a conservation partnership project, which aims to conserve terrestrial, non-SPA habitats used by internationally important wildfowl and wading bird populations within and around the SPA and Ramsar wetlands of the Solent coast.
- 3.44 There have been several iterations of the Strategy. It was first published in 2002 and focused on Brent Geese in the eastern Solent harbours; in 2010 an updated Solent-wide Strategy was published, covering both wading birds and wildfowl. The most recent version of the Strategy is the Solent Waders & Brent Goose Strategy 202440. The 2024 Strategy focuses on understanding bird movements from the SPA areas to inland sites, and between inland sites. The Strategy is supported by Mitigation Guidance (2014)⁴¹ and live mapping showing the network of supporting habitat. The Strategy and supporting Mitigation Guidance informed the development of and are referenced in Policy 26: Solent Waders and Brent Goose feeding and roosting sites.

Protected Sites and Biodiversity

- 3.45 Havant Borough is home to several Internationally protected sites namely the coastal Special Protection Areas (SPAs) and Ramsar sites (Chichester and Langstone Harbour SPA/Ramsar, Solent and Dorset SPA) as well as the Solent Maritime Special Area of Conservation (SAC). These SPAs typically comprise tidal estuaries and / or harbour environments, with extensive mudflats and saltmarshes as well as other associated habitat such as saline lagoons, shingle beaches and more typical terrestrial habitats such as grasslands and woodlands. They are designated for a range of over-wintering and breeding coastal bird species. The associated Ramsar site designations include the relevant bird populations as well as various wetland habitats present. The SAC designation affords protection for the wide range of coastal and maritime habitats around the Solent coast. These international designations are underlain by various Sites of Special Scientific Interest (SSSIs).
- 3.46 The Local Plan is supported by a Habitats Regulations Assessment (HRA). The objective of this assessment is to identify any aspects of the Plan that are considered likely to have a significant effect on a protected habitats site either individually or in combination with other plans or projects.

⁴⁰ <https://solentwbgs.wordpress.com/wp-content/uploads/2021/03/solent-waders-brent-goose-strategy-2020.pdf>

⁴¹ <https://solentwbgs.wordpress.com/wp-content/uploads/2021/03/swbgs-mitigation-guidance-oct-2018.pdf>

- 3.47 The Conservation of Habitats and Species Regulations 2017 do not allow competent authorities to consent plans or projects that may have an adverse effect on the integrity of a designated habitats site unless specific derogation tests are met.
- 3.48 The international and national protected sites are shared with neighbouring LPAs, meaning that impacts that affect the sites also impact the neighbouring LPAs. For example, Chichester and Langstone Harbours SPA is shared with PCC and CDC.
- 3.49 Table 6 of this Statement sets out in detail the key strategic issues in respect of the natural environment and how the Borough Council has addressed these through effective cooperation with PfSH partners.

Table 7: Evidence of the cooperation with neighbouring authorities in regards to employment

<p>Strategic issues</p>	<ul style="list-style-type: none"> • Wildlife habitats are subject to a range of pressures including population growth, recreational visitors, new development and traffic growth. International nature conservation designations are particularly vulnerable and require careful attention to the in-combination effects of human influence. • Impact upon the cross-boundary sites such as SPA/Ramsar and the Solent Maritime SAC. • Recreational Disturbance, specifically impacting wildfowl and waders, and the accommodation of supporting habitat associated with the SPAs. • Nutrient impacts, with nitrogen entering the Solent from wastewater treatment works and rivers leading to excess nitrification. • Biodiversity Net Gain (BNG) has been introduced by Government in the last two years. There are opportunities for strategic offsite BNG solutions.
<p>Partners</p>	<ul style="list-style-type: none"> • All local authorities in PfSH with specific emphasis on those LPAs in South East Hampshire: East Hampshire, Fareham, Gosport, Portsmouth, Havant and Winchester. • Hampshire County Council, including the Hampshire Biodiversity Information Centre and as lead authority for the Local Nature Recovery Strategy. • PfSH's wider membership beyond the LPAs • HIOWWT in regard to BNG and Nutrient Neutrality <p>Members of Bird Aware Solent comprising:</p> <ul style="list-style-type: none"> • Chichester District Council • East Hampshire District Council • Eastleigh Borough Council • Fareham Borough Council • Gosport Borough Council • Hampshire County Council • Havant Borough Council • Isle of Wight Council • New Forest District Council • New Forest National Park Authority • Portsmouth City Council • South Downs National Park Authority

	<ul style="list-style-type: none"> • Southampton City Council • Test Valley Borough Council • Winchester City Council • Natural England • RSPB • Hampshire and Isle of Wight Wildlife Trust • Chichester Harbour Conservancy <p>Members of the Solent Waders and Brent Goose Strategy, conservation partnership which include:</p> <ul style="list-style-type: none"> • HIOWWT • Natural England • RSPB • Hampshire County Council • Coastal Partners. <p>The HIOWWT lead on the co-ordination of survey work and analysis of data for the SWBGS partnership. The partnership is funded by the South Hampshire local authorities including HBC.</p>
<p>Actions/outcomes</p>	<p>Joint Working Arrangements - PfSH</p> <p>Bird Aware Solent</p> <p>Bird Aware Solent is a partnership of local councils across South Hampshire and West Sussex. It raises awareness of the overwintering and breeding coastal bird species of the Solent area.</p> <p><i>Bird Aware Solent Revised Strategy (September 2024)</i>⁴². This aims to prevent bird disturbance from recreational activities as a result of additional new homes. It seeks to do this through a series of management measures which actively encourage all coastal visitors to enjoy their visits in a responsible manner rather than restricting access to the coast or preventing activities that take place there.</p> <p>Solent Waders and Brent Goose Strategy Partnership</p> <p><i>Solent Waders and Brent Goose Strategy (2024)</i>⁴³ The strategy relates to the protection of non-SPA terrestrial supporting habitat used by internationally important wildfowl and wading bird populations within the Solent area. The underlying principle of the strategy is to wherever possible conserve extant sites, and to create new sites, enhancing the quality and extent of the feeding and roosting resource.</p>

⁴² <https://birdaware.org/solent/about-us/our-strategy/revised-strategy-2024/>

⁴³ <https://solentwbgs.wordpress.com/wp-content/uploads/2025/04/solent-waders-brent-goose-strategy-2024.pdf>

*Solent Waders and Brent Goose Strategy, Guidance on Mitigation and Off-setting Requirements (October 2024).*⁴⁴A framework for mitigation and off-setting requirements by to achieve the long-term protection of the wider network of terrestrial supporting habitat sites. This network is under pressure from the growth planned in this area and formal guidance was considered necessary to define a standard approach for the protection and creation of non-designated sites.

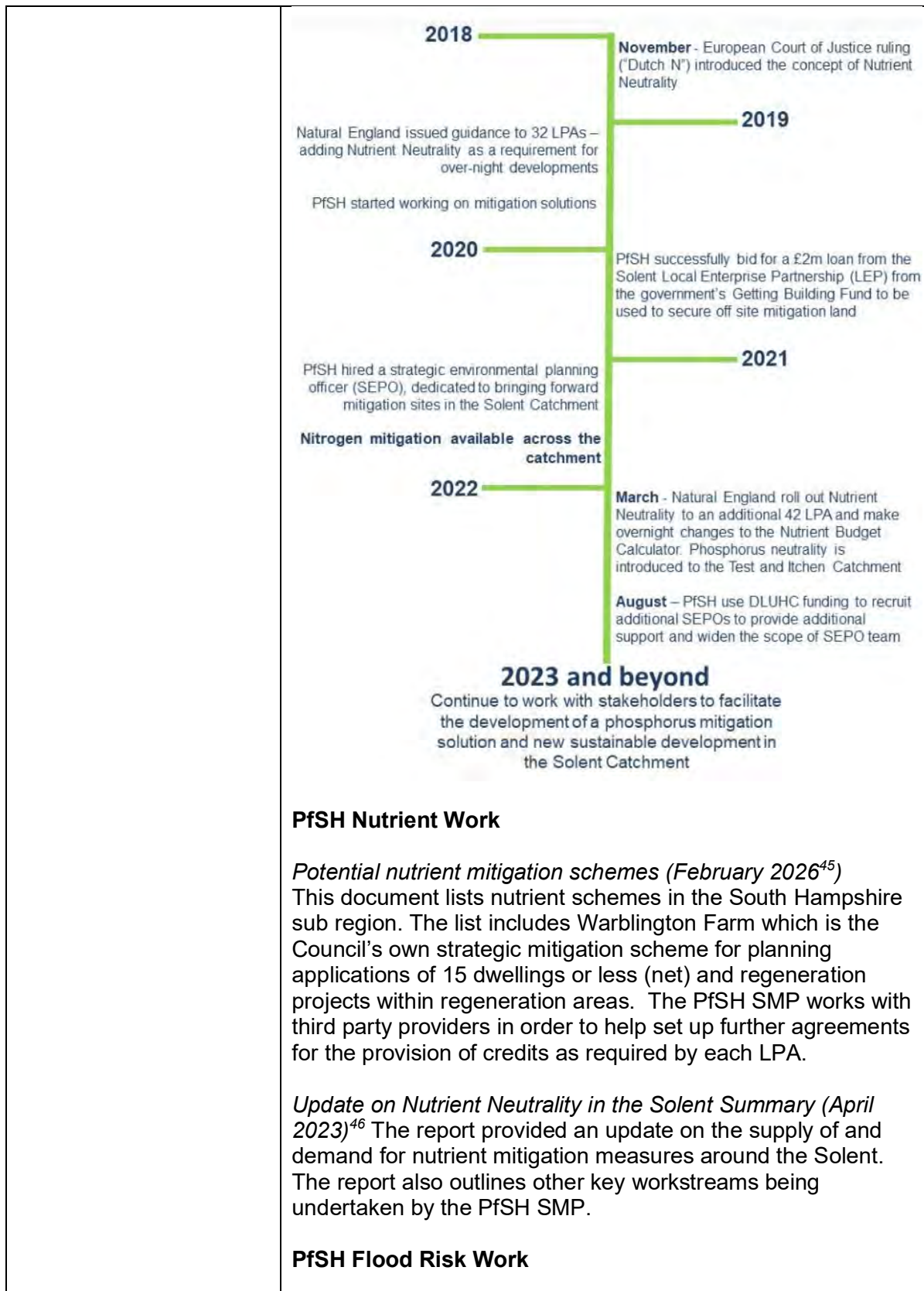
Nutrient Neutrality

HBC working in partnership with PfSH has been proactive in solving nutrient neutrality in the Solent since the introduction of the requirement in 2019. PfSH now has a dedicated SEPT working across the Solent. The Solent Mitigation Partnership (SMP) operates under the umbrella of PfSH. The Borough Council has been working through PfSH POG and environment and water quality subgroups to develop a joined up solution to nutrient neutrality in the Solent.

The diagram below sets out the stages of work undertaken by PfSH (both by the SMP and directly by the officers of the LPA's) in developing nutrient neutrality solutions in the Solent.

Figure 1: Flow chart showing the progress of the PfSH authorities in addressing nutrient neutrality

⁴⁴ <https://solentwbgs.wordpress.com/wp-content/uploads/2025/04/swbgs-mitigation-guidance-2024.pdf>



⁴⁵ <https://www.push.gov.uk/wp-content/uploads/2026/02/Nutrient-Mitigation-Suppliers-Operational-February-2026.pdf>

⁴⁶ <https://www.push.gov.uk/wp-content/uploads/2023/03/Item-10-Nutrient-Neutrality-Update-1.pdf>

	<p>PfSH SFRA Steering Group. This group was set up in February 2026 and its first meeting took place in March. This group is investigating the need for standalone mapping to support the PfSH SFRA work.</p> <p>Funding awarded by national Government to South Hampshire for environmental projects</p> <p>For several years much needed development across the sub-region has been impacted because of environmental concerns, particularly around nutrients entering rivers and the Solent.</p> <p>The SMP on the behalf of the LPA's secured funding from the DLUHC totalling £9.6m (Local Nutrient Mitigation Fund) to support projects to protect the local environment. The money was awarded to the PfSH and will be used for a range of schemes led by individual councils.</p> <p>Projects being brought forward by the SMP include creation of new wetlands and nature reserve areas, improving water efficiency in council homes and upgrading council-owned wastewater treatment plants.</p> <p>Solent Mitigation Partnership (SMP)</p> <p>The Solent Mitigation Partnership (SMP) operates under the umbrella of PfSH. The primary objective of the SMP is to provide a strategic response to the nutrient neutrality issue across the impacted areas of the Solent.</p> <p>In addition to nutrient neutrality work, the SMP is now looking at the potential for BNG on sites across the Solent. An officer group has been set up and meeting on a regular basis led by the SMP lead and attended by planners and ecologists from PfSH authorities</p> <p>Joint Working Arrangements – SEH Group of Authorities</p> <p>Since June 2025 PCC has been working closely with PCC and GBC on cross boundary issues within South East Hampshire (SEH).</p> <p>Since January 2026 FBC has joined the group of SEH and the four authorities have produced a joint SCG (March 20236) which addresses future joint working on strategic environmental matters (including the Local Nature Recovery Strategy and BNG) and references the officer group being set up to address this and other ecological issues in SEH.</p> <p>Jointly Prepared Evidence Base – Environmental related PfSH studies</p> <p><i>South Hampshire Green Infrastructure Strategy (2017 - 2034)</i></p>
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	<p><i>(Adopted March 2017)</i>⁴⁷, <i>(Updated July 2018)</i>. The purpose of this strategy is to set the vision and framework for the delivery of an integrated and multifunctional network of strategic scale green infrastructure (GI) across the South Hampshire sub-region.</p> <p><i>South Hampshire Green Infrastructure Implementation Plan (June 2019)</i>⁴⁸. This Implementation Plan is the delivery plan for South Hampshire Green Infrastructure Strategy 2017-2034 and will support the enhancement of the area’s GI network, enabling growth and development across the sub-region and enhancement of the area’s natural environment through the delivery of a number of key strategic GI projects/initiatives. The plan also sets the framework for more locally based GI planned and delivered at the district and community levels.</p> <p><i>GI related strategies, plans and assessments for PFSH constituent and adjacent local planning authorities and partnerships (August 2019)</i>⁴⁹.</p> <p>This table details specific GI projects by LPA area.</p> <p><i>Integrated Water Management Study (May 2018)</i>⁵⁰ This report has been commissioned by the PFSH to assess any implications from the planned growth in the region for the water resource and water quality environment.</p> <p>Flood Risk <i>PfSH Level 1 Strategic Flood Risk Assessment (February 2024)</i>⁵¹. PCC commissioned consultants on the behalf of ten of the PFSH authorities to prepare an updated SFRA. The SFRA assesses the risk to the South Hampshire from all sources of flooding, now and in the future, taking into account the impacts of climate change, as well as assessing the cumulative impact that land use changes and development in the area will have on the flood risk.</p> <p><i>PfSH Level 1 Strategic Flood Risk Assessment (SFRA) 2024</i>⁵² The study was commissioned on behalf of ten PFSH authorities to prepare an updated SFRA. The SFRA assesses the risk to South Hampshire from all sources of flooding, now and in the future, taking into account the impacts of climate change, as well as assessing the cumulative impact that land use changes and development in the area will have on flood risk.</p> <p>Spatial Position Statements</p>
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⁴⁷ <https://www.push.gov.uk/wp-content/uploads/2018/08/South-Hampshire-GI-Strategy-2017-2034-FINAL.pdf>

⁴⁸ <https://www.push.gov.uk/wp-content/uploads/2019/08/South-Hampshire-Green-Infrastructure-Implementation-Plan-June-2019-.pdf>

⁴⁹ <https://www.push.gov.uk/wp-content/uploads/2019/08/PfSH-Table-of-Relevant-Green-Infrastructure-Strategies-and-Plans-August-2019.pdf>

⁵⁰ <https://www.push.gov.uk/wp-content/uploads/2021/08/Integrated-Water-Management-Study-2018.pdf>

⁵¹ <https://www.push.gov.uk/wp-content/uploads/2024/05/SFRA-Part-1-Main-Report-V6-15.02.24.pdf>

⁵² <https://www.push.gov.uk/work/planning-and-infrastructure/green-infrastructure/flooding-water-management/>

	<p><i>PUSH Spatial Position Statement (June 2016)</i> ⁵³ This position statement was developed to inform long-term decisions about the level and distribution of development in the sub-region over the period from 2011 to 2034. This SPS was informed by the environmental evidence base as set out earlier in this section. The SPS has since been superseded by the 2023 SPS, which is discussed in section 2 above.</p> <p><i>PfSH Spatial Position Statement, (December 2023)</i> ⁵⁴ This report helps to inform the preparation of and strategic co-ordination of local plans including the Building a Better Future Plan. This study was informed by the environmental evidence base as set out earlier in this section and supersedes the 2016 SPS.</p> <p>PfSH (July 2024) BNG on Local Authority Land The PfSH SEPT are working with local authorities including Havant to develop a business case for each potential BNG project using the specification for site modifications recommended by HCC Ecology Team. This report aims to give local authorities a stronger understanding of how BNG on local authority owned land will work in practice.</p>
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⁵³ <https://www.push.gov.uk/wp-content/uploads/2022/05/PUSH-Spatial-Position-Statement-2016.pdf>

⁵⁴ <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

Key Policy Outcomes for environmental matters

- 3.50 Policy 5: Green and Blue Infrastructure is new for the Regulation 19 Local Plan following input from Natural England.
- 3.51 Policy 23: Recreational disturbance on international sites has been written based on evidence created through the joint working undertaken by PfSH and Bird Aware Solent Partnership, specifically the Bird Aware Strategy (September 2024).
- 3.52 Policy 26: Solent Waders and Brent Goose feeding and roosting sites has been written based on evidence that has been commissioned through the joint working undertaken by PfSH. PfSH commissioned the Solent Waders and Brent Goose Strategy Partnership to produce the Solent Waders and Brent Goose Strategy (2024) and Solent Waders and Brent Goose Strategy, Guidance on Mitigation and Off-setting Requirements (2024).
- 3.53 Policy 27: Flood Risk has been informed by and refers to the PfSH SFRA Level 1, and the HBC SFRA (Local Plan Sites).

Transport

Promotion of Sustainable and Cross Boundary Active Travel

- 3.54 Hampshire County Council’s Local Transport 4 (LTP4) sets out the vision for future transport and travel in Havant Borough. LTP4 proposes transformational changes which:
- a) Shift away from planning for vehicles, towards planning for people and places;
 - b) Meet national priorities to decarbonise the transport system;
 - c) Reduce reliance on private car travel;
 - d) Support sustainable economic development and regeneration; and
 - e) Promote active lifestyles.
- 3.55 Havant BC operates under a two tier structure with transport functions being undertaken by HCC whilst the districts and boroughs provide the local planning function. HBC through its planning function, in particular in its approach to transport in the emerging Local Plan, is promoting the transport aims of Hampshire’s LTP455, which seeks to bring about a shift away from planning for vehicles, towards planning for people and places.
- 3.56 Originally established in 2007, Solent Transport is an apolitical partnership between the councils of the Isle of Wight, Hampshire County, Portsmouth and Southampton. In collaboration with the local community, business, government and transport operators, Solent Transport undertakes research, develops transport policy and strategy, submits and supports funding bids and lobbies for transport improvements that will benefit everyone.
- 3.57 Solent Transport also works with the PFSH to deliver the transport objectives to promote economic regeneration in the sub-region. Solent Transport developed the Solent Sub-Regional Transport Model (SRTM). The SRTM is operated by the SYSTRA consultancy under contract to Solent Transport. Since its development in 2010, SRTM has been a key resource for securing several hundred million pounds of transport funding in the Solent and planning its delivery. SRTM has also informed numerous Local Plans, major development transport assessments and transport strategies and studies. The model represents a base year of 2019, and can be used for modelling of transport and land use scenarios for years through to 2046.
- 3.58 The Strategic Transport Assessment for the BBLP used the SRTM. The STRM includes relevant committed development schemes across the model area. In both STAs development growth is therefore assumed to continue in line with the adopted Local Plans for the respective neighbouring authorities. This is standard practice until and is agreed with the relevant Highway Authorities.

Table 8: Evidence of the cooperation with neighbouring authorities in regards to transport

Strategic issues	<p>Reducing the impact on the strategic and local road networks within Havant Borough.</p> <p>Creating modal shift to encourage transport by sustainable means and to reduce congestion and air quality impacts of car use, including cross boundary trips.</p>
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⁵⁵ <https://www.hants.gov.uk/transport/localtransportplan>

Partners	<ul style="list-style-type: none"> • All local authorities falling within the PfSH with specific emphasis on those LPAs in southeast Hampshire namely East Hampshire, Fareham, Gosport, Havant and Winchester • Hampshire County Council as adjoining Transport Authority • Solent Transport
Actions/outcomes	<p>Joint Working Arrangements - PfSH</p> <p><i>Partnership for South Hampshire Identification of Broad Areas of Search for Growth Assessments (December 2023).</i>⁵⁶ The Broad Areas of Search for Growth Assessments work has employed a constraint mapping approach to assess the potentially most sustainable broad locations, at the sub-regional scale, where it would be appropriate to identify sites for allocation in local plans. This includes mapping of transport constraints and opportunities.</p> <p>Joint Working Arrangements - Solent Transport</p> <p>Solent Transport provides leadership, strategy and direction to support sustainable economic growth as detailed in paragraph 3.4.7.</p> <p><i>Transport Delivery Plan (TDP) 2012- 2026 (2012).</i>⁵⁷ This TDP identifies a set of schemes for the period up to 2026, framed by an overall approach to delivery that positions TfSH with the flexibility to mobilise quickly to secure funding opportunities from a variety of sources.</p> <p><i>Transport for South Hampshire Evidence Base Case and Options for Intervention (2012).</i>⁵⁸ This report supports the TDP and sets out the evidence base and options for intervention.</p> <p><i>Subregional Transport model (2015, updated regularly).</i>⁵⁹ Solent Transport has worked together to deliver the Solent Sub Regional Transport Model (SRTM). SRTM is operated by SYSTRA consultancy under contract to Solent Transport. Since its development in 2010, SRTM has been a key resource supporting securing several hundred million pounds of transport funding in the Solent and planning its delivery. SRTM has also informed the PLP and supporting Transport Study.</p> <p>Duty to Cooperate statements with individual LPA's</p>

⁵⁶ <https://www.push.gov.uk/wp-content/uploads/2024/01/Broad-Areas-of-Search-for-Growth-Assessments-6.12.23.pdf>

⁵⁷ <https://documents.hants.gov.uk/transport-for-south-hampshire/TransportDeliveryPlan.pdf>

⁵⁸ <https://www.push.gov.uk/wp-content/uploads/2018/05/Transport-for-South-Hampshire-2012.pdf>

⁵⁹ <https://solent-transport.com/solent-sub-regional-transport-model/#:~:text=The%20SRTM%20is%20a%20multi,economic%20impacts%20of%20these%20interventions.>

	<p><i>Statement of Common Ground Portsmouth City Council & Havant Borough Council (February 2026)</i></p> <p>The Statement of Common Ground sets out the two authorities' respective positions on their Strategic Transport Assessments and the impact of development on the respective areas. No interventions are recommended through Portsmouth's TA in line with decide and provide approach.</p>
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Key Policy Outcomes in regard to Transport

- 3.59 The Borough Council's planning team liaised with National Highways and Hampshire County Council as the Local Highway Authority throughout the plan preparation process. At each stage of the Strategic Transport Assessment process, all relevant parties met and agreed an approach to the work going forward. This has resulted in an agreement of a SoCG.
- 3.60 Policy 55: Accessibility, Transport and Parking was informed by the Strategic Transport Assessment which takes a 'decide and provide' approach advocated by Hampshire County Council's LTP4.

Appendix 1 - Schedule of meetings and outcomes

Appendix 1 Schedule of meetings and outcomes

This table highlights the key points and decisions made through cooperation in the preparation of the Regulation 19 Local Plan.

Abbreviations

The table includes a number of abbreviations as follows:

PUSH - Partnership for Urban South Hampshire

PfSH - Partnership for South Hampshire (formerly PUSH)

PfSH POG - Partnership for South Hampshire Planning Officers Group

BDBC – Basingstoke and Deane Borough Council

CDC - Chichester District Council

CHC – Chichester Harbour Conservancy

EBC - Eastleigh Borough Council

EHDC - East Hampshire District Council

GBC - Gosport Borough Council

FBC - Fareham Borough Council

HBC - Havant Borough Council

HCC - Hampshire County Council

IWC - Isle of Wight Council

PCC - Portsmouth City Council

RBC – Rushmoor Borough Council

SCC - Southampton City Council

SDNPA – South Downs National Park Authority

TVBC – Test Valley Borough Council

WCC - Winchester City Council

DLUHC - Department of Levelling Up Housing and Communities

EA - Environment Agency

HE - Historic England

MHCLG - Ministry for Housing Communities and Local Government

LNRS – Local Nature Recovery Strategy

SDOA - Strategic Development Opportunity Area

SFRA - Strategic Flood Risk Assessment
Solent LEP - Solent Local Economic Partnership
SEPO - Strategic Environmental Planning Officer
SEPT - Strategic Environmental Planning Team
SHMA - Strategic Housing Market Assessment
Solent Forum NEG – Natural Environment Group
SRMP - Solent Recreation Mitigation Partnership
SWBGS – Solent Waders & Brent Goose Strategy
SPS - Spatial Position Statement

Date	DtC Body	Method	Summary of Outcomes
2021			
January 2021	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH agrees to officers broadening the discussion to include a wide range of partners in building a commitment to a jointly owned public-private Greenprint for South Hampshire including input from the NHS.</p> <p>PfSH agrees a budget of £12,500 be added to the PfSH base budget for 2021-22 to continue the work of the Culture Creative Industries Built Environment, themed panel.</p> <p>PfSH endorses the SRMP's proposed method of making up any potential budget deficit should the need arise and proposed budget for 2021/22;</p> <p>PfSH endorses the SRMP's request for more active involvement from all Partners.</p>
February 2021	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>PfSH POG agreed to analyse the employment land/floorspace supply against the need identified in the study using 2020 data – on a sub-regional basis (i.e. the PfSH Functional Economic Market Area).</p> <p>PfSH POG agreed to consider the most appropriate locations for up to five strategic warehouses</p>
March 2021	PfSH Joint Committee	Meeting of all PfSH members and chief executives	PfSH approved the proposed revenue budget for 2021/22. PfSH agreed to a contribution of £20,000 from PfSH's unallocated resources to support a programme of work to develop the Greenprint for South Hampshire.
May 2021	PfSH Planning Officers Group (1 st meeting)	Meeting of all PfSH planning policy officer leads	<p>PfSH'S POG agrees that its key ambitions remain unchanged.</p> <p>PfSH POG also agreed which policies should and which policies shouldn't be retained in the updated PfSH SoCG.</p>

Date	DtC Body	Method	Summary of Outcomes
May 2021	PfSH Planning Officers Group (2 nd meeting)	Meeting of all PfSH planning policy officer leads	<p>POG agree the following recommendations to be put to July Joint Committee:</p> <ul style="list-style-type: none"> • Local Authorities consider the purchase of nitrogen mitigation credits from mitigation suppliers specifically to meet the needs of minor development based on an individual Authority's assessment of need. • Authorities that wish to purchase credits are recommended to do so on a combined catchment basis to ensure best market value is achieved. <p>Authorities are recommended to use a standard suite of template legal agreements to reduce the legal costs to developers and to make the determination of application process more efficient.</p>
June 2021	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>PfSH POG agreed to the following in respect to looking at potential warehousing sites to:-</p> <ul style="list-style-type: none"> • Revisit the criteria used to identify sites • Examine current demand for warehousing • nationally (de-couple from the local view and consider the nature of interest in southern England more generally) • pin down what criteria are being used by those looking for sites in determining what is required (business need)
July 2021	PfSH Chief Executives	Meeting of all PfSH Chief Executives	<ul style="list-style-type: none"> • Natural England presented ideas for broadening the biodiversity agenda using Bird Aware e.g. nutrient mitigation, nature recovery. PfSH Chief Executives agreed that the idea should be explored and worked up in consultation with POG. • Update on PfSH Green Infrastructure and Green Belt designation work, including a number of local authorities yet to respond. It was acknowledged that there were delays to commissioning the work may impact on the completion of the wider SoCG/Joint Strategy.

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> It was agreed that the PfSH Business Plan 2021-2025 should be refreshed, and considered at September 2021 Joint Committee. All reports were agreed for submission to Joint Committee.
July 2021	PfSH Planning Officers Group	Meeting of all PfSH planning officer leads	PfSH POG agreed that the Joint Strategy should remain focussed to 2036, but that a vision to 2050 would be beneficial.
July 2021	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>Bird Aware Solent Annual Report is approved for publication on the PfSH website.</p> <p>PfSH approves the updated revenue budget for 2021/22. PfSH endorses the recommendations to member local planning authorities that: -</p> <ol style="list-style-type: none"> PfSH local planning authorities consider the purchase of nitrogen mitigation credits from mitigation suppliers specifically to meet the needs of minor development based on an individual Authority's assessment of need. PfSH local planning authorities that wish to purchase credits are recommended to do so on a combined catchment basis to ensure best market value is achieved. PfSH local planning authorities use a standard suite of template legal agreements to reduce the legal costs to developers and to make the determination of application process more efficient.
September 2021	PfSH Chief Executives	Meeting of all PfSH Chief Executives	<ul style="list-style-type: none"> PfSH Chief Executives agreed to extend the SEPO role by 2 years to maintain continuity and coordination across environmental work. Agreed to continue the design practitioners' group as a formal PfSH subgroup with a focus on continued professional development and promoting good practice. No firm decision on future funding for the design awards, to be considered at Joint Committee (Feb 2022) with a

Date	DtC Body	Method	Summary of Outcomes
			<p>recommendation to continue but noting resource implications.</p> <ul style="list-style-type: none"> • Agreed to commission workshop in relation to the development of the Creative economy via the Southern Policy Centre. • PfSH Business Plan approved with references to green belt removed. • PfSH Chief executives agreed revisions to the PfSH Statement of Common Ground and asked that emphasis was added on the importance of successfully developing a joint statement.
September 2021	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>PfSH POG agreed that Natural England and PfSH Officers to set up an 'Environmental Delivery Group' to explore different options for the joint delivery of environmental initiatives.</p> <p>PfSH POG agreed that a report should go to Joint Committee recommending a one-year extension to the PfSH SEPO position.</p> <p>PfSH POG agreed the proposed revisions to the update of the PfSH SoCG.</p> <p>PfSH POG agreed the revised version of the Statement should be put to PfSH Joint Committee on the 25 October for sign-off.</p>
October 2021	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>Joint Committee will be asked to approve the Business Plan for 2021-2025 for publication on the PfSH website.</p> <p>Approves the SoCG between PfSH local authorities and FBC.</p> <p>PfSH agrees to an extension of the SEPO role for PfSH for no more than two years to the end of 2023.</p>

Date	DtC Body	Method	Summary of Outcomes
			<p>PfSH agrees to continue PfSH funding for the Solent Design/Quality Place Awards.</p> <p>PfSH agrees the Bird Aware Solent budget for 2022-2023. Joint Committee approves the content of the SoCG.</p>
November 2021	Chichester District Council, East Hampshire District Council, Fareham Borough Council, Gosport Borough Council, and Winchester City Council	Email from Havant Borough Council following receipt of Inspectors' Interim Findings to all of the local authorities bordering Havant together with Fareham and Gosport (which fall within the same Housing Market Area)	Highlights the Interim Findings report in respect of the previous Local Plan. Several sizeable sites from supply are removed from supply which means the Council is unable to meet the collective need for housing. Indicates a need for HBC to seek offers to accommodate unmet need from Duty to Cooperate partners. Invitation to virtual roundtable discussion.
November 2021	East Hampshire District Council, Fareham Borough Council, Gosport Borough Council and Winchester City Council (1 st meeting)	Meetings to discuss Havant Borough Local Plan Interim Findings (split due to officer availability)	HBC provided a brief presentation on the Local Plan (LP) stage 1 hearings, with a focus on questions raised regarding housing deliverability. It was noted that 2,230 homes would be removed from HBC's supply and that HBC is asking neighbouring LPAs whether they are able to meet any of this requirement.
November 2021	Portsmouth City Council and Chichester District Council (2 nd meeting)		<p>It was agreed by all LPAs that PfSH work towards a Joint Strategy was the most suitable vehicle for addressing supply position. Neighbouring authorities confirmed willingness and desire to cooperate and help HBC.</p> <p>Housing land supply of each authority was discussed.</p>
December 2021	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	PfSH POG agreed to recommend that PfSH Joint Committee formally support the SWBGS strategy and mitigation guidance.
2022			
January 2022	PfSH Chief Executives	Meeting of all PfSH Chief Executives	<ul style="list-style-type: none"> PfSH Chief Executives considered a member presentation on potential strategic development opportunity areas.

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> • The PfSH Budget and Budget Report 2022-23 was agreed. • PfSH Coordinators' Report agreed. • Greenprint for South Hampshire Update agreed. • PfSH Chief Executives generally supported the Solent Waders and Brent Geese mitigation guidance and provision of funding. A more strategic approach to funding of nutrient mitigation, biodiversity net gain and wider environmental requirements was discussed. • Reports on the Cultural Industries and Built Environment and Nutrient Mitigation supply and demand analysis was also agreed.
February 2022	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH agrees in principle the ten outcomes which are proposed as a basis for developing a PfSH-wide approach to a green recovery.</p> <p>PfSH formally acknowledges the Solent Waders and Brent Goose Strategy 2020 and Mitigation Guidance 2018 as key reference documents for policy and decision making by PfSH and its partners as appropriate.</p> <p>PfSH agrees Solent Waders and Brent Goose Steering Group's request for annual PfSH funding of £14k.</p> <p>PfSH approves the proposed revenue budget for 2022/23. PfSH agrees to proceed with its support for Creative Network South on the basis of Hampshire Chamber of Commerce continuing as host.</p>
April 2022	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	PfSH POG that existing PfSH working groups should adapt in such a way as to ensure a flexible and coordinated approach to the management of funds for phosphate mitigation with officials in Wiltshire and IoW.

Date	DtC Body	Method	Summary of Outcomes
April 2022	Test Valley Borough Council	Representations from HBC to Test Valley's Draft Local Plan 2040	The 2021 Inspectors' Interim Findings highlighted concerns in relation to over 2000 new homes in the Council's supply. Given the increase in housing need and some of the Inspectors' concerns, it will not be possible for HBC to meet the need for new housing. Seeks formal commitment from Test Valley Borough Council to accommodate unmet need its new local plan.
May 2022	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>PfSH POG agreed that the SoCG should be updated to assess housing need and supply to 2040.</p> <p>PfSH POG agreed to a series of edits to the LUC Green Infrastructure and Green Belt Designation South Hampshire Policy Review Report.</p>
July 2022	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH agree that the available nutrient funding received from DLUHC will be spent on additional nutrient mitigation staffing capacity, with some funds set aside for required consultancy work.</p> <p>PfSH approves the Statement of Accounts for the 2021/22.</p>
September 2022	PfSH Chief Executives	Meeting of all PfSH chief executives	<ul style="list-style-type: none"> • The Joint Strategy has reached a critical stage. • Local transport authorities (LTA) and local planning authorities) have not been able to identify an agreed approach to identifying SDOAs. HCC not able to sign off any strategy that is not sustainable transport-led. • Discussions with LTA officers have failed to clarify what a sustainable transport led strategy would look like. Only one 'new' potential SDOA within the PfSH area at land west of the A3 at Purbrook (Southwick Estate land mainly in WCC area) has been suggested by HCC • Work undertaken looking into the feasibility of increasing densities in the more accessible SDOA

Date	DtC Body	Method	Summary of Outcomes
			<p>locations already identified has had only limited impact on potential additional housing supply.</p> <ul style="list-style-type: none"> • The stalling of the work will lead to the need for bilateral agreements to deal with the issue of unmet housing need in local plans, and the loss of the ability to plan positively and planning by appeal will become inevitable. • PfSH's working relationship with Solent Transport has been discontinued at the request of Hampshire County Council until such a time that an agreement on a way forward has been settled. • A general consensus among chief executives that continuing with a collective approach to developing a joint strategy is preferable to other alternatives.
September 2022	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH agrees that discussions should continue to take place that explore IWC's options for re-joining the PfSH.</p> <p>PfSH endorses the Bird Aware (SRMP's) eighth Annual Report.</p> <p>PfSH agrees that the Southern Policy Centre is invited to run a seminar with PfSH representatives and appropriate others (for example the Solent LEP).</p>
September 2022	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>PfSH POG agreed a proposal that a team of planning officers lead by FBC should provide cover for the SoCG work.</p> <p>PfSH POG agreed that NE should address the matter of the establishment of an 'Accelerator Unit' in terms of its relationship with PfSH.</p>
November 2022	PfSH Chief Executives	Meeting of all PfSH Chief Executives	Moving forward with the Joint Strategy:

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> • PfSH leaders and local transport authorities to outline the current position and impasse in respect of the progress of developing the Joint Strategy • Secretary of State DLUHC outlining local constraints when attempting to meet unmet need through developing a Joint Strategy. <p>Chief executives discussed the approach to the Members' SoCG Briefing.</p>
November 2022	Winchester City Council	Email response from Winchester City Council on Havant Borough's Regulation 18 consultation document	Welcomes proposed approach to housing provision but suggests there should be more emphasis on deliverability. Premature to conclude that the Borough will be unable to meet its housing need in full. Before any formal request to meet unmet housing need – every opportunity has to be thoroughly explored. Requests involvement with planning decisions relating to infrastructure that will be used by those living in West of Waterlooville.
November 2022	South Downs National Park Authority	Representations from SDNPA to HBC's Building a Better Future consultation	Welcome the proposed approach to recognise, protect and enhance designated landscapes and refuse planning permission for applications that cannot remove the significant effect on designated sites. Notes likely unmet need and an annual shortfall of 197 homes per year in the South Downs National Park.
November 2022	Winchester City Council	Representations from HBC to Winchester District Local Plan Regulation 18 Consultation	<p>Notes the plan makes provision to meet Winchester's housing need in full, together within some need from the South Downs National Park. Highlights significant unmet need across the sub-region including Portsmouth and Havant.</p> <p>HBC will build on its housing supply evidence before any formal request to accommodate unmet need from Havant. Highlights need significant joint working required as both authorities move towards Regulation 19 Plans.</p>

Date	DtC Body	Method	Summary of Outcomes
December 2022	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH approves the content of the SoCG.</p> <p>PfSH agrees to prioritise the focus of PfSH over the next three to six months to work on the SDOAs, prepare a case on environmental constraints and continue to lobby government.</p> <p>PfSH endorses the Bird Aware Partnership's proposed budget for 2023/24</p>
December 2022	PfSH Chief Executives	Meeting of all PfSH Chief Executives	<p>Chief executives agreed the budget proposal 2023/24.</p> <p>Re. Joint Strategy POG to explore with LTA officials the scope for flexibility around LTP4 requirements. Proposal agreed in November (to lobby government around planning constraints in South Hampshire) unlikely to change individual LA positions.</p> <p>Chief Executives to consider report on new settlement as part of meeting south Hampshire's unmet need.</p>
December 2022	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	PfSH POG decided that the LUC interim work, valued at £26k, should commence (for completion Feb to May 2023).
2023			
January 2023	PfSH Chief Executives	Meeting of all PfSH Chief Executives	<p>PfSH Chief Executives discussed moving forward on the Joint Strategy including:</p> <ul style="list-style-type: none"> - Levelling Up and Regeneration Bill (NPPF consultation) - New settlement report – no real appetite for further consideration of a new settlement in south Hampshire. - View from the local transport authorities (SDOAs, design and densities) – new development must utilise, as far as possible, existing transport infrastructure and new developments should encourage walking and cycling.

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> - Feedback from POG: scrutiny and validation of SDOA densities – some SDOAs were ruled out at JC. Total unmet need stands at 20K. - Consideration of PfSH members workshop 30 January including NPPF consultation and constraints mapping. Chief executives considered the session should avoid fixating on unmet need figures and focus on the principles of supporting growth.
January 2023	Historic England	Meeting to discuss Campdown Settings Study	Discussion and feedback on the draft Settings Study
February 2023	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>PfSH POG agreed the funding contributions are necessary, for the PfSH SoCG and SFRA.</p> <p>PfSH POG agreed the content of the draft Nutrient Mitigation report for submission to Joint Committee.</p> <p>PfSH POG agreed the future work programme in regard to the SoCG and SPS.</p>
March 2023	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	PfSH POG agreed that the work should proceed on Biodiversity Net Gain (BNG). Regarding assessing demand of units in the context of the proposed PfSH wide work.
April 2023	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH endorse funding the study related to breeding birds if the legal view is that Bird Aware funds cannot be used for this purpose.</p> <p>PfSH agrees that, in the first instance, external funding is sought to cover the operational costs of the SEPT to March 2025.</p> <p>PfSH approves the proposed revenue budget for 2023/24. PfSH agrees an extension to March 2025 for the SEPT.</p>
May 2023	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	PfSH POG agreed to Hampshire Ecology as the chosen supplier for the BNG study.

Date	DtC Body	Method	Summary of Outcomes
June 2023	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>Proposals and preparation for a bid for DLUHC funding support for nutrient mitigation Funding agreed by PfSH POG.</p> <p>PfSH POG agreed the Scoping Report for the Content of the SPS, with amendments for climate change and housing and employment supply.</p> <p>PfSH POG agreed that the Task and Finish Group should discuss whether or not to undertake an SA.</p> <p>PfSH POG agreed to not to progress green/blue strategy work further by commissioning work on landscape and gaps.</p> <p>PfSH POG agreed that LUC's May 2022 report and more recent green/blue interim report (2023) will be sufficient.</p>
June 2023	PfSH Chief Executives	Meeting of all PfSH Chief executives	<p>PfSH Chief Executive considered PfSH Joint Committee (11 July) Reporting:</p> <ul style="list-style-type: none"> a) PfSH Statement of Accounts 22/23 b) Nutrient Mitigation (local government nutrient funding opportunities) <p>Update on progress and consideration of the revised SoCG for presentation to Joint Committee 11 July</p>
July 2023	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH approves the Statement of Accounts for the 2022/23.</p> <p>PfSH agrees the outline approach for use of the Local Nutrient Mitigation Fund should funding become available. PfSH approves implementation of the following projects on receipt of funding:</p> <ul style="list-style-type: none"> i. Water efficiency project ii. Small wastewater treatment works and septic tank upgrade project.
August 2023	Winchester City Council	Letter from Winchester City Council	<ul style="list-style-type: none"> • Update on local plan timetable. • Update on Gypsy and Traveller / Travelling Showpeople Accommodation and request for assistance with identified need within the GTAA.

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> Proposes Statement of Common Ground and Duty to Cooperate meeting to discuss.
September 2023	PfSH Chief Executives	Meeting of all PfSH chief executives	<p>Chief executives agreed an amendments to the PfSH SoG concern the provision of green belt (proposed by EBC and TVBC).</p> <p>Final draft reports to be presented to Joint Committee:</p> <ul style="list-style-type: none"> Green infrastructure evidence base report Nutrient mitigation update Bird Aware annual report Bird Aware funding for site-specific projects Greenprint Updates New Forest Recreation Mitigation PfSH Coordinator's Report
September 2023	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH agrees to continue to take a leading role in driving forward a regional green recovery.</p> <p>PfSH approves the content of the SoCG.</p> <p>PfSH endorses the SRMP's ninth Annual Report.</p> <p>PfSH endorses the principle of planning authorities continuing to work together to develop an agreed package of mitigation measures to be implemented within the New Forest's internationally designated sites.</p>
October 2023	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	PfSH POG agreed amendments to the SPS, and the Broad Areas of Search for Growth Assessments evidence base document.
October 2023	East Hampshire District Council	Duty to Cooperate meeting	Both authorities provided an update on their respective local plans. EHDC noted ongoing work ongoing to disaggregate their standard method figure and challenge to find suitable gypsy and traveller sites.
October 2023	Fareham Borough Council	Duty to Cooperate meeting	Following adoption of Local Plan (April 2023), FBC is focusing on Supplementary Planning Documents (SPDs).

Date	DtC Body	Method	Summary of Outcomes
			From the emerging findings of the HBC Constraints Study it was noted that FBC is similarly affected by Solent Waders and Brent Geese.
October 2023	Chichester District Council	Duty to Cooperate meeting	Meeting to share emerging findings of HBC Constraints Study. Update on respective housing need and supply positions, including emerging unmet housing need from HBC. CDC highlight a significant need for gypsies and travellers pitches.
November 2023	PfSH Chief Executives	Meeting of all PfSH chief executives	<p>PfSH chief executives considered the main reports to PfSH Joint Committee 6 December 2023:</p> <ul style="list-style-type: none"> • PfSH SoCG Broad Areas of Search Assessment and evidence base – including consideration of constraints and transport infrastructure requirements. • Final changes to Draft Spatial Position Statement following the Royal Assent to the Final Draft Spatial Position Statement • PfSH Coordinators Report <p>Following the Bird Aware 5-year review, chief executives noted a study has been commissioned to look at the mitigating the disturbance of summer birds. It was agreed a member briefing would take place.</p> <p>It was agreed that a sub-group would look at the recommendation for PfSH to take forward a leading role in driving forward a regional green recovery.</p> <p>SEPO Team officer posts for the 24/35 financial years to possibly be funded through local authority contributions.</p>
November 2023	Winchester City Council	Duty to Cooperate meeting	Both authorities provided an update on their respective local plans. Gypsy and Traveller Accommodation needs were discussed, formal response to Winchester's request for assistance to be provided once Havant's Gypsy and

Date	DtC Body	Method	Summary of Outcomes
			Traveller Assessment has been provided. Havant provided a presentation on its Constraints Study and an update on the housing need and supply position.
November 2023	Portsmouth City Council	Duty to Cooperate meeting	Both authorities provided an update on respective local plans, including discussions with other neighbouring authorities on unmet housing need. Respective employment need and supply positions were also discussed.
November 2023	Gosport Borough Council	Duty to Cooperate meeting	Both authorities provided an update on respective local plans. Gosport noted viability as a key issue for development deliverability. GBC have an unmet need position of 2,445 homes.
November 2023	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	PfSH POG agreed the SPS and evidence base - Freedom of Information Protocol.
December 2023	PfSH Joint Committee	Meeting of all PfSH members and chief executives	PfSH resolve to note the content of the Broad Areas of Search for Growth Assessments document and that it will be published on the PfSH website. PfSH approves the content of the SPS.
2024			
January 2024	PfSH Chief Executives	Meeting of PfSH Chief Executives	<ul style="list-style-type: none"> • The SEPO provided an update on the Local Nutrient Mitigation Fund including the proposed approach to the delivery of the nutrient mitigation initiatives. • Chief executives agreed to organise a short series of workshops on the Greenprint for South Hampshire that will help Members to understand how they can support the initiative. • The Bird Aware Solent briefing for members on the extension of the Strategy to 2050, to include summer birds and an increase in costs of resourcing has been postponed. • It was agreed that PfSH includes £15 in its budget for financial year 24/25 for continued support for Creative Network South.

Date	DtC Body	Method	Summary of Outcomes
January 2024	Winchester City Council	Draft Statement of Common Ground received from Winchester City Council for comment and review	At the time of receipt, both Councils awaiting update to the evidence base that would inform the Gypsy and Traveller and Housing positions that would inform the final wording of the SoCG.
February 2024	PfSH Chief Executives	Meeting of all PfSH Chief Executives	<ul style="list-style-type: none"> • PfSH Chief Executives agreed approach to the purchase of the Rowlands Castle site using the Local Nutrient Fund Update. A nutrient mitigation supply and demand report was also approved for Joint Committee. • Update on the Greenprint and South Hampshire and Members workshop planned for 23 February. • PfSH Chief executives agreed the PfSH Budget Request report for PfSH Joint Committee. • PfSH Bird Aware Budget Request report agreed but amended to provide greater clarity on service level agreement cost increases. • PfSH Coordinators report approved for Joint Committee, future updates to include Levelling Up and Regeneration Act implementation. • Cllr Woodward stepping down as PfSH Chairman in May 2024. Chief executives to discuss with their respective leaders the option of putting themselves forward.
February 2024	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	PfSH POG agreed the proposals in principle - to use some of the DLUHC nutrient revenue funding for the PfSH SSEPO posts for FY 2024/25, and begin to consider the potential for longer term funding
March 2024	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	PfSH POG the proposals and that the PfSH SEPO has the authority to advertise the officer roles required
March 2024	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH agree that the PfSH continues to support Creative Network South in financial year 2024/25, by allocating a budget of £15k.</p> <p>PfSH approves the proposed revenue budget for 2024/25.</p> <p>PfSH endorses the Bird Aware Partnership's proposed budget for 2024/25.</p>

Date	DtC Body	Method	Summary of Outcomes
March 2024	East Hampshire District Council, Fareham Borough Council, Gosport Borough Council, Portsmouth City Council, South Downs National Park Authority, Winchester City Council	Letters from Havant Borough Council formally requesting assistance with unmet housing need	Formally requests assistance in meeting unmet housing need and provides update on employment evidence base and possible shortfall of employment land.
March 2024	Winchester City Council	Response from WCC to HBC's request from Havant Borough Council to help meet housing need under the Duty to Cooperate	Whilst the City Council remains ready and willing to work and cooperate with Havant BC and our other neighbouring authorities, we have a major challenge ourselves meeting the increase in housing numbers with 40% of the district being located in the SDNP and the issue of both phosphorous and nitrates. The City Council is unable to commit to providing any additional assistance on housing or employment supply to Havant BC at this time, but we will continue to liaise with you under the DtC as we move forward with the next Local Plan review.
April 2024	Chichester District Council	Response from CDC to HBC's formal request for assistance with unmet housing need	Havant's unmet housing need is noted. CDC's Local Plan close to submission and sets out housing target below the standard method due to constrained capacity of the A27. This means Chichester has its own unmet housing need and is not in a position to accommodate any unmet housing need from Havant Borough. Only a small part of Chichester's Plan Area shares a Housing Market Area with Havant – and a significant amount of development is proposed in this area already. Further work is ongoing in relation to the mitigation of transport impacts from the level proposed. Noted ongoing work in relation to employment requirements and as such any potential unmet need is not yet identified/quantified.

Date	DtC Body	Method	Summary of Outcomes
May 2024	PfSH Joint Committee	Meeting of all PfSH members and chief executives	PfSH agreed to the production of an annual SoCG. The group considered that there is merit in maintaining a factual account of the collective housing need and supply.
May 2024	Chichester District Council	Meeting to agree Statement of Common Ground in support of Chichester's Local Plan 2021-2039	Discussions to agree remaining outstanding areas including: <ul style="list-style-type: none"> • it was agreed that further transport modelling would be needed at Southbourne Broad Location of Development (taking into account HBC's growth strategy). • both authorities will work together to consider how unmet Gypsy and Travelling Showpeople needs can be met.
June 2024	PfSH Chief Executives	Meeting of all PfSH Chief Executives	<ul style="list-style-type: none"> • July Joint Committee moved from 8 July to 23 July due to pre-election period. Overview & Scrutiny Committee also rescheduled. • PfSH Chief Executives agreed the PfSH Budget Monitoring and Statement of Accounts 23/24 for Joint Committee. • A PfSH contribution of up to £4,000 was agreed to fund a Natural England workshop on the Environment Act 2021 and the implications of local authorities. • A decision on the preparation of a PfSH annual Statement of Common Ground was deferred. • The review of the Bird Aware Strategy was broadly positive but highlighted resourcing issues, the need to include summer bird mitigation and extend the timeframe to 2050. It was noted that there would be minimal impact on developer contributions. • For the deployment of the Local Nutrient Mitigation Fund, chief executives agreed capital spending authorisation of £3,498m and revenue spending of £272k.

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> Annual Statement of Common Ground to be considered by PfSH Joint Committee in September.
July 2024	PfSH Natural Environment Group	Meeting of all PfSH nutrient and BNG officer leads	The group agreed to convene a task and finish group to complete a supply and demand analysis for BNG units.
July 2024	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>PfSH POG agreed that housing figures to both 2036 <i>and</i> 2039 should be collected to satisfy the need to understand the new position against the 2036 figures in the Spatial Position Statement, and to satisfy the need to make a prediction to 2039 (NPPF requirement for 15 years hence).</p> <p>PfSH POG agreed a proposal for the re-allocation of funding for research to inform evidence-based planning (in partnership with the University of Southampton) for phosphate mitigation in the mid, and also the upper Itchen catchments.</p> <p>PfSH POG agreed that the PfSH SEPO should re-advertise the planning position within the SEPO team - which remains vacant following one previous recruitment exercise</p>
July 2024	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH agreed that Joint Committee should engage with the new Government to ensure that the needs of Solent area, in relation to nutrient mitigation, are fully understood.</p> <p>PfSH agreed a contribution of up to £4k, from unallocated reserves, to fund an 'Environment Act 2021: Implementation Workshop for Local Authorities' facilitated by the Local Nature Partnership.</p> <p>PfSH agreed to support a funding application to the Arts and Humanities Research Council for initiatives that will help to increase the impact of the creative research network in South Hampshire.</p> <p>PfSH approved the proposed £9.6m capital programme funding allocation from the Local Nutrient Mitigation Fund (LNMF) and also approved the proposed £422,610 revenue funding allocation from the LNMF.</p>

Date	DtC Body	Method	Summary of Outcomes
August 2024	PfSH	All PfSH members and chief executives to discuss response to the NPPF consultation	The PfSH authorities prepared and submitted a response to the NPPF consultation ¹ , highlighting the key issues facing the sub region.
August 2024	Winchester City Council	Interim Statement of Common Ground in support of WCC's Local Plan	It was noted by WCC and HBC that the 'unmet needs allowance' was not apportioned to any one local authority with unmet need and that the level of unmet need in the sub-region exceeds the 'unmet needs allowance'. Both authorities agreed to work in collaboration with all other PfSH authorities.
August 2024	Environment Agency	Email exchange between EA and HBC	Clarification of most appropriate data sources for fluvial flood risk.
September 2024	PfSH Natural Environment Group	Meeting of all PfSH nutrient and BNG officer leads	The group agreed to provide information to update the Nutrient Supply and Demand Reporting. The group agreed to record offsite BNG demand within each LPA area.
September 2024	PfSH Joint Committee	Meeting of all PfSH members and chief executives	PfSH agreed that Joint Committee Endorse the Creation of a Greenprint Network. Endorses the Bird Aware Partnership Revised Strategy. Agrees the Deployment of the Local Mitigation Fund.
October 2024	PfSH Natural Environment Group	All PfSH nutrient and BNG officer leads	The group agreed to provide information to update the Nutrient Supply and Demand Reporting.
October 2024	Winchester City Council	Meeting to agree Statement of Common Ground in support of WCC's Local Plan	It was agreed that the unmet needs allowance of 1,900 dwellings in WCC's Proposed Submission Local Plan should be apportioned to individual local authorities. Considering the additional formal request from Portsmouth City Council to accommodate unmet housing need – it was agreed the current unmet need allowance would be apportioned as follows:

¹ <https://www.push.gov.uk/wp-content/uploads/2024/10/Partnership-for-South-Hampshire-Response-to-NPPF-Revisions-Consultation-20.09.24-FINAL.pdf>

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> 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.
October 2024	Winchester City Council	HBC's representations to Winchester District Local Plan Regulation 19 consultation	Notes commitment to set out that 70% of the unmet housing need allowance in the Winchester District Local Plan would be for Havant Borough. Highlights collaborative work undertaken to agree a Statement of Common Ground.
November 2024	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	SEPO update provided and approach to future PfSH SoCG agreed.
November 2024	PfSH Natural Environment Group	Meeting of all PfSH nutrient and BNG officer leads	Discussion on the progress of the LNRS with HCC, Solent Mitigation Partnership update.
December 2024	Local Nature Recovery Strategy (LNRS)	Meeting of all Hampshire LPA and environment officer leads	LNRS relaunch event. Detailed discussion on the way forward and scope for the LNRS.
December 2024	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>The Joint Committee endorsed the Bird Aware Partnership's proposed budget for 2025/26.</p> <p>The committee agreed the Local Nutrient Mitigation Fund (LNMF) capital programme.</p>
December 2024	Heritage England	Email attaching draft heritage policy and Campdown allocation for comment	<p>Comments on supporting text for heritage policy</p> <p>Minor edits to development requirements Campdown allocation</p>
2025			
January 2025	PfSH Natural Environment Group	Meeting of all PfSH planning policy officer environmental leads	Ofwat AMP8 decision update, Solent Mitigation Partnership update.
February 2025	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	Discussion was held on the STRM, Coastal Partners presented in respect of future Flood Defences.

Date	DtC Body	Method	Summary of Outcomes
February 2025	PfSH Natural Environment Group	Meeting of all PfSH planning policy officer environmental leads	<p>All authorities have now adopted the Revised Bird Aware Strategy, with of Havant that will so shortly.</p> <p>Discussion was held on the distribution of Local Nutrient Mitigation Funding.</p> <p>Updates were given on the Solent Nutrient Budget Calculator, and Compensatory Habitats.</p>
March 2025	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>PfSH noted a response to the national consultation on the proposed consultation on the proposed creation of a new Mayoral Combined Authority for Hampshire & the Solent would be deferred.</p> <p>PfSH agreed to allow East Hampshire District Council to leave PfSH at the end of March 2025.</p> <p>PfSH agreed a PfSH budget allocation for the Greenprint initiative of £7.5k for the financial year 2025/26.</p> <p>PfSH approved a £6.93M capital programme funding allocation from the Local Nutrient Mitigation Fund. This included a change to the recommendation to include consultation with Inter-Authority Agreement signatories including Chichester District Council.</p> <p>PfSH agreed future work priorities for the cultural and creative industries and built environment panel.</p> <p>PfSH noted the budget monitoring position for 2024/25 and the proposed revenue budget for 2025/26.</p> <p>PfSH received a report on an updated supply and demand of nutrient mitigation across the Solent.</p>

Date	DtC Body	Method	Summary of Outcomes
April 2025	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>POG considered the Spatial Position Statement monitoring report. The majority of authorities cannot demonstrate a five year supply (except FBC and WCC) and most expect a housing shortfall to 2039. POG also agreed that a formal monitoring report should be prepared for PfSH chief executives meeting in June. It was also agreed that this should include reporting on unmet employment need.</p> <p>PCC provided an update on the outcome of a recent IROPI decision made by the SoS MHCLG on the Portsmouth Local Plan at Tipner and East Horsea Island site ahead of the Local Plan examination. Officers noted that the SoS decision contrasts with the wider national growth agenda. Update to the plan will be based on the new standard method and PCC will need to re-start DtC discussions.</p> <p>The EA provided an update on new National Flood Risk Assessment (NaFRA2) data.</p> <p>POG agreed the recommendations for opportunities for £50k revenue funding associated with the Local Nutrient Fund.</p> <p>Discussion on unspent funding following the completion of the Spatial Position Statement and Strategic Flood Risk Assessment.</p> <p>POG agreed a draft consultation response from PfSH on the Defra Land Use Framework.</p> <p>POG agreed that officials from non-PfSH LPAs that have signed the Solent Mitigation partnership Inter-authority agreement should be invited to POG meetings where the development and roll out of projects are discussed.</p>

Date	DtC Body	Method	Summary of Outcomes
April 2025	Environment Agency	Email from HBC to EA	HBC alerted EA to planned consultation on the Reg18 Local Plan, highlighting key parts of the evidence base relevant to the EA including the SFRA of the Local Plan Sites and Sustainability Appraisal.
May 2025	PfSH Natural Environment Group	Meeting of all PfSH nutrient and BNG officer leads	Discussion on projects that PfSH may wish to support with LNMF. PNEG agreed to survey member local authorities on their approaches to monitoring of compliance of BNG credits for new development.
May 2025	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>POG noted the annual monitoring report on the Spatial Position Statement, including a schedule of employment data to be considered by Chief Executives on 12 June.</p> <p>POG noted a lobbying proposal for resources to enhance flood defences for potential brownfield sites earmarked for development to Treasury and MHCLG.</p> <p>The Solent Mitigation Partnership provides an update including the latest nutrient mitigation supply and analysis, and an update on the LNMF revenue funded project. All are progressing except for a River Itchen project.</p> <p>POG agreed a report to PfSH chief executives which recommends that residual funds to be held until end of September. £10k ringfenced to develop the online SFRA GIS mapping portal.</p> <p>It was noted that the SMP will be launching new mitigation schemes that will benefit the Test and Itchen River catchment soon.</p>
May 2025	Environment Agency	Email from HBC to EA	HBC alerted EA to publication of the Sustainability Appraisal linked to the Regulation 18 Draft Local Plan.
May 2025	Fareham Borough Council	Duty to Cooperate meeting	FBC confirm a new Plan will be developed under the new planning system, with a commitment to meet FBC's needs. It

Date	DtC Body	Method	Summary of Outcomes
			was agreed the two authorities would work towards a Statement of Common Ground in due course.
May 2025	Chichester District Council	Duty to Cooperate meeting	Once submitted Local Plan is adopted, CDC confirm they will be starting a new Local Plan once new regulations are in place. Evidence base being commissioned towards end of year.
May 2025	East Hampshire District Council	Duty to Cooperate meeting	EHDC progressing towards a Reg19 consultation in summer 2026. Follow up meeting to discuss statement of common ground. EHDC queried HBC's ability to assist with gypsy and traveller provision.
May 2025	Gosport Borough Council	Duty to Cooperate meeting	GBC Regulation 19 local plan consultation due to take place during February/March 2026. Employment evidence base to be updated later this year. It was agreed GBC and HBC would meet with PCC to quantify the scale of collective unmet housing need across the Housing Market Area.
June 2025	South Downs National Park Authority	Duty to Cooperate meeting	SDNPA anticipate a Regulation 19 consultation will start in May 2026, with Submission by 2026. SDNPA is working with neighbouring authorities to understand how the standard method figure could be apportioned to areas inside and outside the National Park. Both authorities to work towards a SoCG to support the Regulation 19 versions of respective emerging local plans.
June 2025	Portsmouth City Council	Duty to Cooperate meeting	PCC are progressing an addendum (Regulation 19) which will be submitted alongside their local plan. Updated housing and employment land positions will be known shortly. Agreed Statement of Common Ground would be updated.
June 2025	Chichester District Council, East Hampshire District Council, South Downs National Park Authority, Winchester City Council in addition to Fareham Borough	Letter from Havant Borough Council requesting assistance with unmet housing and employment need	Sets out updated position on unmet housing need of 10,622 dwellings based on the new standard method (December 2024), or 9,292 dwellings when taking the potential unmet needs allowance from the submitted Winchester Local Plan into account. Formally requests assistance in meeting 51,424 sq. m of unmet employment need.

Date	DtC Body	Method	Summary of Outcomes
	Council and Gosport Borough Council		
June 2025	Gosport Borough Council and Portsmouth City Council	Duty to Cooperate meeting	It was agreed that it would be helpful to have an agreed unmet need figure for the three authorities. A methodology was agreed to calculate unmet housing and employment need.
June 2025	Winchester City Council	Duty to Cooperate meeting	WCC sought clarification on various points in HBC's Draft (Regulation 18) Local Plan, including the approach to restricting development on Hayling Island. Statement of Common Ground to be agreed in due course.
June 2025	South Downs National Park Authority	Response from SDNPA to Havant BC	Unable to accommodate any unmet need arising from Havant Borough.
June 2025	Historic England	Meeting	<p>Discussion on the Draft Regulation 18 Local Plan consultation</p> <p>Proposed approach to the historic environment and heritage policies going forwards, to include preparation of a suite of policies.</p>
June 2025	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>POG received an update from PfSH Chief Executives Meeting 12 June:</p> <ul style="list-style-type: none"> - The SPS Annual Monitoring Report from POG was noted. Chief executives commented that a Hampshire-wide spatial development strategy will be expected within two years of the MCA's inception. - Proposals to lobby HMT, DEFRA and MHCLG for developer access to flood defence resources for brownfield sites was agreed. - The Solent Mitigation Partnership projects update and annual report was agreed. - The PfSH available funding/resources report following the completion of the PfSH Spatial Position Statement was noted. <p>POG noted various updates on government policies including:</p>

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> - Revisions to the National Development Plan expected in the Autumn. - The New Towns Taskforce due to submit its final report to MHCLG over the summer (anticipated in July). - Two central government consultations including: <ul style="list-style-type: none"> • Improving the implementation of biodiversity net gain for minor, medium and brownfield development • Reform of Planning Committees-technical consultation <p>AOB</p> <p>Survey of how LPAs are interpreting and applying the ‘in-perpetuity’ requirement on the sale of nutrient mitigation credits to be undertaken.</p> <p>Legal training session on the sale of conservation covenants to be undertaken.</p> <p>Wiltshire Council Local Plan recently hosted a session concerning how the duty to cooperate is being demonstrated. Planning officers agreed that a standard template that records evidence and example of LPA adherence to the duty would be helpful.</p>
July 2025	PfSH Joint Committee	Meeting of all PfSH members and chief executives	<p>Work is continuing with individual authorities through POG to consider the impact of the new housing delivery targets.</p> <p>Joint Committee noted PfSH’s intention to write to relevant government departments, requesting they consider the issue of funding flood infrastructure associated with brownfield development.</p>

Date	DtC Body	Method	Summary of Outcomes
			<p>Joint Committee noted a report on the development of the Solent Mitigation Partnership which will facilitate a nutrient mitigation credit sales function and delivery of the central Local Nutrient Mitigation Fund.</p> <p>Joint Committee resolved to recalculate future contributions to reflect East Hampshire's withdrawal from PfSH.</p> <p>PfSH Coordinator to undertake a light-touch review and update of the PfSH Business Plan 2021-2025 (reflecting current operational context as local government reorganisation and the creation of a strategic mayoral combined authority progresses).</p>
July 2025	PfSH Natural Environment Group	Meeting of all PfSH nutrient and BNG officer leads	Discussion on timing and data needs for nutrient report to be monitored, implementation of BNG monitoring fees and suggested themes for LNMF legal training. Proposal to invite partnership chairs to PNEG meetings on a periodic basis.
July 2025	Winchester City Council	Response from WCC to Havant BC	Disagrees with unmet need figure. Unable to commit to providing any additional assistance on housing or employment supply at this time.
July 2025	Gosport Borough Council	Letter from Gosport Borough Council requesting Havant Borough Council to taking Gosport's unmet need and vice versa	Unable to assist in meeting the unmet housing need of other authorities. Formally requests assistance with Gosport's unmet housing need. Notes that GBC unlikely to be able to meet any office demand, but the Council is currently commissioning updated employment work.
July 2025	Winchester City Council	Response from HBC to Winchester City Council examination document ED37	Supported the submitted Local Plan period of 2020-2040, which maximises the contribution towards unmet need outside of Winchester District.
July 2025	Gosport Borough Council	Response from HBC to Gosport BC's request for assistance with unmet need	HBC is unable to meet the unmet need of other local authorities including Gosport Borough. Requests that HBC is kept up to date on the progress of the update to GBC's employment evidence base.

Date	DtC Body	Method	Summary of Outcomes
July 2025	East Hampshire District Council	Response from East Hants DC to Havant BC	Notes the challenges that EHDC has in responding to its increased standard method figure. Confirms commitment to positively engaging with neighbouring authorities. Due consideration will be given to unmet need arising from HBC.
July 2025	Fareham Borough Council	Response from Fareham BC to Havant BC	Unable to provide any firm commitment to meeting further neighbouring unmet need at this stage.
July 2025	Chichester District Council	Response from Chichester DC to Havant BC re Duty to Cooperate	Unable to say whether it will be able to meet any unmet need from outside the Plan area at this stage.
August 2025	Gosport Borough Council and Portsmouth City Council	Duty to Cooperate meeting with GBC and PCC	<p>Meeting to discuss collective unmet housing and employment need in Southeast Hampshire</p> <p>Across three authorities (GBC, HBC and PCC), there is a significant shortfall of 19,341 dwellings. HBC's employment land shortfall was discussed. It was agreed that PCC and GBC would help towards addressing unmet employment need arising from HBC.</p>
September 2025	Test Valley Borough Council	Representations from HBC to Test Valley's Regulation 18 Local Plan	Highlights extensive levels of unmet development need in the South Hampshire sub-region, discussions with planning authorities in Housing Market Area and constrained supply of land in Havant Borough. Sets out the measures taken to maximise housing supply in emerging local plan. Highlights unmet need allowance included in Winchester's Local Plan and the potential for this to be reduced pending the Inspectors' report. Large amount of unmet need remains to be accommodated and seeks formal commitment from TVBC to accommodate unmet need.
September 2025	Environment Agency	Meeting between EA and HBC	Discussion of the EA's Regulation 18 representation on the Local Plan and exploration of changes and additional evidence required to satisfy them. Confirmed general support for the development strategy and areas for improvement in the plan. Agreed to start developing SoCG. EA provided overview of the status of latest NaFRA release.

Date	DtC Body	Method	Summary of Outcomes
September 2025	PfSH Natural Environment Group	Meeting of all PfSH nutrient and BNG officer leads	SMP provided an update on several projects. Discussion on the implementation of BNG monitoring and compliance.
September 2025	PfSH Planning Officers Group	Meeting of all PfSH planning policy officer leads	<p>The SMP provided a general update on their work including the purchase of land at Stubbington (Fareham) and Woodington (Test Valley) for nutrient mitigation and biodiversity negt gain. Wider project updates were also received in relation to River Itchen WWtP upgrades including a number of emerging projects. The group also considered how any unallocated LNMF Revenue Funding (£50k might be utilised).</p> <p>POG agreed to move to annual nutrient supply and demand reporting. Reports to cover 5, 20 and 15-year trajectories including confirmed and emerging supply scenarios.</p> <p>It was noted that following a survey of members, the majority of respondents favoured retaining the funds for devolution related work.</p> <p>PCC shared the Secretary of State’s second IROPI opinion. It was noted that the opinion undermines Bird Aware and mitigation policies. PCC has issued a pre-action protocol letter and is awaiting government response.</p> <p>POG proposed a short statement to Joint Committee in December which will reiterate the statutory duty to cooperate with each other on strategic matters including unmet housing need and reiterate that the 2023 PfSH Spatial Position Statement. The statement will confirm that it is not proposed to update this statement given that the proposed Mayoral Combined Authority for Hampshire and the Solent will have new statutory responsibilities to address strategic planning issues through the new Spatial Development Strategy.</p>

Date	DtC Body	Method	Summary of Outcomes
			Various updates on government policies were noted.
October 2025	PfSH SEPT	BNG in South Hampshire	<ul style="list-style-type: none"> • The authorities met and compared progress on BNG and identified potential pilot schemes. • Future administration of BNG schemes was discussed.
October 2025	PfSH Natural Environment Group	All PfSH planning policy officer environmental leads	<ul style="list-style-type: none"> • An update was given on the work of the local river catchment partnerships. • An update was given on the Local Nutrient mitigation fund including funding. • An update was given on the calculation of Nutrient Budgets for HMO's.
October 2025	East Hampshire District Council, Fareham Borough Council, Winchester Borough Council and Gosport Borough Council, Havant Borough Council and Portsmouth City Council	Meeting to discuss Development Needs in Southeast Hampshire	<p>GBC, HBC and PCC presented the background work that had been undertaken to quantify the collective unmet housing and employment need in the Southeast Hampshire Housing Market Area, given that they are at a similar stage of plan making.</p> <p>WCC noted that the three authorities would have to demonstrate that they had approached every other LPA for assistance with unmet housing need.</p> <p>It was agreed that an item on collective unmet need for Southeast Hampshire would be mentioned under AOB at PfSH POG.</p> <p>PCC provided an update on devolution in Hampshire & the Solent and Spatial Development Strategy. This includes evidence base gathering on unmet need and constraints.</p> <p>GBC, HBC and PCC to jointly and formally request assistance with collective unmet need from EHDC, FBC and WCC via letter.</p>
October 2025	Fareham Borough Council, East Hampshire	Joint letter on Housing and Employment Need from	Highlights joint working between HBC, GBC and PCC on combined unmet housing and employment needs. Notes all three authorities in the same housing market area and

Date	DtC Body	Method	Summary of Outcomes
	District Council and Winchester City Council	HBC, GBC and PCC to EHDC, FBC and WCC	<p>functional economic market area which has resulted in a comprehensive understanding of unmet need in South East Hampshire.</p> <p>Combined unmet housing need figure for the three authorities is 18,437 homes. Joint working has resulted in the surplus of office floorspace in Portsmouth being committed to Havant, but there remains a deficit of 19,972 square metres of new employment floorspace.</p> <p>Seeks formal assistance with unmet housing need of 18,347 homes and unmet employment need of 19,973 sq. m in line with the Duty to Cooperate. Recognises the substantial ask that will need to be carefully considered and considered in the context of devolution.</p> <p>Seeks confirmation as to how the authority will respond to the level of employment and housing need. Recognises that this may need to take a staged approach.</p>
November 2025	Winchester City Council	Response from WCC to joint letter re: Housing and Employment Need from HBC, GBC and PCC	<p>Agreed that housing shortfall requires a coordinated and strategic approach, but this responsibility does not rest solely with WCC. Confirms there is a need to work collaboratively to plan strategically for unmet housing need.</p> <p>Portsmouth, Gosport and Havant are strongly encouraged to approach other Local Planning Authorities in Hampshire which are located outside of their Housing Market Area, as well as Local Plan consultations in Hampshire. It is WCC's opinion this will strengthen your positions at respective Local Plan Examinations.</p> <p>Seeks clarification on the type of employment land need and supply, and how any surplus identified in Portsmouth and Fareham could meet unmet needs in Havant.</p>

Date	DtC Body	Method	Summary of Outcomes
			Acknowledges importance of planning for unmet needs and working collaboratively, however, given the early stages of the Local Plan, it is premature to make any firm commitments regarding unmet housing or employment need currently.
November 2025	PfSH Planning Officers' Group	All PfSH planning policy officer leads	<ul style="list-style-type: none"> • Presentation to the group of the Joint Committee Members' Briefing (19 November) on the Monitoring of the PfSH Spatial Position Statement 2023. • An update was given on the Nutrient Mitigation Supply and Demand Analysis from the SMP. • An update was given on the work of the SMP.
November 2025	PfSH Joint Committee	All PfSH members and chief executives	The Joint Committee was briefed on the impact of new higher government housing targets and the anticipated changes to the National Planning Policy Framework, on the PfSH Spatial Position Statement (2023).
November 2025	East Hampshire District Council	Response from EHDC to joint letter re: Housing and Employment Need from HBC, GBC and PCC	<p>EHDC is committed to positively engaging with neighbouring authorities. EHDC will give due consideration to unmet housing need and employment needs through:</p> <ul style="list-style-type: none"> - Integrated Impact Assessment which will assess reasonable alternatives including meeting unmet needs; - Infrastructure evidence and site assessments currently in progress; - The identification of housing market areas and functional economic market areas (FEMA), including the limited extent of the Portsmouth HMA within East Hampshire. <p>At this time, it is currently unknown whether EHDC will be able to meet its own disaggregated housing needs and will need to consider to what extent we can meet unmet needs from elsewhere in our Local Plan. Should a surplus of housing capacity be identified, it is envisaged that unmet needs from the SDNP in East Hampshire would be prioritised.</p>

Date	DtC Body	Method	Summary of Outcomes
			<p>EHDC support the positive joint working between authorities which has reduced the amount of unmet employment needs to a modest deficit. EHDC has commissioned an update to its employment land evidence which will inform the Council's position on any potential capacity to assist.</p> <p>EHDC has its own unmet need for Traveller and Travelling Showpeople accommodation and will be seeking assistance from neighbouring authorities on this matter.</p> <p>EHDC acknowledge the same letter was sent to WCC and FBC due to their links within the wider HMA and FEMA but consider that it is important that approaches are made to LPAs beyond those areas due to the substantial amount of unmet need.</p>
November 2025	Fareham Borough Council	Response from FBC to joint letter re: Housing and Employment Need from HBC, GBC and PCC	<p>As part of Local Plan consultations and previous Duty to Cooperate discussions, FBC has endorsed conclusions as far as leaving 'no stone unturned' is considered.</p> <p>The Fareham Local Plan 2037 allocates a total of 900 dwellings towards PfSH unmet need, 800 of which are specifically allocated (within the Plan wording) to Portsmouth. The remaining 100 dwellings is towards wider unmet needs in the area. FBC considers it would be appropriate for the three authorities (GBC, HBC and PCC) to discuss and agree how the 100 dwellings are apportioned between them.</p> <p>Emphasises the Council has been proactive in ensuring all necessary 'ecological infrastructure is in place to deliver housing and employment. Further work is being undertaken to establish whether there are any further sites which could facilitate development both within Fareham, and</p>

Date	DtC Body	Method	Summary of Outcomes
			<p>neighbouring authorities including Gosport, Havant and Portsmouth.</p> <p>Highlights an excess of 119,790 sq. m of employment floorspace compared to the requirement. Confirms that FBC is willing to commit 19,973 sq. m of employment floorspace towards HBC's unmet need and welcomes further dialogue with HBC to agree how best to achieved this.</p> <p>FBC is unable to commit anything further towards unmet housing need at this point in time. The Council's review of the Local Plan will be undertaken through the new plan making system, and FBC will engage with the three authorities as part of that process.</p>
November 2025	South Downs National Park Authority	Letter from SDNPA requesting Havant Borough Council to taking SDPNA unmet need in respect of housing and gypsy and travellers	<p>Notes the publication of two new studies on housing need. SDNPA will be able to meet the 323 homes per year figure but not the AECOM figure of 1,048 homes per year.</p> <p>The Authority is proposing to allocate all suitable, achievable and available for housing development. This results in a provision figure based on landscape capacity.</p> <p>The Gypsy and Traveller and Travelling Showpeople Accommodation concludes there is a need for 73 gypsy and traveller pitches and 11 travelling showpeople plots over the plan period to 2042. It is anticipated that we will not be able to meet our overall need. The Authority is therefore formally requesting that Havant accommodates the unmet needs of gypsy and travellers in Havant Borough.</p>
November 2025	South Downs National Park Authority	Response from HBC to SDNPA's request for assistance with unmet need	Thanks the SDNPA for confirming that they would be able to meet the IcenI housing need figure of 323 homes per year based on the ICENI HEDNA but notes that the Authority would not be able to meet the higher need figure of 1,048 homes per year.

Date	DtC Body	Method	Summary of Outcomes
			<p>Notes the formal request to accommodate unmet housing need of the National Park in the event that that the Planning Inspectorate concludes the 1,048 homes per year figure should be used. Confirms that Havant Borough is in a position of being unable to meet its own housing need by a wide margin. As Havant Borough cannot meet its own housing need, it cannot help the SDNPA within its unmet housing need.</p> <p>In respect of Gypsy and Travellers, the Borough has no identified unmet need. The Borough has a need for 1 pitch which has now been met through grant of planning permission. The Draft Local Plan proposes to safeguard this site for current need.</p> <p>Notes that the Council is in the process of procuring an addendum to the Gypsy and Traveller Accommodation Assessment. Confirms that Havant Borough is significantly constrained, unable to meet its own housing need. For this reason, Havant Borough is unable to assist with the unmet gypsy and traveller needs arising from the National Park at this time.</p>
December 2025	Portsmouth City Council	Duty to Cooperate meeting	<ul style="list-style-type: none"> • Meeting at which the two authorities agreed that following on from the Written Ministerial Statement of November 2025 they would continue to work closely on cross boundary strategic issues. DtC is still a matter of soundness in the NPPF. • The two authorities agreed to prepare a SCG.
December 2025	PfSH Joint Committee	All PfSH members and chief executives	<ul style="list-style-type: none"> • PfSH Joint Committee agreed the recommendation of the Bird Aware Solent Report • Agreed a statement not to update the SPS due to the preparation of the SDS by HatS.

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> • Endorsed the cultural and creative workstream priorities 2026/2027. • Supported the 2024 Bird Aware Solent Revised Strategy and its transitional introduction by September 2026. • Endorsed the Bird Aware Partnership's revised budget • Agreed the Solent Mitigation Partnership budget request.
December 2025	Winchester City Council	Joint letter to WCC from HBC, GBC and FBC	<ul style="list-style-type: none"> • GBC, HBC and PCC sent a joint letter to WCC in response to the WCC letter of November 2025. The joint letter provides 137 Portsmouth City Council - Final Duty to Cooperate Statement March 2026 Organiser of meeting / author of correspondence Date (s) of meeting or correspondence Name and / or purpose of activity Organisations involved Outcomes employment needs from SEH a response to the points raised by WCC regarding employment needs. • WCC's statement that the SEH authorities should do more to proactively approach other local authorities, outside of the Housing Market Area was duly noted by the three councils.
January 2026	PfSH Natural Environment Group	All PfSH planning policy officer environmental leads	<ul style="list-style-type: none"> • Update on the Local River Catchment Partnership • Catchment Partnership updates • SMP update
January 2026	Winchester City Council	WCC response to joint letter from HBC, GBC and FBC	Notes the Inspector led public consultation on the Duty to Cooperation Written Ministerial Statement. Focus will be to move the emerging Local Plan forward to adoption as soon as possible, associated with the next Local Plan will resume after that. Acknowledges the importance of planning for unmet needs across Hampshire and remain committed to working collaboratively.

Date	DtC Body	Method	Summary of Outcomes
January 2026	Fareham Borough Council, Gosport Borough Council, Havant Borough Council and Portsmouth City Council (South East Hampshire authorities)	Duty to Cooperate meeting	<ul style="list-style-type: none"> • FBC was included in the SEH group of authorities with PCC, GBC and HBC. • The authorities met and agreed on the distribution of Housing and Employment need in the area including the provision of 100 dwellings to GBC from FBC and 51,424m² of employment floorspace from FBC to HBC. HBC are undertaking an update to the Employment Land Review to understand whether any previously identified lower-ranked potential employment sites could be considered for housing. HBC will keep FBC on the progress of this work. • They agreed to continue to work together regarding cross boundary issues under SEH in future. • It was decided that a multi-lateral SCG would be produced in March 2026 covering Housing, Employment and Ecological Infrastructure.
February 2026	PfSH Planning Officers Group	All PfSH planning officer leads	<ul style="list-style-type: none"> • A PfSH SFRA group is to be set up led by GBC to consider the need for technical SFRA mapping. • Final Draft National Park Housing Split note to be circulated • No need for PfSH response to draft 2025 NPPF.
February 2026	Chichester District Council	Duty to Cooperate	See note
February 2026	Portsmouth City Council	Statement of Common Ground	<p>A SoCG was signed between PCC and HBC. It was agreed in the SoCG that:</p> <ul style="list-style-type: none"> • Neither authority is in a position to assist the other with accommodating unmet housing need arising out of each Local Plan.

Date	DtC Body	Method	Summary of Outcomes
			<ul style="list-style-type: none"> • Both authorities will continue to work through PfSH and the SEH group to address the wider need for housing in the HMA. • PCC would provide a total of 31,261m2 employment floor space towards HBC's unmet employment needs. • The two authorities will work together and with HCC to promote improved sustainable transport connections. • The two authorities will continue to work positively together as part of wider sub regional partnership work including nutrient neutrality and biodiversity net gain through the Solent Mitigation Partnership and recreational disturbance through Bird Aware Solent.
February 2026	Basingstoke and Deane Borough Council	Representations from HBC to Basingstoke and Deane's Regulation 18 Local Plan	Formally requests assistance with unmet housing need, in the context of no further offers of assistance from neighbouring authorities or the wider HMA.
		Response from BDBC to HBC	<ul style="list-style-type: none"> • Unclear what proportion of outlined need you are specifically requesting the borough to accommodate. • Havant Borough is some distance from the borough. • BDBC is in early stages of updating its Local Plan and our priority must be to meet our own needs first, for which a high level of growth is needed. • The increases of our own housing number means that there is difficulty in accommodating further additional homes from neighbouring areas. The Council does not have any scope to accommodate any unmet housing need from Havant Borough.
February 2026	New Forest District Council	Representations from HBC to New Forest Spatial Options and Policy Directions	Formally requests assistance with unmet housing need, in the context of no further offers of assistance from neighbouring authorities or the wider HMA. Acknowledges New Forest also has unmet need, and suggests further discussion takes place through PfSH so that unmet need can inform the preparation of other authorities' respective local plans.

Date	DtC Body	Method	Summary of Outcomes
March 2026	Environment Agency	Email exchange between EA and HBC	HBC sent draft amendments to Local Plan, and outline of approach to the functional floodplain to the EA for informal review ahead of Regulation 19. Broad agreement confirmed with additional wording suggested by EA.
March 2026	Portsmouth City Council, Gosport Borough Council, Havant Borough Council and Fareham Borough Council	South East Hampshire Multi-lateral Statement of Common Ground	<p>The very first SCG of the SEH local authorities. All the parties agreed upon the following:</p> <ul style="list-style-type: none"> • PCC, GBC and HBC had unmet housing needs, which, FBC and WCC had contributed to, to some extent. The precise unmet need will evolve as local completions figures are released for future years. • After transferring employment land between FBC, HBC and PCC, it is envisaged that there will be no unmet employment need in any of the local authorities and that there is an overall surplus of 106,395 m² in SEH. • All the SEH authorities are in the same character area for BNG and their intention is to make SEH self-sufficient in it. • The SEH Authorities are committed to pragmatic joint working and will focus on shared and consistent methodologies for evidence gathering going forward.
March 2026	Test Valley Borough Council and Havant Borough Council	Duty to Cooperate meeting	<p>This meeting followed HBC's response to TVBC's Reg 18 Local Plan consultation in September 2025.</p> <p>TVBC and HBC updated each other on their respective local plans. HBC an overview of its discussions with neighbouring authorities regarding unmet housing need, including the unmet need allowance from Winchester's Local Plan.</p> <p>TVBC noted a need to identify additional sites following the increase to the housing need figures, and the large unmet need figure arising out of New Forest District. TVBC noted some further work on their SHMA which would consider travel to work areas, including its relationship with Havant.</p>

Date	DtC Body	Method	Summary of Outcomes
March 2026	Hart District Council, Isle of Wight Council, Rushmoor Borough Council, and Southampton City Council	Letter from Havant Borough Council requesting assistance with unmet housing and employment need	Formally requests assistance with unmet housing need, in the context of no further offers of assistance from neighbouring authorities or the wider HMA. Focus on local planning authorities in the Hampshire and the Solent devolution area (from which HBC has not previously sought formal assistance).
March 2026	Hart District Council	Response from Hart District Council to HBC's letter	HDC cannot agree to meet any unmet housing needs. HDC does not consider Havant to be a 'neighbouring area' under the NPPF. Hart is under no obligation to consider unmet housing need arising from Havant.
March 2026	Isle of Wight Council	Duty to Cooperate meeting	This meeting followed HBC's formal request for assistance with unmet housing need. IWC and HBC updated each other on their respective local plans. IWC is at Examination with its Island Plan Strategy, with further Hearings due to take place in April 2026. A Scoping consultation on a local plan being prepared under the new system is due to take place later this year. It was noted that IWC is a separate HMA and would be unlikely to be assist with unmet needs given its respective plan making stage(s).
April 2026	Isle of Wight Council	Response from Isle of Wight Council to HBC's letter	The island would not be able to assist in meeting unmet housing need from Havant Borough. The island itself is also facing a significant increase in the standard method housing need figure, and at this stage, we are unable to confirm whether the island is able to meet its own housing need.
April 2026	Eastleigh Borough Council	Response from Eastleigh Borough Council to HBC's letter	EBC is in the process of establishing whether it can make any contribution to wider unmet housing needs through its local process. However in the event it were able to do so it would be unlikely that such a contribution would assist Havant Borough's unmet need.

Date	DtC Body	Method	Summary of Outcomes
April 2026	Southampton City Council	Email response from Southampton City Council to HBC's letter	SCC is not in a position to support (HBC with unmet housing need) at this time. Work is ongoing but it is expected that SCC will also have an unmet housing need.
April 2026	Rushmoor Borough Council	Response from Rushmoor Borough Council to HBC's letter	Rushmoor is not able to accommodate any unmet housing needs of Havant Borough Council. <ul style="list-style-type: none"> • Rushmoor already has an increased housing requirement using the Standard Method, and has a land supply shortfall. • Highly constrained and urban nature of Rushmoor mean that an oversupply of housing land is unlikely to be identified.
June 2026	South Downs National Park Authority	Representations from HBC to South Downs Proposed Submission (Regulation 19) Local Plan	Supports the progress of the Local Plan that addresses development needs whilst supporting the National Park's statutory purposes and duties. HBC considers the plan to be sound and legally compliant.

Appendix 2 - Regular Duty to Cooperate meetings

Appendix 2: Regular Duty to Cooperate Meetings – Summary

Name of group and frequency of meeting	Purpose of group	Who attends	Typical outcomes
PfSH Joint Committee (Quarterly)	To provide decision making and political overview for the PfSH. The Joint Committee make the high-level decision, agree funding and provide steer to other PfSH groups such as PfSH POG. Maintain liaison with the Local Enterprise Partnership(s) on the work they are undertaking.	The Chief executives and member representatives of the following Councils: East Hampshire District Council Eastleigh Borough Council Fareham Borough Council Gosport Borough Council Hampshire County Council Havant Borough Council New Forest District Council New Forest National Park Authority Portsmouth City Council Southampton City Council Test Valley Borough Council Winchester City Council	<ul style="list-style-type: none"> • Approve expenditure from the joint PfSH capital and revenue budgets. • Appoint officer groups and provide resource to address specific cross boundary issues. • Provide a strategic steer and final decision making in respect to cross boundary issues in South Hampshire. • Commission specific pieces of work to address identified cross boundary issues such as nutrients and recreational disturbance. • Lobby central government on the behalf of all of the South Hampshire authorities.
PfSH Planning Officers Group (Quarterly)	PfSH POG is the lead group for addressing planning related issues across the South Hampshire sub-region. The POG reports to Joint Committee, though in some instances it is	The lead planning policy officers of the Council's as outlined above.	<ul style="list-style-type: none"> • Provides expert advice and steer to joint committee on cross boundary planning issues. • Commissions consultants to carry out specific studies and pieces of work on behalf of the PfSH authorities. • Provides liaison on sub regional projects with third parties such as statutory undertakers.

Name of group and frequency of meeting	Purpose of group	Who attends	Typical outcomes
	granted delegated decision-making powers. PfSH officer groups focusing upon specific issues such as the Natural Environment Group report to PfSH POG.		<ul style="list-style-type: none"> • Provides overview and steer to subgroups such as the Natural Environment Group. • Develops joint SPS and SoCG to support its members in the Local Plans. • Manages the work of the PfSH SEPO.
PfSH sub groups (Quarterly)	These sub groups tend to be formed in order to address specific specialised cross boundary issues. The main one at this point is the Natural Environment Group which is focusing on the ongoing provision of nutrient and BNG solutions across the sub region and providing a steer to the PfSH SEPO and his team. In the past there have been Air Quality and Water Quality focused sub groups.	The planning policy officers leading on environmental issues for the Council's as outlined above.	<ul style="list-style-type: none"> • Provides expert advice and steer to joint committee and POG on cross boundary environmental planning issues. • Provides steer to the PfSH SEPO and team on the work being undertaken on BNG and Nutrient Neutrality • Provides liaison on sub regional projects with third parties such as the water companies and Wildlife Trust.
Hampshire and Isle of Wight Planning Officers Group. (Quarterly)	To share advice and experience on cross boundary and national issues at a County Level. It is the higher-level group to which DPG,	Chief Planners for each of the Hampshire Local Planning Authorities and the County Council.	<ul style="list-style-type: none"> • Liaise on and share experience on high level planning matters between the LPAs'. • Liaise on and share experience in regard to changes to National level guidance and policy. • Drive forward high-level bids.

Name of group and frequency of meeting	Purpose of group	Who attends	Typical outcomes
	PRLG and the HIPOG Sustainable Design Group respond.	with authorities across Hampshire. The Authorities are as follows: Basingstoke & Deane Borough Council East Hampshire District Council Eastleigh Borough Council Fareham Borough Council Gosport Borough Council Hampshire County Council Hart District Council Havant Borough Council Isle of Wight Council New Forest District Council New Forest National Park Authority Portsmouth City Council Rushmoor District Council South Downs National Park Authority Southampton City Council Test Valley Borough Council Winchester City Council	
Hampshire & Isle of Wight Development Plans Group (Quarterly)	To coordinate work projects, informally share information, and assist in identifying shared strategic work priorities. There is a particular focus on understanding of, and consistency between, local plans and	The lead planning policy officers of the Council's as outlined above.	<ul style="list-style-type: none"> • Improved understanding of respective local plan and neighbourhood plan activities • Sharing of information and best practice for plan development, hence achieving greater consistency of respective authorities' outputs • Consistency of key messages to external customers • Achieving time efficiencies for all parties relating to the above.

Name of group and frequency of meeting	Purpose of group	Who attends	Typical outcomes
	neighbourhood plans across Hampshire and the Isle of Wight.		
Planning Research Liaison Group (Quarterly)	Share thoughts and best practice on evidence to support local plans	The planning policy monitoring lead for each of the Council's as outlined above.	<ul style="list-style-type: none"> • Responding to Government requirements on evidence gathering such as brownfield registers and self-build registers • Sharing best practice on emerging studies, and monitoring • HCC share and coordinate county-wide studies such as on demographics, and monitoring. • Liaison with HCC on housing and employment monitoring.
HIPOG Sustainable Design Group (Three times a year)	To share advice and experience on cross boundary and national issues related to sustainable design at a County Level.	The planning policy environment lead for each of the Council's as outlined above.	<ul style="list-style-type: none"> • Responding to Government requirements on sustainable design • Sharing experience and best practice on sustainable design policy
Solent Waders & Brent Goose Strategy (SWBGS) Steering Group (monthly)	Oversee the functioning of the SWBGS; discuss individual planning applications where impacts to SPA supporting habitat occur; discuss/share best practice on mitigation measures; guide policy responses to strategic SPA bird mitigation.	Natural England RSPB Hampshire & Isle of Wight Wildlife Trust Havant Borough Council Fareham Borough Council Winchester City Council Hampshire County Council Gosport Borough Council Portsmouth City Council Coastal Partners	<ul style="list-style-type: none"> • Providing advice on efficacy of mitigation measures for individual planning applications. • Refining policy responses for strategic bird mitigation • Dissemination of research, evidence and case-studies for strategic and site-based bird mitigation.

Name of group and frequency of meeting	Purpose of group	Who attends	Typical outcomes
Chichester Harbour Conservancy - Chichester Harbour Protection and Recovery of Nature (CHaPRoN) Steering Group (Quarterly)	Oversee progress of CHC's CHaPRoN scheme, which aims to enhance the natural environment of Chichester Harbour National Landscape through specific targets for nature recovery and restoration.	CHC Coastal Partners Natural England Environment Agency Southern Water Havant Borough Council Three Harbours	<ul style="list-style-type: none"> • Review of CHaPRoN progress targets • Discussion of specific projects e.g. saltmarsh restoration, bird nesting habitat, water quality improvements. • Sharing of funding opportunities • Sharing of research/best practice.
Hampshire Local Nature Recovery Strategy (LNRS) LPA Working Group (monthly Sep 2023-Nov 2025)	To ensure all local planning authorities will be fully involved, enabling a collaborative approach to the creation of the LNRS.	Ecologists, planning policy officers and land managers from the following: Basingstoke & Deane Borough Council East Hampshire District Council Eastleigh Borough Council Fareham Borough Council Gosport Borough Council Hampshire County Council Hart District Council Havant Borough Council Isle of Wight Council New Forest District Council New Forest National Park Authority Portsmouth City Council Rushmoor District Council South Downs National Park Authority Southampton City Council	Discuss: <ul style="list-style-type: none"> • LNRS methodology • Mapping • Habitat and species lists and actions • Individual site discussions • Engagement

Name of group and frequency of meeting	Purpose of group	Who attends	Typical outcomes
		Test Valley Borough Council Winchester City Council	
Solent Forum Natural Environment Group (NEG) (biannually)	The Natural Environment Group (NEG) was set up in 2004 to take forward issues and actions identified by the Solent Marine Sites (SEMS) management scheme and wider environmental issues identified by its members.	Associated British Ports Beaulieu River Management Chichester District Council Chichester Harbour Conservancy Cowes Harbour Commissioners Eastleigh Borough Council Environment Agency Fareham Borough Council Gosport Borough Council Hampshire County Council Havant Borough Council Isle of Wight Council KHM Portsmouth Langstone Harbour Board Lymington Harbour Commissioners Natural England New Forest District Council New Forest National Park Authority Portsmouth City Council Portsmouth International River Hamble Harbour Authority (Hampshire County Council) Southampton City Council Southern Inshore Fisheries and Conservation Authority	<ul style="list-style-type: none"> Knowledge sharing of research, case studies, funding opportunities, and issues affecting the Solent European Marine Sites.

Name of group and frequency of meeting	Purpose of group	Who attends	Typical outcomes
		Southern Water Sussex Inshore Fisheries and Conservation Authority Test Valley Borough Council West Sussex County Council Wightlink Winchester City Council Yarmouth Harbour Commissioners	
Solent Forum Solent European Marine Sites (SEMS) Management Group (annually)	To consider the management of activities through annual monitoring, discussion and management measures, to ensure that they are not damaging the Solent's designated sites.	Associated British Ports Beaulieu River Management Chichester District Council Chichester Harbour Conservancy Cowes Harbour Commissioners Eastleigh Borough Council Environment Agency Fareham Borough Council Gosport Borough Council Hampshire County Council Havant Borough Council Isle of Wight Council KHM Portsmouth Langstone Harbour Board Lymington Harbour Commissioners Natural England New Forest District Council New Forest National Park Authority Portsmouth City Council	<ul style="list-style-type: none"> Knowledge sharing of research, case studies, funding opportunities, and issues affecting the Solent European Marine Sites.

Name of group and frequency of meeting	Purpose of group	Who attends	Typical outcomes
		Portsmouth International River Hamble Harbour Authority (Hampshire County Council) Southampton City Council Southern Inshore Fisheries and Conservation Authority Southern Water Sussex Inshore Fisheries and Conservation Authority Test Valley Borough Council West Sussex County Council Wightlink Winchester City Council Yarmouth Harbour Commissioners	

Appendix 3 - Key Changes to the Building a Better Future Plan prior to Regulation 19

Appendix 3 Schedule of Key Changes to the Local Plan Policies prior to Regulation 19 arising from the Duty to Cooperate

The table below highlights some key points raised in response to DtC discussions to date. It then summarises how the policies have been changed in direct response to these comments.

Policy	Organisation	Outcome (changes made to the Local Plan)
5: Green and Blue Infrastructure	Natural England	This policy is new for the Regulation 19 Local Plan following input from Natural England.
6: Amount of Housing	Winchester City Council	DtC discussion supporting the delivery of the Winchester Local Plan 2020-2020 resulted in Table H2 of that Plan including an unmet needs allowance of 495 dwellings – 30% of which is apportioned to Portsmouth City Council; and 70% of which is apportioned to Havant Borough Council. Policy 6 of the Pre-Submission Local Plan reflects this and identifies 346 dwellings from the Winchester Local Plan.
7: Amount of Employment	Fareham Borough Council	Discussion with South East Hampshire authorities re: unmet development needs resulted in a formal offer of 19,973 square metres of employment floorspace towards Havant Borough Council's unmet need.
	Portsmouth City Council	Request for formal assistance with unmet housing and employment development need resulted in Portsmouth City Council to formally offer its surplus of 31,261 square metres of office floorspace to meet unmet need in Havant Borough.
23: Recreational disturbance on international sites	Partnership for South Hampshire	The policy has been written based on evidence created through the joint working undertaken by PfSH and Bird Aware Solent Partnership, specifically the Bird Aware Strategy (September 2024).
24: Water quality effects on international sites	Partnership for South Hampshire	The policy has been informed by evidence that was created through the joint working undertaken by PfSH.
26: Solent Waders and Brent Goose feeding and roosting sites	Partnership for South Hampshire	This policy has been written based on evidence that has been commissioned through the joint working undertaken by PfSH. PfSH commissioned the Solent Waders and Brent Goose

		Strategy Partnership to produce the Solent Waders and Brent Goose Strategy (2024) and Solent Waders and Brent Goose Strategy, Guidance on Mitigation and Off-setting Requirements (2024).
27: Flood Risk	Partnership for South Hampshire	The policy has been informed by and refers to the PfSH SFRA Level 1, and the HBC SFRA (Local Plan Sites).
33: Conservation Areas	Historic England	This policy was developed between Regulation 18 and 19 following engagement with Historic England.
34: Listed Buildings	Historic England	This policy was developed between Regulation 18 and 19 following engagement with Historic England.
35: Archaeology	Historic England	This policy was developed between Regulation 18 and 19 following engagement with Historic England.
36: Locally Listed Buildings and non-designated heritage assets	Historic England	This policy was developed between Regulation 18 and 19 following engagement with Historic England.
37: Improvements in Energy Performance of Historic Assets	Historic England	This policy was developed between Regulation 18 and 19 following engagement with Historic England.
55: Accessibility, Transport and Parking	Hampshire County Council	This policy has been informed by Hampshire County Council's Local Transport Plan 4 (LTP4).

Appendix 4 - Letters to and from neighbouring authorities

Chichester District Council

Andrew Frost
Director for Planning and the Environment
Chichester District Council

Enquiries to: Alex Robinson
Direct line: [REDACTED]
Email: [REDACTED]

By email only: [REDACTED]

Date: 5th March 2024

Dear Andrew

HAVANT BOROUGH'S EMERGING LOCAL PLAN – DUTY TO COOPERATE

Many thanks to your officers who met with my colleagues on 24 October 2023 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of Havant Borough's Local Plan, and its housing need and supply position. This follows the approval of the Partnership for South Hampshire (PfSH) Spatial Position Statement (SPS) at Joint Committee on 6 December 2023.

As you are aware, Havant Borough Council is currently preparing a new Local Plan. We recently published an updated Local Development Scheme (LDS) which indicates that we will be publishing a draft (Regulation 18) Local Plan in Quarter 4 of 2024.

The LDS can be viewed here:

<https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-development-scheme-lds>.

Havant Borough Council is a pro-development local authority with an ambitious regeneration agenda. We are keen to deliver this alongside other objectives such as delivering more affordable housing for our communities and addressing international issues such as climate change. Havant Borough values partnership working which allows us to work positively and proactively on cross boundary issues and looks forward to continuing working with Chichester District to deliver strategic priorities including meeting the development needs of our two areas.

As with most urban local planning authorities in the Southeast, one of the biggest challenges for the new Local Plan will be to meet Havant's own development needs. The Inspectors' Interim Findings¹ in respect of the previous Local Plan acknowledged that Havant may be an authority that cannot sustainably meet its housing needs in accordance with paragraph 11 b) of the National Planning Policy Framework (NPPF) (see paragraph 52). Nevertheless, the Council's starting point is that no stone will be left unturned in order to meet its own need.

¹ <https://www.havant.gov.uk/media/8718>

Whilst Havant's evidence base on housing supply is emerging, the attached plan from the Council's draft Constraints Study illustrates the very constrained supply of land in Havant Borough. The least constrained areas shown are already identified for development, notably that of the Dunsbury Park tax site which is part of the Solent Freeport, and Havant Thicket Reservoir which serves a sub-regional function, stretching far beyond Havant Borough's boundaries.

Housing Need and Supply

The NPPF makes clear that in order to significantly boost housing supply, the standard method is an advisory starting-point for establishing a housing requirement for an area. Applying a housing need figure of 516 dwellings², there is a need for 10,320 dwellings in Havant Borough over a Local Plan period to 2043 (see table below).

The Council has undertaken a comprehensive and robust assessment of the following sources of supply to assess how far it is able to meet its own housing need:

- Outstanding planning permissions as of 1 April 2023;
- Adopted Local Plan allocations without planning permission;
- Potential housing sites³; and
- Windfall development⁴.

Our work on the previous Local Plan and the Inspectors' interim findings report clearly signal a need for robust evidence and including that sites should meet the NPPF definition of 'developable'. For this reason, it will not be possible to rely on any housing delivery from Havant and Waterlooville town centres until evidence of deliverability is more advanced. In any case, development in these locations will be unlikely to be sufficient in scale to close the gap between the Borough's objectively assessed need and identified housing supply. The Council will keep all sources of housing supply up to date and robust in order to demonstrably ensure that every effort is made to address housing need within the Borough's boundary.

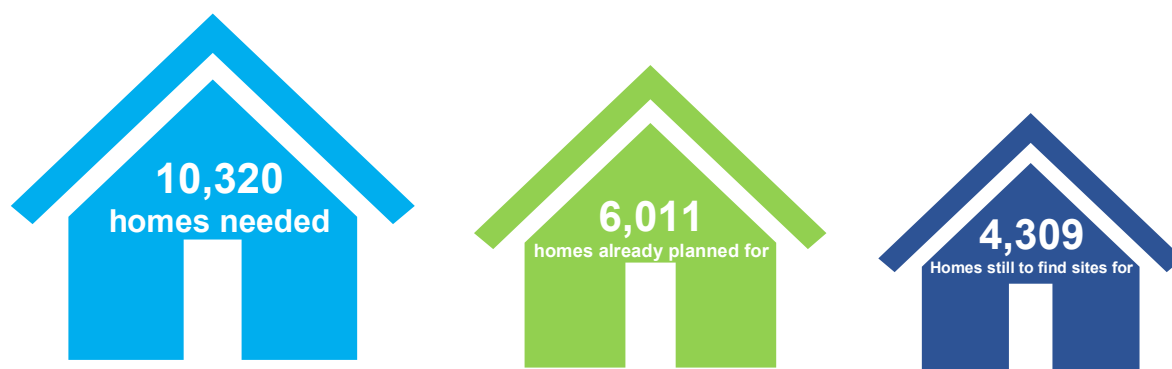
² The standard method calculation of 516 dwellings per annum (dpa) is used from 2022, though the standard method need calculation for 2024 is 512 dwellings per annum prior to the publication of the 2023 affordability ratio which is due to be published in March 2024. The former is used as a worst case scenario.

³ Identified by Table 1 of the Council's [Housing Delivery Position Statement](#)

⁴ The Council's evidence on windfall development will be updated to inform the new Local Plan.

	Identified housing need (2022/23-2042/43)	Net Dwellings Completed or Committed
	10,320	
Completions 2022-23		495
Outstanding planning permissions at 1/4/23		1,524
Allocations in Adopted Local Plan without planning permission		606
Potential housing sites		1,524
Potential housing sites where previous Inspectors' raised deliverability concern		700
Windfall Development		1,162
Total		6,011
Remaining objectively assessed housing (unmet need)	4,309	

Against a standard method figure of 10,320 dwellings, the Council is only able to identify a supply of 6,011 dwellings over the plan period. **This results in an unmet housing need figure of 4,309 dwellings.**



All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply. We will be continuing to reach out to the development industry and landowners to ascertain whether there are any further sites which could be available for development and be assessed as part of the plan-making process – our Call for Sites has recently been relaunched on our website. However, given the extent of the very constrained supply of land, there will likely be insufficient capacity to meet objectively assessed need within the Plan area.

Employment Need and Supply

Havant's constrained land supply will also mean it is extremely challenging for the Borough to identify sufficient sites to meet employment need. The Council has commissioned an

Employment Land Review, building upon the 2021 PfSH Economic, Employment and Commercial Needs Study⁵. This will confirm whether Havant has sufficient employment land to meet its own development needs or will need to formally request assistance from its neighbours to accommodate any unmet need. We will keep you up to date with the progress of our evidence base on employment land supply.

Chichester Local Plan 2021-2039: Proposed Submission

We are conscious of the very advanced stage of Chichester District's plan preparation and note you are due to submit your Local Plan for examination.

The Proposed Submission Local Plan indicates that the capacity of the A27 has led to the Council to plan for a housing requirement below the need derived from the standard method. As a result of not meeting the identified housing needs, Chichester District is now unable to accommodate any unmet need from the South Downs National Park. In this respect, Havant Borough was approached to see whether it may be able to meet any of Chichester's unmet needs. I can confirm that Havant is unable to assist Chichester in addressing its unmet need, given that Havant Borough is unable to meet its own need.

In the event that it is shown through Chichester's Local Plan examination that there is additional capacity to accommodate housing development, and Chichester's housing need can then be met or exceeded, we would ask that Havant's unmet need is addressed.

Joint working

Havant Borough is keen to continue an open and collaborative dialogue about addressing unmet housing need from both of our administrative areas. While Chichester District is not a member of the Partnership for South Hampshire (PfSH), the PfSH Spatial Position Statement highlights the scale of unmet need that exists across the South Hampshire. It is therefore important that there continue to be constructive and active discussions to effectively address this matter. As such, an updated statement of common ground will need to be agreed between our authorities before the start of your examination. This will ensure this matter is appropriately addressed by both of our respective local plans.

Planning Practice Guidance on plan-making⁶ sets out that strategic policy-making authorities should cooperate in meeting housing need, using the most appropriate functional geographical area, such as a housing market area (HMA). That being a case, there is a clear functional geography between Chichester and Havant for which there is a significant unmet housing need.

We are conscious of the proposed repealing of the duty to cooperate and its proposed replacement with an alignment policy. Whilst the detail of such a test is not yet known, the Government has made clear that cross-boundary working on strategic priorities, including unmet need will remain. Therefore, the Borough Council's position is we should ensure compliance with the existing legislation up to the point that the process changes.

⁵ push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf

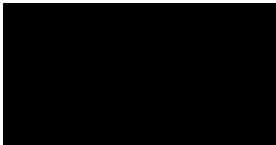
⁶ [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/plan-making) Paragraph: 017 Reference ID: 61-017-20190315 Revision date: 15 03 2019

You will be aware of the work that has been undertaken between our two authorities to address the duty to co-operate in recent years. Moving forwards, we seek to undertake a series of detailed discussions with yourselves as our respective plans progress, in order to ensure that unmet need and other cross-boundary matters are robustly addressed. Going forwards it is the Council's intention to agree an updated statement of common ground in support of our respective local plans.

The NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. 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. I am obviously aware of your request for assistance from Havant Borough to help with Chichester's unmet need, to which the Borough Council has formally responded to. Nevertheless, I am formally writing to ask whether your authority is able to accommodate any of Havant Borough's unmet housing need?

I would like to request a meeting to discuss how this matter can be resolved and would be grateful if you could please advise of your availability by return. I look forward to hearing from you on this important issue and would be grateful for a response by **28 March 2024**.

Yours sincerely



Alex Robinson
Executive Head of Place

cc Tony Whitty
Claire Potts

Alex Robinson
Executive Head of Place
Havant Borough Council

If calling please ask for: **Tony Whitty**

By email only:

Our ref:

Your ref:

Dear Alex

HAVANT BOROUGH'S EMERGING LOCAL PLAN – DUTY TO COOPERATE


Thank you for your letter dated 5th March 2024, setting out the progress of C

Your unmet housing need is noted. As you note in the letter, Chichester District's Local Plan is close to submission and sets out a housing target below that derived from the standard method due to constrained capacity of the A27. This means we have our own unmet housing need and are no longer able to meet an element of unmet need from the South Downs National Park, as was proposed at the Preferred Approach stage. Unfortunately, this means that Chichester is not currently in a position to accommodate any unmet need from Havant Borough. Only a small part of Chichester's Plan Area, at Southbourne, shares a Housing Market Area with Havant. The Chichester Local Plan Proposed Submission proposes a significant amount of development in this area already, with further work ongoing in relation to mitigation of transport impacts from the level proposed.

It is noted that work in relation to employment requirements is ongoing and as such any potential unmet need is not yet identified/quantified.

We are of course happy to continue dialogue and are keen to finalise a Statement of Common Ground ahead of submitting our plan for examination. I understand a further meeting was held this week to discuss revisions to the latest Statement of Common Ground drafted between the two authorities and that work on this is progressing.

Yours sincerely



Tony Whitty
Divisional Manager
Planning Policy

Cc: David Hayward

Tony Whitty
Divisional Manager
Planning Policy
Chichester District Council

Enquiries to: David Hayward
Direct line: [REDACTED]
Email: [REDACTED]
My reference:
Your reference:
Date: 11 September 2025

Dear Tony

RE: UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Thank you for meeting us to discuss unmet housing and employment need at our Duty to Cooperate meeting on the 12th June 2025, and your subsequent response dated 17th July 2025.

It is noted that the Chichester Local Plan 2021-39 was recently adopted by Chichester District Council. It is also recognised that a positive answer regarding meeting unmet needs cannot be given at this stage and that other requests with assistance of unmet needs from neighbouring authorities are likely to be received. Indeed, we have received similar Duty to Cooperate requests from Portsmouth City Council and Gosport Borough Council.

Duty to Cooperate

As you will be aware, the NPPF and PPG do not provide a fixed format how the duty to cooperate should be discharged, nor prescribe which authorities should be cooperated with in the preparation of local plans. The Council's approach has been to focus duty to cooperate discussions with the Borough's immediate neighbouring authorities, and with other authorities within the same Housing Market Area (HMA)¹. In this respect, we note a small part of the Chichester Plan Area at Southbourne, lies within the same HMA.

In terms of the Functional Economic Area, Havant Borough is identified as part of South Hampshire², though it should be acknowledged that the geography of FEMAs are unlikely to correspond neatly with individual local authority or sub-regional boundaries. Indeed, Havant Borough is closely linked with the western part of Chichester District falling within the HMA.

¹ For avoidance of doubt, as well as yourselves this is Gosport Borough Council, Fareham Borough Council, Portsmouth City Council, East Hampshire District Council and Winchester City Council.

² <https://www.push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf>

We note your representations to our recent Regulation 18 Local Plan consultation express a desire to consider the Strategic Transport Assessment in order to determine any cross-boundary implications. At this stage, the TA may appear to be absent in the Council's evidence base as it currently stands. To clarify, the Regulation 18 Local Plan was drafted in such a way to negate substantive updates and changes to the Regulation 19 Plan – hence the reference to a Strategic Transport Assessment in the Council's evidence base. I can confirm it is the Council's intention to publish the Transport Assessment (TA) alongside the Regulation 19 Local Plan in due course. I can confirm that we will be pleased to meet with you at an appropriate point, to discuss its emerging findings. I can also confirm that allocations within the emerging (at that point) Chichester Local Plan were included in the modelling.

For completeness, we have also noted the various other issues raised by your representations e.g. River Ems strategic wildlife corridor and will be very pleased to discuss these matters with you in due course.

Chichester District Local Plan Review

Thank you for providing an indication of the process by which Chichester District Council will look to respond to the high level of unmet housing and employment need arising from Havant Borough. We welcome the Council's commitment to exploring whether unmet housing and/or employment needs can be met, in addition to Chichester's own. It is noted that this would include sharing of methodologies, relevant evidence and outcomes of site related work as it is progressed, including whether any potential sites are suitable to meet needs arising from Havant Borough.

I look forward to continuing our constructive and active discussions to effectively address unmet needs in due course. May I suggest that a further Duty to Cooperate discussion takes place in advance of any Regulation 18 consultation for the Local Plan review, if not sooner? I look forward to meeting you further to discuss the Local Plan review and an updated Statement of Common Ground to support Havant Borough's Regulation 19 Local Plan in due course.

Yours sincerely

David Hayward

Strategic Planning Manager

If calling please ask for:

David Hayward
Havant Borough Council

Our ref:

By email only:

Your ref:

17 July 2025

Dear David

DUTY TO COOPERATE LETTER 12 JUNE 2025

Thank you for your letter of 12th June 2025, further to our meeting of 12th May 2025. We note the position in relation to unmet need, as discussed at the meeting and set out in the letter.

As you know, the Chichester Local Plan 2021-39 is currently at an advanced stage of examination, and as such consideration in relation to meeting unmet needs will be for the next full Local Plan.

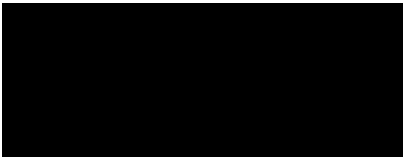
Once the plan is adopted we anticipate immediately working on a Site Allocation DPD and/or a new Local Plan under the revised plan-making system, as set out in our most recent Local Development Scheme. One of the early pieces of evidence work will be a review of our land supply position through an update to the Housing and Employment Land Availability Assessment (HELAA) and a Call for Sites. This information will be a starting point, alongside other evidence, in determining both whether we can meet our own housing need in a future plan and whether there is scope to also meet any needs from elsewhere. This means that we are unable to say at this stage whether we will be able to meet any unmet need from outside the Plan Area. We would note that large parts of our Plan Area are also constrained and that we are likely to receive similar requests from other LPAs which will also need to be considered.

In terms of process, if the evidence indicates scope to meet any housing and/or employment needs on top of our own needs we would be happy to work with you to explore whether any potential sites are suitable to meet needs arising in Havant Borough. We would anticipate that this would include sharing methodologies, relevant evidence and outcomes of site related work as it is progressed. This will include exploring the strategic relationships between Havant and areas of Chichester District. In our response to an earlier letter, dated 5 March 2024, we noted that only a small part of the Chichester Plan Area, at Southbourne, lies within the same Housing Market Area as Havant. The same applies to the Functional Economic Market Area. It would be useful to understand whether there is available evidence to update the understanding of these connections in terms of commuting and travel patterns for example. Transport evidence would also be relevant.

Whilst we note that the Havant Constraints Study presents “areas of least constraint” in adjoining Districts, including Chichester, the study is at a high level, focussing on particular constraints only and as such further detailed work would be required, as part of the process already outlined above, to determine whether there are suitable sites for development in these areas which are not needed to meet Chichester’s own need. It is also noted that one of the identified areas is remote from Havant, on the other side of the South Downs National Park.

Whilst we cannot give a positive answer at this stage, we will continue to discuss and meet as necessary as the work on both plans develops, including in relation to any changes to the housing requirement that may come out of devolution and strategic development strategies or local government reorganisation.

Yours sincerely



Tony Whitty
Divisional Manager
Planning Policy


East Hampshire District Council



Outlook

FW: East Hampshire Local Plan: Duty to Co-operate Provision of Traveller and Travelling Showpeople accommodation

From [REDACTED]
Date Mon 2023-10-02 14:33
To [REDACTED]
Cc [REDACTED]

 1 attachment (9 MB)

GT TSP Site Assessment for the Local Plan.pdf;

Dear Heather

Firstly, please accept our apologies for the delay in responding to you.

As you may be aware, our current [Local Development Scheme](#) suggests that we will be targeting a Pre-Submission (Regulation 19) Local Plan consultation in Q1 of 2024.

In confidence however, we are currently discussing with Members an updated LDS which would push back the Regulation 19 and submission. We are also considering further consultation options as well prior to the Regulation 19, which would be in Autumn next year. Pre-Submission (Regulation 19) consultation is being considered in Summer 2025 and submission following in Autumn 2025. This is of course very much confidential and subject to change at this point, but wanted to let you know the latest position in the interests of a good working relationship. We may be in a position to provide you with a fuller update when we meet with you on the 18th.

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 a draft 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.

We will of course be happy to discuss further and look forward to working with you to pull together the draft SCG.

Kind regards,

Jade

Jade Ellis

Principal Planning Policy Officer | [REDACTED]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

Advanced notice of leave: 12-13 October 2023



Your privacy matters. Go to www.havant.gov.uk/privacy-policy

Information in this message is confidential and may be privileged. It is intended solely for the person to whom it is addressed.

If you are not the intended recipient, please notify the sender, and please delete the message from your system immediately.

Sent: 26 September 2023 09:29

Subject: Fw: East Hampshire Local Plan: Duty to Co-operate Provision of Traveller and Travelling Showpeople accommodation

CAUTION: This email came from outside of the council - only open links and attachments that you're expecting.

Thanks.

Heather Stevens

Principal Planner, Planning Policy

East Hampshire District Council, Penns Place, Petersfield, GU31 4EX

[REDACTED]



Your privacy matters. Go to easthants.gov.uk/privacy-policy

Information in this message is confidential and may be privileged. It is intended solely for the person to whom it is addressed. If you are not the intended recipient, please notify the sender, and please delete the message from your system immediately.

OUR VALUES



Sent: 18 August 2023 16:47

Cc: Planning Policy and Urban Design <planning.design@havant.gov.uk>

Subject: East Hampshire Local Plan: Duty to Co-operate Provision of Traveller and Travelling Showpeople accommodation

Dear David

We are writing to you as we prepare for a consultation on the East Hampshire draft Local Plan (Reg.18) in the new year (See [LDS July 2023](#)).

East Hampshire District Council takes seriously its duty to plan for additional Traveller and Travelling Showpeople sites to meet identified need, as part of the preparation of the Local Plan. We have kept our evidence base up to date, with ORS currently refreshing our [GTAA 2020](#) to align with our plan period (2021-2040) and revisit key sites. We have also granted planning permission for many Traveller pitches where appropriate, only refusing permission where sites are particularly unsuitable, such as within 400m of the Wealden Heaths SPA. We annually publish our [Five Year Supply](#), and currently have 2 years supply for Traveller pitches, and 0 years supply for Travelling Showpeople plots.

In our district, the delivery of new Traveller accommodation is particularly restricted by environmental considerations such as flood risk and for historic reasons, many existing sites being within 400m of the SPA, so now not suitable to expand or intensify. Equally the same issue applies to provision of Travelling Showpeople plots, but is further exacerbated by the rural nature of our district given the type of large vehicles that need to access such sites.

We have considered all existing Traveller and Travelling Showpeople sites and potential sites, reviewing constraints and identifying whether there is potential for development for Traveller pitches or Travelling Showpeople plots. Please see attached document.

The outcome of this process is that we have a high need, as shown in the [GTAA 2020](#), and very little capacity to meet that identified need, as shown in the site assessment (see link). The refresh of the GTAA will likely show similar or increased need. That evidence base will be made available alongside the forthcoming draft Local Plan consultation in January 2024.

Our [Duty to Co-operate Framework 2022](#) identifies the following as strategic cross boundary matters;

- Meeting the identified need for Gypsy, Traveller and Travelling Showpeople accommodation within the District and wider unmet needs
- Consideration of the potential need for transit accommodation for Travellers (with regards to travelling routes across districts/boroughs).

And on these matters, lists the following authorities as engaged;

South Downs National Park Authority, Waverley Borough Council, Winchester City Council, Hart District Council, Basingstoke and Deane Borough Council, Chichester District Council, Havant Borough Council, Hampshire County Council

The [Duty to Co-operate Framework 2022](#) documents the efforts gone to identify sites, along with the [background paper](#) that supported the 2022/23 Local Plan consultation. That background paper included reference to requesting Hampshire County Council to review its landholdings for this purpose, which it did in 2019, but no suitable available land was identified. The Council asked Hampshire County Council to carry out this exercise again in 2023, but received the same conclusion.

Consequently, the Council requests your response under the Duty to Cooperate on whether your authority might be in a position to assist with meeting the need set out within the GTAA given that the Council is currently unable to identify how this need can be met.

For this purpose, it would be helpful to consider the following:

- Whether your authority is in a position to assist, and if so, how much and the mechanism through which this could be delivered
- The stage you are at in the plan-making process.

We kindly ask that you review the above information and respond accordingly confirming your authority's position and whether it is able to assist us with the delivery of Traveller and Travelling Showpeople sites. It is appreciated that your authority may not be in a

position to do so but given the Duty to Cooperate requirements including the demonstration of the soundness test that will allow the Council to proceed to the examination of the Local Plan, could you please provide any relevant evidence to sufficiently demonstrate why your authority cannot assist.

We would be grateful to receive your response by **Friday 8 September**.

We are looking to prepare Statement of Common Grounds (SCG) to support our consultation on the draft Local Plan. Your response to this request will help form the SCG.

Many thanks for your time taken to consider this and respond. If you have any questions please get in touch, we are more than happy to discuss with you.

Kind regards

Heather.

Heather Stevens

Principal Planner, Planning Policy

East Hampshire District Council, Penns Place, Petersfield, GU31 4EX



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**OUR
VALUES**



Natalie Meagher
Director of Regulation and
Enforcement
East Hampshire District Council

Enquiries to: Alex Robinson
Direct line: [REDACTED]
Email: [REDACTED]
Date: 5th March 2024

By email only

Dear Natalie

HAVANT BOROUGH'S EMERGING LOCAL PLAN – DUTY TO COOPERATE

Many thanks to your officers who met with my colleagues on 18 October 2023 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of Havant Borough's Local Plan, and its housing need and supply position. This follows the approval of the Partnership for South Hampshire (PfSH) Spatial Position Statement (SPS) at Joint Committee on 6 December 2023.

As you are aware, Havant Borough Council is currently preparing a new Local Plan. We recently published an updated Local Development Scheme (LDS) which indicates that we will be publishing a draft (Regulation 18) Local Plan in Quarter 4 of 2024.

The LDS can be viewed here:

<https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-development-scheme-lds>.

Havant Borough Council is a pro-development local authority with an ambitious regeneration agenda. We are keen to deliver this alongside other objectives such as delivering more affordable housing for our communities and addressing international issues such as climate change. Havant Borough values partnership working through PfSH which allows us to work positively and proactively on cross boundary issues, including the sufficient provision of housing and employment across the sub-region. The PfSH SPS confirms the Council's commitment to delivering sustainable development in the most sustainable locations, and meeting housing need where possible.

As with most urban local planning authorities in the Southeast, one of the biggest challenges for the new Local Plan will be to meet Havant's own development needs. The Inspectors' Interim Findings¹ in respect of the previous Local Plan acknowledged that Havant may be an authority that cannot sustainably meet its housing needs in accordance with paragraph 11 b)

¹ <https://www.havant.gov.uk/media/8718>

of the National Planning Policy Framework (NPPF) (see paragraph 52). Nevertheless, the Council's starting point is that no stone will be left unturned in order to meet its own need.

Whilst Havant's evidence base on housing supply is emerging, the attached plan from the Council's draft Constraints Study illustrates the very constrained supply of land in Havant Borough. The least constrained areas shown are already identified for development, notably that of the Dunsbury Park tax site which is part of the Solent Freeport, and Havant Thicket Reservoir which serves a sub-regional function, stretching far beyond Havant Borough's boundaries.

Housing Need and Supply

The NPPF makes clear that in order to significantly boost housing supply, the standard method is an advisory starting-point for establishing a housing requirement for an area. Applying a housing need figure of 516 dwellings², there is a need for 10,320 dwellings in Havant Borough over a Local Plan period to 2043 (see table below).

The Council has undertaken a comprehensive and robust assessment of the following sources of supply to assess how far it is able to meet its own housing need:

- Outstanding planning permissions as of 1 April 2023;
- Adopted Local Plan allocations without planning permission;
- Potential housing sites³; and
- Windfall development⁴.

Our work on the previous Local Plan and the Inspectors' interim findings report clearly signal a need for robust evidence and including that sites should meet the NPPF definition of 'developable'. For this reason, it will not be possible to rely on any housing delivery from Havant and Waterlooville town centres until evidence of deliverability is more advanced. In any case, development in these locations will be unlikely to be sufficient in scale to close the gap between the Borough's objectively assessed need and identified housing supply. The Council will keep all sources of housing supply up to date and robust in order to demonstrably ensure that every effort is made to address housing need within the Borough's boundary.

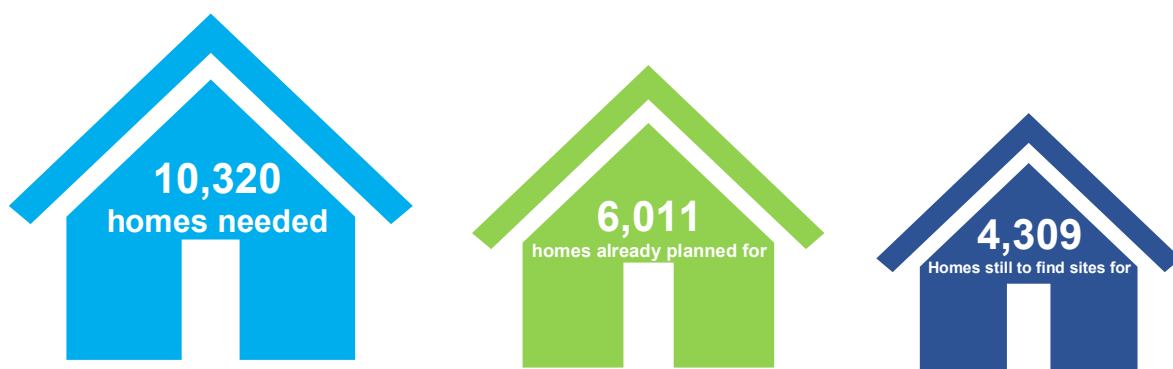
² The standard method calculation of 516 dwellings per annum (dpa) is used from 2022, though the standard method need calculation for 2024 is 512 dwellings per annum prior to the publication of the 2023 affordability ratio which is due to be published in March 2024. The former is used as a worst case scenario.

³ Identified by Table 1 of the Council's [Housing Delivery Position Statement](#)

⁴ The Council's evidence on windfall development will be updated to inform the new Local Plan.

	Identified housing need (2022/23-2042/43)	Net Dwellings Completed or Committed
	10,320	
Completions 2022-23		495
Outstanding planning permissions at 1/4/23		1,524
Allocations in Adopted Local Plan without planning permission		606
Potential housing sites		1,524
Potential housing sites where previous Inspectors' raised deliverability concern		700
Windfall Development		1,162
Total		6,011
Remaining objectively assessed housing (unmet need)	4,309	

Against a standard method figure of 10,320 dwellings, the Council is only able to identify a supply of 6,011 dwellings over the plan period. **This results in an unmet housing need figure of 4,309 dwellings.**



All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply. We will be continuing to reach out to the development industry and landowners to ascertain whether there are any further sites which could be available for development and be assessed as part of the plan-making process – our Call for Sites has recently been relaunched on our website. However, given the very constrained supply of land, there will likely be insufficient capacity to meet objectively assessed need within the Plan area.

Employment Need and Supply

Havant's constrained land supply will also mean it is extremely challenging for the Borough to identify sufficient sites to meet employment need. The Council has commissioned an

Employment Land Review, building upon the 2021 PfSH Economic, Employment and Commercial Needs Study⁵. This will confirm whether Havant has sufficient employment land to meet its own development needs or will need to formally request assistance from its neighbours to accommodate any unmet need. We will keep you up to date with the progress of our evidence base on employment land supply.

East Hampshire Local Plan 2021-2040 Regulation 18

Alongside this letter, we have submitted representations on your Draft Local Plan consultation and are continuing to engage on a Statement of Common Ground.

Joint working

The PfSH Spatial Position Statement (SPS) is of course a useful starting point in demonstrating compliance with the duty to cooperate. However, given the scale of unmet need that exists within the sub-region, it is important that there continue to be constructive and active discussions to effectively address this matter. It is Havant Borough Council's position that relying solely on the PfSH SPS will not demonstrate compliance with the duty to cooperate. As such, ongoing discussions and a bi-lateral statement of common ground will need to be agreed in order to demonstrate that this matter is appropriately addressed by our respective local plans.

Planning Practice Guidance on plan-making⁶ sets out that strategic policy-making authorities should cooperate in meeting housing need, using the most appropriate functional geographical area, such as a housing market area (HMA). That being a case, 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.

We are conscious of the proposed repealing of the duty to cooperate and its proposed replacement with an alignment policy. Whilst the detail of such a test is not yet known, the Government has made clear that cross-boundary working on strategic priorities, including unmet need will remain. Therefore, the Borough Council's position is we should ensure compliance with the existing legislation up to the point that the process changes.

You will be aware of the work that has been undertaken between our two authorities to address the duty to co-operate in recent years. Moving forwards, we seek to undertake a series of detailed discussions with yourselves as our respective plans progress, in order to ensure that unmet need and other cross-boundary matters are robustly addressed. It is the Council's ambition to agree a statement of common ground prior to any Regulation 19 consultation on either of our plans thereby minimising soundness and legal compliance issues for both plans.

The NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. 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. I am therefore formally

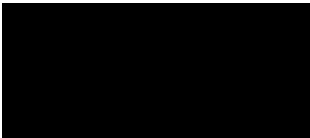
⁵ push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf

⁶ [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/plan-making) Paragraph: 017 Reference ID: 61-017-20190315 Revision date: 15 03 2019

writing to ask whether your authority is able to accommodate any of Havant Borough's unmet housing need?

I would like to request a meeting to discuss how this matter can be resolved and would be grateful if you could please advise of your availability by return. I look forward to hearing from you on this important issue and would be grateful for a response by **28 March 2024**.

Yours sincerely



Alex Robinson
Executive Head of Place

cc Adam Harvey

Alex Robinson
Executive Head of Place
Havant Borough Council
Sent VIA Email

Enquiries to: 0
Direct line: [REDACTED]
Email: [REDACTED]
My reference:
Your reference:
Date: Monday 22nd April 2024

Dear Alex,

Response to Havant Borough Council's request to help meet unmet housing need under the Duty to Cooperate

Thank you for your letter dated 5 March 2024 requesting assistance from East Hampshire District Council (EHDC) to meet potential unmet housing needs from Havant Borough (currently identified as 4,309 homes).

It is not clear from your correspondence whether you are seeking the same assistance from other neighbouring local planning authorities, although we understand Portsmouth City Council to be in a similar situation to you and unable to assist. EHDC agrees that we should ensure compliance with existing legislation regarding the Duty-to-Cooperate, until such point that the process changes.

EHDC advocates the approach taken by Havant Borough Council (HBC) that the starting point should be that no stone will be left unturned and we welcome seeing further work on the matter supporting the emerging Havant Borough Local Plan.

We note the letter asks us whether we can meet 'any' of the need and it is therefore assumed it is not expecting us to meet all the need. The total amount of unmet needs you have identified (4,309 homes) exceeds the number of new homes we are identifying new land for through proposed allocations in our draft Local Plan (3,500 homes). East Hampshire cannot meet all this unmet need, either sustainably or practically during the plan period (2021-2040). To do so would cause significant harm to our district and simply would not be deliverable over the plan period.

We note that the figure of 4,309 homes is identified as unmet needs, but not confirmed, as the capacity work is ongoing (not yet published), and "All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply" and a further call for sites is planned. Therefore, as we understand it, the figure of 4,309 is unconfirmed, but that a significant amount of unmet need is expected from Havant Borough.

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 Havant and Portsmouth 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). This limits the amount of land available to meet such unmet needs.

Whilst our recent Draft Local Plan consultation (Reg.18, 2024) identified sites to deliver above our housing requirement, as you say in your response to our consultation, it is only 643 homes in excess. Following previous discussions, we have/are likely to receive formal requests for assistance to meeting housing needs from both Portsmouth City Council and Chichester District Council, whilst already accounting for some unmet needs from the SDNP. Your request is in addition.

Our recent consultation on the Draft Local Plan 2021-2040 has raised many issues to consider further. We are currently reviewing those representations to further understand our future land supply position. As we consider the responses, we need to relook carefully at sites, deliverability and potential unmet needs identified elsewhere. We also need to carefully assess constraints ourselves, as we are not without constraints (including showstopper environmental constraints). As the responsible planning authority preparing a new Local Plan, whilst recognising the NPPF requirement to meet housing needs, and boost housing supply, we must balance this with what is right for our local area, and it would not be reasonable to expect East Hampshire to mop up unmet needs from many other areas to the detriment of our own area (particularly in relation to the environment and infrastructure).

That said, we accept the need to carefully consider this when preparing our plan and would expect to accommodate some unmet needs from areas that can evidence a functional relationship with areas of our district, subject to the outcome of our Integrated Impact Assessment and other supporting evidence base. We are not yet able to agree the extent of that.

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.

It is useful to understand the likely extent of Havant Borough'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.

We also look forward to the publishing of Havant's constraints study, and the outcome of the further site assessment and call for sites. It is noted that a windfall allowance has been taken into account, however, the windfall allowance supporting the withdrawn Havant Local Plan only considered sites of four dwellings or less. It is considered further work is needed to support the potential for a windfall allowance, especially on sites of five dwellings or more. This is even more apparent if housing delivery from Havant and Waterlooville town centres are disregarded. If not, the amount of development in Havant Borough until 2043 could be underestimated, having an adverse impact on infrastructure provision.

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.

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.

Yours sincerely



Natalie Meagher

Director of Regulation and Enforcement

Cc Adam Harvey
Heather Stevens

Simon Jenkins, Adam Harvey
East Hampshire District Council

By email only:

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 12th June 2025

Dear Simon and Adam

UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Many thanks to you and your colleagues who met with us on 15th May 2025 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of the Council's Local Plan – the Building a Better Future Plan, including the latest position on our housing and employment development needs. This follows our letter dated 5th March 2024 which formally requested assistance with our unmet housing needs, as well as highlighting the work being undertaken to update the Council's employment evidence base.

As you may be aware, the Council is currently consulting on the full draft (Regulation 18) Building a Better Future Plan which closes on 1st July 2025.

Housing need and supply

As you will be aware, the Council's starting point is that it will leave no stone unturned in order to meet its own housing need. However, as demonstrated by the Constraints Study¹ there is also a very constrained supply of land in Havant Borough with the least constrained areas already identified for development.

Our previous letter dated 5th March 2024 identified an unmet housing need of 4,309 homes between 2022 to 2043. Significantly however, that was under the previous standard method figure of 516 dwellings per annum, equivalent to 10,320 dwellings between 2023 and 2043. The publication of the new standard method in December 2024 means that the Borough's need has increased to 892 dwellings per annum, equivalent to 17,840 homes over the plan period (2023 to 2043).

Given the expected lack of suitable land within the Borough with development potential to meet identified housing need, the Strategic Housing and Economic Land Availability

¹ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

Assessment (SHELAA) includes a comprehensive and robust assessment of all land in the Borough to ensure the Council has fully examined all opportunities for development, and has been published alongside the full draft (Regulation 18) Local Plan for consultation.

The SHELAA concludes there is a developable housing supply of 7,981 dwellings between 2023 and 2043. However, the SHELAA does not take account of the development strategy, nor the Sustainability Appraisal which is undertaken to determine whether a site should be allocated. A total of four potential development strategies were considered through the SA process covering a broad spectrum from a full environmental and brownfield focus to a full housing delivery focus. However, crucially under none of the options is it possible to achieve delivery of the total need for housing as set out under the standard method, by some margin².

Housing Supply 2023-2043 (number of dwellings likely to be delivered under each development strategy option)				
Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Completions 2023/24	368	368	368	368
Commitments	1,142	1,142	1,142	1,142
Broad locations considered suitable under the strategy option	1,003	2,406	2,406	2,406
Site allocations considered suitable for allocation under the strategy option	821	1,906	2,669	4,282
Small sites with the urban area	29	37	37	37
Windfall	1,360	1,360	1,360	1,360
Total housing supply	4,723	7,218	7,981	9,594
Supply against standard method plan requirement of 17,840	(13,117)	(10,622)	(9,859)	(8,246)

The chosen development strategy (Option 2) combines and balances key national and local objectives in the most effective way and overall represents the most appropriate strategy, when considered against the alternatives. The spatial distribution of development planned for through the chosen option focuses on the existing built areas across the Borough, notably Havant and Waterlooville town centres and less constrained greenfield land. On this basis, the Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum.

There is therefore an unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year). The submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance' of 1,900 dwellings – of which 70% equivalent to 1,330 dwellings would be apportioned to Havant Borough. This would increase overall supply to

² Further information can be found in Sustainability Appraisal which has been published as part of the Council's evidence base: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

8,548 dwellings over the plan period, and reduce unmet need to 9,292 dwellings (or 465 homes per year).

It should be noted this contribution can only be afforded limited weight and may change before the Plan has successfully passed through Examination. However, this obviously only represents a proportion of Havant Borough’s unmet need, with a large amount remaining to be accommodated within neighbouring authorities which will need to be discussed through the Duty to Cooperate.

Under the Duty to Cooperate, the Borough Council is formally requesting East Hampshire District Council to assist in meeting the unmet housing need of at least 9,292 dwellings arising from Havant Borough. The Borough Council has approached its other neighbouring local authorities, and local authorities within the same housing market area³ with the same request and I will keep you updated on progress with our discussions. I am also mindful that there is unmet housing need arising from Portsmouth City and Gosport Borough respectively within the same Housing Market Area.

Employment need and supply

The Council has now published an Employment Land Review (ELR) which provides an up-to-date assessment of the Borough’s economic and employment development needs⁴. It identifies an objectively assessed need figure of 175,199 sq. m of net new floorspace over the plan period of which 139,140 sq. m results from industrial demand, and 36,059 sq. m for office demand.

The ELR indicates that the industrial market is strong across the Borough, but the market is constrained due to low levels of availability. The potential site allocations could help to address some of those supply constraints, but the Dunsbury Park Freeport Tax Site status means that the floorspace supply from Phase 3 cannot be relied on to meet general demand and local need for new floorspace. This is further compounded by a lack of office sites promoted to meet need and a number of allocated sites no longer available to meet the Borough’s employment need⁵.

Overall demand and supply	2023-43 Sq m (GIA)
Industrial demand	139,140
Office demand	36,059
Gross demand	175,199
Industrial supply	121,475
Office supply	2,300
Total supply	123,775
Balance over (under) supply	-51,424

³ Fareham Borough Council and Gosport Borough Council

⁴ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

⁵ Kingscroft Farm (SHELAA Refs HA20 and ED09) and Brockhampton West (Ref ED14)

On this basis, the Borough has an unmet need of 51,424 sq. m for employment floorspace over the plan period. Of this, 17,665 sq. m is industrial demand and 33,759 sq. m is office demand.

Under the Duty to Cooperate, the Borough Council is formally requesting East Hampshire District Council to assist in meeting 51,424 sq. m of unmet employment need. The Borough Council will also be approaching our other neighbouring local authorities, and local authorities within the same travel to work area with the same request and I will keep you updated on progress with our discussions.

Joint working

While East Hampshire is no longer a member of the Partnership for South Hampshire, our authorities have a strong track record of working together. We look forward to continuing constructive and active discussions to effectively address unmet housing and employment development needs arising from Havant Borough.

In your response to this request for assistance, please could you set out the process by which your authority will look to respond to the high level of unmet housing and employment need arising from Havant Borough. It is recognised this may need to take a staged approach depending on the progress of your local plan, and its supporting evidence. A further meeting can be arranged if it would be useful to explore this further. Please could you respond no later than 10th July 2025. Please note that we may share your response with other duty to cooperate partners and publish it as part of our evidence base.

I look forward to receiving any consultation response to our Draft Local Plan consultation and progressing our discussions around a Statement of Common Ground in due course.

Yours sincerely

David Hayward

Strategic Planning Manager

David Hayward
Public Service Plaza
Havant
Hampshire
PO9 2AX

Enquiries to: Simon Jenkins

Direct line: [REDACTED]

Email: [REDACTED]

Reference:

Date: 2nd July 2025

Dear David,

Thank you for your letter dated 12 June 2025 and constructive discussion held on 15 May 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 and employment needs in Havant Borough.

Havant Borough unmet development needs

East Hampshire District Council (EHDC) acknowledges the significant development constraints facing Havant Borough and the associated unmet housing and employment needs you have identified through your Regulation 18 consultation and supporting evidence base. We also note that you originally formally sought assistance with your unmet needs when you responded to our Draft Local Plan consultation in 2024, but since then the goal posts have 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 Havant Borough, we note your formal request under the Duty to Cooperate for assistance in addressing an unmet housing need of at least 9,292 dwellings and an unmet employment floorspace need of 51,424 sqm over the plan period to 2043. Please note that our housing number has hugely increased too, 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.

Like us, you have consulted on a draft Local Plan, to which we have just responded (June 2025). However, we note that your draft Local Plan consultation relates to the new standard method and higher housing number, yet ours predated that change. 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 516 homes a year to 892 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, *“there is therefore an unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year). The submitted Winchester Local Plan, which is at Examination, includes an ‘unmet needs allowance’ of 1,900 dwellings – of which 70% equivalent to 1,330 dwellings would be apportioned to Havant Borough. This would increase overall supply to 8,548 dwellings over the plan period, and reduce unmet need to 9,292 dwellings (or 465 homes per year)”*.

In our response to your draft Local Plan consultation, we identify some measures that could help increase the amount of housing that can be planned for in Havant Borough, such as reviewing implementation rates. Every effort should be made to maximise how much housing can be delivered within the constraints that exist – however we do acknowledge that there are significant constraints to development in Havant 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 Havant 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 his 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 Havant Borough, please do note, we have also been formally asked to assist with Portsmouth City Council and Gosport Borough Council's unmet housing needs. We are aware that there are also unmet needs in Chichester District (at examination) and potentially emerging from Waverley Borough (our 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 other areas and note Winchester's pending position that is currently being assessed at examination. As such, we would appreciate it if you could keep us updated on the extent of your unmet housing need.

In terms of employment, at present, we have not been asked to meet unmet employment needs from any other authority other than Havant Borough (51,424 sq. m) but appreciate that with additional housing comes employment needs. We have just commissioned an update to our Housing and Economic Development Needs Assessment (HEDNA), so at present, we cannot identify a definitive amount for employment needs in East Hampshire, and as such cannot offer a position on assistance with unmet employment needs from elsewhere. We will be interested to see the outcome of our updated HEDNA and have further discussion with our economic development colleagues to better understand the market for employment land use, as at present, delivery timescales are lengthy.

You specifically ask 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. As noted, 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.

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 development 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? (A model of delivery being pursued by many authorities; to make provision for Traveller accommodation on strategic sites as part of the housing mix).

The forthcoming update to the East Hampshire GTAA will consider household connections to Havant Borough, as evidence to support the possibility of provision on large sites in Havant Borough. We wish to continue to discuss this with Havant Borough and seek your co-operation with the update of our GTAA when our consultant attempts to liaise with you. Please consider this a formal request from East Hampshire for your assistance with unmet needs for Traveller accommodation, and a specific request with regards to Site allocation 1 (Soughleigh) and potentially Allocation 25: Campdown.

Future Dialogue

Like you, we acknowledge the close working relationship that has long been established between our two authorities, through previous joint working practices and PfSH. We wish to continue that 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

Simon Jenkins
Planning and Special Projects Lead

Adam Harvey
Planning Policy Manager
East Hampshire District Council

Enquiries to: David Hayward
Direct line: [REDACTED]
Email: [REDACTED]
My reference:
Your reference:
Date: 10 September 2025

Dear Adam

RE: UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Thank you for meeting us to discuss unmet housing and employment need at our Duty to Cooperate meeting on the 15th May 2025, and your subsequent response dated 21st July 2025.

I can confirm that we have now concluded the most recent set of Duty to Cooperate discussions, which included a formal request to accommodate unmet housing and employment need, with all authorities in the Portsmouth Housing Market Area¹, as well as the South Downs National Park Authority.

We also note your formal request for assistance with unmet need for traveller accommodation, and are pleased to provide the Council's response to this matter below.

Havant Borough unmet development needs

Thank you for confirming East Hampshire District Council (EHDC)'s commitment to positively engaging and cooperating with neighbouring authorities to plan strategically for housing and employment growth across the wider area. We welcome your acknowledgement of the significant development constraints facing Havant Borough and the associated unmet housing and employment needs.

Housing

We are mindful that the majority of housing need figures for each local authority in South Hampshire have significantly increased as a result of the 2024 changes to the standard method. It is acknowledged that this represents a significant challenge for Local Plans across the sub-region. We also note that your housing need has also significantly increased and that your draft Local Plan pre-dated this change.

¹ For avoidance of doubt, as well as yourselves this is Gosport Borough Council, Fareham Borough Council, Portsmouth City Council, Winchester City Council and Chichester District Council.

Havant Borough has seen an increase from 516 dwellings per annum to 892 dwellings per annum (an increase of 72%). We have recently set out the implications of the increase to our standard method figure and the impact that this has had on our unmet need position in response to Winchester's Local Plan examination². In effect, our unmet housing need position has more than doubled from 4,309 to 9,292 dwellings.

We also note your response to our recent Draft (Regulation 18) Local Plan consultation which includes a number of suggested measures to increase the amount of housing that can be planned for in Havant Borough. We have set out our initial thoughts on these matters below.

Plan period

EHDC queries whether 2023 is the most appropriate start date for the plan period when more recent commitment data is known for the base period 1st April 2024. In this respect, we are keen ensure that our unmet housing need position is not overestimated. We will be reviewing the implications for changing the start of the plan period, and will be happy to share the results of this analysis with you in due course. An amended plan period start date will also be informed by the timescales for our Pre-Submission Regulation 19 consultation.

Please note however, this is unlikely to have a significant impact on the high level of unmet need that exists within Havant Borough. The precise amount of unmet need will of course further fluctuate between now and the examination due to, for example, annual data returns on housing completions. But it is unlikely this will change the overall picture of unmet need.

Non-implementation rates

We note your comments relating to the 15% non-implementation discount applied to larger sources of housing land supply, and the 5% non-implementation discount applied to small sites – the latter of which is consistent with East Hampshire's approach.

Given the Council is not able to address its housing needs in full, it has proposed a housing requirement based on development capacity. The housing requirement is based on the total number of homes (7,218 new homes (net)) that can be provided across a 20 year period, equivalent to around 361 dwellings per annum. However, this does not provide for any flexibility in the event that housing does not come forward at the expected rate, and/or for any non-implementation of sites. The alternative would be to set a housing requirement below the identified development capacity. However, this would not be effective or be positively prepared.

We will further consider the approach to the non-implementation rates applied, and whether any evidence is required to support this approach for the Pre-Submission Regulation 19 Plan. We would be happy to discuss this further through our Duty to Cooperate discussions.

² <https://www.localplan.winchester.gov.uk/examination-page/responses-to-inspector-note-15-implications-of-changing-the-local-plan-period>

Windfall

You will be aware that an updated Windfall Analysis paper was published alongside the Draft Regulation 18 Local Plan. Compared to earlier iterations of this analysis, an additional stage of analysis was undertaken to reflect key principles of the development strategy. However, it also removed any study threshold, as all sites delivering a net gain of 1 dwelling or more were included in the analysis. The spreadsheet detailing the past windfall rates between 1st April 2013 to 31st March 2024 can be provided on request.

Thank you also for identifying the discrepancy in the Windfall Analysis paper in terms of when windfall delivery is due to commence. I can confirm that windfall delivery is projected to commence from year 4 of the plan period as set out in paragraph 2.5 of the analysis.

Employment

Thank you for acknowledging our unmet need position on employment need. We note that East Hampshire District Council is not currently able to offer a position on whether it is able to assist with unmet employment needs. I also note that the Council has just commissioned an updated Housing and Economic Development Needs Assessment (HEDNA). I should be most grateful if you could please keep me updated on the progress of this study. In particular, it would be helpful to understand whether an updated position will be available in advance of consultation on East Hampshire's Regulation 19 Local Plan. Perhaps we could convene a further meeting once there are draft results of the study?

East Hampshire Local Plan

Thank you for setting out the process by which you will be responding to unmet development needs in the preparation of your Local Plan, which will include the preparation of key evidence base including the Integrated Impact Assessment. We appreciate the need for you to have first fully considered your ability to meet your own identified development needs, before considering whether unmet needs of neighbouring areas can be planned for. We strongly support your proposal to assess the District's ability to assist with unmet development needs through an Integrated Impact Assessment (IIA). In particular, we welcome confirmation that the IIA will assess reasonable alternatives that include meeting unmet development needs. We would recommend that this approach is reflected in the Transport Assessment and other evidence base studies.

Indeed, we are acutely aware of the wider unmet need arising out of southeast Hampshire having received similar Duty to Cooperate requests from Portsmouth City Council and Gosport Borough Council. We also note that the South Downs National Park Authority's commitment to leaving no stone unturned in meeting identified development needs.

Gypsy, Traveller and Travelling Showpeople need

Thank you for updating us on the forthcoming review of the East Hampshire Gypsy and Traveller Accommodation Assessment (GTAA). We will be very pleased to discuss this with you, as well as providing any information or data that the Council or its consultant may require to update this part of your evidence base.

We also note your formal request under the Duty to Cooperate for assistance with unmet needs for Traveller accommodation, and questions in relation to whether two of the larger development sites in Havant Borough could accommodate Traveller accommodation to assist with East Hampshire's unmet needs.

By way of background, the Council's 2024 Gypsy and Traveller Accommodation Assessment concludes that there is no identified unmet need for Gypsy and Traveller pitches or Travelling Showpeople plots within Havant Borough. Though the 2017 joint GTAA did identify that Havant Borough had a need to provide 1 pitch, this need has now been met through a permission for 2 pitches at a site in Long Copse Lane in northern Emsworth. The Draft Local Plan proposes to safeguard this site for current need.

Thank you for acknowledging the significant constraints that affect Havant Borough's ability to meet general housing need. To confirm, the Council has not had any sites proposed to meet gypsy and traveller needs. The only option that Havant Borough would have would be to explore whether unmet need for gypsy and travellers from neighbouring areas general housing allocations.

In this regard, we note your specific request as to explore the potential for gypsy and traveller pitches as part of Allocation 1: Southleigh and potentially Allocation 25: Campdown which are proposed housing allocations Council's Draft Local Plan. In terms of the latter, there is a currently a live planning application reference APP/23/00488 on land at Campdown. Given this scheme is relatively advanced in the planning system, it unlikely that the Borough Council will be able secure any gypsy and traveller accommodation in that location.

The majority of the land included within the Southleigh allocation is being promoted by Bloor Homes who have recently undertaken some public consultation events with a view to submitting an outline planning application later this year. Given that we do not yet have a formal planning application for Southleigh, we would be happy to explore whether the site promoter would consider the provision of gypsy and traveller pitches as part of the overall development.

However, clearly there is a deliverability question in terms of whether part(s) of the site would be available for that purpose, and the provision of such pitches which would inevitably reduce the amount of available developable land. This in turn would negate our ability to address our own housing need within the Borough's boundary. This in turn, would potentially increase the extent of our unmet need, and 'ask' of our neighbouring authorities including East Hampshire. We would obviously wish to avoid such a situation.

Future dialogue

We welcome the District Council's willingness to continue dialogue with us and wider Duty to Cooperate partners to understand the scale and spatial distribution of unmet need across the sub-region.

I look forward to continuing our constructive and active discussions to effectively address unmet needs and look forward to prepare a Statement of Common Ground to support our Regulation 19 Local Plan consultations in due course.

Yours sincerely

David Hayward

Strategic Planning Manager



Sent jointly on behalf of
Portsmouth City Council,
Gosport Borough Council
and Havant Borough
Council

Adam Harvey
Planning Policy Manager
East Hampshire District Council

By email only:



13 October 2025

Dear Adam,

Re: Housing and employment need in South East Hampshire

This letter follows on from our Duty to Cooperate meeting held on 09 October 2025, which was attended by East Hampshire District Council, Winchester City Council, Fareham Borough Council, Havant Borough Council, Gosport Borough Council and Portsmouth City Council. This letter has been prepared jointly by Gosport Borough Council, Havant Borough Council and Portsmouth City Council and the same letter has been sent to Winchester City Council and Fareham Borough Council. The Duty to Cooperate is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004. It is also included within the National Planning Policy Framework and Planning Policy Guidance specifically in terms of planning strategically across local boundaries. It is acknowledged that significant and successful ongoing sub-regional work has already been undertaken by the Partnership for South Hampshire (PfSH), although it is recognised further ongoing work is required as outlined in this letter.

Gosport Borough Council, Havant Borough Council and Portsmouth City Council have been working together over the last few months in order to identify our combined unmet housing and employment needs. We consider this to be a worthwhile planning activity as we are all at a similarly advanced stage of plan making namely approaching Pre-Submission. Furthermore, the three local authorities are located entirely in the same housing market area and functional economic market area of South East Hampshire and as such, this work has resulted in a comprehensive understanding of the unmet need which exists within South East Hampshire. All of our three Local Plans will need to use the 2024 standard method to assess housing need, meaning that there has not been an in-depth assessment of unmet need across the Housing Market Area given that the Spatial Position Statement¹ published by PfSH in 2023 used the previous standard method.

¹ <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

The East Hampshire, Winchester and Fareham local authority areas are entirely or partially located in South East Hampshire and share at least in part the same housing market area and functional economic market area as Gosport, Havant and Portsmouth. They are at different stages of plan making and are gathering evidence on whether they can meet housing need as calculated under the 2024 standard method.

The combined housing need, supply and unmet need for the Gosport, Havant and Portsmouth local authority areas are set out in table 1 of Appendix 1 of this letter. The unmet housing need figure for the three local authorities is 18,347 homes.

This unmet housing need figure is considerably higher than the shortfall of 11,771 identified for the whole of South Hampshire in the Spatial Position Statement² published by PfSH in 2023. There are two main drivers for this increase. Firstly, there is the change in the standard method in 2024 from being population based to stock based, which resulted in increased need across South East Hampshire. Secondly, the end date of the Spatial Position Statement of 2036 is at least four years before the end dates of our emerging local plans.

The combined employment need, supply and unmet need for the Gosport, Havant and Portsmouth local authority areas is set out in table 2 of Appendix 1. A positive outcome of joint working over the summer has been that a surplus of office floorspace in Portsmouth has been committed to Havant through the Duty to Cooperate. However, there is still a deficit of 19,973 square metres of new employment floorspace across the three local authorities.

Table 3 of Appendix 1 sets out the key constraints of our three local authority areas. These are similar and linked including flood risk, international nature conservation designations, land contamination and a lack of land that can be built on. The table also sets out the approaches we have taken in our respective Plans including housing densities, making optimal use of sustainable locations and protecting public open space. All the information in Appendix 1 of this letter is supported by robust evidence bases and no stone has been left unturned in the search for new deliverable and developable sites within our local authority boundaries.

Under the Duty to Cooperate, Gosport Borough Council, Havant Borough Council and Portsmouth City Council are formally requesting East Hampshire District Council along with Winchester City Council and Fareham Borough Council to assist in meeting the unmet housing need of 18,347 homes and unmet employment need of 19,973 square metres of new employment floorspace. Following on from our meeting last week, we have compiled a list of other local planning authorities that we have individually discussed unmet housing and employment needs; this is set out in Appendix 2.

Portsmouth City Council had an advisory meeting with the Planning Inspectorate in August 2025 and asked about the unmet need in South East Hampshire. The City Council was advised that there was only a focused window between now and submission to engage with Fareham, Winchester and East Hampshire on any further distribution of unmet needs. The advisory inspector considered that continued engagement was necessary, that Portsmouth should not be 'diffident' in asking for help from its neighbours and that the City Council needed to prioritise demonstrating their own efforts for ongoing joint working.

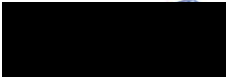
This request is in line with the Duty to Cooperate. We understand that it is a substantial ask that will need to be carefully considered by both Members and officers at your Council.

² <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

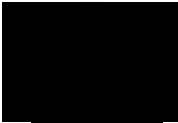
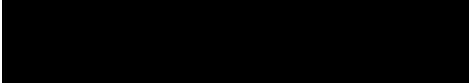
However, the need for land to accommodate new homes and jobs in South East Hampshire is great. We hope that this letter provides the necessary clarity on the quantum of development involved and can form the basis for further work going forward. We are mindful of proposals for Devolution and if this is taken forward by Government then meeting housing need will be a core component of the Spatial Development Strategy for Hampshire and the Solent. Nonetheless, this is not yet confirmed and as set out above it is necessary to continue to progress Local Plans and the Duty to Cooperate in the meantime.

We would be grateful if you would reply to this letter by 10 November 2025. Please can you set out in your response the process by which your authority will look to respond to the level of employment and housing need. It is recognised that this may need to take a staged approach depending on the progress of your local plan and its supporting evidence. We look forward to working positively with you going forward.

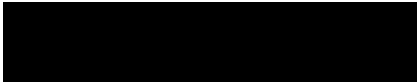
Yours sincerely



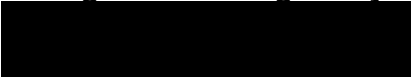
Lucy Howard
Head of Planning Policy



David Hayward
Strategic Planning Manager



Jayson Grygiel
Manager of Planning Policy



Appendix 1: Housing and employment need and supply in the local authority areas of Portsmouth, Gosport and Havant

TABLE 1: HOUSING NEED AND SUPPLY ANALYSIS

LPA	Plan period		Housing need according to the standard method	Housing supply	Unmet need	Notes
Gosport Borough Council	2025-2042 (17 years)	Total	7,378	2,537	-4,841	Housing supply based on revised SHLAA due for publication with Regulation 19 Plan in 2026. Regulation 18 SHLAA available online: www.gosport.gov.uk/gbip2040evidence
		<i>Dwellings per annum</i>	434	150	-284	
Havant Borough Council	2025-2043 (18 years)	Total	15,966	6,466	-9,590	The 2025 standard method indicates a local need figure of 887 dwellings per annum, equivalent to 15,966 dwellings across an 18 year plan period. The HBC 2024 Trajectory (supporting the Regulation 18 Local Plan consultation) estimated completions of 419 during 24/25 and 338 during 25/26. This compares with 24/25 draft completions which suggest this was actually 326. Based on 419 dwellings minus 326, an additional 93 dwellings have been rolled forward into 25/26. Outstanding planning permissions as of 1 April 2025 are not reflected in commitments and so may slightly underestimate supply. HBC's unmet need figure does not currently include any unmet needs allowance from Winchester's Local Plan, pending the outcome of the examination. With the inclusion of 203 dwellings (70% of 290 dwellings towards an unmet needs allowance) from Winchester's Local Plan, the unmet need position would reduce to 9,297 dwellings (517 dwellings per annum).
		<i>Dwellings per annum</i>	892	323	-480	
Portsmouth City Council	2025-2040 (15 years)	Total	15,285	11,369	-3,916	PCC supply based on HELAA that will be published winter 2025 to support the Local Plan Addendum. The supply does not include the Fareham 800, which reduces unmet need to 3,116 (annualised 208). This is noted in the explanatory text of the Local Plan and in the Duty to Cooperate Statement. The Winchester commitment is not
		<i>Dwellings per annum</i>	1019	758	-261	

TABLE 2: EMPLOYMENTS NEEDS AND SUPPLY ANALYSIS

LPA	Plan period	Employment need	Employment supply	Surplus/unmet need	Notes	
Gosport Borough Council	2025 to 2042 (17 years)	Total	66,085	76,190	10,105	<p>GBC is using the Stantec Study for PFSH (2021) for employment need. Table 11.1 (office) & Table 11.4 (industrial) of the study showed an employment need for Gosport between 2019 & 2040 of 76,538 (3,645 per year). To update this for July 2025 position, adjusted for GBCs plan period to 2042, the following has been done: Employment need 2019-2040 (76,538) minus employment completions between 2019 and 2024 (17,743) equals 58,795. Add two additional years of annualised need from the Stantec study to cover to 2042 (3,645 x 2). Total employment need: 66,085. GBCs EDNAVELLA compares supply with various employment forecasts/scenarios and comes to the conclusion that we are meeting our current requirements. Please note we are refreshing this study. Employment supply based on EDNAVELLA (2018) and internal work to date. Refresh to EDNAVELLA currently being undertaken for Regulation 19 in early 2026. Regulation 18 EDNAVELLA available online.</p>
		<i>m2 per annum</i>	3,887	4,482	594	
Havant Borough Council	2023-2043 (20 years)	Total	175,199	123,775	-51,424	<p>Data has been taken from Havant Borough Council's analysis of the ELR and SHELAA. The supply position excludes Dunsbury Park Phase 3 which has the potential to deliver 13,935 sq. m. This floorspace is associated with the net additional demand generated by its freeport tax site status.</p>
		<i>m2 per annum</i>	8,760	6,189	-2571	
Portsmouth City Council	2025-2040 (15 years)	Total	117,400	138,746	21,346	<p>Supply figure based on HELAA that will be published in winter 2025. Need figure from draft HEDNA Update. The surplus is mainly of office floorspace. Can help to meet Havant's need as requested.</p>
		<i>m2 per annum</i>	7,827	9,250	1423	
OVERALL		Total	358,684	338,711	-19,973	

	<i>m2 per annum</i>	20,474	19,920	-553.7	
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TABLE 3: Local Plan key constraints and approaches

Gosport Borough Council	Havant Borough Council	Portsmouth City Council
<ul style="list-style-type: none"> The Borough is over 80% 'built-on' with significant brownfield land resulting from a military legacy. All allocated sites are brownfield sites. 	<ul style="list-style-type: none"> Focusing development within established urban and developed areas across the borough³. Limited land outside of these urban areas remaining available for development. 	<ul style="list-style-type: none"> The City is almost entirely built up and all sites are brownfield.
<ul style="list-style-type: none"> The council undertakes regular call for sites (most recently in March 2025) and the process has remained open to submissions. 	<ul style="list-style-type: none"> Given the limited land availability in Havant Borough, the Council's 'call for sites' remains open. 	<ul style="list-style-type: none"> The council undertakes regular call for sites, the last was undertaken in April 2025.
<ul style="list-style-type: none"> Development supported in the borough's town centres to help sustain and enhance existing retail. Gosport's Town Centre and Waterfront is identified for regeneration however demonstrating deliverability is difficult and some previously available sites are no longer available. Council pursuing a Car Parking Strategy to release surplus car parks for mixed-use development including new homes. 	<ul style="list-style-type: none"> A focus on development in the borough's town centres to help sustain and enhance them⁴. The following key areas are identified for mixed use development, including housing delivery: <ul style="list-style-type: none"> Havant Town Centre (628 dwellings); Civic Campus, Havant (170 dwellings); Waterlooville Town Centre (337 dwellings); and Leigh Park Town Centre (45 dwellings). 	<ul style="list-style-type: none"> Portsmouth City Centre is allocated for large scale redevelopment of between 1,600 and 2,300 dwellings.
<ul style="list-style-type: none"> All of the identified development sites in Gosport are brownfield. 	<ul style="list-style-type: none"> A focus on brownfield sites, together with greenfield sites that can deliver sustainable development within environmental and social limits. Development should have no unacceptable impacts on international, 	<ul style="list-style-type: none"> All of the identified development sites in Portsmouth are brownfield

³ Based on a robust audit of land as set out through the Council's [Strategic Housing and Economic Land Availability Assessment](#)

⁴ Evidenced by specific deliverability evidence base studies including the Town Centre Regeneration Appraisal Sites Report <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies> and Waterlooville Town Centre SPD

<ul style="list-style-type: none"> There is no agricultural land identified for development in the Borough. 	<p>national, or local environmental designations, or national landscape designations.</p> <ul style="list-style-type: none"> Agricultural land value and local landscape value are <u>not</u> considered an overarching constraint preventing an allocation 	<ul style="list-style-type: none"> There is no agricultural land identified for development in the City.
<ul style="list-style-type: none"> High development densities to make the most efficient use of land and promote sustainable transport accessibility. Indicative densities in draft policy are: <ul style="list-style-type: none"> Above 80dph in Gosport Town Centre and Waterfront; 50 to 100dph in identified Regeneration Areas; and 30 to 50dph in existing suburban parts of the Borough. 	<ul style="list-style-type: none"> High development densities to make the most efficient use of land and promote sustainable transport accessibility i.e. : <ul style="list-style-type: none"> 80 dph within Havant, Waterlooville and Leigh Park Town Centres; 55 dph within the proposed defined opportunity areas in the Draft Local Plan; and 40 dph elsewhere in the Borough 	<ul style="list-style-type: none"> High development densities to make the most efficient use of land and promote sustainable transport accessibility i.e: <ul style="list-style-type: none"> High density development of at least 120dph in areas of high accessibility; Medium density development of at least 80dph across the City's core residential areas; Lower density development of at least 40dph in the suburban edge.
<ul style="list-style-type: none"> The draft local plan seeks to align with HCC's Local Transport Plan 4 and prioritises improvements to the local cycling and walking network, and public transport. Proposed development is located in relatively accessible locations. The strategic site Blockhouse will require the development of a mobility hub, providing an opportunity to reduce car dependency and support modal shift. 	<ul style="list-style-type: none"> A pattern of development and improvements to the transport network, with housing development concentrated on sites with good access to public transport routes and/or services and facilities with the density policy reflecting this. The Local Plan looks to promote active travel and public transport in line with Local Transport Plan 4. Sustaining existing communities and protecting them from coastal erosion and sea level rise but responding to climate change effects by not adding to the level of risk through a presumption against 	<ul style="list-style-type: none"> The Council's Local Transport Plan 3 sets out the proposed interventions to improve public transport and sustainable travel in the City. Higher density areas correspond with those with the best access to public transport.
<ul style="list-style-type: none"> Following discussion with the Environment Agency it was determined that there would be no land defined as Flood Zone 3b within Gosport. 	<ul style="list-style-type: none"> Sustaining existing communities and protecting them from coastal erosion and sea level rise but responding to climate change effects by not adding to the level of risk through a presumption against 	<ul style="list-style-type: none"> Following discussion with the Environment Agency it was determined that there would be no land defined as Flood Zone 3b within Portsmouth. The Southsea Coastal Scheme and North

<ul style="list-style-type: none"> The council's SHLAA excludes sites entirely within an area of flooding that has 3.3% of greater AEP (annual exceedance probability) as defined in Appendix A, Figure 12 of the SFRA⁵). To deliver the draft plans main strategic site Blockhouse, there will be a need for considerable investment in flood defence mitigation. Without this mitigation, the site will not be deliverable and the council will no longer be able to include approx. 500 homes within its housing supply (thus increasing unmet need). 	<p>new housing in areas at risk now or in the future (due to the risk to the single access road on and off Hayling Island; brownfield development will continue to be accepted if the site itself is safe)</p>	<p>Portsea scheme will protect the majority of Portsea Island.</p> <ul style="list-style-type: none"> The council's HELAA excludes sites entirely within an area of flooding that has 3.3% or greater AEP (annual exceedance probability) as defined in Appendix A, Figure 11 of the SFRA[1];
<ul style="list-style-type: none"> Safeguarding existing open spaces and expecting new developments of over 50 dwellings to provide new open space at a rate of 1.6ha per 1,000 people or enhance existing spaces. The council's SHLAA considers open spaces classified as low value in the Open Space Monitoring Report for development. Medium and High Value sites are excluded, along with existing cemeteries and allotments. 	<ul style="list-style-type: none"> Safeguarding existing open spaces and expecting new developments to enhance them and/or provide new open spaces 	<ul style="list-style-type: none"> Safeguarding existing open spaces and expecting new developments of over 50 dwellings to provide new open space at a rate of 1.65ha per 1,000 people or enhance existing spaces. The Council's HELAA excludes sites that are entirely or the majority within protected open spaces as specifically designated and identified clearly in a made Neighbourhood Plan or Local Plan;
<ul style="list-style-type: none"> All internationally, nationally and locally protected habitats are protected by the Local Plan. 	<ul style="list-style-type: none"> All international, national and local environmental designations are protected. 	<ul style="list-style-type: none"> The following sites are protected from development due to their nature conservation value: <ul style="list-style-type: none"> Special Protection Areas Ramsar Sites of Significant Importance for Nature Conservation

⁵ www.gosport.gov.uk/article/2963/PfSH-Level-1-Strategic-Flood-Risk-Assessment-2023-2024-Appendix-A-and-Appendix-B

○ Sites identified as Core or Primary sites for Solent Waders and Brent Geese.

Appendix 2: Table setting out the Local Planning Authorities approached by Gosport, Havant and Portsmouth Local Planning Authorities in respect of Housing and Employment under the Duty to Cooperate.

It should be noted that these are the most recent approaches to each local authority and in many instances, there have been earlier discussions/approaches made between authorities.

This table is concerned only with unilateral approaches that have been made by the three authorities to date and does not capture the very detailed and comprehensive work undertaken at a sub-regional level through PfSH.

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Basingstoke and Deane BC	Not approached, different HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need	Not approached, different HMA	n/a
Chichester DC	Not approached, different HMA	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached, interrogation of the respective HEDNAs for the LPA's led to agreement that the authorities are in separate HMAs (SE Hants / Coastal West Sussex) (July 25)	n/a
East Hampshire DC	Approached and asked to accommodate unmet housing need (July 2025)	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached and asked to accommodate unmet housing need (January 2024)	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Eastleigh BC	Not approached, different HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need	Different FEMA, watching brief	Not approached, different HMA	n/a
Fareham BC	Approached and asked to accommodate unmet housing need (July 2025)	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached and asked to accommodate unmet housing need. 800 agreed units for Portsmouth in Fareham Local Plan (2023)	n/a
Gosport BC	n/a	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached and asked to accommodate unmet housing need. (January 2024, August 2025) The two authorities are unable to meet each other's needs.	n/a
Hart DC	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to	Different FEMA, watching brief. HBC will respond to local plan as it comes forward to	Not approached, separate HMA	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Havant BC	Approached and asked to accommodate unmet housing need (July 2025) The two authorities are unable to meet each other's needs.	n/a	n/a	n/a	Approached and asked to accommodate unmet housing need. (January 2024, August 2025) The two authorities are unable to meet each other's needs.	n/a
Isle of Wight C	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Approached, interrogation of the respective HEDNAs for the LPA's led to agreement that the authorities are in separate HMAs (SE Hants / loW) (SoCG July 24)	n/a
New Forest DC	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Not approached, separate HMA	n/a
New Forest NPA	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond	Different FEIMA, watching brief. HBC will respond	Not approached, separate HMA	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
			to local plan as it comes forward to highlight unmet need.	to local plan as it comes forward to highlight unmet need.		
Portsmouth CC	Approached and asked to accommodate unmet housing need (July 2025) The two authorities are unable to meet each other's needs	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025). PCC has agreed to provide HBC with ~30,000 m ² of office floorspace	n/a	n/a
Rushmoor BC	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Not approached, separate HMA	n/a
South Downs NPA	Not approached, separate HMA	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025).	Approached. The two authorities are unable to meet each other's needs. (July 2025)	n/a
Test Valley BC	Not approached, separate HMA	n/a	Different HMA, watching brief – consultation response (September 2025) asked to	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to	Not approached, separate HMA	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Winchester CC	Approached and asked to accommodate unmet housing need. (July 2025)	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025) WCC agreed to provide HBC 70% of its housing surplus (currently 203 units)	Approached and asked to accommodate unmet employment need (June 2025)	Approached. Asked to accommodate unmet housing need. (January 2024) WCC agreed to provide PCC 30% of its housing surplus (currently 67 units)	n/a

*At the time of writing Gosport Borough Council have sufficient employment sites to meet their employment need and so have not approached other local authorities on this matter.

** At the time of writing Portsmouth City Council has a surplus of office floorspace and a small shortfall of manufacturing/warehousing.

Enquiries to: localplan@easthants.gov.uk

Lucy Howard, Head of Planning
Policy (Portsmouth City Council)

David Hayward, Strategic Planning
manager (Havant Borough
Council)

Jayson Grygiel, Manager of
Planning Policy (Gosport Borough
Council)

11 November 2025

Dear Lucy, David and Jayson,

Re: Formal Response to Request for Assistance with Unmet Housing and Employment Needs – Duty to Cooperate

Thank you for your joint letter dated 13 October 2025, and for the constructive discussions held at the Duty to Cooperate meeting on 9 October 2025. East Hampshire District Council (EHDC) welcomes the opportunity to continue working collaboratively with neighbouring authorities to address strategic planning matters across South East Hampshire.

We acknowledge the significant unmet housing need of **18,347 homes** and employment floorspace deficit of **19,973 sqm** identified across Gosport, Havant and Portsmouth, as set out in your letter and supporting evidence. We appreciate the comprehensive analysis undertaken and recognise the shared challenges posed by land constraints and environmental considerations.

East Hampshire Context

EHDC is currently preparing a new Local Plan, with Regulation 19 consultation scheduled for summer 2026. The uplift in housing need resulting from the 2024 standard method has had a substantial impact on our district. The district-wide housing need has increased from **575 homes per annum** to **1,124 homes per annum**, representing a **95% increase**. This is one of the highest percentage increases nationally.

Our district is further complicated by the presence of the South Downs National Park (SDNP), which covers approximately **57% of East Hampshire's geographical area** and is a separate local planning authority. Based on joint work with the SDNPA and other similarly affected authorities, recent evidence supports disaggregating housing need based on housing stock. With **26% of East Hampshire's housing stock** falling within the SDNP, the residual housing need for the EHDC Local Planning Authority area is approximately **828 homes per annum**, equating to **14,904 homes** over the emerging plan period (2025–2043).

The SDNPA has consulted on a Regulation 18 draft Local Plan proposing up to **90 homes per annum** in East Hampshire, leaving a shortfall of **206 homes per annum** or **3,708 homes** over the plan period.

Consideration of Unmet Needs

EHDC is committed to positively engaging with neighbouring authorities under the Duty to Cooperate. We recognise the development constraints faced by Gosport, Havant and Portsmouth, and the efforts made to identify and quantify unmet needs. We also acknowledge the advice from the Planning Inspectorate regarding the importance of timely engagement.

As part of our Local Plan preparation, we will give due consideration to the unmet housing and employment needs of your authorities. This will be informed by:

- Our Integrated Impact Assessment (IIA), which will assess reasonable alternatives including meeting unmet needs;
- Infrastructure evidence and site assessments currently in progress;
- The identification of housing market areas and functional economic market areas (FEMA), including the limited extent of the Portsmouth HMA within East Hampshire (primarily the southern parishes of Clanfield, Horndean and Rowlands Castle);

We are also mindful of potential unmet needs emerging from Chichester District, Waverley Borough and other Surrey authorities, and will assess the extent to which these relate to East Hampshire's housing market geography.

At this time, it is currently unknown whether EHDC will be able to meet its own disaggregated housing needs and therefore through due assessment will need to consider to what extent we can meet unmet needs from elsewhere in our Local Plan. Should a surplus of housing capacity be identified as part of a suitable development strategy, it is envisaged that unmet needs from the SDNP in East Hampshire would be prioritised.

Employment Needs

To date, Havant Borough is the only authority to have formally requested assistance with unmet employment needs. However, we support the positive joint working between your authorities that has reduced the amount of unmet employment needs but appreciate there remains a modest deficit. EHDC has commissioned an update to its Housing and Economic Development Needs Assessment (HEDNA) and Employment Land Review (ELR), which will inform our position on employment land provision and any potential capacity to assist neighbouring authorities.

Traveller Accommodation

EHDC is likely to have its own unmet need for Traveller and Travelling Showpeople accommodation. We will be seeking assistance from neighbouring authorities, including those within the Portsmouth HMA, and would welcome reciprocal consideration of this matter.

Next Steps

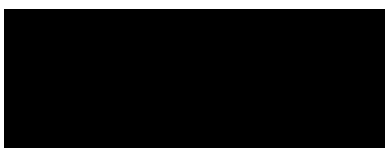
We acknowledge that the same letters have also been sent to Winchester City Council and Fareham Borough Council due to their links within the wider HMA and FEMA; but consider it is important that approaches are made to local planning authorities beyond those areas due to the substantial amount of unmet need.

We wish to continue our dialogue with you all 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 Statements of Common Ground at the appropriate time to support Regulation 19 consultations and beyond.

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

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.

Yours sincerely,



Adam Harvey

Planning Policy Manager

David Hayward
Planning Policy Manager
Havant Borough Council
Public Service Plaza
Havant
PO9 2AX

Enquiries to: Planning Policy
Direct line: [REDACTED]
Email: [REDACTED]
Reference: EHDC LP Update
Date: 17/06/26

Dear David,

East Hampshire District Council Local Plan Update

I am writing to draw your attention to the recent decision by East Hampshire District Council (EHDC) regarding its emerging Local Plan and to explain the council's stated position following changes to national planning policy and local government arrangements.

EHDC has formally agreed that it will no longer seek to submit a Local Plan under the 'legacy' planning system by the Government's deadline of 31 December 2026. The reasons for this decision are set out in the report presented to Cabinet on 28 May 2026.

As a result, EHDC has resolved to focus its planning policy work on engaging with the Government's new planning system and associated regulations, and looking ahead to considering how future plan-making aligns with the geography of the new unitary authorities.

The Cabinet report is available on our [website](#), along with recent [news releases](#) on this subject.

If you have any questions, please get in touch.

Yours sincerely

[REDACTED]
Heather Stevens
Planning Policy Manager
East Hampshire District Council

Fareham Borough Council

Richard Jolley
Director of Planning and Regeneration
Fareham Borough Council

Enquiries to: Alex Robinson
Direct line: [REDACTED]
Email: [REDACTED]

By email only: [REDACTED]

Date: 5th March 2024

Dear Richard

HAVANT BOROUGH'S EMERGING LOCAL PLAN – DUTY TO COOPERATE

Many thanks to your officers who met with my colleagues on 19 October 2023 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of Havant Borough's Local Plan, and its housing need and supply position. This follows the approval of the Partnership for South Hampshire (PfSH) Spatial Position Statement (SPS) at Joint Committee on 6 December 2023.

As you are aware, Havant Borough Council is currently preparing a new Local Plan. We recently published an updated Local Development Scheme (LDS) which indicates that we will be publishing a draft (Regulation 18) Local Plan in Quarter 4 of 2024.

The LDS can be viewed here:

<https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-development-scheme-lds>.

Havant Borough Council is a pro-development local authority with an ambitious regeneration agenda. We are keen to deliver this alongside other objectives such as delivering more affordable housing for our communities and addressing international issues such as climate change. Havant Borough values partnership working through PfSH which allows us to work positively and proactively on cross boundary issues, including the sufficient provision of housing and employment across the sub-region. The PfSH SPS confirms the Council's commitment to delivering sustainable development in the most sustainable locations, and meeting housing need where possible.

As with most urban local planning authorities in the Southeast, one of the biggest challenges for the new Local Plan will be to meet Havant's own development needs. The Inspectors' Interim Findings¹ in respect of the previous Local Plan acknowledged that Havant may be an authority that cannot sustainably meet its housing needs in accordance with paragraph 11 b)

¹ <https://www.havant.gov.uk/media/8718>

of the National Planning Policy Framework (NPPF) (see paragraph 52). Nevertheless, the Council's starting point is that no stone will be left unturned in order to meet its own need.

Whilst Havant's evidence base on housing supply is emerging, the attached plan from the Council's draft Constraints Study illustrates the very constrained supply of land in Havant Borough. The least constrained areas shown are already identified for development, notably that of the Dunsbury Park tax site which is part of the Solent Freeport, and Havant Thicket Reservoir which serves a sub-regional function, stretching far beyond Havant Borough's boundaries.

Housing Need and Supply

The NPPF makes clear that in order to significantly boost housing supply, the standard method is an advisory starting-point for establishing a housing requirement for an area. Applying a housing need figure of 516 dwellings², there is a need for 10,320 dwellings in Havant Borough over a Local Plan period to 2043 (see table below).

The Council has undertaken a comprehensive and robust assessment of the following sources of supply to assess how far it is able to meet its own housing need:

- Outstanding planning permissions as of 1 April 2023;
- Adopted Local Plan allocations without planning permission;
- Potential housing sites³; and
- Windfall development⁴.

Our work on the previous Local Plan and the Inspectors' interim findings report clearly signal a need for robust evidence and including that sites should meet the NPPF definition of 'developable'. For this reason, it will not be possible to rely on any housing delivery from Havant and Waterlooville town centres until evidence of deliverability is more advanced. In any case, development in these locations will be unlikely to be sufficient in scale to close the gap between the Borough's objectively assessed need and identified housing supply. The Council will keep all sources of housing supply up to date and robust in order to demonstrably ensure that every effort is made to address housing need within the Borough's boundary.

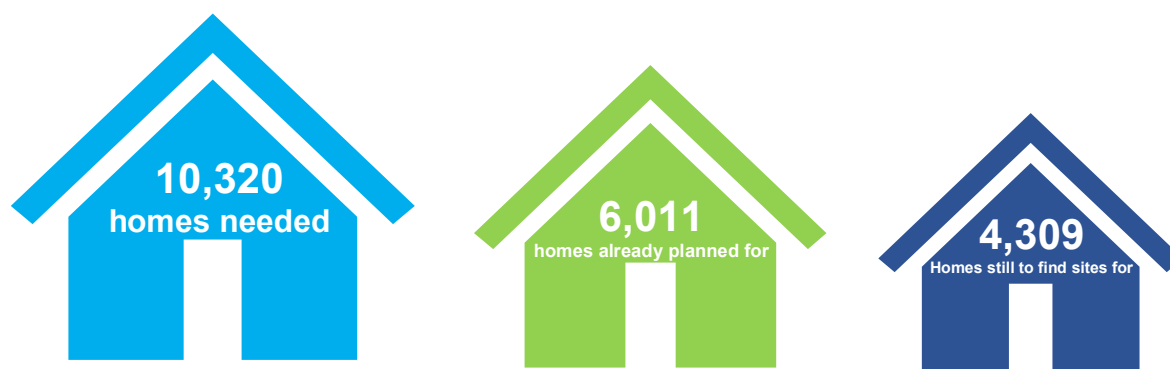
² The standard method calculation of 516 dwellings per annum (dpa) is used from 2022, though the standard method need calculation for 2024 is 512 dwellings per annum prior to the publication of the 2023 affordability ratio which is due to be published in March 2024. The former is used as a worst case scenario.

³ Identified by Table 1 of the Council's [Housing Delivery Position Statement](#)

⁴ The Council's evidence on windfall development will be updated to inform the new Local Plan.

	Identified housing need (2022/23-2042/43)	Net Dwellings Completed or Committed
	10,320	
Completions 2022-23		495
Outstanding planning permissions at 1/4/23		1,524
Allocations in Adopted Local Plan without planning permission		606
Potential housing sites		1,524
Potential housing sites where previous Inspectors' raised deliverability concern		700
Windfall Development		1,162
Total		6,011
Remaining objectively assessed housing (unmet need)	4,309	

Against a standard method figure of 10,320 dwellings, the Council is only able to identify a supply of 6,011 dwellings over the plan period. **This results in an unmet housing need figure of 4,309 dwellings.**



All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply. We will be continuing to reach out to the development industry and landowners to ascertain whether there are any further sites which could be available for development and be assessed as part of the plan-making process – our Call for Sites has recently been relaunched on our website. However, given the very constrained supply of land, there will likely be insufficient capacity to meet objectively assessed need within the Plan area.

Employment Need and Supply

Havant's constrained land supply will also mean it is extremely challenging for the Borough to identify sufficient sites to meet employment need. The Council has commissioned an

Employment Land Review, building upon the 2021 PfSH Economic, Employment and Commercial Needs Study⁵. This will confirm whether Havant has sufficient employment land to meet its own development needs or will need to formally request assistance from its neighbours to accommodate any unmet need. We will keep you up to date with the progress of our evidence base on employment land supply.

Fareham Local Plan 2037

We are aware of your recently adopted Local Plan and understand the Council's resultant position that it is not updating its plan at this time.

Havant Borough strongly supports and fully endorses the Fareham Local Plan's approach towards unmet need, which makes a contribution of 900 dwellings, 800 specifically for Portsmouth and 100 for the wider sub-region. Unfortunately, 100 dwellings will not be sufficient to close the gap between Havant Borough's housing need and supply. However, that was at a time when Havant Borough was in a position where it expected to be able to meet its needs in full, and prior to the approval of the Spatial Position Statement, which shows a significant sub-sub-regional shortfall to 2036.

Further neighbouring authorities will need to make a meaningful contribution in order to address the unmet need arising from Havant Borough and the wider sub-region. The Council would welcome any assistance that Fareham Borough is able to offer in terms of lobbying authorities in following this demonstrably sound approach.

Joint working

The PfSH Spatial Position Statement (SPS) is of course a useful starting point in demonstrating compliance with the duty to cooperate. However, given the scale of unmet need that exists within the sub-region, it is important that there continue to be constructive and active discussions to effectively address this matter. It is Havant Borough Council's position that relying solely on the PfSH SPS will not demonstrate compliance with the duty to cooperate. As such, ongoing discussions and a bi-lateral statement of common ground will need to be agreed in order to demonstrate that this matter is appropriately addressed.

Planning Practice Guidance on plan-making⁶ sets out that strategic policy-making authorities should cooperate in meeting housing need, using the most appropriate functional geographical area, such as a housing market area (HMA). That being a case, there is a clear functional geography between Fareham's eastern wards and that of Havant for which there is a significant unmet housing need.

We are conscious of the proposed repealing of the duty to cooperate and its proposed replacement with an alignment policy. Whilst the detail of such a test is not yet known, the Government has made clear that cross-boundary working on strategic priorities, including unmet need will remain. Therefore, the Borough Council's position is we should ensure compliance with the existing legislation up to the point that the process changes.

⁵ push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf

⁶ [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/plan-making) Paragraph: 017 Reference ID: 61-017-20190315 Revision date: 15 03 2019

You will be aware of the work that has been undertaken between our two authorities to address the duty to co-operate in recent years. Moving forwards, we seek to undertake a series of detailed discussions with yourselves as Havant Borough's plan progresses, in order to ensure that unmet need and other cross-boundary matters are robustly addressed.

The NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. 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. I am formally writing to ask whether your authority is able to accommodate any of Havant Borough's unmet housing need?

I would like to request a meeting to discuss how this matter can be resolved and would be grateful if you could please advise of your availability by return. I look forward to hearing from you on this important issue and would be grateful for a response by **28 March 2024**.

Yours sincerely

A black rectangular redaction box covering the signature of Alex Robinson.

Alex Robinson
Executive Head of Place

cc Kirstin Clow

Lee Smith, Peter Drake
Fareham Borough Council

Via email only:

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 12th June 2025

Dear Lee and Peter

UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Many thanks to you and your colleagues who met with us on 7th May 2025 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of the Council's Local Plan – the Building a Better Future Plan, including the latest position on our housing and employment development needs. This follows our letter dated 5th March 2024 which formally requested assistance with our unmet housing needs, as well as highlighting the work being undertaken to update the Council's employment evidence base.

As you may be aware, the Council is currently consulting on the full draft (Regulation 18) Building a Better Future Plan which closes on 1st July 2025.

Housing need and supply

As you will be aware, the Council's starting point is that it will leave no stone unturned in order to meet its own housing need. However, as demonstrated by the Constraints Study¹ there is also a very constrained supply of land in Havant Borough with the least constrained areas already identified for development.

Our previous letter dated 5th March 2024 identified an unmet housing need of 4,309 homes between 2022 to 2043. Significantly however, that was under the previous standard method figure of 516 dwellings per annum, equivalent to 10,320 dwellings between 2023 and 2043. The publication of the new standard method in December 2024 means that the Borough's need has increased to 892 dwellings per annum, equivalent to 17,840 homes over the plan period (2023 to 2043).

Given the expected lack of suitable land within the Borough with development potential to meet identified housing need, the Strategic Housing and Economic Land Availability

¹ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

Assessment (SHELAA) includes a comprehensive and robust assessment of all land in the Borough to ensure the Council has fully examined all opportunities for development, and has been published alongside the full draft (Regulation 18) Local Plan for consultation.

The SHELAA concludes there is a developable housing supply of 7,981 dwellings between 2023 and 2043. However, the SHELAA does not take account of the development strategy, nor the Sustainability Appraisal which is undertaken to determine whether a site should be allocated. A total of four potential development strategies were considered through the SA process covering a broad spectrum from a full environmental and brownfield focus to a full housing delivery focus. However, crucially under none of the options is it possible to achieve delivery of the total need for housing as set out under the standard method, by some margin².

Housing Supply 2023-2043 (number of dwellings likely to be delivered under each development strategy option)				
Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Completions 2023/24	368	368	368	368
Commitments	1,142	1,142	1,142	1,142
Broad locations considered suitable under the strategy option	1,003	2,406	2,406	2,406
Site allocations considered suitable for allocation under the strategy option	821	1,906	2,669	4,282
Small sites with the urban area	29	37	37	37
Windfall	1,360	1,360	1,360	1,360
Total housing supply	4,723	7,218	7,981	9,594
Supply against standard method plan requirement of 17,840	(13,117)	(10,622)	(9,859)	(8,246)

The chosen development strategy (Option 2) combines and balances key national and local objectives in the most effective way and overall represents the most appropriate strategy, when considered against the alternatives. The spatial distribution of development planned for through the chosen option focuses on the existing built areas across the Borough, notably Havant and Waterlooville town centres and less constrained greenfield land. On this basis, the Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum.

There is therefore an unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year). The submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance' of 1,900 dwellings – of which 70% equivalent to 1,330 dwellings would be apportioned to Havant Borough. This would increase overall supply to

² Further information can be found in Sustainability Appraisal which has been published as part of the Council's evidence base: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

8,548 dwellings over the plan period, and reduce unmet need to 9,292 dwellings (or 465 homes per year).

It should be noted this contribution can only be afforded limited weight and may change before the Plan has successfully passed through Examination. However, this obviously only represents a proportion of Havant Borough's unmet need, with a large amount remaining to be accommodated within neighbouring authorities which will need to be discussed through the Duty to Cooperate.

Under the Duty to Cooperate, the Borough Council is formally requesting Fareham Borough Council to assist in meeting the unmet housing need of at least 9,292 dwellings arising from Havant Borough. The Borough Council has approached its other neighbouring local authorities³, and local authorities within the same housing market area⁴ with the same request and I will keep you updated on progress with our discussions. I am also mindful that there is unmet housing need arising from Portsmouth City and Gosport Borough respectively within the same Housing Market Area.

Employment need and supply

The Council has now published an Employment Land Review (ELR) which provides an up-to-date assessment of the Borough's economic and employment development needs⁵. It identifies an objectively assessed need figure of 175,199 sq. m of net new floorspace over the plan period of which 139,140 sq. m results from industrial demand, and 36,059 sq. m for office demand.

The ELR indicates that the industrial market is strong across the Borough, but the market is constrained due to low levels of availability. The potential site allocations could help to address some of those supply constraints, but the Dunsbury Park Freeport Tax Site status means that the floorspace supply from Phase 3 cannot be relied on to meet general demand and local need for new floorspace. This is further compounded by a lack of office sites promoted to meet need and a number of allocated sites no longer available to meet the Borough's employment need⁶.

³ East Hampshire District Council, Portsmouth City Council, Winchester City Council and the South Downs National Park Authority

⁴ Fareham Borough Council and Gosport Borough Council

⁵ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

⁶ Kingscroft Farm (SHELAA Refs HA20 and ED09) and Brockhampton West (Ref ED14)

Overall demand and supply	2023-43 Sq m (GIA)
Industrial demand	139,140
Office demand	36,059
Gross demand	175,199
Industrial supply	121,475
Office supply	2,300
Total supply	123,775
Balance over (under) supply	-51,424

On this basis, the Borough has an unmet need of 51,424 sq. m for employment floorspace over the plan period. Of this, 17,665 sq. m is industrial demand and 33,759 sq. m is office demand.

Under the Duty to Cooperate, the Borough Council is formally requesting Fareham Borough Council to assist in meeting 51,424 sq. m of unmet employment need. The Borough Council will also be approaching our other neighbouring local authorities, and local authorities within the same travel to work area with the same request and I will keep you updated on progress with our discussions.

Joint working

Our authorities have a strong track record of working together through the Partnership for South Hampshire and on a bi-lateral basis. We look forward to continuing constructive and active discussions to effectively address unmet housing and employment development needs arising from Havant Borough.

In your response to this request for assistance, please could you set out the process by which your authority will look to respond to the high level of unmet housing and employment need arising from Havant Borough. It is recognised this may need to take a staged approach depending on the progress of your local plan, and its supporting evidence. A further meeting can be arranged if it would be useful to explore this further. Please could you respond no later than 10th July 2025. Please note that we may share your response with other duty to cooperate partners and publish it as part of our evidence base.

I look forward to receiving any consultation response to our Draft Local Plan consultation and progressing our discussions around a Statement of Common Ground in due course.

Yours sincerely

David Hayward

Strategic Planning Manager

FAREHAM

BOROUGH COUNCIL

Mr David Hayward
Public Service Plaza
Civic Centre Road
Havant
Hampshire
PO9 2AX

Head of Planning
Lee Smith

Contact: Lee Smith

Ext.: [REDACTED]

Date: 7 July 2025

Dear Mr Hayward

ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Thank you for your recent letter concerning the duty to cooperate and requesting assistance with unmet housing and employment need. This was discussed at our recent duty to cooperate meeting on the 7th May where we discussed progress on our respective local plans.

At that meeting, colleagues were very interested to hear about the approach Havant Borough Council is taking towards identifying sites to meet its housing need. It was reassuring to hear about your methodology and to see the thorough evidence backed work that you have undertaken in reaching the position you are now at in identifying an unmet housing need of 10,622 dwellings and 51,424 sq.m of employment need.

It is noted that Havant is able to include 1,330 dwellings from Winchester as a contribution to unmet need, reducing the overall shortfall for Havant to 9,292. You will be aware that on adoption of the Fareham Local Plan 2037 (April 2023) this Council included a 900-dwelling commitment towards the wider PfSH unmet need, of which 800 homes are specifically allocated to meet Portsmouth's request for unmet need contribution, with 100 towards wider PfSH needs.

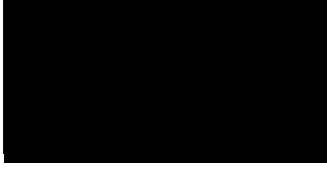
However, following adoption of the Fareham Local Plan in April 2023, Fareham Borough Council has yet to begin progress on the next Local Plan. The Council is therefore unable to provide any firm commitment to meeting further neighbouring unmet need or addressing cross-boundary matters at present.

Fareham remains committed to continuing to work on sub-regional matters in a positive and constructive way.

Development Management
Civic Offices Civic Way Fareham PO16 7AZ

Keep up to date with our latest news: like  Fareham on Facebook
and follow @FarehamBC on  (Twitter)

Yours sincerely



Lee Smith
Head of Planning

Lee Smith
Head of Planning
Fareham Borough Council

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 10 September 2025

Dear Lee

RE: UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Thank you for meeting us to discuss unmet housing and employment need at our Duty to Cooperate meeting on the 7th June 2025, and your subsequent response dated 7th July 2025.

It is accepted that the adopted Fareham Borough Local Plan (April 2023) includes a 900-dwelling commitment towards the wider PfSH unmet need, of which 800 homes are specifically allocated to meet Portsmouth's request for unmet need contribution, with 100 towards wider PfSH needs. In relation to the latter, it would be useful to understand what the mechanism is for the allocation of the 100 dwellings – is it envisaged that this will be apportioned to a particular authority? We note the supporting text references that Gosport is likely to have an unmet need and is clearly a neighbouring authority. It would be useful to be able to clarify whether this 100-dwelling contribution from the Adopted Local Plan can be put towards Havant's unmet need.

We note that Fareham Borough Council has yet to begin progress on the next Local Plan, and is therefore unable to provide any firm commitment to meeting further neighbouring unmet need or addressing cross-boundary matters at present. However, in our request for assistance with our unmet needs, we asked you to set out the process by which your authority would look to respond to the high level of unmet housing and employment need arising from Havant Borough.

We welcome the Borough Council's willingness to work and cooperate with Havant Borough Council and our neighbouring authorities. Please can you advise how you will be engaging with us in the preparation of the Local Plan Review? It is recognised that this may need to take a staged approach.

Moving forwards, we would appreciate early sight of your emerging project plan for the Local Plan. In particular, we would wish to see that the options tested through Sustainability Appraisal, and Transport Assessment and other evidence base studies include a scenario where unmet needs are planned for, in addition to meeting Fareham's housing need. We

welcome Fareham Borough Council's commitment to continuing to work on sub-regional matters in a positive and constructive way. We look forward to continuing dialogue with the Council on strategic cross boundary matters as our plans progress. May I suggest a further meeting before the 'Early Engagement consultation' on the Local Plan Review later this year?

Yours sincerely

David Hayward

Strategic Planning Manager



Sent jointly on behalf of
Portsmouth City Council,
Gosport Borough Council
and Havant Borough
Council

Peter Drake
Team Leader Planning Strategy
Fareham Borough Council

By email only:



13 October 2025

Dear Peter,

Re: Housing and employment need in South East Hampshire

This letter follows on from our Duty to Cooperate meeting held on 09 October 2025, which was attended by East Hampshire District Council, Winchester City Council, Fareham Borough Council, Havant Borough Council, Gosport Borough Council and Portsmouth City Council. This letter has been prepared jointly by Gosport Borough Council, Havant Borough Council and Portsmouth City Council and the same letter has been sent to Winchester City Council and East Hampshire Council. The Duty to Cooperate is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004. It is also included within the National Planning Policy Framework and Planning Policy Guidance specifically in terms of planning strategically across local boundaries. It is acknowledged that significant and successful ongoing sub-regional work has already been undertaken by the Partnership for South Hampshire (PfSH), although it is recognised further ongoing work is required as outlined in this letter.

Gosport Borough Council, Havant Borough Council and Portsmouth City Council have been working together over the last few months in order to identify our combined unmet housing and employment needs. We consider this to be a worthwhile planning activity as we are all at a similarly advanced stage of plan making namely approaching Pre-Submission. Furthermore, the three local authorities are located entirely in the same housing market area and functional economic market area of South East Hampshire and as such, this work has resulted in a comprehensive understanding of the unmet need which exists within South East Hampshire. All of our three Local Plans will need to use the 2024 standard method to assess housing need, meaning that there has not been an in-depth assessment of unmet need across the Housing Market Area given that the Spatial Position Statement¹ published by PfSH in 2023 used the previous standard method.

¹ <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

The East Hampshire, Winchester and Fareham local authority areas are entirely or partially located in South East Hampshire and share at least in part the same housing market area and functional economic market area as Gosport, Havant and Portsmouth. They are at different stages of plan making and are gathering evidence on whether they can meet housing need as calculated under the 2024 standard method.

The combined housing need, supply and unmet need for the Gosport, Havant and Portsmouth local authority areas are set out in table 1 of Appendix 1 of this letter. The unmet housing need figure for the three local authorities is 18,347 homes.

This unmet housing need figure is considerably higher than the shortfall of 11,771 identified for the whole of South Hampshire in the Spatial Position Statement² published by PfSH in 2023. There are two main drivers for this increase. Firstly, there is the change in the standard method in 2024 from being population based to stock based, which resulted in increased need across South East Hampshire. Secondly, the end date of the Spatial Position Statement of 2036 is at least four years before the end dates of our emerging local plans.

The combined employment need, supply and unmet need for the Gosport, Havant and Portsmouth local authority areas is set out in table 2 of Appendix 1. A positive outcome of joint working over the summer has been that a surplus of office floorspace in Portsmouth has been committed to Havant through the Duty to Cooperate. However, there is still a deficit of 19,973 square metres of new employment floorspace across the three local authorities.

Table 3 of Appendix 1 sets out the key constraints of our three local authority areas. These are similar and linked including flood risk, international nature conservation designations, land contamination and a lack of land that can be built on. The table also sets out the approaches we have taken in our respective Plans including housing densities, making optimal use of sustainable locations and protecting public open space. All the information in Appendix 1 of this letter is supported by robust evidence bases and no stone has been left unturned in the search for new deliverable and developable sites within our local authority boundaries.

Under the Duty to Cooperate, Gosport Borough Council, Havant Borough Council and Portsmouth City Council are formally requesting Fareham Borough Council along with Winchester City Council and East Hampshire Council to assist in meeting the unmet housing need of 18,347 homes and unmet employment need of 19,973 square metres of new employment floorspace. Following on from our meeting last week, we have compiled a list of other local planning authorities that we have individually discussed unmet housing and employment needs; this is set out in Appendix 2.

Portsmouth City Council had an advisory meeting with the Planning Inspectorate in August 2025 and asked about the unmet need in South East Hampshire. The City Council was advised that there was only a focused window between now and submission to engage with Fareham, Winchester and East Hampshire on any further distribution of unmet needs. The advisory inspector considered that continued engagement was necessary, that Portsmouth should not be 'diffident' in asking for help from its neighbours and that the City Council needed to prioritise demonstrating their own efforts for ongoing joint working.

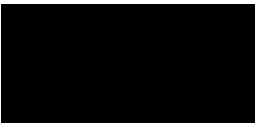
This request is in line with the Duty to Cooperate. We understand that it is a substantial ask that will need to be carefully considered by both Members and officers at your Council.

² <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

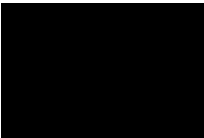
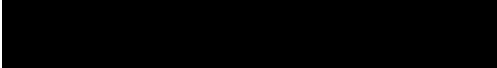
However, the need for land to accommodate new homes and jobs in South East Hampshire is great. We hope that this letter provides the necessary clarity on the quantum of development involved and can form the basis for further work going forward. We are mindful of proposals for Devolution and if this is taken forward by Government then meeting housing need will be a core component of the Spatial Development Strategy for Hampshire and the Solent. Nonetheless, this is not yet confirmed and as set out above it is necessary to continue to progress Local Plans and the Duty to Cooperate in the meantime.

We would be grateful if you would reply to this letter by 10 November 2025. Please can you set out in your response the process by which your authority will look to respond to the level of employment and housing need. It is recognised that this may need to take a staged approach depending on the progress of your local plan and its supporting evidence. We look forward to working positively with you going forward.

Yours sincerely



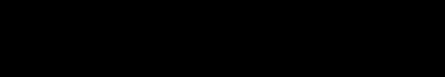
Lucy Howard
Head of Planning Policy



David Hayward
Strategic Planning Manager



Jayson Grygiel
Manager of Planning Policy



Appendix 1: Housing and employment need and supply in the local authority areas of Portsmouth, Gosport and Havant

TABLE 1: HOUSING NEED AND SUPPLY ANALYSIS

LPA	Plan period		Housing need according to the standard method	Housing supply	Unmet need	Notes
Gosport Borough Council	2025-2042 (17 years)	Total	7,378	2,537	-4,841	Housing supply based on revised SHLAA due for publication with Regulation 19 Plan in 2026. Regulation 18 SHLAA available online: www.gosport.gov.uk/gbip2040evidence
		<i>Dwellings per annum</i>	434	150	-284	
Havant Borough Council	2025-2043 (18 years)	Total	15,966	6,466	-9,590	The 2025 standard method indicates a local need figure of 887 dwellings per annum, equivalent to 15,966 dwellings across an 18 year plan period. The HBC 2024 Trajectory (supporting the Regulation 18 Local Plan consultation) estimated completions of 419 during 24/25 and 338 during 25/26. This compares with 24/25 draft completions which suggest this was actually 326. Based on 419 dwellings minus 326, an additional 93 dwellings have been rolled forward into 25/26. Outstanding planning permissions as of 1 April 2025 are not reflected in commitments and so may slightly underestimate supply. HBC's unmet need figure does not currently include any unmet needs allowance from Winchester's Local Plan, pending the outcome of the examination. With the inclusion of 203 dwellings (70% of 290 dwellings towards an unmet needs allowance) from Winchester's Local Plan, the unmet need position would reduce to 9,297 dwellings (517 dwellings per annum).
		<i>Dwellings per annum</i>	892	323	-480	
Portsmouth City Council	2025-2040 (15 years)	Total	15,285	11,369	-3,916	PCC supply based on HELAA that will be published winter 2025 to support the Local Plan Addendum. The supply does not include the Fareham 800, which reduces unmet need to 3,116 (annualised 208). This is noted in the explanatory text of the Local Plan and in the Duty to Cooperate Statement. The Winchester commitment is not
		<i>Dwellings per annum</i>	1019	758	-261	

TABLE 2: EMPLOYMENTS NEEDS AND SUPPLY ANALYSIS

LPA	Plan period	Employment need	Employment supply	Surplus/unmet need	Notes	
Gosport Borough Council	2025 to 2042 (17 years)	Total	66,085	76,190	10,105	<p>GBC is using the Stantec Study for PFSH (2021) for employment need. Table 11.1 (office) & Table 11.4 (industrial) of the study showed an employment need for Gosport between 2019 & 2040 of 76,538 (3,645 per year). To update this for July 2025 position, adjusted for GBCs plan period to 2042, the following has been done: Employment need 2019-2040 (76,538) minus employment completions between 2019 and 2024 (17,743) equals 58,795. Add two additional years of annualised need from the Stantec study to cover to 2042 (3,645 x 2). Total employment need: 66,085. GBCs EDNAVELLA compares supply with various employment forecasts/scenarios and comes to the conclusion that we are meeting our current requirements. Please note we are refreshing this study. Employment supply based on EDNAVELLA (2018) and internal work to date. Refresh to EDNAVELLA currently being undertaken for Regulation 19 in early 2026. Regulation 18 EDNAVELLA available online.</p>
		<i>m2 per annum</i>	3,887	4,482	594	
Havant Borough Council	2023-2043 (20 years)	Total	175,199	123,775	-51,424	<p>Data has been taken from Havant Borough Council's analysis of the ELR and SHELAA. The supply position excludes Dunsbury Park Phase 3 which has the potential to deliver 13,935 sq. m. This floorspace is associated with the net additional demand generated by its freeport tax site status.</p>
		<i>m2 per annum</i>	8,760	6,189	-2571	
Portsmouth City Council	2025-2040 (15 years)	Total	117,400	138,746	21,346	<p>Supply figure based on HELAA that will be published in winter 2025. Need figure from draft HEDNA Update. The surplus is mainly of office floorspace. Can help to meet Havant's need as requested.</p>
		<i>m2 per annum</i>	7,827	9,250	1423	
OVERALL		Total	358,684	338,711	-19,973	

	<i>m2 per annum</i>	20,474	19,920	-553.7	
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TABLE 3: Local Plan key constraints and approaches

Gosport Borough Council	Havant Borough Council	Portsmouth City Council
<ul style="list-style-type: none"> The Borough is over 80% 'built-on' with significant brownfield land resulting from a military legacy. All allocated sites are brownfield sites. 	<ul style="list-style-type: none"> Focusing development within established urban and developed areas across the borough³. Limited land outside of these urban areas remaining available for development. 	<ul style="list-style-type: none"> The City is almost entirely built up and all sites are brownfield.
<ul style="list-style-type: none"> The council undertakes regular call for sites (most recently in March 2025) and the process has remained open to submissions. 	<ul style="list-style-type: none"> Given the limited land availability in Havant Borough, the Council's 'call for sites' remains open. 	<ul style="list-style-type: none"> The council undertakes regular call for sites, the last was undertaken in April 2025.
<ul style="list-style-type: none"> Development supported in the borough's town centres to help sustain and enhance existing retail. Gosport's Town Centre and Waterfront is identified for regeneration however demonstrating deliverability is difficult and some previously available sites are no longer available. Council pursuing a Car Parking Strategy to release surplus car parks for mixed-use development including new homes. 	<ul style="list-style-type: none"> A focus on development in the borough's town centres to help sustain and enhance them⁴. The following key areas are identified for mixed use development, including housing delivery: <ul style="list-style-type: none"> Havant Town Centre (628 dwellings); Civic Campus, Havant (170 dwellings); Waterlooville Town Centre (337 dwellings); and Leigh Park Town Centre (45 dwellings). 	<ul style="list-style-type: none"> Portsmouth City Centre is allocated for large scale redevelopment of between 1,600 and 2,300 dwellings.
<ul style="list-style-type: none"> All of the identified development sites in Gosport are brownfield. 	<ul style="list-style-type: none"> A focus on brownfield sites, together with greenfield sites that can deliver sustainable development within environmental and social limits. Development should have no unacceptable impacts on international, 	<ul style="list-style-type: none"> All of the identified development sites in Portsmouth are brownfield

³ Based on a robust audit of land as set out through the Council's [Strategic Housing and Economic Land Availability Assessment](#)

⁴ Evidenced by specific deliverability evidence base studies including the Town Centre Regeneration Appraisal Sites Report <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies> and Waterlooville Town Centre SPD

<ul style="list-style-type: none"> • There is no agricultural land identified for development in the Borough. • High development densities to make the most efficient use of land and promote sustainable transport accessibility. Indicative densities in draft policy are: <ul style="list-style-type: none"> ○ Above 80dph in Gosport Town Centre and Waterfront; ○ 50 to 100dph in identified Regeneration Areas; and ○ 30 to 50dph in existing suburban parts of the Borough. 	<p>national, or local environmental designations, or national landscape designations.</p> <ul style="list-style-type: none"> • Agricultural land value and local landscape value are <u>not</u> considered an overarching constraint preventing an allocation • High development densities to make the most efficient use of land and promote sustainable transport accessibility i.e. : <ul style="list-style-type: none"> ○ 80 dph within Havant, Waterlooville and Leigh Park Town Centres; ○ 55 dph within the proposed defined opportunity areas in the Draft Local Plan; and ○ 40 dph elsewhere in the Borough 	<ul style="list-style-type: none"> • There is no agricultural land identified for development in the City. • High development densities to make the most efficient use of land and promote sustainable transport accessibility i.e: <ul style="list-style-type: none"> ○ High density development of at least 120dph in areas of high accessibility; ○ Medium density development of at least 80dph across the City's core residential areas; ○ Lower density development of at least 40dph in the suburban edge.
<ul style="list-style-type: none"> • The draft local plan seeks to align with HCC's Local Transport Plan 4 and prioritises improvements to the local cycling and walking network, and public transport. Proposed development is located in relatively accessible locations. The strategic site Blockhouse will require the development of a mobility hub, providing an opportunity to reduce car dependency and support modal shift. • Following discussion with the Environment Agency it was determined that there would be no land defined as Flood Zone 3b within Gosport. 	<ul style="list-style-type: none"> • A pattern of development and improvements to the transport network, with housing development concentrated on sites with good access to public transport routes and/or services and facilities with the density policy reflecting this. • The Local Plan looks to promote active travel and public transport in line with Local Transport Plan 4. • Sustaining existing communities and protecting them from coastal erosion and sea level rise but responding to climate change effects by not adding to the level of risk through a presumption against 	<ul style="list-style-type: none"> • The Council's Local Transport Plan 3 sets out the proposed interventions to improve public transport and sustainable travel in the City. • Higher density areas correspond with those with the best access to public transport. • Following discussion with the Environment Agency it was determined that there would be no land defined as Flood Zone 3b within Portsmouth. The Southsea Coastal Scheme and North

<ul style="list-style-type: none"> The council's SHLAA excludes sites entirely within an area of flooding that has 3.3% of greater AEP (annual exceedance probability) as defined in Appendix A, Figure 12 of the SFRA⁵). To deliver the draft plans main strategic site Blockhouse, there will be a need for considerable investment in flood defence mitigation. Without this mitigation, the site will not be deliverable and the council will no longer be able to include approx. 500 homes within its housing supply (thus increasing unmet need). 	<p>new housing in areas at risk now or in the future (due to the risk to the single access road on and off Hayling Island; brownfield development will continue to be accepted if the site itself is safe)</p>	<p>Portsea scheme will protect the majority of Portsea Island.</p> <ul style="list-style-type: none"> The council's HELAA excludes sites entirely within an area of flooding that has 3.3% or greater AEP (annual exceedance probability) as defined in Appendix A, Figure 11 of the SFRA[1];
<ul style="list-style-type: none"> Safeguarding existing open spaces and expecting new developments of over 50 dwellings to provide new open space at a rate of 1.6ha per 1,000 people or enhance existing spaces. The council's SHLAA considers open spaces classified as low value in the Open Space Monitoring Report for development. Medium and High Value sites are excluded, along with existing cemeteries and allotments. 	<ul style="list-style-type: none"> Safeguarding existing open spaces and expecting new developments to enhance them and/or provide new open spaces 	<ul style="list-style-type: none"> Safeguarding existing open spaces and expecting new developments of over 50 dwellings to provide new open space at a rate of 1.65ha per 1,000 people or enhance existing spaces. The Council's HELAA excludes sites that are entirely or the majority within protected open spaces as specifically designated and identified clearly in a made Neighbourhood Plan or Local Plan;
<ul style="list-style-type: none"> All internationally, nationally and locally protected habitats are protected by the Local Plan. 	<ul style="list-style-type: none"> All international, national and local environmental designations are protected. 	<ul style="list-style-type: none"> The following sites are protected from development due to their nature conservation value: <ul style="list-style-type: none"> Special Protection Areas Ramsar Sites of Significant Importance for Nature Conservation

⁵ www.gosport.gov.uk/article/2963/PfSH-Level-1-Strategic-Flood-Risk-Assessment-2023-2024-Appendix-A-and-Appendix-B

○ Sites identified as Core or Primary sites for Solent Waders and Brent Geese.

Appendix 2: Table setting out the Local Planning Authorities approached by Gosport, Havant and Portsmouth Local Planning Authorities in respect of Housing and Employment under the Duty to Cooperate.

It should be noted that these are the most recent approaches to each local authority and in many instances, there have been earlier discussions/approaches made between authorities.

This table is concerned only with unilateral approaches that have been made by the three authorities to date and does not capture the very detailed and comprehensive work undertaken at a sub-regional level through PfSH.

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Basingstoke and Deane BC	Not approached, different HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need	Not approached, different HMA	n/a
Chichester DC	Not approached, different HMA	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached, interrogation of the respective HEDNAs for the LPA's led to agreement that the authorities are in separate HMAs (SE Hants / Coastal West Sussex) (July 25)	n/a
East Hampshire DC	Approached and asked to accommodate unmet housing need (July 2025)	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached and asked to accommodate unmet housing need (January 2024)	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Eastleigh BC	Not approached, different HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need	Different FEMA, watching brief	Not approached, different HMA	n/a
Fareham BC	Approached and asked to accommodate unmet housing need (July 2025)	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached and asked to accommodate unmet housing need. 800 agreed units for Portsmouth in Fareham Local Plan (2023)	n/a
Gosport BC	n/a	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached and asked to accommodate unmet housing need. (January 2024, August 2025) The two authorities are unable to meet each other's needs.	n/a
Hart DC	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to	Different FEMA, watching brief. HBC will respond to local plan as it comes forward to	Not approached, separate HMA	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Havant BC	Approached and asked to accommodate unmet housing need (July 2025) The two authorities are unable to meet each other's needs.	n/a	n/a	n/a	Approached and asked to accommodate unmet housing need. (January 2024, August 2025) The two authorities are unable to meet each other's needs.	n/a
Isle of Wight C	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Approached, interrogation of the respective HEDNAs for the LPA's led to agreement that the authorities are in separate HMAs (SE Hants / loW) (SoCG July 24)	n/a
New Forest DC	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Not approached, separate HMA	n/a
New Forest NPA	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond	Different FEIMA, watching brief. HBC will respond	Not approached, separate HMA	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
			to local plan as it comes forward to highlight unmet need.	to local plan as it comes forward to highlight unmet need.		
Portsmouth CC	Approached and asked to accommodate unmet housing need (July 2025) The two authorities are unable to meet each other's needs	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025). PCC has agreed to provide HBC with ~30,000 m ² of office floorspace	n/a	n/a
Rushmoor BC	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Not approached, separate HMA	n/a
South Downs NPA	Not approached, separate HMA	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025).	Approached. The two authorities are unable to meet each other's needs. (July 2025)	n/a
Test Valley BC	Not approached, separate HMA	n/a	Different HMA, watching brief – consultation response (September 2025) asked to	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to	Not approached, separate HMA	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Winchester CC	Approached and asked to accommodate unmet housing need. (July 2025)	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025) WCC agreed to provide HBC 70% of its housing surplus (currently 203 units)	Approached and asked to accommodate unmet employment need (June 2025)	Approached. Asked to accommodate unmet housing need. (January 2024) WCC agreed to provide PCC 30% of its housing surplus (currently 67 units)	n/a

*At the time of writing Gosport Borough Council have sufficient employment sites to meet their employment need and so have not approached other local authorities on this matter.

** At the time of writing Portsmouth City Council has a surplus of office floorspace and a small shortfall of manufacturing/warehousing.

FAREHAM

BOROUGH COUNCIL

Jayson Grygiel
Gosport Borough Council

David Hayward,
Havant Borough Council

Lucy Howard,
Portsmouth City Council

Letter sent by email only

Contact Lee Smith

Direct dial [REDACTED]

Date 26 November 2025

Dear Jayson, David and Lucy,

Housing and employment need in South-East Hampshire

Thank you for hosting the Duty to Cooperate meeting on 9 October and for your follow-up letter of 13 October 2025 regarding Housing and Employment need in South-East Hampshire.

I can confirm that I have shared and discussed your letter with the Executive Leader of this Council (Councillor Simon Martin) and the Executive Member for Planning and Development (Councillor Malcolm Daniells). The following response has been agreed with those Members.

Fareham Borough Council considers the approach of jointly addressing the duty to cooperate issue as constructive and informative and is committed to continuing work on sub-regional matters in a positive and constructive way.

Fareham Borough Council has met with the three authorities on an individual basis a number of times over recent years, with cooperation on the Fareham Local Plan 2037, and more recently with the progression of the three Local Plans in question. This approach of considering the issues at a South-East Hampshire scale provides a consistent and effective consideration of the challenges and approach to dealing with them. To that end, the letter of 13 October sets out the position of the three planning authorities regarding housing and employment need and supply position and makes the requirements very clear.

Fareham recognises the total combined unmet need figure for the three authorities of 18,347 homes against the 2024 Standard methodology and acknowledges how this differs from numbers previously identified by the Partnership for South Hampshire (PfSH). As part of our responses to local plan consultations and to previous duty to cooperate discussions, we have also considered the various methodologies used in assessing the availability of land and have endorsed conclusions as far as leaving 'no stone unturned' is considered.



The Fareham Local Plan 2037 was adopted in April 2023 and represents one of the few up-to-date Local Plans in Hampshire. It is also the only adopted plan locally that includes a commitment towards unmet need. The Plan allocates a total of 900 dwellings towards PfSH unmet need, 800 of which are specifically allocated (within the Plan wording) to Portsmouth. The remaining 100 dwellings is towards wider unmet needs in the area.

In this Council's opinion, it would be appropriate for the three authorities to discuss and agree how the 100 dwellings are apportioned between them. Once a decision has been reached by the three authorities in question, Fareham would welcome a formal approach and agreement on this matter.

As well as making a contribution towards unmet need through its current adopted local plan, this Council has also been very proactive in ensuring that all necessary 'ecological infrastructure' (which I will expand on further below) is in place to ensure that the delivery of housing and employment is able to take place without delay.

During recent years, there has been an increasing awareness of the impacts of increased levels of nitrates upon nationally protected sites around the coast. Ensuring the impacts of nitrates upon Habitat sites are appropriately mitigated, is an integral issue in deciding planning proposals. In many instances planning permission for new housing cannot be granted in the absence of mitigation and much of the mitigation needs to be achieved 'off site'.

In addition, the Government's policies for biodiversity net gain (BNG) have been implemented, whereby a 10% uplift in BNG is sought as an integral part of many developments. Whilst the potential to deliver the 10% BNG uplift on site may be achievable for some developments, in many instances offsite solutions are required.

There are also important areas along the south coast which are identified as sites for overwintering birds including Brent Geese, some of which may have potential for housing or other development. Where the reduction or loss of these sites is necessary or unavoidable, alternative mitigation land needs to be provided and appropriately safeguarded.

Fareham Borough Council has been proactive through both direct delivery and working with others to ensure that land is delivered within the Borough which mitigates the impacts of nutrients, is available for the offsite provision of biodiversity net gain and secures land for overwintering birds and Brent Geese (I have collectively termed these three areas as 'ecological infrastructure'). Many of these sites to date have been identified and established within the gap between Fareham, Stubbington and Gosport.

This Council is about to undertake further work to establish the extent and number of further sites which could be brought forward within the Borough to deliver additional ecological infrastructure. Such sites are critical in bringing forward development, whilst ensuring that important environmental provisions are delivered. The intention is that identified sites will be available to facilitate both the delivery of development within the Borough along with the development delivered within neighbouring authorities including Gosport, Havant and Portsmouth.

The Council acknowledges the remaining deficit of 19,973 square metres of new employment floorspace across the three authorities and notes the request for help with this unmet need.

Fareham recognises the importance of a strong, responsive and competitive economy, alongside the delivery of housing delivery. The promotion of economic development is one of the Council's six corporate priorities.

The adopted Fareham Local Plan 2037 identifies an employment floorspace requirement across the Plan period of 121,964 square metres of employment floorspace. The Local Plan allocated seven new sites to meet this requirement, two of these sites (Faraday and Swordfish) form the strategic site at Daedalus. These seven sites are in addition to the strategic site at Welborne (allocated through the Welborne Plan). Between them, Welborne and Daedalus contribute 77% of the anticipated supply.

At point of adoption the plan identified a supply of 241,754 square metres of employment floorspace, an excess of 119,790 square metres compared to the requirement. The Inspector at the Local Plan examination recognised the value and importance of the two strategic sites and welcomed the inclusion of the additional sites to facilitate some flexibility and choice in the local market. To maximise flexibility the Local Plan does not allocate these sites for a particular use class, rather all employment allocations are for mixed employment use.

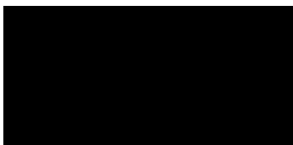
As the Council's local plan is adopted, the Council is not in a position to include any wording within the current Plan, committing some of this supply to unmet need. Fareham Borough Council is willing to commit 19,973 square metres of its employment floorspace towards Havant Borough Council's unmet need and would welcome a further dialogue with Havant Borough Council to agree how best to achieve this.

With regards to making a further contribution to housing unmet need, the Council is unable to commit to anything further at this point in time. The Council's review of the Local Plan will need to be undertaken through the new Local Plan system. The Council is awaiting the publication of further legislation and guidance regarding the new plan-making system. This approach is in accordance with our Local Development Scheme (LDS) which acknowledges that the timetable in the LDS will be subject to the progression of legislation, national planning policy and any transitional arrangements for these reforms.

Any future review of the Plan will of course be conducted within the new framework of the regulations and guidance, and we will engage with you as part of that process.

Please let me know if I can assist any further.

Yours sincerely,



Lee Smith
Head of Planning

Gosport Borough Council

Debbie Gore
Chief Executive
Gosport Borough Council

Enquiries to: Alex Robinson

Direct line: [REDACTED]

Email: [REDACTED]

Date: 5th March 2024

By email only:
[REDACTED]

Dear Debbie

HAVANT BOROUGH'S EMERGING LOCAL PLAN – DUTY TO COOPERATE

Many thanks to your officers who met with my colleagues on 14 November 2023 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of Havant Borough's Local Plan, and its housing need and supply position. This follows the approval of the Partnership for South Hampshire (PfSH) Spatial Position Statement (SPS) at Joint Committee on 6 December 2023.

As you are aware, Havant Borough Council is currently preparing a new Local Plan. We recently published an updated Local Development Scheme (LDS) which indicates that we will be publishing a draft (Regulation 18) Local Plan in Quarter 4 of 2024.

The LDS can be viewed here:

<https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-development-scheme-lds>.

Havant Borough Council is a pro-development local authority with an ambitious regeneration agenda. We are keen to deliver this alongside other objectives such as delivering more affordable housing for our communities and addressing international issues such as climate change. Havant Borough values partnership working through PfSH which allows us to work positively and proactively on cross boundary issues, including the sufficient provision of housing and employment across the sub-region. The PfSH SPS confirms the Council's commitment to delivering sustainable development in the most sustainable locations, and meeting housing need where possible.

As with most urban local planning authorities in the Southeast, one of the biggest challenges for the new Local Plan will be to meet Havant's own development needs. The Inspectors' Interim Findings¹ in respect of the previous Local Plan acknowledged that Havant may be an authority that cannot sustainably meet its housing needs in accordance with paragraph 11 b)

¹ <https://www.havant.gov.uk/media/8718>

of the National Planning Policy Framework (NPPF) (see paragraph 52). Nevertheless, the Council's starting point is that no stone will be left unturned in order to meet its own need.

Whilst Havant's evidence base on housing supply is emerging, the attached plan from the Council's draft Constraints Study illustrates the very constrained supply of land in Havant Borough. The least constrained areas shown are already identified for development, notably that of the Dunsbury Park tax site which is part of the Solent Freeport, and Havant Thicket Reservoir which serves a sub-regional function, stretching far beyond Havant Borough's boundaries.

Housing Need and Supply

The NPPF makes clear that in order to significantly boost housing supply, the standard method is an advisory starting-point for establishing a housing requirement for an area. Applying a housing need figure of 516 dwellings², there is a need for 10,320 dwellings in Havant Borough over a Local Plan period to 2043 (see table below).

The Council has undertaken a comprehensive and robust assessment of the following sources of supply to assess how far it is able to meet its own housing need:

- Outstanding planning permissions as of 1 April 2023;
- Adopted Local Plan allocations without planning permission;
- Potential housing sites³; and
- Windfall development⁴.

Our work on the previous Local Plan and the Inspectors' interim findings report clearly signal a need for robust evidence and including that sites should meet the NPPF definition of 'developable'. For this reason, it will not be possible to rely on any housing delivery from Havant and Waterlooville town centres until evidence of deliverability is more advanced. In any case, development in these locations will be unlikely to be sufficient in scale to close the gap between the Borough's objectively assessed need and identified housing supply. The Council will keep all sources of housing supply up to date and robust in order to demonstrably ensure that every effort is made to address housing need within the Borough's boundary.

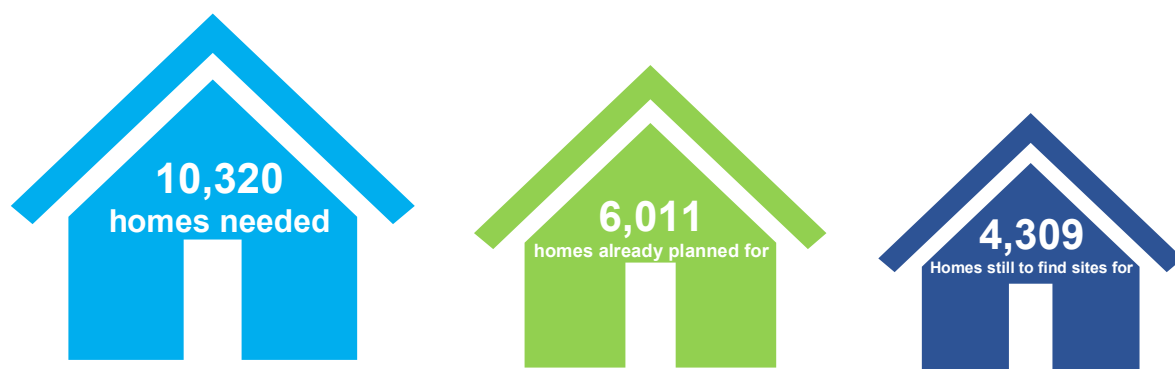
² The standard method calculation of 516 dwellings per annum (dpa) is used from 2022, though the standard method need calculation for 2024 is 512 dwellings per annum prior to the publication of the 2023 affordability ratio which is due to be published in March 2024. The former is used as a worst case scenario.

³ Identified by Table 1 of the Council's [Housing Delivery Position Statement](#)

⁴ The Council's evidence on windfall development will be updated to inform the new Local Plan.

	Identified housing need (2022/23-2042/43)	Net Dwellings Completed or Committed
	10,320	
Completions 2022-23		495
Outstanding planning permissions at 1/4/23		1,524
Allocations in Adopted Local Plan without planning permission		606
Potential housing sites		1,524
Potential housing sites where previous Inspectors' raised deliverability concern		700
Windfall Development		1,162
Total		6,011
Remaining objectively assessed housing (unmet need)	4,309	

Against a standard method figure of 10,320 dwellings, the Council is only able to identify a supply of 6,011 dwellings over the plan period. **This results in an unmet housing need figure of 4,309 dwellings.**



All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply. We will be continuing to reach out to the development industry and landowners to ascertain whether there are any further sites which could be available for development and be assessed as part of the plan-making process – our Call for Sites has recently been relaunched on our website. However, given the extent of the very constrained supply of land, there will likely be insufficient capacity to meet objectively assessed need within the Plan area.

Employment Need and Supply

Havant's constrained land supply will also mean it is extremely challenging for the Borough to identify sufficient sites to meet employment need. The Council has commissioned an

Employment Land Review, building upon the 2021 PfSH Economic, Employment and Commercial Needs Study⁵. This will confirm whether Havant has sufficient employment land to meet its own development needs or will need to formally request assistance from its neighbours to accommodate any unmet need. We will keep you up to date with the progress of our evidence base on employment land supply.

Gosport Borough Local Plan 2038

From our recent meeting, we are aware that Gosport Borough is due to consult on a Regulation 19 Local Plan later this year. We are also aware that Gosport is likely to have an unmet housing need.

Joint working

The PfSH Spatial Position Statement (SPS) is of course a useful starting point in demonstrating compliance with the duty to cooperate. However, given the scale of unmet need that exists within the sub-region, it is important that there continue to be constructive and active discussions to effectively address this matter. It is Havant Borough Council's position that relying solely on the PfSH SPS will not demonstrate compliance with the duty to cooperate. As such, ongoing discussions and a bi-lateral statement of common ground will need to be agreed in order to demonstrate that this matter is appropriately addressed by our respective local plans.

Planning Practice Guidance on plan-making⁶ sets out that strategic policy-making authorities should cooperate in meeting housing need, using the most appropriate functional geographical area, such as a HMA. That being a case, there is a clear functional geography between Gosport and Havant for which there is a significant unmet housing need.

We are conscious of the proposed repealing of the duty to cooperate and its proposed replacement with an alignment policy. Whilst the detail of such a test is not yet known, the Government has made clear that cross-boundary working on strategic priorities, including unmet need will remain. Therefore, the Borough Council's position is we should ensure compliance with the existing legislation up to the point that the process changes.

You will be aware of the work that has been undertaken between our two authorities to address the duty to co-operate in recent years. Moving forwards, we seek to undertake a series of detailed discussions with yourselves as our respective plans progress, in order to ensure that unmet need and other cross-boundary matters are robustly addressed.

The NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. 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. Notwithstanding any unmet need that may arise from Gosport, I am dutybound to formally ask whether your authority is able to accommodate any of Havant Borough's unmet housing need?

⁵ push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf

⁶ [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/plan-making) Paragraph: 017 Reference ID: 61-017-20190315 Revision date: 15 03 2019

If it remains the case that both our authorities are unable to meet need, we ask that you work with us to establish a collaborative dialogue about addressing unmet housing need in the wider sub-region.

I would like to request a meeting to discuss this matter and would be grateful if you could please advise of your availability by return. I look forward to hearing from you on this important issue and would be grateful for a response by **28 March 2024**.

Yours sincerely



Alex Robinson
Executive Head of Place

cc Jayson Grygiel



Town Hall, High Street,
Gosport, Hampshire, PO12 1EB.
DX136567 Gosport 2
Website: www.gosport.gov.uk
Switchboard: (023) 92584242
Chief Executive: Debbie Gore

Alex Robinson
Executive Head of Place
Havant Borough Council

By e-mail

Please ask for:

Jayson Grygiel

Direct dial:

E-mail:

28th March 2024

Dear Alex,

Havant Borough Emerging Local Plan- Duty To Cooperate

Thank you for your letter dated 5th March 2024 concerning the above matter and your explanation regarding the significant analysis undertaken by Havant Borough Council to search for new housing sites across the Borough.

I can advise you at this time Gosport Borough Council is unable to assist in meeting the unmet housing needs of other local authorities. Under the Government's Standard Method which requires us to use the 2014 projections we are required to find 344 dwellings per annum which over the plan period to 2040 is a requirement of 5,504 dwellings. Unfortunately despite a thorough search of the Borough and a number of 'Call for Sites' we have only found a supply of 2,823 dwellings. Consequently, this results in Gosport Borough itself having an unmet need of 2,681 dwellings and therefore highlights that we are unable to meet the housing needs of other authorities at this time.

As you will be aware, the Borough is a dense urban area with very little land to develop due to environmental considerations or the presence of a number of operational military establishments. The Council's key allocations are either former MoD sites or current MoD sites which are about to be released (such as Blockhouse 1). These sites present significant challenges in terms of flood risk, neglected heritage assets, contamination, and proximity to internationally important habitats as well as a constrained road network with limited public transport options. These sites have particular viability challenges.

In relation to continuing a collaborative dialogue regarding unmet need across the wider sub-region, the Council's Planning Policy Manager, Jayson Grygiel, will be happy to assist. Please contact him directly regarding convenient dates

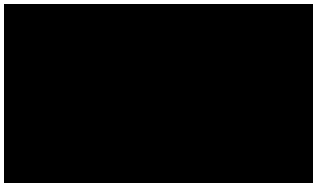
[Redacted contact information]

In terms of employment needs, I note that you are currently undertaking further work regarding this requirement. I look forward to having further discussions with you once the results are available.

This Council will continue to work with Havant Borough Council on a bilateral and multilateral basis through the arrangements of the Partnership for South Hampshire (PfSH) in order to meet the requirements of the *Duty to Cooperate*, as set out in Section 33A of the Planning and Compulsory Act 2004.

If you have any queries regarding the points raised in this letter please do not hesitate to contact me.

Yours sincerely,



Debbie Gore
Chief Executive

Debbie Gore and Jayson Grygiel
Gosport Borough Council

By email only:

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 12th June 2025

Dear Debbie and Jayson

UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Many thanks to you and your colleagues who met with us on 20th May 2025 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of the Council's Local Plan – the Building a Better Future Plan, including the latest position on our housing and employment development needs. This follows our letter dated 5th March 2024 which formally requested assistance with our unmet housing needs, as well as highlighting the work being undertaken to update the Council's employment evidence base.

As you may be aware, the Council is currently consulting on the full draft (Regulation 18) Building a Better Future Plan which closes on 1st July 2025.

Housing need and supply

As you will be aware, the Council's starting point is that it will leave no stone unturned in order to meet its own housing need. However, as demonstrated by the Constraints Study¹ there is also a very constrained supply of land in Havant Borough with the least constrained areas already identified for development.

Our previous letter dated 5th March 2024 identified an unmet housing need of 4,309 homes between 2022 to 2043. Significantly however, that was under the previous standard method figure of 516 dwellings per annum, equivalent to 10,320 dwellings between 2023 and 2043. The publication of the new standard method in December 2024 means that the Borough's need has increased to 892 dwellings per annum, equivalent to 17,840 homes over the plan period (2023 to 2043).

Given the expected lack of suitable land within the Borough with development potential to meet identified housing need, the Strategic Housing and Economic Land Availability

¹ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

Assessment (SHELAA) includes a comprehensive and robust assessment of all land in the Borough to ensure the Council has fully examined all opportunities for development, and has been published alongside the full draft (Regulation 18) Local Plan for consultation.

The SHELAA concludes there is a developable housing supply of 7,981 dwellings between 2023 and 2043. However, the SHELAA does not take account of the development strategy, nor the Sustainability Appraisal which is undertaken to determine whether a site should be allocated. A total of four potential development strategies were considered through the SA process covering a broad spectrum from a full environmental and brownfield focus to a full housing delivery focus. However, crucially under none of the options is it possible to achieve delivery of the total need for housing as set out under the standard method, by some margin².

Housing Supply 2023-2043 (number of dwellings likely to be delivered under each development strategy option)				
Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Completions 2023/24	368	368	368	368
Commitments	1,142	1,142	1,142	1,142
Broad locations considered suitable under the strategy option	1,003	2,406	2,406	2,406
Site allocations considered suitable for allocation under the strategy option	821	1,906	2,669	4,282
Small sites with the urban area	29	37	37	37
Windfall	1,360	1,360	1,360	1,360
Total housing supply	4,723	7,218	7,981	9,594
Supply against standard method plan requirement of 17,840	(13,117)	(10,622)	(9,859)	(8,246)

The chosen development strategy (Option 2) combines and balances key national and local objectives in the most effective way and overall represents the most appropriate strategy, when considered against the alternatives. The spatial distribution of development planned for through the chosen option focuses on the existing built areas across the Borough, notably Havant and Waterlooville town centres and less constrained greenfield land. On this basis, the Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum.

There is therefore an unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year). The submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance' of 1,900 dwellings – of which 70% equivalent to 1,330 dwellings would be apportioned to Havant Borough. This would increase overall supply to

² Further information can be found in Sustainability Appraisal which has been published as part of the Council's evidence base: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

8,548 dwellings over the plan period, and reduce unmet need to 9,292 dwellings (or 465 homes per year).

It should be noted this contribution can only be afforded limited weight and may change before the Plan has successfully passed through Examination. However, this obviously only represents a proportion of Havant Borough's unmet need, with a large amount remaining to be accommodated within neighbouring authorities which will need to be discussed through the Duty to Cooperate.

Under the Duty to Cooperate, the Borough Council is formally requesting Gosport Borough Council to assist in meeting the unmet housing need of at least 9,292 dwellings arising from Havant Borough. The Borough Council has approached its other neighbouring local authorities, and local authorities within the same housing market area with the same request and I will keep you updated on progress with our discussions. I am also mindful that there is unmet housing need arising from your authority and Portsmouth City respectively within the same Housing Market Area.

Employment need and supply

The Council has now published an Employment Land Review (ELR) which provides an up-to-date assessment of the Borough's economic and employment development needs³. It identifies an objectively assessed need figure of 175,199 sq. m of net new floorspace over the plan period of which 139,140 sq. m results from industrial demand, and 36,059 sq. m for office demand.

The ELR indicates that the industrial market is strong across the Borough, but the market is constrained due to low levels of availability. The potential site allocations could help to address some of those supply constraints, but the Dunsbury Park Freeport Tax Site status means that the floorspace supply from Phase 3 cannot be relied on to meet general demand and local need for new floorspace. This is further compounded by a lack of office sites promoted to meet need and a number of allocated sites no longer available to meet the Borough's employment need⁴.

Overall demand and supply	2023-43 Sq m (GIA)
Industrial demand	139,140
Office demand	36,059
Gross demand	175,199
Industrial supply	121,475
Office supply	2,300
Total supply	123,775
Balance over (under) supply	-51,424

³ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

⁴ Kingscroft Farm (SHELAA Refs HA20 and ED09) and Brockhampton West (Ref ED14)

On this basis, the Borough has an unmet need of 51,424 sq. m for employment floorspace over the plan period. Of this, 17,665 sq. m is industrial demand and 33,759 sq. m is office demand.

Under the Duty to Cooperate, the Borough Council is formally requesting Gosport Borough Council to assist in meeting 51,424 sq. m of unmet employment need. The Borough Council will also be approaching our other neighbouring local authorities, and local authorities within the same travel to work area with the same request and I will keep you updated on progress with our discussions.

Joint working

Our authorities have a strong track record of working together through the Partnership for South Hampshire and on a bi-lateral basis. We look forward to continuing constructive and active discussions to effectively address unmet housing and employment development needs arising from Havant Borough.

Through our recent discussions and the PfSH Statement of Common Ground, we are content that Gosport Borough is making every effort to meet as much of its own housing need. We look forward to discussing the collective unmet housing need in the Southeast Hampshire Housing Market Area on 17th June 2025. For completeness, please could you respond no later than 10th July 2025. Please note that we may share your response with other duty to cooperate partners and publish it as part of our evidence base.

I look forward to receiving any consultation response to our Draft Local Plan consultation and progressing our discussions around a Statement of Common Ground in due course.

Yours sincerely

David Hayward

Strategic Planning Manager



Town Hall, High Street,
Gosport, Hampshire, PO12 1EB.
DX136567 Gosport 2
Website: www.gosport.gov.uk
Switchboard: (023) 92584242
Chief Executive: Debbie Gore

David Hayward
Strategic Planning Manager
Havant Borough Council

By e-mail

Please ask for:

Jayson Grygiel

Direct dial:

[REDACTED]

E-mail:

[REDACTED]

8th July 2025

Dear David,

Request for Havant Borough Council to consider taking Gosport's Unmet Housing Need and vice versa

Thank you for your letter dated 12th June 2025 setting out an update on the progress of Havant's Local Plan and formally requesting assistance with Havant's unmet housing needs, as well as highlighting employment matters. Please see Gosport Borough Council's response to your request below.

In addition, thank you for meeting us on the 25th May 2025 in relation to our ongoing Duty to Cooperate arrangements. I have attached a copy of the slides we presented at the meeting for your information and as you will recall we have previously agreed a set of notes and outcomes for this particular meeting.

The purpose of this letter is to set out a response to your recent letter, and formally update you on the progress of Gosport Borough's Local Plan and our housing need and supply position. It also represents the Council's formal request to ask whether Havant Borough Council can consider taking any of Gosport Borough's unmet housing need which is set out later in this letter. As discussed at our recent meeting, Gosport Borough Council recognises Havant's increasing housing need and the significant constraints facing the Borough. For your information, we have recently completed a round of meetings to discuss our unmet needs with all the local authorities that comprise the Portsmouth Housing Market Area and have formally written to each accordingly.

Response to Havant Borough Council letter

In relation to your formal request it is clear from your explanation that significant analysis has been undertaken by Havant Borough Council to search for new housing sites across the Borough. It is noted that Havant has an unmet need of 10,622 dwellings which could reduce to 9,292 dwellings if the submitted Winchester Local Plan's 'unmet needs allowance' is partly apportioned to Havant Borough.

I can advise you at this time Gosport Borough Council is unable to assist in meeting the unmet housing need of other local authorities. As set out in this letter and covered in our recent meeting, unfortunately, despite a thorough search of the Borough and four 'call for sites' we have only found a supply of 2,538 which means that over the plan period to 2042 the Borough would have an unmet need of just over 4,800 dwellings and therefore highlights that we are unable to meet the housing needs of other authorities at this time.

In relation to employment need and supply, thank you for your explanation of your recently published Employment Land Review and the supply position which results in an unmet need for employment floorspace. Your formal request for assistance in meeting the 51,424 sq. m of unmet employment need (of which, 17,665 sq. m is industrial demand and 33,759 sq. m if office demand) is noted.

I can advise you at this time Gosport Borough Council is unable to assist in meeting the unmet employment need of other local authorities. As discussed at our recent meeting, Gosport is currently able to identify sufficient land to meet the employment needs suggested in its employment evidence which is informed by the Economic, Employment and Commercial Needs (including logistics) Study produced for PFSH by Stantec in 2021, and the Gosport Economic Development Needs Assessment and Employment Land Availability Assessment (EDNA/ELLA) (produced in 2018). I can advise that based on the available sites and the Council's employment evidence, the majority of our supply over the plan period to 2042 is likely to be light industrial and general industrial. Due to the lack of office demand, I can confirm we are very unlikely to be able to meet any office demand from other authorities. The Council is currently commissioning an updated EDNA/ELLA and I will keep you updated on progress with our evidence work.

Sub-regional cooperation

In order to work across boundaries it is acknowledged that both Havant Borough Council and Gosport Borough Council have worked very closely and collaboratively with the authorities that comprise the Partnership for South Hampshire (PFSH) including the work that led to the production of the PFSH Spatial Position Statement (SPS), approved by PFSH Joint Committee on 6th December 2023.

PFSH has provided a framework for sub-regional planning since the production of the South East Plan (adopted May 2009). It has also been successful on a number of cross-boundary environmental initiatives including finding effective measures to address the issues of recreational disturbance and nutrient pollution on internationally important habitats in order that authorities can keep granting planning permission for new dwellings.

Local Plan timetable

In relation to Gosport Borough's Local Plan, we recently published an updated Local Development Scheme (LDS) which indicates that we will be publishing a Regulation 19 Local Plan in early 2026. The LDS can be viewed here: [Local Development Scheme \(LDS\) - Gosport Borough Council](#)

The timing of our request regarding unmet need

As you will be aware there has been a period of uncertainty with a number of actual and proposed changes published regarding the calculation of housing need for each local authority area and whether it will be discretionary or mandatory and whether there would be particular exceptions to this. Following the Government's publication of the latest National Planning Policy Framework (NPPF) and associated documents in December

2024, the Council is in a clearer position of its latest local housing need, that it is again mandatory, and how the Council should consider its unmet housing need.

In addition, following a recent Inspector's Advisory Meeting regarding our emerging Local Plan it became clear that we needed to undertake further work with the local authorities that make up the Portsmouth Housing Market Area (HMA), particularly as there have been a number of changes to the Standard Method for calculating local housing need since the SPS was approved.

Housing Need and Supply

As we discussed at the meeting, the housing need for each local authority in South Hampshire has significantly increased, except for Southampton. Gosport's Standard Method has increased from 339 dwellings per annum to **434 dwellings per annum** (a 28% increase). As the slides indicate this level has only been achieved four times in the last 42 years due to two major site releases available at the same time (see slide 14). Our current adopted Local Plan includes a figure of 170 dpa and we are anticipating a slightly lower figure going forward with our emerging Local Plan due to limited site availability.

As slide 12 indicates 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.

Gosport Borough Council has an established history of being pro-growth and is now a largely dense urban area. The Council has one of the highest rates of granting planning permissions in England.

Slide 15 of the attached presentation indicates the urban character of the Borough, brownfield opportunities, and the restrictions on any non-urban areas such as operational MoD establishments or a Site of Special Scientific Interest.

The Council has taken a no-stone-unturned approach and has undertaken four 'call for sites' including enabling landowners/developers and other interested parties to submit sites at any time through the preparation of the Local Plan. The Council's Strategic Housing Land Availability Assessment (SHLAA) is currently being refreshed for the Reg 19 consultation with the previous version available to view on the Council's website¹. As identified on our slides a number of sites are no longer available for residential as the landowners have alternative plans (such as Gosport Police Station, Immigration Removal Centre). A smaller number of additional sites have become available (see slide 23).

The Borough has particular deliverability and viability issues with a number of its key sites. Over the past twenty years the Council has successfully facilitated development on a number of complex former MoD sites, a number of which are still ongoing (e.g. the former HMS Daedalus and Royal Hospital Haslar sites). Many of the sites have a complex mix of issues including: contaminated land; a lack of investment by Government agencies in infrastructure including sea defences; ongoing flood management issues; significant heritage assets that have been left in a deteriorating condition; limited transport options; and relatively low gross development values. All these issues have affected the speed of delivery of past and current sites and continue to impact on ascertaining whether current brownfield releases are deliverable. This also poses challenges for securing affordable housing and developer contributions.

¹ [Strategic Housing Land Availability Assessment](#)

As a consequence of the above matters it has been made clear that we need to formally request all the local authorities in the Portsmouth HMA to consider whether they are able to take our identified unmet housing need which as outlined above is just over 4,800 dwellings.

As discussed recently, the duty to cooperate meetings and this formal letter are part of an ongoing process and consequently we would be happy to discuss the matter on a regular basis with Havant BC and the other local authorities in the HMA.

I would therefore be grateful for a response to our request for Havant BC to consider taking our unmet need by **12th September 2025** in order that you are able to give this matter due consideration.

Thank you for your cooperation on this matter and if in the meantime you require any further clarification please do not hesitate to contact me. Please note that we may share your response as part of our evidence base.

Yours sincerely,



Jayson

Jayson Grygiel
Manager of Planning Policy
Gosport Borough Council

Jayson Grygiel
Manager of Planning Policy
Gosport Borough Council

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 15 July 2025

Dear Jayson

Response to Gosport's formal request for Havant Borough to consider taking Gosport's unmet housing need and vice versa

Thank you for your letter dated 8th July 2025 which formally requests assistance from Havant Borough with Gosport's unmet housing need, and provides an update on the progress of Gosport Borough's Local Plan. In addition, thank you for sending across a copy of the slides that you presented at our Duty to Cooperate meeting on the 25th May 2025.

For completeness, I attach a copy of the agreed meeting note and the slides that Havant Borough Council presented for this particular meeting. We also note that this formed one of a series of meetings to discuss your unmet needs with all the local authorities that comprise the Portsmouth Housing Market Area. This reflects the approach taken by Havant Borough Council.

Thank you also for confirming Gosport Borough Council's commitment to joint working and the duty to cooperate on a regular basis. I am happy to reaffirm Havant Borough's will be happy to continue to discuss unmet housing need on a bi-lateral basis with Gosport Borough Council together with other local authorities in the Portsmouth HMA.

Response to Gosport Borough Council

From our recent Duty to Cooperate discussion, we appreciate the no-stone-untuned approach taken by the Council which has included four 'call for sites'. It is evident that significant work has been undertaken to identify all available sources of housing supply in Gosport Borough, with extensive analysis needed to support the deliverability and viability of a number of key development sites. As a consequence, it is noted that Gosport Borough is only able to identify a supply of 2,538 homes over the plan period to 2042, resulting in an unmet need of 4,823 homes.

As you know, Havant Borough Council is in a position being unable to meet its own housing need. As you have set out in your letter, Havant Borough has an unmet need of 10,622 dwellings which could reduce to 9,292 dwellings subject to the conclusion of the Winchester Local Plan Examination. Unfortunately, Havant Borough is similarly unable to assist in

meeting the unmet housing need of other local authorities including that of Gosport Borough.

Employment need and supply

Thank you for acknowledging our unmet need position on employment need. We note that Gosport Borough Council is unable to assist in meeting the unmet employment need of other local authorities at this time. I also note that the Council is currently commissioning an updated Economic Development Needs Assessment and Employment Land Availability Assessment. I should be most grateful if you could please keep me updated on the progress of these evidence base studies. In particular, it would be helpful to understand whether an updated position will be available in advance of consultation on Gosport Borough's Regulation 19 Local Plan. Perhaps we could convene a further meeting once those evidence base studies are nearing conclusion?

Yours sincerely

David Hayward

Strategic Planning Manager

Portsmouth City Council

Ian Maguire
Assistant Director for Planning and
Economic Growth
Portsmouth City Council

Enquiries to: Alex Robinson
Direct line: [REDACTED]
Email: [REDACTED]
Date: 5th March 2024

By email only:
[REDACTED]

Dear Ian,

HAVANT BOROUGH'S EMERGING LOCAL PLAN – DUTY TO COOPERATE

Many thanks to your officers who met with my colleagues on 13 November 2023 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of Havant Borough's Local Plan, and its housing need and supply position. This follows the approval of the Partnership for South Hampshire (PfSH) Spatial Position Statement (SPS) at Joint Committee on 6 December 2023.

As you are aware, Havant Borough Council is currently preparing a new Local Plan. We recently published an updated Local Development Scheme (LDS) which indicates that we will be publishing a draft (Regulation 18) Local Plan in Quarter 4 of 2024.

The LDS can be viewed here:

<https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-development-scheme-lds>.

Havant Borough Council is a pro-development local authority with an ambitious regeneration agenda. We are keen to deliver this alongside other objectives such as delivering more affordable housing for our communities and addressing international issues such as climate change. Havant Borough values partnership working through PfSH which allows us to work positively and proactively on cross boundary issues, including the sufficient provision of housing and employment across the sub-region. The PfSH SPS confirms the Council's commitment to delivering sustainable development in the most sustainable locations, and meeting housing need where possible.

As with most urban local planning authorities in the Southeast, one of the biggest challenges for the new Local Plan will be to meet Havant's own development needs. The Inspectors' Interim Findings¹ in respect of the previous Local Plan acknowledged that Havant may be an authority that cannot sustainably meet its housing needs in accordance with paragraph 11 b)

¹ <https://www.havant.gov.uk/media/8718>

of the National Planning Policy Framework (NPPF) (see paragraph 52). Nevertheless, the Council's starting point is that no stone will be left unturned in order to meet its own need.

Whilst Havant's evidence base on housing supply is emerging, the attached plan from the Council's draft Constraints Study illustrates the very constrained supply of land in Havant Borough. The least constrained areas shown are already identified for development, notably that of the Dunsbury Park tax site which is part of the Solent Freeport, and Havant Thicket Reservoir which serves a sub-regional function, stretching far beyond Havant Borough's boundaries.

Housing Need and Supply

The NPPF makes clear that in order to significantly boost housing supply, the standard method is an advisory starting-point for establishing a housing requirement for an area. Applying a housing need figure of 516 dwellings², there is a need for 10,320 dwellings in Havant Borough over a Local Plan period to 2043 (see table below).

The Council has undertaken a comprehensive and robust assessment of the following sources of supply to assess how far it is able to meet its own housing need:

- Outstanding planning permissions as of 1 April 2023;
- Adopted Local Plan allocations without planning permission;
- Potential housing sites³; and
- Windfall development⁴.

Our work on the previous Local Plan and the Inspectors' interim findings report clearly signal a need for robust evidence and including that sites should meet the NPPF definition of 'developable'. For this reason, it will not be possible to rely on any housing delivery from Havant and Waterlooville town centres until evidence of deliverability is more advanced. In any case, development in these locations will be unlikely to be sufficient in scale to close the gap between the Borough's objectively assessed need and identified housing supply. The Council will keep all sources of housing supply up to date and robust in order to demonstrably ensure that every effort is made to address housing need within the Borough's boundary.

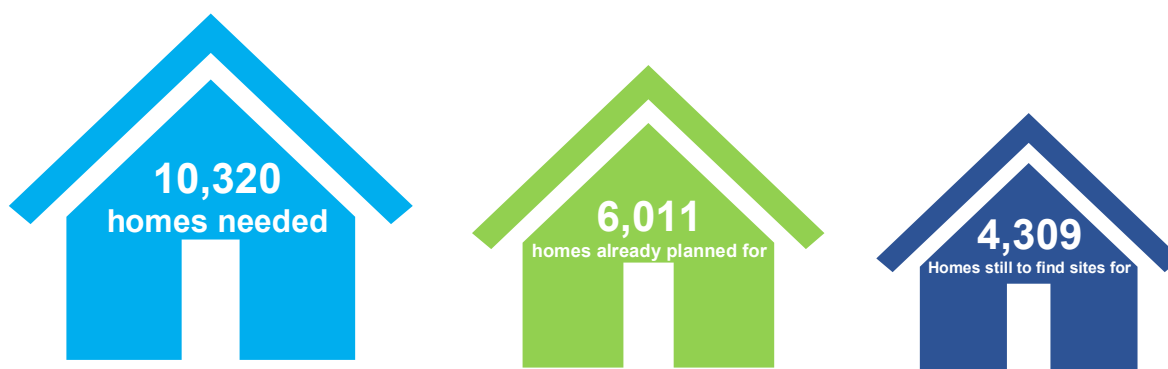
² The standard method calculation of 516 dwellings per annum (dpa) is used from 2022, though the standard method need calculation for 2024 is 512 dwellings per annum prior to the publication of the 2023 affordability ratio which is due to be published in March 2024. The former is used as a worst case scenario.

³ Identified by Table 1 of the Council's [Housing Delivery Position Statement](#)

⁴ The Council's evidence on windfall development will be updated to inform the new Local Plan.

	Identified housing need (2022/23-2042/43)	Net Dwellings Completed or Committed
	10,320	
Completions 2022-23		495
Outstanding planning permissions at 1/4/23		1,524
Allocations in Adopted Local Plan without planning permission		606
Potential housing sites		1,524
Potential housing sites where previous Inspectors' raised deliverability concern		700
Windfall Development		1,162
Total		6,011
Remaining objectively assessed housing need (unmet need)	4,309	

Against a standard method figure of 10,320 dwellings, the Council is only able to identify a supply of 6,011 dwellings over the plan period. **This results in an unmet housing need figure of 4,309 dwellings.**



All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply. We will be continuing to reach out to the development industry and landowners to ascertain whether there are any further sites which could be available for development and be assessed as part of the plan-making process – our Call for Sites has recently been relaunched on our website. However, given the extent of the very constrained supply of land, there will likely be insufficient capacity to meet objectively assessed need within the Plan area.

Employment Need and Supply

Havant's constrained land supply will also mean it is extremely challenging for the Borough to identify sufficient sites to meet employment need. The Council has commissioned an

Employment Land Review, building upon the 2021 PfSH Economic, Employment and Commercial Needs Study⁵. This will confirm whether Havant has sufficient employment land to meet its own development needs or will need to formally request assistance from its neighbours to accommodate any unmet need. We will keep you up to date with the progress of our evidence base on employment land supply.

Portsmouth Local Plan 2038

Following our recent meeting, we are aware that Portsmouth City is due to consult on a Regulation 19 Local Plan later this year. By this stage it is crucial that cross-boundary matters have been addressed effectively.

We are also in receipt of the City Council's letter dated 22 January 2024 which requests the Borough Council's help with meeting unmet housing need of Portsmouth of 3,577. This is reduced from a total unmet need of 4,377 when taking into account the Fareham Local Plan which makes provision for 800 homes to help Portsmouth's identified need. That commitment was made at a time when Havant Borough expected to be in a position to be able to meet its needs in full, and prior to the approval of the Spatial Position Statement, which shows a significant sub-regional shortfall to 2036.

In response to that letter, I can confirm that Havant is unable to assist Portsmouth in addressing its unmet need, given that the Borough is unable to meet its own housing need.

Joint working

The PfSH Spatial Position Statement (SPS) is of course a useful starting point in demonstrating compliance with the duty to cooperate. However, given the scale of unmet need that exists within the sub-region, it is important that there continue to be constructive and active discussions to effectively address this matter. It is Havant Borough Council's position that relying solely on the PfSH SPS will not demonstrate compliance with the duty to cooperate. As such, ongoing discussions and a bi-lateral statement of common ground will need to be agreed in order to demonstrate that this matter is appropriately addressed by our respective local plans.

Planning Practice Guidance on plan-making⁶ sets out that strategic policy-making authorities should cooperate in meeting housing need, using the most appropriate functional geographical area, such as an HMA. That being a case, there is a clear functional geography between Portsmouth and Havant for which there is a significant unmet housing need.

We are conscious of the proposed repealing of the duty to cooperate and its proposed replacement with an alignment policy. Whilst the detail of such a test is not yet known, the Government has made clear that cross-boundary working on strategic priorities, including unmet need will remain. Therefore, the Borough Council's position is we should ensure compliance with the existing legislation up to the point that the process changes.

⁵push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf

⁶ [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/414141/Plan-making_-_GOV.UK_(www.gov.uk).pdf) Paragraph: 017 Reference ID: 61-017-20190315 Revision date: 15 03 2019

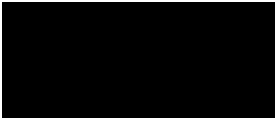
You will be aware of the work that has been undertaken between our two authorities to address the duty to co-operate in recent years. Moving forwards, we seek to undertake a series of detailed discussions with yourselves as our respective plans progress, in order to ensure that unmet need and other cross-boundary matters are robustly addressed.

The NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. 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. I am obviously aware of your recent request for assistance from Havant Borough to help with Portsmouth's unmet housing need, to which the Borough Council has formally responded as part of this letter. Nevertheless, I am dutybound to formally ask whether your authority would be able to accommodate any of Havant Borough's unmet housing need?

If it remains the case that both our authorities are unable to meet need, we ask that you work with us to establish a collaborative dialogue about addressing unmet housing need in the wider sub-region.

I would like to request a meeting to discuss this matter and would be grateful if you could please advise of your availability by return. I look forward to hearing from you on this important issue and would be grateful for a response by **28 March 2024**.

Yours sincerely



Alex Robinson
Executive Head of Place

cc Lucy Howard



Portsmouth City Council
Civic Offices
Guildhall Square
Portsmouth
PO1 2NE

David Hayward
Planning Policy Manager
Havant Borough Council

By email only

22 January 2024

Dear David,

Request from Portsmouth City Council to help meet unmet housing need under the Duty to Cooperate

Portsmouth City Council is currently preparing its draft Local Plan, which it expects to publish for pre-submission consultation in May 2024, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Boosting the supply of homes in the City is an important element of the new Portsmouth Local Plan and is in accordance with national policy. The City Council has carried out a thorough search for new housing sites in the City looking at all possible sources of supply in its Housing and Economic Land Availability Assessment (HELAA). This will be published as a key part of the Core Document Library supporting the Local Plan consultation in May. The HELAA sets out a supply of land to accommodate 13,603 homes in the City for the plan period 2020 to 2040. This in turn provides an annualised supply figure of 680 homes per year.

The housing need for the City using the standard methodology is currently 899 homes per year. Over the plan period this is 17,980 new homes. Further comprehensive information on housing need in Portsmouth is set out in the Housing and Economic Development Needs Assessment (HEDNA), which will also be published as part of our Core Document Library in May.

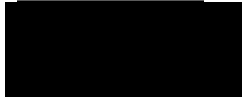
There is therefore an unmet housing need in the City of 4,377 homes over the plan period, which is 219 homes per year. The adopted Fareham Local Plan makes provision for 800 homes to help meet Portsmouth's identified need. This reduces the total unmet need in the City to 3,577 homes equating to 179 homes on an annualised basis.

The Duty to Cooperate is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004. It is also included within the National Planning Policy Framework and Planning Policy Guidance specifically in terms of planning strategically across local boundaries. Under the Duty to Cooperate, the City Council is formally requesting Havant Borough Council to assist in meeting the unmet housing need of

Portsmouth of 3,577 homes. The City Council will also be approaching our other neighbouring local authorities with the same request and I will keep you updated on progress with our negotiations.

I do understand that you will need time to consider this matter. I would appreciate a written response by Monday 19 February. Please do feel free to contact me in the interim if you would like to discuss this further. I also look forward to progressing our Statement of Common Ground, which will address all our strategic cross boundary issues including housing.

Yours sincerely



Lucy Howard
Head of Planning Policy



Ian Maguire and Lucy Howard
Portsmouth City Council

By email only:

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 12th June 2025

Dear Ian and Lucy

UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Many thanks to your colleagues who met with us on 4th June 2025 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of the Council's Local Plan – the Building a Better Future Plan, including the latest position on our housing and employment development needs. This follows our letter dated 5th March 2024 which formally requested assistance with our unmet housing needs, as well as highlighting the work being undertaken to update the Council's employment evidence base.

As you may be aware, the Council is currently consulting on the full draft (Regulation 18) Building a Better Future Plan which closes on 1st July 2025.

Housing need and supply

As you will be aware, the Council's starting point is that it will leave no stone unturned in order to meet its own housing need. However, as demonstrated by the Constraints Study¹ there is also a very constrained supply of land in Havant Borough with the least constrained areas already identified for development.

Our previous letter dated 5th March 2024 identified an unmet housing need of 4,309 homes between 2022 to 2043. Significantly however, that was under the previous standard method figure of 516 dwellings per annum, equivalent to 10,320 dwellings between 2023 and 2043. The publication of the new standard method in December 2024 means that the Borough's need has increased to 892 dwellings per annum, equivalent to 17,840 homes over the plan period (2023 to 2043).

Given the expected lack of suitable land within the Borough with development potential to meet identified housing need, the Strategic Housing and Economic Land Availability

¹ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

Assessment (SHELAA) includes a comprehensive and robust assessment of all land in the Borough to ensure the Council has fully examined all opportunities for development, and has been published alongside the full draft (Regulation 18) Local Plan for consultation.

The SHELAA concludes there is a developable housing supply of 7,981 dwellings between 2023 and 2043. However, the SHELAA does not take account of the development strategy, nor the Sustainability Appraisal which is undertaken to determine whether a site should be allocated. A total of four potential development strategies were considered through the SA process covering a broad spectrum from a full environmental and brownfield focus to a full housing delivery focus. However, crucially under none of the options is it possible to achieve delivery of the total need for housing as set out under the standard method, by some margin².

Housing Supply 2023-2043 (number of dwellings likely to be delivered under each development strategy option)				
Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Completions 2023/24	368	368	368	368
Commitments	1,142	1,142	1,142	1,142
Broad locations considered suitable under the strategy option	1,003	2,406	2,406	2,406
Site allocations considered suitable for allocation under the strategy option	821	1,906	2,669	4,282
Small sites with the urban area	29	37	37	37
Windfall	1,360	1,360	1,360	1,360
Total housing supply	4,723	7,218	7,981	9,594
Supply against standard method plan requirement of 17,840	(13,117)	(10,622)	(9,859)	(8,246)

The chosen development strategy (Option 2) combines and balances key national and local objectives in the most effective way and overall represents the most appropriate strategy, when considered against the alternatives. The spatial distribution of development planned for through the chosen option focuses on the existing built areas across the Borough, notably Havant and Waterlooville town centres and less constrained greenfield land. On this basis, the Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum.

There is therefore an unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year). The submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance' of 1,900 dwellings – of which 70% equivalent to 1,330 dwellings would be apportioned to Havant Borough. This would increase overall supply to

² Further information can be found in Sustainability Appraisal which has been published as part of the Council's evidence base: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

8,548 dwellings over the plan period, and reduce unmet need to 9,292 dwellings (or 465 homes per year).

It should be noted this contribution can only be afforded limited weight and may change before the Plan has successfully passed through Examination. However, this obviously only represents a proportion of Havant Borough's unmet need, with a large amount remaining to be accommodated within neighbouring authorities which will need to be discussed through the Duty to Cooperate.

Under the Duty to Cooperate, the Borough Council is formally requesting Portsmouth City Council to assist in meeting the unmet housing need of at least 9,292 dwellings arising from Havant Borough. The Borough Council has approached its other neighbouring local authorities³, and local authorities within the same housing market area⁴ with the same request and I will keep you updated on progress with our negotiations. I am also mindful that there is unmet housing need arising from your authority and Gosport Borough within the same Housing Market Area.

Employment need and supply

The Council has now published an Employment Land Review (ELR) which provides an up-to-date assessment of the Borough's economic and employment development needs⁵. It identifies an objectively assessed need figure of 175,199 sq. m of net new floorspace over the plan period of which 139,140 sq. m results from industrial demand, and 36,059 sq. m for office demand.

The ELR indicates that the industrial market is strong across the Borough, but the market is constrained due to low levels of availability. The potential site allocations could help to address some of those supply constraints, but the Dunsbury Park Freeport Tax Site status means that the floorspace supply from Phase 3 cannot be relied on to meet general demand and local need for new floorspace. This is further compounded by a lack of office sites promoted to meet need and a number of allocated sites no longer available to meet the Borough's employment need⁶.

³ East Hampshire District Council, Portsmouth City Council, Winchester City Council and the South Downs National Park Authority

⁴ Fareham Borough Council and Gosport Borough Council

⁵ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

⁶ Kingscroft Farm (SHELAA Refs HA20 and ED09) and Brockhampton West (Ref ED14)

Overall demand and supply	2023-43 Sq m (GIA)
Industrial demand	139,140
Office demand	36,059
Gross demand	175,199
Industrial supply	121,475
Office supply	2,300
Total supply	123,775
Balance over (under) supply	-51,424

On this basis, the Borough has an unmet need of 51,424 sq. m for employment floorspace over the plan period. Of this, 17,665 sq. m is industrial demand and 33,759 sq. m is office demand.

Under the Duty to Cooperate, the Borough Council is formally requesting Portsmouth City Council to assist in meeting 51,424 sq. m of unmet employment need. The Borough Council will also be approaching our other neighbouring local authorities, and local authorities within the same travel to work area with the same request and I will keep you updated on progress with our discussions.

Joint working

Our authorities have a strong track record of working together through the Partnership for South Hampshire (PfSH) and on a bi-lateral basis. We look forward to continuing constructive and active discussions to effectively address unmet housing and employment development needs arising from Havant Borough.

Through our recent discussions and the PfSH Statement of Common Ground, we are content the City is making every effort to meet as much of its own housing and employment need. We look forward to discussing the collective unmet housing need in the Southeast Hampshire Housing Market Area on 17th June 2025. For completeness, please could you respond to the request for assistance no later than 10th July 2025. Please note that we may share your response with other duty to cooperate partners and publish it as part of our evidence base.

I look forward to receiving any consultation response to our Draft Local Plan consultation and progressing our discussions around a Statement of Common Ground in due course.

Yours sincerely

David Hayward

Strategic Planning Manager



Portsmouth City Council
Civic Offices
Guildhall Square
Portsmouth
PO1 2NE

David Hayward
Planning Policy Manager
Havant Borough Council

By email only:



21 August 2025

Dear David,

Re: Housing and employment need in Havant Borough and Portsmouth City

Thank you for your letter dated 12 June 2025 updating us on the progress of your Local Plan and raising the issue of unmet housing and employment needs.

I would like to commend you on the progress on the Havant Local Plan. We responded to your consultation on 01 July noting the constrained nature of the Borough with its limited areas for growth. The City Council is content that the Borough Council is making every effort to meet their development needs. Your comments on the unmet needs allowance in Winchester's emerging Local Plan are noted. We agree that the Winchester contribution to helping to meet Havant and Portsmouth's unmet housing need can only be given limited weight until the Winchester Local Plan has successfully passed examination.

Portsmouth City Council is also progressing its emerging Local Plan. We published it for Pre-Submission consultation in summer 2024, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Thank you for your response. We are now preparing an Addendum to the Local Plan, which will be the subject of a focussed Pre-Submission consultation in winter 2025. The Addendum has been prepared by the City Council following the Opinion given by central Government in February 2025 on the strategic site of Tipner West.

Boosting the supply of homes in the City is an important element of the new Portsmouth Local Plan and is in accordance with national policy. The City Council has carried out a thorough search for new housing sites in the City looking at all possible sources of supply in its Housing and Economic Land Availability Assessment (HELAA). This was updated in 2025 and will be published as a key part of the Core Document Library supporting the Local Plan Addendum consultation later this year.

The draft Portsmouth Pre-Submission Local Plan Addendum 2025 sets out a supply of land to accommodate 11,369 net additional homes in the City for the plan period 2025 to 2040 with a net annual provision of approximately 588 homes each year over the period 2025-2030 and a net annual provision of approximately 843 homes each year over the period

2030-2040. The housing need for the City using the new standard method is currently 1,019 homes per year. Over the plan period this is 15,285 new homes. Further comprehensive information on housing need in Portsmouth is set out in the Housing and Economic Development Needs Assessment (HEDNA) and its Update (2025), which will also be published as part of our Core Document Library later this year.

There is therefore an unmet housing need in the City of 3,916 homes over the plan period, which is 261 homes per year. The adopted Fareham Local Plan (2023) makes provision for 800 homes to help meet Portsmouth's identified need. This reduces the total unmet need in the City to 3,116 homes equating to 208 homes on an annualised basis.

The Duty to Cooperate is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004. It is also included within the National Planning Policy Framework and Planning Policy Guidance specifically in terms of planning strategically across local boundaries. Under the Duty to Cooperate, the City Council is formally requesting Havant Borough Council to assist in meeting the unmet housing need of Portsmouth of 3,916 homes. The City Council will also be approaching our other neighbouring local authorities with the same request, and I will keep you updated on progress with our negotiations. As Portsmouth cannot meet its own housing need, it cannot help Havant with its unmet housing need.

The draft Portsmouth Pre-Submission Local Plan Addendum 2025 sets out a supply of land to accommodate 138,746 m² of new employment floorspace in the City for the plan period 2025 to 2040. This is divided into 60,248 m² office floorspace, 14,118 m² research & development / industrial processes and 64,380 m² manufacturing / warehousing floorspace. There is an overall surplus of 31,261 m² of new employment floorspace, which is entirely office floorspace.

In your letter dated 12 June 2025, it is stated that the Borough has an unmet need of 51,424 m² of employment floorspace over the plan period of which 17,665 m² is industrial demand and 33,759 m² is office demand. The Borough Council formally requested Portsmouth City Council to assist in meeting 51,424 m² of unmet employment need. The City Council is happy to formally offer its surplus of 31,261 m² of office floorspace to meet unmet need in Havant Borough under the Duty to Cooperate. Both local authorities are in the same functional economic market area and this arrangement will help to create jobs and increase prosperity in south east Hampshire.

Finally, I would like to mention the work of Havant Borough Council, Gosport Borough Council and Portsmouth City Council on development needs which is currently being undertaken. It is pragmatic for the three authorities to work together because we are all at similar stages of local plan preparation, we all share the same housing market area and functional economic market area and we all have unmet housing need. The work is in line with the Duty to Cooperate and mindful of Devolution and Local Government Reorganisation. I look forward to progressing this work with both Havant and Gosport going forward.

Yours sincerely


Lucy Howard
Head of Planning Policy



Lucy Howard
Head of Planning Policy
Portsmouth City Council

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 10 September 2025

Dear Lucy

Re: Housing and employment need in Portsmouth City and Havant Borough

Thank you for your letter dated 21st August 2025 updating us on the progress of your Local Plan and formally requesting assistance from Havant Borough with Portsmouth's unmet housing need. We are delighted to receive Portsmouth's formal offer of assistance in meeting our unmet employment need and have set out further thoughts on this matter below.

We are pleased to see the progress that Portsmouth City Council is making with its emerging Local Plan and will look forward to formally responding to the Pre-Submission consultation on the Addendum to the Local Plan in due course. It is of course disappointing, from the perspective of meeting unmet housing need, to note the recent decisions regarding the proposed Tipner development. Thank you also for acknowledging the work that is being undertaken to ensure that every effort is being undertaken to meet Havant's own development needs.

We appreciate the thorough search that Portsmouth City Council has undertaken in looking at all possible sources of housing supply in its Housing and Economic Land Availability Assessment (HELAA). It is noted that the Pre-Submission Local Plan Addendum 2025 sets out a supply of land to accommodate 11,369 net additional homes in the City for the plan period 2025 to 2040, compared with the new standard method figure which is 15,285 new homes over the plan period. As a result, there is an unmet need in the City of 3,916 homes, which is 261 homes per year. It is also noted that the adopted Fareham Local Plan (2023) makes provision for 800 homes which reduces Portsmouth City's unmet need to 3,116 homes.

As you know, Havant Borough Council is in a position of being unable to meet its own housing need. As Havant Borough cannot meet its own housing need, it cannot help Portsmouth City with its unmet housing need. We have similarly approached neighbouring local authorities, and all authorities in the Portsmouth Housing Market Area (HMA) and will keep you updated on the progress of our negotiations. We are also commenting on local plans within the Hampshire and the Solent devolution area, as these will be covered by the same Spatial Development Strategy. As you know, both of our authorities also have an

interest in the outcome of the Examination of the Winchester Local Plan, which includes an unmet needs allowance apportioned between Portsmouth and Havant. This may reduce the extent to which we our authorities will need to request further contributions from Winchester City Council and other authorities moving forwards.

Thank you for providing us with an update on your employment evidence base. We are really pleased that you can offer assistance with Havant's unmet employment need, particularly Portsmouth's surplus of 31,261 m² of office floorspace. Whilst Havant's overall demand for office floorspace may change between now and when the Plan is submitted for Examination, Portsmouth's unmet need contribution will effectively reduce our unmet need for office floorspace to 2,498m². It will reduce our overall unmet need for employment need by 60%. The Borough Council would like to formally express our thanks for the positive collaboration that has brought us to this point and for the accommodation of a sizeable proportion of unmet employment need. We look forward to formalising this as part of an updated bi-lateral Statement of Common Ground between our two authorities in due course.

We are also really pleased that you have recognised the ongoing work of Portsmouth City Council, Gosport Borough Council and Havant Borough Council to collectively discuss development needs. Our three authorities have already made significant progress to quantify our collective development needs in a short amount of time, which will be invaluable for discussions with our neighbouring authorities in the same housing market area and functional economic market areas moving forwards.

Yours sincerely

David Hayward

Strategic Planning Manager

cc Jayson Grygiel
Manager of Planning Policy
Gosport Borough Council

Statement of Cooperation | June 2026

South Downs National Park Authority

Mike Hughes
Interim Head of Planning
South Downs National Park Authority

Enquiries to:
Direct line:
Email:

Alex Robinson

Date:

5th March 2024

By email only:

Dear Mike,

HAVANT BOROUGH'S EMERGING LOCAL PLAN – DUTY TO COOPERATE

Many thanks to your officers who met with my colleagues on 3 November 2023 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of Havant Borough's Local Plan, and its housing need and supply position. This follows the approval of the Partnership for South Hampshire (PfSH) Spatial Position Statement (SPS) at Joint Committee on 6 December 2023.

As you are aware, Havant Borough Council is currently preparing a new Local Plan. We recently published an updated Local Development Scheme (LDS) which indicates that we will be publishing a draft (Regulation 18) Local Plan in Quarter 4 of 2024.

The LDS can be viewed here:

<https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-development-scheme-lds>.

Havant Borough Council is a pro-development local authority with an ambitious regeneration agenda. We are keen to deliver this alongside other objectives such as delivering more affordable housing for our communities and addressing international issues such as climate change. Havant Borough values partnership working through PfSH which allows us to be able to work positively and proactively on cross boundary issues and looks forward to continuing working with the National Park Authority to deliver strategic priorities including meeting the development needs of our two areas, whilst conserving and enhancing the natural beauty of the South Downs National Park.

As with most urban local planning authorities in the Southeast, one of the biggest challenges for the new Local Plan will be to meet Havant's own development needs. The Inspectors' Interim Findings¹ in respect of the previous Local Plan acknowledged that Havant may be an authority that cannot sustainably meet its housing needs in accordance with paragraph 11 b)

¹ <https://www.havant.gov.uk/media/8718>

of the National Planning Policy Framework (NPPF) (see paragraph 52). Nevertheless, the Council's starting point is that no stone will be left unturned in order to meet its own need.

Whilst Havant's evidence base on housing supply is emerging, the attached plan from the Council's draft Constraints Study illustrates the very constrained supply of land in Havant Borough. The least constrained areas shown are already identified for development, notably that of the Dunsbury Park tax site which is part of the Solent Freeport, and Havant Thicket Reservoir which serves a sub-regional function, stretching far beyond Havant Borough's boundaries.

Housing Need and Supply

The NPPF makes clear that in order to significantly boost housing supply, the standard method is an advisory starting-point for establishing a housing requirement for an area. Applying a housing need figure of 516 dwellings², there is a need for 10,320 dwellings in Havant Borough over a Local Plan period to 2043 (see table below).

The Council has undertaken a comprehensive and robust assessment of the following sources of supply to assess how far it is able to meet its own housing need:

- Outstanding planning permissions as of 1 April 2023;
- Adopted Local Plan allocations without planning permission;
- Potential housing sites³; and
- Windfall development⁴.

Our work on the previous Local Plan and the Inspectors' interim findings report clearly signal a need for robust evidence and including that sites should meet the NPPF definition of 'developable'. For this reason, it will not be possible to rely on any housing delivery from Havant and Waterlooville town centres until evidence of deliverability is more advanced. In any case, development in these locations will be unlikely to be sufficient in scale to close the gap between the Borough's objectively assessed need and identified housing supply. The Council will keep all sources of housing supply up to date and robust in order to demonstrably ensure that every effort is made to address housing need within the Borough's boundary.

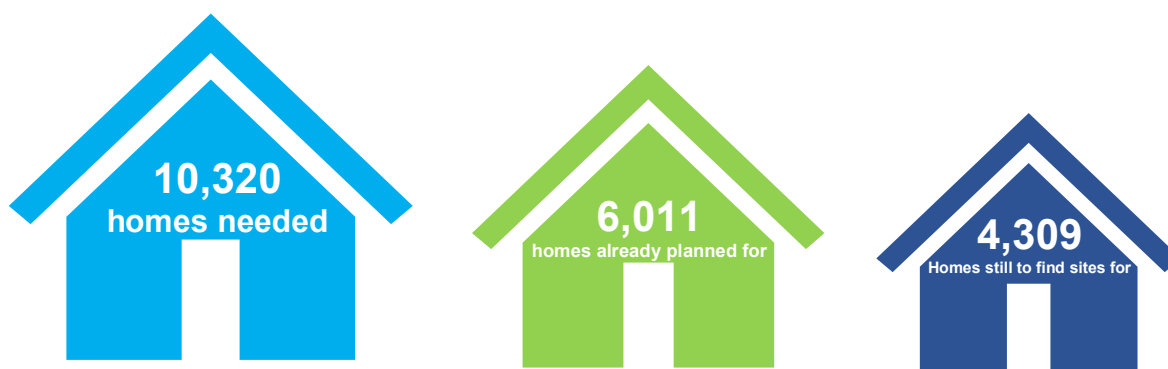
² The standard method calculation of 516 dwellings per annum (dpa) is used from 2022, though the standard method need calculation for 2024 is 512 dwellings per annum prior to the publication of the 2023 affordability ratio which is due to be published in March 2024. The former is used as a worst case scenario.

³ Identified by Table 1 of the Council's [Housing Delivery Position Statement](#)

⁴ The Council's evidence on windfall development will be updated to inform the new Local Plan.

	Identified housing need (2022/23-2042/43)	Net Dwellings Completed or Committed
	10,320	
Completions 2022-23		495
Outstanding planning permissions at 1/4/23		1,524
Allocations in Adopted Local Plan without planning permission		606
Potential housing sites		1,524
Potential housing sites where previous Inspectors' raised deliverability concern		700
Windfall Development		1,162
Total		6,011
Remaining objectively assessed housing (unmet need)	4,309	

Against a standard method figure of 10,320 dwellings, the Council is only able to identify a supply of 6,011 dwellings over the plan period. **This results in an unmet housing need figure of 4,309 dwellings.**



All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply. We will be continuing to reach out to the development industry and landowners to ascertain whether there are any further sites which could be available for development and be assessed as part of the plan-making process – our Call for Sites has recently been relaunched on our website. However, given the extent of the very constrained supply of land, there will likely be insufficient capacity to meet objectively assessed need within the Plan area.

Employment Need and Supply

Havant's constrained land supply will also mean it is extremely challenging for the Borough to identify sufficient sites to meet employment need. The Council has commissioned an

Employment Land Review, building upon the 2021 PfSH Economic, Employment and Commercial Needs Study⁵. This will confirm whether Havant has sufficient employment land to meet its own development needs or will need to formally request assistance from its neighbours to accommodate any unmet need. We will keep you up to date with the progress of our evidence base on employment land supply.

South Downs Local Plan Review

We are aware that you are in the very early stages of updating the Authority's Local Plan, working towards a draft plan for a Regulation 18 consultation in early 2025.

Havant Borough recognises the South Downs National Park is a landscape designation of national importance. It is acknowledged that there is no standardised approach to reaching a housing requirement for the National Park, and that development capacity within the Park will ultimately be influenced by the ability of the landscape to accommodate change whilst conserving and enhancing its landscape and scenic beauty. We are also mindful that the Park is likely to have an unmet housing need.

Nevertheless, we are also aware that there will need to be bi-lateral discussions on meeting housing need with neighbouring authorities where the Park covers part of their area.

Joint working

Havant Borough is keen to continue an open and collaborative dialogue about addressing unmet housing need from both of our administrative areas. While the Authority is not a member of the Partnership for South Hampshire (PfSH), the PfSH Spatial Position Statement highlights the scale of unmet need that exists across the South Hampshire. It is therefore important that there continue to be constructive and active discussions to effectively address this matter. As such, an updated statement of common ground will need to be agreed between our authorities in order to demonstrate that this matter is appropriately addressed by our respective local plans.

We are conscious of the proposed repealing of the duty to cooperate and its proposed replacement with an alignment policy. Whilst the detail of such a test is not yet known, the Government has made clear that cross-boundary working on strategic priorities, including unmet need will remain. Therefore, the Borough Council's position is we should ensure compliance with the existing legislation up to the point that the process changes.

You will be aware of the work that has been undertaken between our two authorities to address the duty to co-operate in recent years. Moving forwards, we seek to undertake a series of detailed discussions with yourselves as our respective plans progress, in order to ensure that unmet need and other cross-boundary matters are robustly addressed. Going forwards it is the Council's intention to agree an updated statement of common ground in support of our respective local plans.

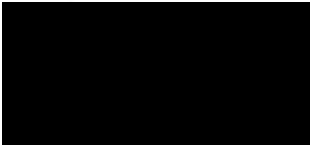
The NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. Havant Borough will require

⁵ push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf

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. Notwithstanding any unmet need that may arise from the National Park, I am dutybound to ask whether your authority is able to accommodate any of Havant Borough's unmet housing need?

I would like to request a meeting to discuss how this matter and would be grateful if you could please advise of your availability by return. I look forward to hearing from you on this important issue and would be grateful for a response by **28 March 2024**.

Yours sincerely



Alex Robinson
Executive Head of Place

Cc Claire Tester

13 March 2024

Alex Robinson
Executive Head of Place
Havant Borough Council
By email only to [REDACTED]

Dear Alex

Havant Borough's Emerging Local Plan – Duty to Cooperate

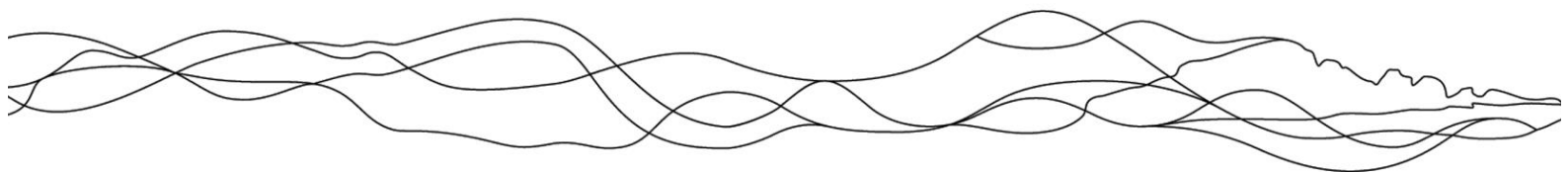
Thank you for your letter dated 5th March 2024 about the progression of your Local Plan and identified unmet needs for homes and potentially employment space. Mike Hughes has asked me to respond.

The SDNPA is at the early engagement and evidence gathering stage of its Local Plan Review. The timetable was agreed at our full [National Park Authority meeting on 14 December 2022](#) which see us at Regulation 18 stage early 2025, Regulation 19 stage early 2026 and submission stage mid 2026.

A housing and economic development need assessment (HEDNA) has been prepared for the National Park using a locally derived methodology for housing need as recommended by Planning Practice Guidance. This HEDNA is available on our website at [Housing and Economic Development Needs Assessment 2023 - South Downs National Park Authority](#)

In addition, a call-for-sites for development, biodiversity net gain offsetting, nutrient offsetting and renewable energy was carried out in Summer 2022; assessments of these sites are underway and we hope to publish this Land Availability Assessment later this Spring, at [Land Availability Assessment \(LAA\) - South Downs National Park Authority](#). Other evidence base studies and statutory assessments are also being progressed. Over the next six months we will be working up potential allocations and policies for inclusion in a draft Plan for consideration by our members in the Autumn of 2024. Until this work is complete we will not know if we are able to meet the needs identified in the HEDNA.

At present we are assuming that the Local Plan Review will progress under the new planning system introduced under the Levelling Up and Regeneration Act 2023, but this depends on the progress Government makes this year with secondary legislation, guidance and National Development Management Policies. A report setting out our approach to preparing a Local Plan in this dynamic national context is going to our members tomorrow and is available on our website at [Planning Committee 14 March 2024 - South Downs National Park Authority](#). Appendix IC is a Cooperation and Alignment Strategy setting out how we intend to meet the Duty to Cooperate and its successor the Alignment Test.



Paragraph 182 of the December 2023 NPPF states that national parks have the highest status of protection in relation to landscape and scenic beauty, and that the scale and extent of development within all these designated areas should be limited. The PPG also says national parks “are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas” (Paragraph: 041 Reference ID: 8-041-20190721).

Paragraph 28 of the National Parks Vision and Circular 2010 says the Authorities’ primary responsibility is to deliver their statutory purposes. Furthermore, Section 245 of the Levelling Up and Regeneration Act 2023 requires all relevant authorities, including Havant Borough Council, to seek to further the purposes of the National Park. These purposes are:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

For the above reasons it is unlikely that the South Downs National Park will be able to accommodate any unmet need arising in Havant Borough.

However, we can confirm that we are committed to continued liaison and joint working towards achieving effective outcomes and I would be happy to meet with you to explore opportunities further, including signing a Statement of Common Ground.

My current availability is set out in the covering email.

Yours sincerely



Claire Tester
Planning Policy Manager

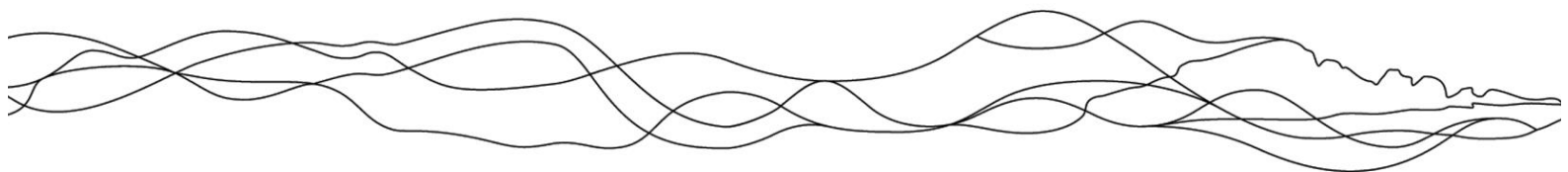


South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive (Interim): Tim Slaney



Tim Slaney, Claire Tester
South Downs National Park Authority

By email only:

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 12th June 2025

Dear Tim and Claire

UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

In advance of our meeting scheduled to take place on 23rd June, the purpose of this letter is to formally update you on the progress of the Council's Local Plan – the Building a Better Future Plan, including the latest position on our housing and employment development needs. This follows our letter dated 5th March 2024 which formally requested assistance with our unmet housing needs, as well as highlighting the work being undertaken to update the Council's employment evidence base.

As you may be aware, the Council is currently consulting on the full draft (Regulation 18) Building a Better Future Plan which closes on 1st July 2025.

Housing need and supply

As you will be aware, the Council's starting point is that it will leave no stone unturned in order to meet its own housing need. However, as demonstrated by the Constraints Study¹ there is also a very constrained supply of land in Havant Borough with the least constrained areas already identified for development.

Our previous letter dated 5th March 2024 identified an unmet housing need of 4,309 homes between 2022 to 2043. Significantly however, that was under the previous standard method figure of 516 dwellings per annum, equivalent to 10,320 dwellings between 2023 and 2043. The publication of the new standard method in December 2024 means that the Borough's need has increased to 892 dwellings per annum, equivalent to 17,840 homes over the plan period (2023 to 2043).

Given the expected lack of suitable land within the Borough with development potential to meet identified housing need, the Strategic Housing and Economic Land Availability Assessment (SHELAA) includes a comprehensive and robust assessment of all land in the

¹ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

Borough to ensure the Council has fully examined all opportunities for development, and has been published alongside the full draft (Regulation 18) Local Plan for consultation.

The SHELAA concludes there is a developable housing supply of 7,981 dwellings between 2023 and 2043. However, the SHELAA does not take account of the development strategy, nor the Sustainability Appraisal which is undertaken to determine whether a site should be allocated. A total of four potential development strategies were considered through the SA process covering a broad spectrum from a full environmental and brownfield focus to a full housing delivery focus. However, crucially under none of the options is it possible to achieve delivery of the total need for housing as set out under the standard method, by some margin².

Housing Supply 2023-2043 (number of dwellings likely to be delivered under each development strategy option)				
Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Completions 2023/24	368	368	368	368
Commitments	1,142	1,142	1,142	1,142
Broad locations considered suitable under the strategy option	1,003	2,406	2,406	2,406
Site allocations considered suitable for allocation under the strategy option	821	1,906	2,669	4,282
Small sites with the urban area	29	37	37	37
Windfall	1,360	1,360	1,360	1,360
Total housing supply	4,723	7,218	7,981	9,594
Supply against standard method plan requirement of 17,840	(13,117)	(10,622)	(9,859)	(8,246)

The chosen development strategy (Option 2) combines and balances key national and local objectives in the most effective way and overall represents the most appropriate strategy, when considered against the alternatives. The spatial distribution of development planned for through the chosen option focuses on the existing built areas across the Borough, notably Havant and Waterlooville town centres and less constrained greenfield land. On this basis, the Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum.

There is therefore an unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year). The submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance' of 1,900 dwellings – of which 70% equivalent to 1,330 dwellings would be apportioned to Havant Borough. This would increase overall supply to 8,548 dwellings over the plan period, and reduce unmet need to 9,292 dwellings (or 465 homes per year).

² Further information can be found in Sustainability Appraisal which has been published as part of the Council's evidence base: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

It should be noted this contribution can only be afforded limited weight and may change before the Plan has successfully passed through Examination. However, this obviously only represents a proportion of Havant Borough's unmet need, with a large amount remaining to be accommodated within neighbouring authorities which will need to be discussed through the Duty to Cooperate.

Under the Duty to Cooperate, the Borough Council is formally requesting the South Downs National Park Authority to assist in meeting the unmet housing need of at least 9,292 dwellings arising from Havant Borough. The Borough Council has also approached its other neighbouring local authorities, and local authorities within the same housing market area with the same request and I will keep you updated on progress with our negotiations. I am also mindful that there is unmet housing need arising from Portsmouth City and Gosport Borough respectively within the same Housing Market Area.

Employment need and supply

The Council has now published an Employment Land Review (ELR) which provides an up-to-date assessment of the Borough's economic and employment development needs³. It identifies an objectively assessed need figure of 175,199 sq. m of net new floorspace over the plan period of which 139,140 sq. m results from industrial demand, and 36,059 sq. m for office demand.

The ELR indicates that the industrial market is strong across the Borough, but the market is constrained due to low levels of availability. The potential site allocations could help to address some of those supply constraints, but the Dunsbury Park Freeport Tax Site status means that the floorspace supply from Phase 3 cannot be relied on to meet general demand and local need for new floorspace. This is further compounded by a lack of office sites promoted to meet need and a number of allocated sites no longer available to meet the Borough's employment need⁴.

Overall demand and supply	2023-43 Sq m (GIA)
Industrial demand	139,140
Office demand	36,059
Gross demand	175,199
Industrial supply	121,475
Office supply	2,300
Total supply	123,775
Balance over (under) supply	-51,424

³ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

⁴ Kingscroft Farm (SHELAA Refs HA20 and ED09) and Brockhampton West (Ref ED14)

On this basis, the Borough has an unmet need of 51,424 sq. m for employment floorspace over the plan period. Of this, 17,665 sq. m is industrial demand and 33,759 sq. m is office demand.

Under the Duty to Cooperate, the Borough Council is formally requesting the South Downs National Park Authority to assist in meeting 51,424 sq. m of unmet employment need. The Borough Council will also be approaching our other neighbouring local authorities, and local authorities within the same travel to work area with the same request and I will keep you updated on progress with our discussions.

Joint working

Our authorities have a strong track record of working together and we look forward to constructive and active discussions to effectively address unmet development needs arising from Havant Borough. We also acknowledge that paragraph 189 of the 2024 National Planning Policy Framework states that national parks have the highest status of protection in relation to landscape and scenic beauty, and that the scale and extent of development within these designated areas should be limited.

In your response to this request for assistance, please could you set out the process by your authority will look to respond to the high level of unmet housing and employment need arising from Havant Borough. It is recognised this may need to take a staged approach depending on the progress of your local plan, and its supporting evidence. A further meeting can be arranged if it would be useful to explore this further. Please could you respond no later than 10th July 2025. Please note that we may share your response with other duty to cooperate partners and publish it as part of our evidence base.

I look forward to receiving any consultation response to our Draft Local Plan consultation and progressing our discussions around a Statement of Common Ground in due course.

Yours sincerely

David Hayward

Strategic Planning Manager

26 June 2025

David Hayward
Strategic Planning Manager
Havant Borough Council

SENT BY EMAIL

Dear David

Re: Update from Havant Borough Council regarding assistance with unmet housing and employment need under the duty to cooperate.

Thank you for your letter dated 12 June 2025 in relation to Havant Borough Council's formal request of the South Downs National Park Authority to assist in meeting the unmet need of 9,292 dwellings and 51,424sqm employment floor space arising from Havant Borough.

We appreciate there is a lack of suitable land within Havant Borough to meet residential and employment needs. The Havant Borough Sustainability Appraisal sets out four development options – ranging from a brownfield focus to a full housing delivery focus – and none of these options can meet identified needs given the constraints set out in the Havant Borough Constraints Study (i.e., flood risk and national designations etc.).

The South Downs National Park Authority (SDNPA) previously explained in its letter dated 13 March 2024 that it was unlikely that the National Park would be able to accommodate any unmet needs arising from Havant Borough. In light of updated national planning policy and the evolving evidence base of the South Downs Local Plan Review, it is with regret that we must confirm that the **National Park will not be able to accommodate any unmet needs arising from Havant Borough**. The collective reasons for this are as follows:

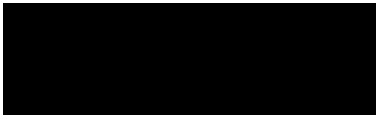
- The **National Parks and Access to the Countryside Act 1949** – as amended by Section 245 of the Levelling Up and Regeneration Act 2023 – requires all relevant bodies to seek to further the purposes of the South Downs National Park. These purposes are to conserve and enhance the natural beauty, wildlife, and cultural heritage of the area; and to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- The **DEFRA Circular for English National Parks and the Broads (2010)** recognises that National Parks are not suitable locations for unrestricted housing – see Paragraph 78.
- The **National Planning Policy Framework (NPPF)** explains that the scale and extent of development within protected landscapes should be limited – see Paragraph 189.
- The **National Planning Practice Guidance (PPG)** explains that National Parks are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas – see Paragraph 041, Reference ID 8-041-20190721.

- The SDNPA is “leaving no stone unturned” in the preparation of the South Downs Local Plan Review and is working with neighbouring authorities (such as East Hampshire and Winchester Councils) to understand how standard method figures could be apportioned between areas inside and outside of the National Park. Although this work is still ongoing, it is clear from the emerging evidence base of the South Downs Local Plan Review that the National Park will not be able to deliver enough homes to meet the equivalent of the standard method within its boundary.

Although we are not able to accommodate any unmet needs arising from Havant Borough, we are committed to continuing liaison and joint working with Havant Borough Council towards achieving effective outcomes, including the signing of a Statement of Common Ground (SoCG). Further comments are set out in the SDNPA’s formal response to the Regulation 18 consultation of the Havant Borough Local Plan 2043.

We wish you well with the progression of your local plan.

Yours sincerely



Claire Tester MRTPI
Planning Policy Manager
South Downs National Park Authority
Contact: Lewis Ford, Senior Planning Policy Officer

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810
E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Siân McGeever

Claire Tester
Planning Policy Manager
South Downs National Park Authority

Enquiries to: David Hayward
Direct line: [REDACTED]
Email: [REDACTED]
My reference:
Your reference:
Date: 10 September 2025

Dear Claire

RE: UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Thank you for meeting us to discuss unmet housing and employment need at our recent Duty to Cooperate meeting on the 23rd June 2025. This formed part of a series of Duty to Cooperate discussions with our neighbouring authorities and those within the Housing Market Area, including East Hampshire and Winchester Districts which are partly covered by the National Park.

Thank you also for your response dated 26th June 2025 which confirms that the National Park will not be able to accommodate any unmet needs from Havant Borough. We note the collective reasons for this, and appreciate that it would be unreasonable for the South Downs National Park to plan for unmet needs from neighbouring areas on this basis.

The responses to our recent request for assistance from East Hampshire and Winchester highlight the implications of the increase to housing need figures as a result of the 2024 standard method, and the resulting level of development that has to be planned for. As such, we welcome the South Downs National Park's commitment to "leaving no stone unturned" in the preparation of the South Downs Local Plan Review.

Whilst we acknowledge that the South Downs National Park Authority is unable to accommodate any unmet needs arising from Havant Borough, we welcome the National Park's commitment to continuing liaison and joint working. We look forward to continuing dialogue with the National Park Authority on strategic cross boundary matters as our plans progress. May I suggest a further meeting to discuss a joint Statement of Common Ground in support of our respective Regulation 19 Local Plan consultations?

Yours sincerely

David Hayward

Strategic Planning Manager

Claire Tester MRTPI
Planning Policy Manager
South Downs National Park Authority

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 28 November 2025

Dear Claire

Housing Need in the South Downs National Park

Thank you for your letter dated 19th November 2025 updating us on the progress of your Local Plan and formally requesting assistance from Havant Borough Council with the National Park's unmet housing need.

We are pleased to see the progress that the South Downs National Park Authority is making with its emerging Local Plan, notably the two new studies on housing need which produce two different need figures for the National Park. We also note that you will shortly be publishing an updated Land Availability Assessment and will look forward to responding to your Regulation 19 Local Plan consultation in due course.

Thank you for confirming that the South Downs would be able to meet the IcenI housing need figure of 323 homes per year based on the 2023 Housing and Economic Development Needs Assessment produced by IcenI. We also note that the earlier AECOM study, points to a significantly higher need figure of 1,048 homes per year which the National Park would not be able to meet.

In the event that the Planning Inspectorate concludes that the AECOM method for calculating housing need is the sound approach, we note your formal request to accommodate unmet housing needs of the National Park within Havant Borough. As you know, Havant Borough Council is in a position of being unable to meet the Borough's own housing need by a wide margin. As Havant Borough cannot meet its own housing need, it cannot help South Downs National Park Authority with its unmet housing need.

We have similarly approached neighbouring local authorities and those within the Housing Market Area, notably Chichester District Council, East Hampshire District Council and Winchester City Council. Significant parts of these Districts are of course covered by the South Downs National Park. We will keep you updated on the progress of our negotiations with these authorities. However, at this stage you will be aware that we have an interest in the outcome of the Winchester Local Plan Examination, which includes an unmet needs allowance for Havant. This has reduced significantly from when the Plan was submitted but

currently stands at 346 dwellings¹ based on the Proposed Main Modifications. This compares with our unmet need position of at least 10,622 dwellings.

Gypsy and Traveller Accommodation

Thank you for updating us on your position regarding Gypsy and Traveller and Travelling Showpeople Accommodation and your recent 'call for sites'.

By way of background, the Council's 2024 Gypsy and Traveller Accommodation Assessment concludes that there is no identified unmet need for Gypsy and Traveller pitches or Travelling Showpeople plots within Havant Borough. Though the 2017 joint GTAA did identify that Havant Borough had a need to provide 1 pitch, this need has now been met through a permission for 2 pitches at a site in Long Copse Lane in northern Emsworth. The Draft Local Plan proposes to safeguard this site for current need. For completeness, we can also confirm we have not had any potential gypsy or traveller sites submitted for consideration through the local plan.

The Council is currently in the process of procuring an addendum to the Gypsy and Traveller Accommodation Assessment and we will be happy to keep you updated on the progress of this.

In terms of our ability to assist with the need for meeting Gypsy and Traveller Accommodation, Havant Borough is significantly constrained, with limited land available for development. As set out above, Havant Borough is unable to meet its own general housing need. For this reason, Havant Borough is unable to assist with the unmet gypsy and traveller needs arising from the South Downs National Park at this time.

Nevertheless, we welcome the Authority's willingness to continue dialogue with us and our respective Local Plans. We will look forward to preparing a Statement of Common Ground to support our respective Regulation 19 Local Plan consultations in due course.

Yours sincerely

David Hayward

Strategic Planning Manager

¹ MM49 <https://www.localplan.winchester.gov.uk/assets/inline/2683/Schedule-of-Proposed-Main-Modifications.pdf>

Winchester City Council



David Hayward
Havant Borough Council
Civic Offices
Civic Centre Road
Havant
PO9 2ER
United Kingdom

16 August 2023

Dear David Hayward

Thank you for your cooperation so far with the Winchester City Council Local Plan Review and your response to the draft plan Regulation 18 consultation. As you know, the Council has a statutory duty under the Planning and Compulsory Purchase Act 2004 (as amended) to maintain an up-to-date Local Development Scheme (LDS) which currently states that the Council are due to consult upon the Regulation 19 document this year. Unfortunately, this timeline is no longer achievable due to a number of factors that are outside of the Council's control. Reasons for this have been set out within a recent Cabinet report and described in recent press release that can be found here: [Local Plan timetable reviewed and work outlined to produce a sound plan - Winchester City Council](#)

On the 10 August, our Members resolved to amend the timetable for the Local Plan review¹ consequently adjusting the Regulation 19 consultation timing until quarter 2 of 2024. The updated timetable can be found in Appendix 2 of the following link to the Cabinet report:

<https://democracy.winchester.gov.uk/documents/g4402/Public%20reports%20pack%2010th-Aug-2023%2010.00%20Cabinet%20Committee%20Local%20Plan.pdf?T=10>) –

issues concerning Gypsy and Travellers and the Duty to Cooperate/Statement of Common Ground highlighted by PINS during a Local Plan advice meeting are outlined below.

Gypsy and Traveller / Travelling Showpeople (GTTS) Accommodation

One particular issue the Council wishes to address is that of Gypsy and Traveller accommodation need. As part of the previous Local Plan, a Gypsy and Traveller DPD² was prepared in order to support policy on site delivery within the district. Though helpful in accommodating the assessed need through safeguarding, expansion, and allocation of sites, the document and evidence base used to inform the need has since

¹ <https://democracy.winchester.gov.uk/documents/g4402/Decisions%2010th-Aug-2023%2010.00%20Cabinet%20Committee%20Local%20Plan.pdf?T=2>

² <https://www.localplan.winchester.gov.uk/LibraryAssets/attach/130/rebrandGypsy-and-Traveller-DPD-adoption-version-11-.pdf>

undergone an update (due to the passage of time) to support the Local Plan review. In addition to this, a key piece of the evidence base to establish need, that has been updated, is the Gypsy and Traveller Accommodation Assessment.

Gypsy and Traveller Accommodation Assessment (GTAA)

As part of the review of the Local Plan, Opinion Research Services (ORS) were appointed to prepare a Gypsy and Travellers Accommodation Assessment (GTAA)³. The GTAA breaks down the overall GTTS need into 4-year bands. The current need takes into account unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households and movement from bricks and mortar in the first 4 years. The total net new household formation is then applied proportionately across the remaining 4-year bands. The GTAA identifies an overall need for:

- 115 pitches for for Gypsy and Travellers that met the PPTS planning definition of a traveller
- 85 pitches for Gypsy and Travellers that at the time of preparing the GTAA did not meet the planning definition of a traveller
- 27 plots for Travelling Showperson's

Gypsy and Traveller Pitch Deliverability Assessment

ORS were also appointed to prepare a Pitch Deliverability Assessment (PDA)⁴ with the objective to provide advice on the suitability, availability, and achievability of any existing private Gypsy and Traveller sites (with permanent planning permission) to assist in meeting the identified accommodation needs (as outlined above) for Gypsies and Travellers.

The PDA recommended a potential solution to meet the need for circa. 20 additional pitches is via intensification/expansion; this could be achieved through either site allocation or could come forward as windfall development. It is assumed that the remainder of the need (i.e., the assessed need of those meeting the definition within the PPTS) could be delivered through the windfall process. The Council have also carried out a number of Call for Sites exercises, resulting in only a single site that unfortunately, does not appear to have significant development potential.

Definition of Gypsy, Travellers, and Travelling Showpeople, PINS Advice, and Unmet Need

The recent *Smith* decision by the Court of Appeal which determined that the planning policy definition of Gypsies and Travellers discriminates against disabled and elderly members of the community⁵ has led the Council to seek advice from the Planning

³ <https://www.localplan.winchester.gov.uk/LibraryAssets/attach/112/2022-10-31-Winchester-GTAA-Final-Report.pdf>

⁴ <https://www.localplan.winchester.gov.uk/LibraryAssets/attach/113/2022-10-31-Winchester-Pitch-Deliverability-Assessment-Final-Report.pdf>

⁵ [Lisa Smith v Secretary of State for Levelling Up, Housing & Communities & Anor. - Find case law \(nationalarchives.gov.uk\)](https://www.nationalarchives.gov.uk/courts/cases/lisa-smith-v-secretary-of-state-for-levelling-up-housing-and-communities-anor/)

Inspectorate as part of a Local Plan review advisory session. Although the decision runs contrary to the definition set out within Annex 1 of the PPTS⁶ (notwithstanding para. 134 of the judgement confirms the decision relates specifically to the case and does not amend the current definition) no further guidance update has been published. The Council understands from speaking to the *Department of Levelling up, Housing and Communities* that Ministers are currently considering their response to the judgement. Should an amendment occur to the existing definition of Gypsy and Travellers to align with the *Smith* decision, the Council will review the implications of this as necessary.

Based on advice received from an Inspector at the recent PINS Advisory meeting, the Council is aiming to assess the impact of the court decision in terms of overall need and will need to be able to demonstrate at the examination how all potential sources of supply have been exhausted. The Inspector further advised the Council to raise this matter with neighbouring authorities to establish if they might be willing or able to take some of the unmet Gypsy and Traveller need through the Duty to Cooperate.

Consequently, the Council requests your response under the Duty to Cooperate on whether your authority might be in a position to assist with meeting the need set out within the GTAA given that the Council is currently unable to identify how this need can be met. For this purpose, it would be helpful to consider the following:

- Whether your authority is in a position to assist, and the mechanism through which this could be delivered
- If your authority is able to assist in meeting some of the Council's Gypsy and Traveller need, how much of this need would it be able to deliver
- Details of suitable sites in your plan area to meet the need, and a possible timeline for delivery
- The stage you are at in the plan-making process

The Council requests that you review the above information and respond accordingly confirming your authority's position and whether it is able to assist in the Council's delivery of Gypsy and Traveller sites. It is appreciated that your authority may not be in a position to do so but given the Duty to Cooperate requirements including the demonstration of the soundness test that will allow the Council to proceed to the examination of the Local Plan, could you please provide appropriate evidence (such as land availability assessments) to sufficiently demonstrate why your authority cannot assist.

Duty to Cooperate and Statement of Common Ground (SoCG)

You will be aware that under the Duty to Cooperate requirements, the Council must engage with neighbouring authorities on strategic cross-boundary matters, looking to resolve these through a Statement of Common Ground. The Council has entered into a number of SoCG with different authorities and is in the process of reviewing these to establish their appropriateness. In the event that the existing SoCG is adequate, it would be necessary in order to meet Duty to Cooperate obligations, to note that

⁶ [Title \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

meetings have taken place and that both parties agree to the adequacy of the existing SoCG (in the context of the passage of time), with other SoCG requiring an update.

The Council is therefore going to contact you shortly with proposed dates to set up Duty to Cooperate meetings with the intention of entering into a SoCG.

The Council would like to work with you in a constructive manner to identify a list of matters and help us to identify any issues that you feel would be appropriate to be included in the SoCG. Further to this, it would be appreciated if you could provide contact details for the relevant officer leading on your Duty to Cooperate.

The Council appreciates your assistance in these matters and would like to thank you in advance for your response. It is requested that a response is received by Monday September 11.

Should you have any issues with the above, or would like to discuss matters prior to meeting, please do get in touch with either myself or Adrian Fox

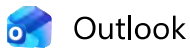
[REDACTED]

Yours sincerely

Adam Bennett
Strategic Planning Officer

Winchester City Council
Colebrook Street
Winchester, SO23 9LJ

[REDACTED]



RE: Gypsy and Traveller unmet need response

From Ellis, Jade [REDACTED]
Date Thu 2024-01-04 13:52
To Adam Bennett [REDACTED] Hayward, David [REDACTED]
Cc Adrian Fox [REDACTED] Steve Opacic [REDACTED]

Hi Adam

I'm very well thank you. I hope you're well and enjoyed a lovely Christmas.

Apologies for not responding to you sooner on this matter. Our GTAA is in the final stages of a draft which confirms that our need is effectively met by the existing permission, and there is no new arising need over the plan period.

In terms of our ability to assist with the need for meeting GTAA – this is likely be challenging. As you know from our emerging Constraints Study, Havant Borough is constrained which will significantly limit our ability to meet general housing need. As such, we are unable to assist in addressing the unmet need arising within Winchester District at this time.

Please let me know if you have any queries or wish to discuss at all.

Many thanks, Jade

Jade Ellis

Principal Planning Policy Officer | [REDACTED]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

Advanced notice of leave: None upcoming



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If you are not the intended recipient, please notify the sender, and please delete the message from your system immediately.

From: Adam Bennett [REDACTED]
Sent: 13 December 2023 09:06
To: Hayward, David [REDACTED] Ellis, Jade [REDACTED]
Cc: Adrian Fox [REDACTED] Steve Opacic [REDACTED]
Subject: Gypsy and Traveller unmet need response

CAUTION: This email came from outside of the council - only open links and attachments that you're expecting.

Morning both – I hope you are well; I am just going through our records in advance of producing the draft SoCG. Apologies if I have missed this but I cannot find a response to the Gypsy and Traveller unmet needs

letter previously sent. At our DtC meeting I believe we were awaiting the publication of your GTAA but had a draft version in place; has this been completed?

Is it still the case that there is a demonstrable need of one site over the planning period of which is existing and has planning permission? In light of there being no increased need, is there potential for any land to come forward and assist in meeting the WCC unmet need?

Let me know if there are any issues.

Regards

Adam Bennett
Senior Planning Officer
Winchester City Council
Colebrook Street
Winchester, SO23 9LJ



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Dawn Adey
Strategic Director of Place
Winchester City Council

Enquiries to: Alex Robinson
Direct line: [REDACTED]
Email: [REDACTED]
Date: 5th March 2024

By email only:
[REDACTED]

Dear Dawn,

HAVANT BOROUGH'S EMERGING LOCAL PLAN – DUTY TO COOPERATE

Many thanks to your officers who met with my colleagues on 2 November 2023 to discuss our respective local plans.

The purpose of this letter is to formally update you on the progress of Havant Borough's Local Plan, and its housing need and supply position. This follows the approval of the Partnership for South Hampshire (PfSH) Spatial Position Statement (SPS) at Joint Committee on 6 December 2023.

As you are aware, Havant Borough Council is currently preparing a new Local Plan. We recently published an updated Local Development Scheme (LDS) which indicates that we will be publishing a draft (Regulation 18) Local Plan in Quarter 4 of 2024.

The LDS can be viewed here:

<https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-development-scheme-lds>.

Havant Borough Council is a pro-development local authority with an ambitious regeneration agenda. We are keen to deliver this alongside other objectives such as delivering more affordable housing for our communities, and addressing international issues such as climate change. Havant Borough values partnership working through PfSH which allows us to work positively and proactively on cross boundary issues, including the sufficient provision of housing and employment across the sub-region. The PfSH SPS confirms the Council's commitment to delivering sustainable development in the most sustainable locations, and meeting housing need where possible.

As with most urban local planning authorities in the Southeast, one of the biggest challenges for the new Local Plan will be to meet Havant's own development needs. The Inspectors' Interim Findings¹ in respect of the previous Local Plan acknowledged that Havant may be an authority that cannot sustainably meet its housing needs in accordance with paragraph 11 b)

¹ <https://www.havant.gov.uk/media/8718>

of the National Planning Policy Framework (NPPF) (see paragraph 52). Nevertheless, the Council's starting point is that no stone will be left unturned in order to meet its own need.

Whilst Havant's evidence base on housing supply is emerging, the attached plan from the Council's draft Constraints Study illustrates the very constrained supply of land in Havant Borough. The least constrained areas shown are already identified for development, notably that of the Dunsbury Park tax site which is part of the Solent Freeport, and Havant Thicket Reservoir which serves a sub-regional function, stretching far beyond Havant Borough's boundaries.

Housing Need and Supply

The NPPF makes clear that in order to significantly boost housing supply, the standard method is an advisory starting-point for establishing a housing requirement for an area. Applying a housing need figure of 516 dwellings², there is a need for 10,320 dwellings in Havant Borough over a Local Plan period to 2043 (see table below).

The Council has undertaken a comprehensive and robust assessment of the following sources of supply to assess how far it is able to meet its own housing need:

- Outstanding planning permissions as of 1 April 2023;
- Adopted Local Plan allocations without planning permission;
- Potential housing sites³; and
- Windfall development⁴.

Our work on the previous Local Plan and the Inspectors' interim findings report clearly signal a need for robust evidence and including that sites should meet the NPPF definition of 'developable'. For this reason, it will not be possible to rely on any housing delivery from Havant and Waterlooville town centres until evidence of deliverability is more advanced. In any case, development in these locations will be unlikely to be sufficient in scale to close the gap between the Borough's objectively assessed need and identified housing supply. The Council will keep all sources of housing supply up to date and robust in order to demonstrably ensure that every effort is made to address housing need within the Borough's boundary.

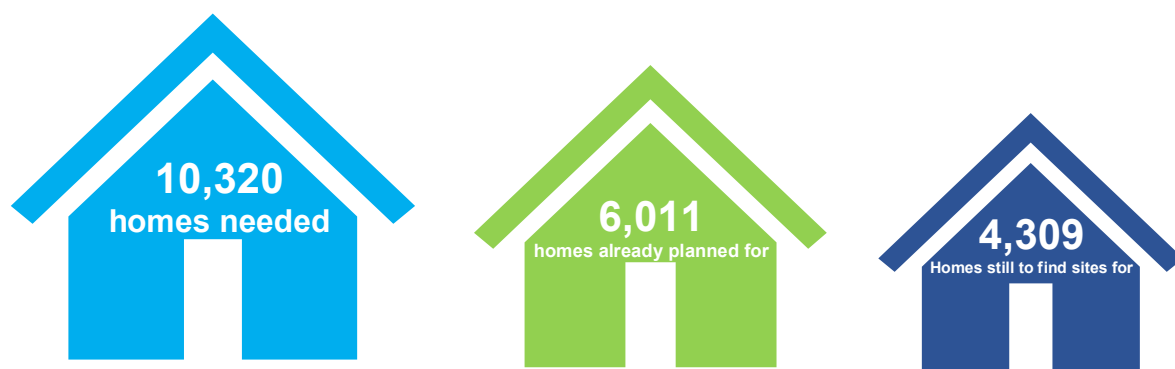
² The standard method calculation of 516 dwellings per annum (dpa) is used from 2022, though the standard method need calculation for 2024 is 512 dwellings per annum prior to the publication of the 2023 affordability ratio which is due to be published in March 2024. The former is used as a worst case scenario.

³ Identified by Table 1 of the Council's [Housing Delivery Position Statement](#)

⁴ The Council's evidence on windfall development will be updated to inform the new Local Plan.

	Identified housing need (2022/23-2042/43)	Net Dwellings Completed or Committed
	10,320	
Completions 2022-23		495
Outstanding planning permissions at 1/4/23		1,524
Allocations in Adopted Local Plan without planning permission		606
Potential housing sites		1,524
Potential housing sites where previous Inspectors' raised deliverability concern		700
Windfall Development		1,162
Total		6,011
Remaining objectively assessed housing (unmet need)	4,309	

Against a standard method figure of 10,320 dwellings, the Council is only able to identify a supply of 6,011 dwellings over the plan period. **This results in an unmet housing need figure of 4,309 dwellings.**



All of the sites submitted through the consultation in late 2022 are undergoing assessment and may offer the potential to increase supply. We will be continuing to reach out to the development industry and landowners to ascertain whether there are any further sites which could be available for development and be assessed as part of the plan-making process – our Call for Sites has recently been relaunched on our website. However, given the extent of the very constrained supply of land, there will likely be insufficient capacity to meet objectively assessed need within the Plan area.

Employment Need and Supply

Havant's constrained land supply will also mean it is extremely challenging for the Borough to identify sufficient sites to meet employment need. The Council has commissioned an

Employment Land Review, building upon the 2021 PfSH Economic, Employment and Commercial Needs Study⁵. This will confirm whether Havant has sufficient employment land to meet its own development needs, or will need to formally request assistance from its neighbours to accommodate any unmet need. We will keep you up to date with the progress of our evidence base on employment land supply.

Winchester District Local Plan 2020-2040

From our recent meeting, we are conscious that Winchester District is due to consult on a Regulation 19 Local Plan during July to September 2024. By this stage it is crucial that cross-boundary matters have been addressed effectively.

Havant Borough's representations to the Regulation 18 Local Plan consultation in November 2022 broadly supported the plan's focus on high quality development, including homes for all. It was also noted that the plan proposes to meet Winchester's housing need in full together with some need from the South Downs National Park.

During our recent meeting we also noted your authority's intention to provide a buffer of about 1,450 dwellings to help contribute towards the PfSH shortfall. However, the Plan indicates that this buffer will also be needed to cater for potential increases to housing need identified by the standard method in Winchester. There would be no housing clearly ringfenced towards unmet need arising across the sub-region. In the absence of a Joint Strategy, we are concerned there is no clear mechanism to address the significant unmet need arising from Havant and the wider sub-region, particularly as you progress towards a Regulation 19 Local Plan.

Joint working

The PfSH Spatial Position Statement (SPS) is of course a useful starting point in demonstrating compliance with the duty to cooperate. However, given the scale of unmet need that exists within the sub-region, it is important that there continue to be constructive and active discussions to effectively address this matter. It is Havant Borough Council's position that relying solely on the PfSH SPS will not demonstrate compliance with the duty to cooperate. As such, ongoing discussions and a bi-lateral statement of common ground will need to be agreed in order to demonstrate that this matter is appropriately addressed by our respective local plans.

Planning Practice Guidance on plan-making⁶ sets out that strategic policy-making authorities should cooperate in meeting housing need, using the most appropriate functional geographical area, such as a housing market area (HMA). That being a case, there is a clear functional geography between Winchester's eastern wards and that of Havant for which there is a significant unmet housing need.

We are conscious of the proposed repealing of the duty to cooperate and its proposed replacement with an alignment policy. Whilst the detail of such a test is not yet known, the Government has made clear that cross-boundary working on strategic priorities, including

⁵ push.gov.uk/wp-content/uploads/2021/05/Economic-Employments-and-Commercial-Needs-including-logistics-Study-Final-Report-March-2021.pdf

⁶ [Plan-making - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/plan-making) Paragraph: 017 Reference ID: 61-017-20190315 Revision date: 15 03 2019

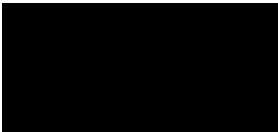
unmet need will remain. Therefore, the Borough Council's position is we should ensure compliance with the existing legislation up to the point that the process changes.

You will be aware of the work that has been undertaken between our two authorities to address the duty to co-operate in recent years. Moving forwards, we seek to undertake a series of detailed discussions with yourselves as our respective plans progress, in order to ensure that unmet need and other cross-boundary matters are robustly addressed. It is the Council's ambition to agree a statement of common ground prior to any Regulation 19 consultation on either of our plans thereby minimising soundness and legal compliance issues for both plans.

The NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. 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. I am therefore formally writing to ask whether your authority is able to accommodate any of Havant Borough's unmet housing need?

I would like to request a meeting to discuss how this matter can be resolved, and would be grateful if you could please advise of your availability by return. I look forward to hearing from you on this important issue and would be grateful for a response by **28 March 2024**.

Yours sincerely



Alex Robinson
Executive Head of Place

cc Adrian Fox



Alex Robinson
Executive Head of Place
Havant Borough Council
Public Service Plaza
Havant
PO9 2AX

Your Ref :
Our Ref :
Contact : Dawn Adey
Direct Line : [REDACTED]
Email: [REDACTED]

25th March 2024

Dear Alex,

Request from Havant Borough Council to help meet unmet housing need under the Duty to Cooperate

Thank you for your letter dated 5th March 2024 which has updated us on the progress on Havant Brought's Local Plan and your ambitious regeneration plans.

Housing need

Winchester City Council fully appreciates the work that Officers from Havant Borough Council have undertaken to meet your own housing need to address the Inspector's Interim Findings in respect of the previous Local Plan. This Council recognises and is supportive of the work that Havant Borough Council has undertaken in terms of a search for new housing and employment sites.

In your letter it indicates that the housing need for Havant over the Local Plan period using the Government's standard methodology is currently 516 homes per year which this equates to 10,320 new homes over the period to 2043. The letter further states that whilst is still ongoing in terms of the sites that were submitted through the consultation in late 2022, you currently have an unmet housing need of 4,309 homes. Your letter also indicates that it is also challenging to identify suitable sites to meet employment need.

We understand under the Duty to Cooperate Havant are approaching a number of Local Planning Authorities, including Winchester City Council, to assist with meeting this unmet housing/employment need. It would be helpful if you could please clarify which Local Planning Authorities you have approached given that the NPPF refers to neighbouring areas.

As the above indicates, we are aware that under the duty-to-cooperate we are required to consider requests for unmet housing need from neighbouring areas. From our Statement of Common Ground discussions with other neighbouring Local Planning Authorities, we know of at least one other Local Planning Authority that is in a similar position to Havant Borough Council (Portsmouth City Council).



Brownfield land

Officers from Havant Borough Council will be aware that the Government requires Local Planning Authorities to prioritise the use of brownfield land and there are various funding streams available to Local Planning Authorities to help unlock brownfield sites (e.g. the Brownfield Release Funding). On the 13 February 2024 the Government issued a Press Release and made it very clear that as part of its long-term plan for housing, every council in England will be told that they will need to prioritise brownfield developments and instructed to be less bureaucratic and more flexible in applying policies that halt housebuilding on brownfield land. Whilst this particular issue has not been specifically referred to in your letter, we trust that Havant Borough Council are doing everything within their power to prioritise the redevelopment and delivery of brownfield land. This work will need to clearly demonstrate that there is no more capacity available on any these brownfield sites to help meet the Government's standard methodology.

PfSH Spatial Position Statement

Winchester City Council and Havant Borough Council are both a member of the Partnership for South Hampshire (PfSH). At a meeting of the PfSH Joint Committee on 6th December 2023 a Spatial Position Statement (SPS) was agreed. You will be aware from your work on PfSH Planning Officers Group, that the SPS includes a number of Broad Areas of Search which will help to progress a reduction in the shortfall of housing need in the PfSH area. The Broad Areas Search for Growth that have been included in the SPS include:

- South-east/east of Eastleigh Town (Eastleigh)
- Havant Town Centre (Havant)
- Waterlooville Town Centre (Havant)
- Southleigh (Havant)
- East of Romsey (Test Valley)
- South-west of Chandler's Ford (Test Valley)
- East of Botley (Winchester)

It is important to note that the SPS cannot allocate land or determine the quantum of development within the Broad Areas of Search for Growth, as these matters will be determined through individual Local Plans. The SPS indicates that these Broad Areas of Search for Growth have the potential to deliver a combined total of approximately 9,700 homes. This would make a significant contribution to the shortfall in housing provision in South Hampshire including assisting with Havant's unmet housing need.

Winchester City Council's Regulation 18 Local Plan

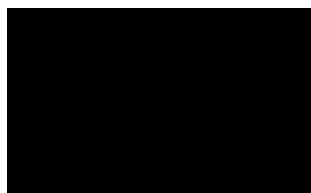
Winchester City Council is committed to meet its own growth needs. I am sure that you are aware, that in addition to work that has been undertaken on PfSH, Winchester City Council's Regulation 18 Local Plan included a 'buffer' of 1,450 dwellings to meet any unmet housing need/changes to the Government's standard methodology. Officers are

currently reviewing all of the representations that were submitted on the Regulation 18 Local Plan and contacting the various landowners to ask them to complete a Site Deliverability Assessment. Currently this workstream is still ongoing but we are able to confirm that at an Officer level, the intention is to still provide for an unmet housing need allowance in the Regulation 19 Local Plan when it is published for public consultation late Summer 2024. However, at this stage of the process, Officers are unable to confirm exactly what level this unmet housing need allowance will be in the Regulation 19 Local Plan. This due to the fact that this work is ongoing and the assumptions that Officers are working on are currently in the process of being tested by Hampshire County Council Trading Arm as part of the Strategic Transport Assessment.

Given the approach being taken by Winchester City Council outlined above, combined with the fact that PfSH have very recently agreed a Spatial Position Statement to meet a housing shortfall in the South Hampshire area, it is considered that this is the best approach to assessing and supporting the any unmet housing need arising from Havant Borough Council's Local Plan.

This Council welcomes the continued co-operation and engagement between our respective Local Planning Authorities on this and other cross county strategic planning matters including with progressing work by Officer's to agree a Statement of Common Ground.

Your sincerely



Dawn Adey
Strategic Director of Place

Julie Pinnock and Adrian Fox
Winchester City Council

By email only:

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 12th June 2025

Dear Julie and Adrian

UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

In advance of our meeting scheduled on 24th June 2025, the purpose of this letter is to formally update you on the progress of the Council's Local Plan – the Building a Better Future Plan, including the latest position on our housing and employment development needs. This follows our letter dated 5th March 2024 which formally requested assistance with our unmet housing needs, as well as highlighting the work being undertaken to update the Council's employment evidence base.

As you may be aware, the Council is currently consulting on the full draft (Regulation 18) Building a Better Future Plan which closes on 1st July 2025.

Housing need and supply

As you will be aware, the Council's starting point is that it will leave no stone unturned in order to meet its own housing need. However, as demonstrated by the Constraints Study¹ there is also a very constrained supply of land in Havant Borough with the least constrained areas already identified for development.

Our previous letter dated 5th March 2024 identified an unmet housing need of 4,309 homes between 2022 to 2043. Significantly however, that was under the previous standard method figure of 516 dwellings per annum, equivalent to 10,320 dwellings between 2023 and 2043. The publication of the new standard method in December 2024 means that the Borough's need has increased to 892 dwellings per annum, equivalent to 17,840 homes over the plan period (2023 to 2043).

Given the expected lack of suitable land within the Borough with development potential to meet identified housing need, the Strategic Housing and Economic Land Availability Assessment (SHELAA) includes a comprehensive and robust assessment of all land in the

¹ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

Borough to ensure the Council has fully examined all opportunities for development, and has been published alongside the full draft (Regulation 18) Local Plan for consultation.

The SHELAA concludes there is a developable housing supply of 7,981 dwellings between 2023 and 2043. However, the SHELAA does not take account of the development strategy, nor the Sustainability Appraisal which is undertaken to determine whether a site should be allocated. A total of four potential development strategies were considered through the SA process covering a broad spectrum from a full environmental and brownfield focus to a full housing delivery focus. However, crucially under none of the options is it possible to achieve delivery of the total need for housing as set out under the standard method, by some margin².

Housing Supply 2023-2043 (number of dwellings likely to be delivered under each development strategy option)				
Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Completions 2023/24	368	368	368	368
Commitments	1,142	1,142	1,142	1,142
Broad locations considered suitable under the strategy option	1,003	2,406	2,406	2,406
Site allocations considered suitable for allocation under the strategy option	821	1,906	2,669	4,282
Small sites with the urban area	29	37	37	37
Windfall	1,360	1,360	1,360	1,360
Total housing supply	4,723	7,218	7,981	9,594
Supply against standard method plan requirement of 17,840	(13,117)	(10,622)	(9,859)	(8,246)

The chosen development strategy (Option 2) combines and balances key national and local objectives in the most effective way and overall represents the most appropriate strategy, when considered against the alternatives. The spatial distribution of development planned for through the chosen option focuses on the existing built areas across the Borough, notably Havant and Waterlooville town centres and less constrained greenfield land. On this basis, the Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum.

There is therefore an unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year). The submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance' of 1,900 dwellings – of which 70% equivalent to 1,330 dwellings would be apportioned to Havant Borough. This would increase overall supply to 8,548 dwellings over the plan period, and reduce unmet need to 9,292 dwellings (or 465 homes per year).

² Further information can be found in Sustainability Appraisal which has been published as part of the Council's evidence base: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

Whilst the Hearing sessions have now concluded, this contribution can only be afforded limited weight and may change before the Plan has successfully passed through Examination. However, this obviously only represents a proportion of Havant Borough's unmet need, with a large amount remaining to be accommodated within neighbouring authorities.

Furthermore, it is understood the submitted Plan is being examined under the previous version of the National Planning Policy Framework (NPPF). In the event that paragraph 234b of the NPPF applies, and the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system as soon as the relevant provisions under the Levelling Up and Regeneration Act 2023 are brought into force.

Under the Duty to Cooperate, the Borough Council therefore continues to formally request Winchester City Council to assist in meeting the unmet housing need of at least 9,292 dwellings arising from Havant Borough. The Borough Council has approached its other neighbouring local authorities, and local authorities within the same housing market area with the same request and I will keep you updated on progress with our discussions. I am also mindful that there is unmet housing need arising from Portsmouth City and Gosport Borough respectively within the same Housing Market Area.

Employment need and supply

The Council has now published an Employment Land Review (ELR) which provides an up-to-date assessment of the Borough's economic and employment development needs³. It identifies an objectively assessed need figure of 175,199 sq. m of net new floorspace over the plan period of which 139,140 sq. m results from industrial demand, and 36,059 sq. m for office demand.

The ELR indicates that the industrial market is strong across the Borough, but the market is constrained due to low levels of availability. The potential site allocations could help to address some of those supply constraints, but the Dunsbury Park Freeport Tax Site status means that the floorspace supply from Phase 3 cannot be relied on to meet general demand and local need for new floorspace. This is further compounded by a lack of office sites promoted to meet need and a number of allocated sites no longer available to meet the Borough's employment need⁴.

³ www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

⁴ Kingscroft Farm (SHELAA Refs HA20 and ED09) and Brockhampton West (Ref ED14)

Overall demand and supply	2023-43 Sq m (GIA)
Industrial demand	139,140
Office demand	36,059
Gross demand	175,199
Industrial supply	121,475
Office supply	2,300
Total supply	123,775
Balance over (under) supply	-51,424

On this basis, the Borough has an unmet need of 51,424 sq. m for employment floorspace over the plan period. Of this, 17,665 sq. m is industrial demand and 33,759 sq. m is office demand.

Under the Duty to Cooperate, the Borough Council is formally requesting Winchester City Council to assist in meeting 51,424 sq. m of unmet employment need. The Borough Council will also be approaching our other neighbouring local authorities, and local authorities within the same travel to work area with the same request and I will keep you updated on progress with our discussions.

Joint working

Our authorities have a strong track record of working together through the Partnership for South Hampshire and on a bi-lateral basis. We look forward to continuing constructive and active discussions to effectively address unmet housing and employment development needs arising from Havant Borough.

In your response to this request for assistance, please could you set out the process by which your authority will look to respond to the high level of unmet housing and employment need arising from Havant Borough. It is recognised this may need to take a staged approach depending on the progress of your local plan, and its supporting evidence. A further meeting can be arranged if it would be useful to explore this further. Please could you respond no later than 10th July 2025. Please note that we may share your response with other duty to cooperate partners and publish it as part of our evidence base.

I look forward to receiving any consultation response to our Draft Local Plan consultation and progressing our discussions around a Statement of Common Ground in due course.

Yours sincerely

David Hayward

Strategic Planning Manager

Mr David Hayward
Strategic Planning Manager
Havant Borough Council
Public Service Plaza
Havant
PO9 2AX

Your Ref:
Our ref:
Contact: Adrian Fox
Email: [REDACTED]

2nd July 2025

Dear David,

UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

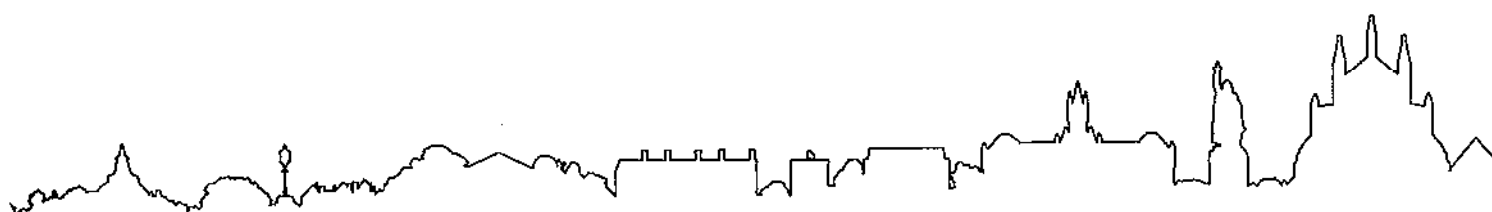
Thank you for your letter dated 12th June 2025 and our subsequent Duty to cooperate meeting on the 24th June 2025.

Winchester City Council Regulation 19 Local Plan

The hearing sessions for the Winchester City Council Local Plan concluded on Friday 6th June 2025. As you will be aware the city council's Regulation 19 Local Plan included an unmet need allowance of 1,900 dwellings. We have proposed through our Duty to Cooperate discussions and as reflected in our submitted Main Modifications that a proportion of this unmet need allowance would be assigned to Havant Borough Council (currently 1,330 homes). The outcome of our current Local Plan examination is not yet known and we await further communication from our Inspector in terms of the next steps for the current Local Plan following on the completion of the hearing sessions.

Review of the Winchester City Council Local Plan

In accordance with a letter from the Chief Planning Officer, the city council agreed an updated Local Development Scheme at a meeting of its Cabinet in February 2025. The timetable indicates that the city council will start a review of the next Local Plan during Quarter 2 (June – September 2025). Owing to the fact that the hearing sessions for the current Local Plan examination have only just concluded, we are just starting work on the next Local Plan review and we will need to agree with Members the start and end date of the next Local Plan and most importantly, the process that we as Officers are recommending to Members that we should follow for the Local Plan Review. We do not yet have any detailed information that we can



share with you at this particular moment as we do need time to work through next steps and to develop a project plan.

Housing requirements

As for all Local Planning Authorities across Hampshire the City Council's housing requirement is increasing under the standard method from 676 homes per year to 1,128 homes per year. Given in particular that 40% of the district is located within the South Downs National Park (SDNP), we know that is therefore going to be a challenge meeting our own increased housing requirement.

In addition to 40% of the district being located in the SDNP, and unlike Havant (who only have to deal with nitrates) the City Council also has the added challenge of providing for the mitigation of both phosphorous and nitrates. We have been working closely with PfSH to bring forward a number of nutrient mitigation schemes which includes work to upgrade 10 Winchester City Council owned Waste Water Treatment Plants that would generate phosphorous credits. We are also keen to understand the outcome of the trial work that the New Forest District Council and PfSH are undertaking on plans to upgrade Private Wastewater Treatment Plants to generate nutrients credits as we have a number of settlements that have housing developments that are served off Private Wastewater Treatment Plants. However, it is extremely important to point out that as our District is affected by nutrients and phosphorous this may well be a limiting factor on how much housing development we can accommodate in the District. We will need to be able to demonstrate to an Inspector that there are deliverable nutrient solutions for the level of housing development that we are including in in our next Local Plan. You are probably aware that it is much more difficult to deliver phosphorous mitigation than nitrate mitigation as this needs to be upstream of the proposed development.

Havant - Housing need and supply

We note in your letter you state:

'Under the Duty to Cooperate, the Borough Council therefore continues to formally request Winchester City Council to assist in meeting the unmet housing need of at least 9,292 dwellings arising from Havant Borough. The Borough Council has approached its other neighbouring local authorities, and local authorities within the same housing market area with the same request and I will keep you updated on progress with our discussions. I am also mindful that there is unmet housing need arising from Portsmouth City and Gosport Borough respectively within the same Housing Market Area'.

We would also note that the Havant Borough Council unmet need figure of 9,292 homes has not yet been tested through a Local Plan examination. We have made representations to your Regulation 18 Local Plan that without further information confirming that future development cannot take place on Hayling island, we remain unable to agree the unmet housing need figure of 9,292 dwellings.

In addition to the above, you will be aware that we have also received Duty to Cooperate requests from Portsmouth City Council and Gosport Borough Council. We would like to reiterate the key point that we made at our Local Plan examination that under the Duty-to-Cooperate, it is not just Winchester City Council that would need to assist in meeting the Havant unmet need and is Havant Borough Council's responsibility to have discussions with all of your neighbouring Local Planning Authorities in this regard. In this regard we do note that Test Valley Borough Council are currently consulting on their draft Regulation 18 Local Plan. From reading their draft Regulation 18 Local Plan (paragraph 3.37) they have not apparently been approached by any other Local Planning Authority in terms of assisting with any PfSH unmet housing need. Allied to this, for completeness, it would also be beneficial for Havant Borough Council to also contact the South Downs National Park Authority.

In terms of nutrients, having checked the Local Plan website there does not appear to be a nutrients topic paper that shows the supply and demand for credits. We presume that this work would be completed by the Regulation Local Plan is consulted on.

Havant employment need and supply

The level of employment need in the Regulation 19 Local Plan was discussed at length at our Local Plan examination. Using the economic forecasts in the city council's latest Employment Land Study, we can confirm that we currently do not have any spare employment capacity to assist Havant Borough Council. We will be commissioning an updated Employment Land study to support the Review of the Local Plan but work on commissioning this study has not yet started.

As the above indicates, whilst the City Council remains ready and willing to work and co-operate with Havant BC and our other neighbouring authorities, we do have a major challenge ourselves with meeting the increase in housing numbers and importantly how we can accommodate this with 40% of the district being located in the SDNP and the issue of both phosphorous and nitrates. In view of this, the City Council is unable to commit to providing any additional assistance on housing or employment supply to Havant BC at this time but we will continue to liaise with you under the DtC as we move forward with our next Local Plan review.

Yours sincerely



Adrian Fox
Strategic Planning Manager

Adrian Fox
Strategic Planning Manager
Winchester City Council

Enquiries to: David Hayward
Direct line: [REDACTED]
Email: [REDACTED]
My reference:
Your reference:
Date: 27 August 2025

Dear Adrian

RE: UPDATE FROM HAVANT BOROUGH COUNCIL REGARDING ASSISTANCE WITH UNMET HOUSING AND EMPLOYMENT NEED UNDER THE DUTY TO COOPERATE

Thank you for meeting us to discuss unmet housing and employment need at our recent Duty to Cooperate meeting on the 24th June 2025. Your subsequent letter dated 2nd July 2025 specifically challenges the unmet development need arising out of Havant Borough. This letter addresses the questions raised and provides the City Council with further reassurance that Havant Borough is leaving no stone unturned in order to effectively address its own development needs.

We have now concluded the most recent set of Duty to Cooperate discussions, which included a formal request to accommodate unmet housing and employment need, with all authorities in the Portsmouth Housing Market Area (HMA)¹, as well as the South Downs National Park Authority.

I can confirm that we have similarly received requests to accommodate unmet housing need under the Duty to Cooperate from Gosport Borough Council and Portsmouth City Council.

Duty to Cooperate

As you will know, the 'duty to cooperate' is a legal requirement of the local plan process. At the point of examination, appropriate evidence will need to be provided to demonstrate that the duty to cooperate has effectively been discharged for the plan being examined. The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) do not provide a fixed format for how the duty to cooperate should be discharged, nor prescribe which authorities should be cooperated with in the preparation of local plans.

¹ For avoidance of doubt, as well as yourselves this is Gosport Borough Council, Fareham Borough Council, Portsmouth City Council, East Hampshire District Council and Chichester District Council.

As highlighted above, the Council's approach has been to focus duty to cooperate discussions with the Borough's immediate neighbouring authorities, and with other authorities within the same Housing Market Area.

Test Valley Borough Council (TVBC)'s current draft Regulation 18 Local Plan sets out which that they have not been approached by any of their neighbouring Local Planning Authorities in terms of assisting with any Partnership for South Hampshire (PfSH) unmet housing need. However, Havant Borough Council's approach to them as a non-neighbouring authority is noted in TVBC's Duty to Cooperate Topic Paper². This reflects Havant Borough's response to TBVC's Draft Local Plan consultation in 2022 which highlighted that it would not be possible for Havant Borough to meet its housing need. We will be formally responding to their current consultation on their draft Regulation 18 Local Plan in due course and will reiterate our position regarding unmet need.

In relation to the South Downs National Park, you will be aware that paragraph 189 of the 2024 NPPF states that national parks have the highest status of protection in relation to landscape and scenic beauty, and that the scale and extent of development within these designated areas should be limited. In this regard, the South Down National Park Authority's response dated 26th June 2025 confirms they are unable to accommodate any unmet needs arising from Havant Borough.

Finally, Winchester's Local Plan Inspector recently concluded a consultation on the implications of changing the plan period (WCC examination document ED37) which may affect the unmet needs allowance and the amount that can be apportioned towards Havant Borough's unmet housing need. In response to this consultation, you will be aware that the Council has set out its support for the submitted Local Plan period of 2020-2040 which maximises the contribution towards unmet need outside of Winchester District. This in turn, will reduce the extent to which Havant Borough would need to request further contributions from Winchester City Council and other authorities moving forwards.

Housing requirements

The majority of housing need figures for each local authority in South Hampshire have significantly increased as a result of the 2024 changes to the standard method. It is acknowledged that this represents a significant challenge for Local Plans across the sub-region. Indeed, Havant Borough has seen an increase from 516 to 892 dwellings per annum (an increase of 72%).

The table attached as an annex to the consultation response on Winchester City Council (WCC) examination document ED37 illustrates the profound impact that the increase to the standard method has had on our unmet need position which has more than doubled (from 4,309 to 9,292 dwellings). Significant work that has been undertaken to identify available sources of housing supply in the context of the constraints that exist in Havant Borough. It is unlikely that there will be any new sites that can substantively increase our supply.

² [Draft Test Valley Local Plan 2042 Duty to Cooperate Topic Paper June 2025](#) – see Table 1 Strategic Planning Matter 1a: Housing

Indeed, we are acutely aware of the wider unmet need arising out of southeast Hampshire having received similar Duty to Cooperate requests from Portsmouth City Council and Gosport Borough Council respectively.

Havant – acknowledgement of unmet need

Through our ongoing duty to cooperate discussions, we have emphasised how the Council is leaving no stone unturned in order to address its own housing need. Your letter dated 2nd July 2025, specifically challenges the unmet housing need position arising out of Havant Borough.

Havant Borough first highlighted that that it would be an authority highly unlikely to meet its housing need following receipt of the previous Local Plan Inspectors Findings in November 2021³. Since then, numerous PfSH officer and member meetings discussed development need and development constraints. This culminated in the approval of the PfSH Spatial Position Statement in December 2023⁴, which confirms an unmet need of 2,603 dwellings for Havant Borough up to 2036. To reiterate Winchester City Council are recorded as being part of the approval of this document⁵. Significantly, the position to 2036 does not provide for the minimum 15 year period as required by the NPPF and we need to plan to 2043.

Whilst the unmet housing need position has since changed, we have kept you up to date through PfSH together with bi-lateral meetings since then. Notably our meetings on 2nd November 2023, and the 24th June 2025 have covered housing need and supply, with the changes summarised in the annex to the consultation response on WCC examination document ED37.

On a bi-lateral basis, we have also set out the robust approach to identifying all sites to deliver housing in Havant Borough. This has included a comprehensive audit of land across Havant Borough to ensure that opportunities for development have been fully examined.⁶. Indeed, this included approaching landowners to ascertain whether there are any additional sites not already included in the SHELAA. We are therefore disappointed that Winchester City Council is not accepting of the unmet need figure of 9,292 dwellings.

The housing supply positions presented in the Council's Sustainability Appraisal (SA) provide an indication of the amount of development that could be delivered under each development strategy option having regard to:

- a. the characteristics of sites themselves (i.e. the type of land that would be affected by development eg brownfield or greenfield; any nature conservation, heritage or other protective designations etc);
- b. locational matters (i.e. where development should take place in relation to other facilities, infrastructure needs etc) and
- c. qualitative requirements (eg density and quality requirements for housing).

³ This was confirmed in an email to Steve Opacic, Strategic Planning Projects Officer on 17/11/21

⁴ [PfSH Joint Committee 6 December 2023](#)

⁵ This is set out in the minutes to the PfSH Joint Committee meeting of 6 December 2023 which are available at www.push.gov.uk/wp-content/uploads/2023/12/Minutes-of-PfSH-Joint-Committee-6-December-2023.pdf

⁶ See paragraphs 3.15-3.16 of the Council's 2024 Strategic and Economic Land Availability Assessment for more detail <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

As you are aware from our meeting, the SA which accompanies the Regulation 18 Local Plan tested four potential development strategies which ranged from a full environmental and brownfield development focus (Option 1), to one with a full housing delivery focus with few environmental considerations (Option 4).

Simple Overview of the 4 Development Strategy Options Considered



The table presented at our recent Duty to Cooperate meeting shows the expected housing supply under each of the strategy options. This was produced based on analysis of different sources of housing supply in the Council's SHELAA including variables of developable sites with the exception of Option 4. Further information is provided for each of the options below.

Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Completions 2023/24	368	368	368	368
Commitments	1,142	1,142	1,142	1,142
Broad locations considered suitable under the strategy option	1,003	2,406	2,406	2,406
Site allocations considered suitable for allocation under the strategy option	821	1,906	2,669	4,282
Small sites with the urban area	29	37	37	37
Windfall	1,360	1,360	1,360	1,360
Total housing supply	4,723	7,218	7,981	9,594
Supply against standard method plan requirement of 17,840	(13,117)	(10,622)	(9,859)	(8,246)

As will recall from our recent Duty to Cooperate meeting, the four options represent the following:

- Option 1 restricts development to established urban and developed areas and brownfield sites across the borough, with a particular focus on development within the town centres.

The housing supply only includes developable SHELAA sites on previously developed land including the town centre broad locations.

- Option 2 represents the proposed development strategy which maximises development in established and urban areas and on brownfield sites; and greenfield development where it has no unacceptable impacts on international, national or local environmental designations. Sustaining existing communities and protecting them from coastal erosion and sea level rise; responding to the effects of climate change by not adding to the level of flood risk through a presumption against new housing in areas at risk of flooding, now or in the future. Due to the flood risk to the single access road on and off the island, this includes greenfield sites on Hayling Island, which may not themselves be at risk. Brownfield development on the island would continue to be acceptable if the site itself is safe.

In supply terms, this translates to all developable sites in the SHELAA, both greenfield and brownfield, excluding greenfield sites located on Hayling Island.

- Option 3 actively supports greenfield development in most locations, except where restricted by environmental law (e.g. Habitat Regulations). As with the above, existing communities would be sustained and protected from coastal erosion and sea level rise; responding to the effects of climate change by not adding to the level of flood risk through a presumption against new housing in areas at risk of flooding, now or in the future. However, housing development on Hayling Island on sites that are not themselves at flood risk would be considered acceptable, despite the flood risk to the access road.

The supply position under this option includes all developable sites in the SHELAA, both greenfield and brownfield, including greenfield sites on Hayling Island.

- Option 4 represents a fully market-led position driven by housing need. The housing supply position is not directly comparable with the SA option. It includes both all developable and discounted housing sites from the SHELAA. It should be noted that a number of the reasons for discounting the SHELAA sites include NPPF footnote 7 constraints (e.g. within a National Landscape designation, current day risk of tidal flooding, land in use as mitigation for protected species).

For completeness, we would recommend referring to the SA for a full description of the alternative development strategies considered. It is also our intention to provide a detailed explanation of this analysis and the development strategy options considered alongside our Regulation 19 Local Plan consultation.

We trust that this provides Winchester City Council reassurance that the Council is taking a robust and comprehensive approach to leaving no stone unturned in order to address its own housing need. Indeed, even if the Council was able to demonstrate that Option 3 was an appropriate development strategy, there would only be a further supply of 763 dwellings

to meet need (10,622 – 9,859 = 763 dwellings). As such, there would still be a very significant level of unmet housing need arising out of Havant Borough.

We would be grateful if the City Council could clarify whether it accepts that unmet need arises out of Havant Borough in principle, thus necessitating discussions under the Duty to Cooperate as to how this need can be accommodated rather than whether it exists. The Borough Council accepts of course that the precise amount of unmet need will fluctuate between now and the examination due to, for example, annual data returns on housing completions. We reiterate the offer made at our recent meeting to go through the available development sites in Havant Borough so that Winchester colleagues can fully scrutinise our site assessment process.

For completeness, I can confirm that we will also be publishing a nutrients budget as part of the Council's Habitat Regulations Assessment accompanying the Council's Regulation 19 Local Plan in due course.

Hayling Island

In the letter dated 2nd July 2025 it is stated *“that without further information confirming that future development cannot take place on Haying Island, we remain unable to agree the unmet housing need figure of 9,292 dwellings”*. We understand from our meeting that the information sought would be commentary from the Environment Agency regarding this element of the development strategy. Building on the information in the section above, I would reiterate that if all available development sites on the island are developed, the housing need for Havant Borough would still not be met by a wide margin.

Nonetheless, I can confirm that in their response to the Draft Local Plan consultation, the Environment Agency have stated:

“Thank you for consulting the Environment Agency on your ‘Building a Better Future Plan’, we feel that issues within our remit have been well recognised within the document and are pleased that this generally translates forward into clear and robust policies to ensure that the environment is protected as development in the Borough is forthcoming.

We have the following comments that we hope you find useful in further developing the plan.

Policy 1 - We support the approach set out in Policy 1 (i) that seeks to sustain existing communities whilst not increasing risk by avoiding new housing in areas at risk of flooding now or in the future. The extent to which the Local Plan uses the available evidence to avoid allocating development in areas at risk of flooding and coastal erosion is a particular strength in its approach to building resilience to climate change within the Borough.

Policy 4 - We welcome the safeguarding of land in Policy 4 (l) that integrates the Local Plan with Flood and Coastal Erosion Risk Management Strategies and Schemes within the Borough. This integration is also evident in the approach to development on Hayling Island – this precautionary approach considering uncertainties around funding and viable standards of protection of future schemes will build resilience into the Local Plan with respect to climate change. Any regeneration proposals on Hayling Island (and within the

wider Borough) will need to meet the requirements of the relevant local and national policies on flood risk and coastal change.”

We trust the Environment Agency’s response provides the City Council with the reassurance that is needed to take discussions regarding unmet need forward.

Havant – Employment need and supply

Thank you for acknowledging our unmet need position on employment need. We note that Winchester City Council does not currently have any spare employment capacity to assist Havant Borough Council. I also note that the Council will be commissioning an updated Employment Study to support the Local Plan Review, but this study is not yet commissioned. I should be most grateful if you could please keep us updated on the progress of this work. Perhaps it would be useful to convene a further meeting before the study is commissioned in order to ensure the methodology for it will include a higher growth option?

Winchester – Housing need and supply

It is acknowledged the National Park covers around 40% of Winchester District which represents a major constraint to development. It is also noted that the City Council’s housing need figure has increased from 676 homes to 1,128 homes per year. This would equate to 16,920 dwellings across a 15 year period. This compares with the theoretical capacity of approximately 62,359 dwellings outside of the National Park shown in the Council’s SHELAA. This would be sufficient to meet Winchester’s housing need figure by more than 3.6 times. This may offer a simplistic view of the District’s potential to accommodate housing supply, but does paint a picture of the potentially suitable development land within Winchester District, starkly contrasting with the position in Havant Borough.

As an example, the 2023 PfSH Spatial Position Statement identifies East of Botley for strategic-scale development within Winchester District, to be considered further through the Local Plans. Given the lead in times for large sites, it is disappointing that this strategic option for growth was not taken forward in the Winchester City Council Regulation 19 Local Plan. In this regard, it should be noted that the Government’s New Towns Taskforce is focused on exploring locations for new towns, with locations supported by existing infrastructure wherever possible.

The strategic options within Havant Borough at Southleigh together with Havant and Waterlooville Town Centres have all been earmarked for development for some time, and are reaffirmed in the Council’s Draft Local Plan with the potential to provide nearly 2,400 homes by 2043⁷.

You will also be aware of the Constraints Study⁸ which identifies areas of least constraint both within and around Havant Borough itself, as well as our immediate authorities including that of Winchester. The findings of this analysis conclude that there are two broad parcels north of the South Downs National Park that are less constrained, including one

⁷ Southleigh would deliver 1,650 dwellings by 2043 and will continue delivering beyond the end of this period.

⁸ <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

very large parcel which spans Winchester and East Hampshire District. Whilst it is acknowledged that these are relatively remote, it should be acknowledged that providing social and physical infrastructure alongside new homes would be an option, particularly when comprehensively planning for new settlements through a Local Plan.

It is noted the City Council has a constraint to development in terms of the limited availability (albeit, still in excess of two years) of mitigation for both phosphorous and nitrogen which may constrain the level of housing development that can take place in the short term. However, in our experience, the private market will be incentivised to provide appropriate mitigation (including phosphorous) mitigation. We also note the work you are undertaking with PfSH to upgrade Winchester City Council owned Waste Water Treatment Plants. As such, there is a reasonable prospect that there will be an available supply of mitigation for both phosphorous and nitrogen in due course as the market adapts to higher development rates.

Winchester Local Plan Review

Thank you the update on the Winchester City Council Local Plan – which confirms that it is expected that the Council will start a review of the next Local Plan during Quarter 2 (June – September 2025).

We welcome the City Council's willingness to work and cooperate with Havant Borough Council and our neighbouring authorities. Please can you advise how you will be comprehensively engaging with us in the preparation of the Local Plan Review at the early stages, prior to formal engagement under Regulation 18?

Our previous letter asked you to set out the process by which your authority would look to respond to the high level of unmet housing and employment need arising from Havant Borough. May we suggest this takes a staged approach given the early stages of the Local Plan Review? In particular, we would appreciate early sight of your emerging project plan for the Local Plan. We'd wish to confirm that any options tested through Sustainability Appraisal, Transport Assessment and other evidence base studies include a scenario where unmet needs are planned for, in addition to meeting Winchester's development needs.

I look forward to continuing our constructive and active discussions to effectively address unmet needs and look forward to meeting you further to discuss the Local Plan Review timetable and an updated Statement of Common Ground to support Havant Borough's Regulation 19 Local Plan in due course.

Yours sincerely

David Hayward

Strategic Planning Manager



Sent jointly on behalf of
Portsmouth City Council,
Gosport Borough Council
and Havant Borough
Council

Adrian Fox
Strategic Planning Manager
Winchester City Council

By email only:



13 October 2025

Dear Adrian,

Re: Housing and employment need in South East Hampshire

This letter follows on from our Duty to Cooperate meeting held on 09 October 2025, which was attended by East Hampshire District Council, Winchester City Council, Fareham Borough Council, Havant Borough Council, Gosport Borough Council and Portsmouth City Council. This letter has been prepared jointly by Gosport Borough Council, Havant Borough Council and Portsmouth City Council and the same letter has been sent to East Hampshire Council and Fareham Borough Council. The Duty to Cooperate is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004. It is also included within the National Planning Policy Framework and Planning Policy Guidance specifically in terms of planning strategically across local boundaries. It is acknowledged that significant and successful ongoing sub-regional work has already been undertaken by the Partnership for South Hampshire (PfSH), although it is recognised further ongoing work is required as outlined in this letter.

Gosport Borough Council, Havant Borough Council and Portsmouth City Council have been working together over the last few months in order to identify our combined unmet housing and employment needs. We consider this to be a worthwhile planning activity as we are all at a similarly advanced stage of plan making namely approaching Pre-Submission. Furthermore, the three local authorities are located entirely in the same housing market area and functional economic market area of South East Hampshire and as such, this work has resulted in a comprehensive understanding of the unmet need which exists within South East Hampshire. All of our three Local Plans will need to use the 2024 standard method to assess housing need, meaning that there has not been an in-depth assessment of unmet need across the Housing Market Area given that the Spatial Position Statement¹ published by PfSH in 2023 used the previous standard method.

¹ <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

The East Hampshire, Winchester and Fareham local authority areas are entirely or partially located in South East Hampshire and share at least in part the same housing market area and functional economic market area as Gosport, Havant and Portsmouth. They are at different stages of plan making and are gathering evidence on whether they can meet housing need as calculated under the 2024 standard method.

The combined housing need, supply and unmet need for the Gosport, Havant and Portsmouth local authority areas are set out in table 1 of Appendix 1 of this letter. The unmet housing need figure for the three local authorities is 18,347 homes.

This unmet housing need figure is considerably higher than the shortfall of 11,771 identified for the whole of South Hampshire in the Spatial Position Statement² published by PfSH in 2023. There are two main drivers for this increase. Firstly, there is the change in the standard method in 2024 from being population based to stock based, which resulted in increased need across South East Hampshire. Secondly, the end date of the Spatial Position Statement of 2036 is at least four years before the end dates of our emerging local plans.

The combined employment need, supply and unmet need for the Gosport, Havant and Portsmouth local authority areas is set out in table 2 of Appendix 1. A positive outcome of joint working over the summer has been that a surplus of office floorspace in Portsmouth has been committed to Havant through the Duty to Cooperate. However, there is still a deficit of 19,973 square metres of new employment floorspace across the three local authorities.

Table 3 of Appendix 1 sets out the key constraints of our three local authority areas. These are similar and linked including flood risk, international nature conservation designations, land contamination and a lack of land that can be built on. The table also sets out the approaches we have taken in our respective Plans including housing densities, making optimal use of sustainable locations and protecting public open space. All the information in Appendix 1 of this letter is supported by robust evidence bases and no stone has been left unturned in the search for new deliverable and developable sites within our local authority boundaries.

Under the Duty to Cooperate, Gosport Borough Council, Havant Borough Council and Portsmouth City Council are formally requesting Winchester City Council along with East Hampshire District Council and Fareham Borough Council to assist in meeting the unmet housing need of 18,347 homes and unmet employment need of 19,973 square metres of new employment floorspace. Following on from our meeting last week, we have compiled a list of other local planning authorities that we have individually discussed unmet housing and employment needs; this is set out in Appendix 2.

Portsmouth City Council had an advisory meeting with the Planning Inspectorate in August 2025 and asked about the unmet need in South East Hampshire. The City Council was advised that there was only a focused window between now and submission to engage with Fareham, Winchester and East Hampshire on any further distribution of unmet needs. The advisory inspector considered that continued engagement was necessary, that Portsmouth should not be 'diffident' in asking for help from its neighbours and that the City Council needed to prioritise demonstrating their own efforts for ongoing joint working.

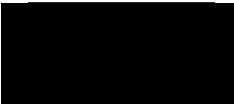
This request is in line with the Duty to Cooperate. We understand that it is a substantial ask that will need to be carefully considered by both Members and officers at your Council.

² <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

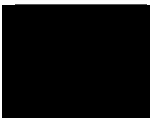
However, the need for land to accommodate new homes and jobs in South East Hampshire is great. We hope that this letter provides the necessary clarity on the quantum of development involved and can form the basis for further work going forward. We are mindful of proposals for Devolution and if this is taken forward by Government then meeting housing need will be a core component of the Spatial Development Strategy for Hampshire and the Solent. Nonetheless, this is not yet confirmed and as set out above it is necessary to continue to progress Local Plans and the Duty to Cooperate in the meantime.

We would be grateful if you would reply to this letter by 10 November 2025. Please can you set out in your response the process by which your authority will look to respond to the level of employment and housing need. It is recognised that this may need to take a staged approach depending on the progress of your local plan and its supporting evidence. As discussed last week, we consider that you should share this letter with your examination inspector and would be grateful if you could say in your response when you have done this. We look forward to working positively with you going forward.

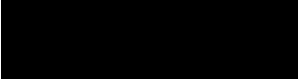
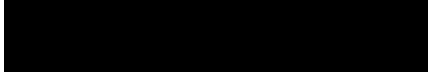
Yours sincerely



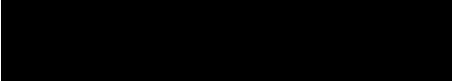
Lucy Howard
Head of Planning Policy



David Hayward
Strategic Planning Manager



Jayson Grygiel
Manager of Planning Policy



Appendix 1: Housing and employment need and supply in the local authority areas of Portsmouth, Gosport and Havant

TABLE 1: HOUSING NEED AND SUPPLY ANALYSIS

LPA	Plan period		Housing need according to the standard method	Housing supply	Unmet need	Notes
Gosport Borough Council	2025-2042 (17 years)	Total	7,378	2,537	-4,841	Housing supply based on revised SHLAA due for publication with Regulation 19 Plan in 2026. Regulation 18 SHLAA available online: www.gosport.gov.uk/gbip2040evidence
		<i>Dwellings per annum</i>	434	150	-284	
Havant Borough Council	2025-2043 (18 years)	Total	15,966	6,466	-9,590	The 2025 standard method indicates a local need figure of 887 dwellings per annum, equivalent to 15,966 dwellings across an 18 year plan period. The HBC 2024 Trajectory (supporting the Regulation 18 Local Plan consultation) estimated completions of 419 during 24/25 and 338 during 25/26. This compares with 24/25 draft completions which suggest this was actually 326. Based on 419 dwellings minus 326, an additional 93 dwellings have been rolled forward into 25/26. Outstanding planning permissions as of 1 April 2025 are not reflected in commitments and so may slightly underestimate supply. HBC's unmet need figure does not currently include any unmet needs allowance from Winchester's Local Plan, pending the outcome of the examination. With the inclusion of 203 dwellings (70% of 290 dwellings towards an unmet needs allowance) from Winchester's Local Plan, the unmet need position would reduce to 9,297 dwellings (517 dwellings per annum).
		<i>Dwellings per annum</i>	892	323	-480	
Portsmouth City Council	2025-2040 (15 years)	Total	15,285	11,369	-3,916	PCC supply based on HELAA that will be published winter 2025 to support the Local Plan Addendum. The supply does not include the Fareham 800, which reduces unmet need to 3,116 (annualised 208). This is noted in the explanatory text of the Local Plan and in the Duty to Cooperate Statement. The Winchester commitment is not
		<i>Dwellings per annum</i>	1019	758	-261	

TABLE 2: EMPLOYMENTS NEEDS AND SUPPLY ANALYSIS

LPA	Plan period	Employment need	Employment supply	Surplus/unmet need	Notes	
Gosport Borough Council	2025 to 2042 (17 years)	Total	66,085	76,190	10,105	<p>GBC is using the Stantec Study for PFSH (2021) for employment need. Table 11.1 (office) & Table 11.4 (industrial) of the study showed an employment need for Gosport between 2019 & 2040 of 76,538 (3,645 per year). To update this for July 2025 position, adjusted for GBCs plan period to 2042, the following has been done: Employment need 2019-2040 (76,538) minus employment completions between 2019 and 2024 (17,743) equals 58,795. Add two additional years of annualised need from the Stantec study to cover to 2042 (3,645 x 2). Total employment need: 66,085. GBCs EDNAVELLA compares supply with various employment forecasts/scenarios and comes to the conclusion that we are meeting our current requirements. Please note we are refreshing this study. Employment supply based on EDNAVELLA (2018) and internal work to date. Refresh to EDNAVELLA currently being undertaken for Regulation 19 in early 2026. Regulation 18 EDNAVELLA available online.</p>
		<i>m2 per annum</i>	3,887	4,482	594	
Havant Borough Council	2023-2043 (20 years)	Total	175,199	123,775	-51,424	<p>Data has been taken from Havant Borough Council's analysis of the ELR and SHELAA. The supply position excludes Dunsbury Park Phase 3 which has the potential to deliver 13,935 sq. m. This floorspace is associated with the net additional demand generated by its freeport tax site status.</p>
		<i>m2 per annum</i>	8,760	6,189	-2571	
Portsmouth City Council	2025-2040 (15 years)	Total	117,400	138,746	21,346	<p>Supply figure based on HELAA that will be published in winter 2025. Need figure from draft HEDNA Update. The surplus is mainly of office floorspace. Can help to meet Havant's need as requested.</p>
		<i>m2 per annum</i>	7,827	9,250	1423	
OVERALL		Total	358,684	338,711	-19,973	

	<i>m2 per annum</i>	20,474	19,920	-553.7	
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TABLE 3: Local Plan key constraints and approaches

Gosport Borough Council	Havant Borough Council	Portsmouth City Council
<ul style="list-style-type: none"> The Borough is over 80% 'built-on' with significant brownfield land resulting from a military legacy. All allocated sites are brownfield sites. 	<ul style="list-style-type: none"> Focusing development within established urban and developed areas across the borough³. Limited land outside of these urban areas remaining available for development. 	<ul style="list-style-type: none"> The City is almost entirely built up and all sites are brownfield.
<ul style="list-style-type: none"> The council undertakes regular call for sites (most recently in March 2025) and the process has remained open to submissions. 	<ul style="list-style-type: none"> Given the limited land availability in Havant Borough, the Council's 'call for sites' remains open. 	<ul style="list-style-type: none"> The council undertakes regular call for sites, the last was undertaken in April 2025.
<ul style="list-style-type: none"> Development supported in the borough's town centres to help sustain and enhance existing retail. Gosport's Town Centre and Waterfront is identified for regeneration however demonstrating deliverability is difficult and some previously available sites are no longer available. Council pursuing a Car Parking Strategy to release surplus car parks for mixed-use development including new homes. 	<ul style="list-style-type: none"> A focus on development in the borough's town centres to help sustain and enhance them⁴. The following key areas are identified for mixed use development, including housing delivery: <ul style="list-style-type: none"> Havant Town Centre (628 dwellings); Civic Campus, Havant (170 dwellings); Waterlooville Town Centre (337 dwellings); and Leigh Park Town Centre (45 dwellings). 	<ul style="list-style-type: none"> Portsmouth City Centre is allocated for large scale redevelopment of between 1,600 and 2,300 dwellings.
<ul style="list-style-type: none"> All of the identified development sites in Gosport are brownfield. 	<ul style="list-style-type: none"> A focus on brownfield sites, together with greenfield sites that can deliver sustainable development within environmental and social limits. Development should have no unacceptable impacts on international, 	<ul style="list-style-type: none"> All of the identified development sites in Portsmouth are brownfield

³ Based on a robust audit of land as set out through the Council's [Strategic Housing and Economic Land Availability Assessment](#)

⁴ Evidenced by specific deliverability evidence base studies including the Town Centre Regeneration Appraisal Sites Report <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies> and Waterlooville Town Centre SPD

<ul style="list-style-type: none"> There is no agricultural land identified for development in the Borough. High development densities to make the most efficient use of land and promote sustainable transport accessibility. Indicative densities in draft policy are: <ul style="list-style-type: none"> Above 80dph in Gosport Town Centre and Waterfront; 50 to 100dph in identified Regeneration Areas; and 30 to 50dph in existing suburban parts of the Borough. 	<p>national, or local environmental designations, or national landscape designations.</p> <ul style="list-style-type: none"> Agricultural land value and local landscape value are <u>not</u> considered an overarching constraint preventing an allocation High development densities to make the most efficient use of land and promote sustainable transport accessibility i.e. : <ul style="list-style-type: none"> 80 dph within Havant, Waterlooville and Leigh Park Town Centres; 55 dph within the proposed defined opportunity areas in the Draft Local Plan; and 40 dph elsewhere in the Borough 	<ul style="list-style-type: none"> There is no agricultural land identified for development in the City. High development densities to make the most efficient use of land and promote sustainable transport accessibility i.e: <ul style="list-style-type: none"> High density development of at least 120dph in areas of high accessibility; Medium density development of at least 80dph across the City's core residential areas; Lower density development of at least 40dph in the suburban edge.
<ul style="list-style-type: none"> The draft local plan seeks to align with HCC's Local Transport Plan 4 and prioritises improvements to the local cycling and walking network, and public transport. Proposed development is located in relatively accessible locations. The strategic site Blockhouse will require the development of a mobility hub, providing an opportunity to reduce car dependency and support modal shift. Following discussion with the Environment Agency it was determined that there would be no land defined as Flood Zone 3b within Gosport. 	<ul style="list-style-type: none"> A pattern of development and improvements to the transport network, with housing development concentrated on sites with good access to public transport routes and/or services and facilities with the density policy reflecting this. The Local Plan looks to promote active travel and public transport in line with Local Transport Plan 4. Sustaining existing communities and protecting them from coastal erosion and sea level rise but responding to climate change effects by not adding to the level of risk through a presumption against 	<ul style="list-style-type: none"> The Council's Local Transport Plan 3 sets out the proposed interventions to improve public transport and sustainable travel in the City. Higher density areas correspond with those with the best access to public transport. Following discussion with the Environment Agency it was determined that there would be no land defined as Flood Zone 3b within Portsmouth. The Southsea Coastal Scheme and North

<ul style="list-style-type: none"> The council's SHLAA excludes sites entirely within an area of flooding that has 3.3% of greater AEP (annual exceedance probability) as defined in Appendix A, Figure 12 of the SFRA⁵). To deliver the draft plans main strategic site Blockhouse, there will be a need for considerable investment in flood defence mitigation. Without this mitigation, the site will not be deliverable and the council will no longer be able to include approx. 500 homes within its housing supply (thus increasing unmet need). 	<p>new housing in areas at risk now or in the future (due to the risk to the single access road on and off Hayling Island; brownfield development will continue to be accepted if the site itself is safe)</p>	<p>Portsea scheme will protect the majority of Portsea Island.</p> <ul style="list-style-type: none"> The council's HELAA excludes sites entirely within an area of flooding that has 3.3% or greater AEP (annual exceedance probability) as defined in Appendix A, Figure 11 of the SFRA[1];
<ul style="list-style-type: none"> Safeguarding existing open spaces and expecting new developments of over 50 dwellings to provide new open space at a rate of 1.6ha per 1,000 people or enhance existing spaces. The council's SHLAA considers open spaces classified as low value in the Open Space Monitoring Report for development. Medium and High Value sites are excluded, along with existing cemeteries and allotments. 	<ul style="list-style-type: none"> Safeguarding existing open spaces and expecting new developments to enhance them and/or provide new open spaces 	<ul style="list-style-type: none"> Safeguarding existing open spaces and expecting new developments of over 50 dwellings to provide new open space at a rate of 1.65ha per 1,000 people or enhance existing spaces. The Council's HELAA excludes sites that are entirely or the majority within protected open spaces as specifically designated and identified clearly in a made Neighbourhood Plan or Local Plan;
<ul style="list-style-type: none"> All internationally, nationally and locally protected habitats are protected by the Local Plan. 	<ul style="list-style-type: none"> All international, national and local environmental designations are protected. 	<ul style="list-style-type: none"> The following sites are protected from development due to their nature conservation value: <ul style="list-style-type: none"> Special Protection Areas Ramsar Sites of Significant Importance for Nature Conservation

⁵ www.gosport.gov.uk/article/2963/PfSH-Level-1-Strategic-Flood-Risk-Assessment-2023-2024-Appendix-A-and-Appendix-B

○ Sites identified as Core or Primary sites for Solent Waders and Brent Geese.

Appendix 2: Table setting out the Local Planning Authorities approached by Gosport, Havant and Portsmouth Local Planning Authorities in respect of Housing and Employment under the Duty to Cooperate.

It should be noted that these are the most recent approaches to each local authority and in many instances, there have been earlier discussions/approaches made between authorities.

This table is concerned only with unilateral approaches that have been made by the three authorities to date and does not capture the very detailed and comprehensive work undertaken at a sub-regional level through PfSH.

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Basingstoke and Deane BC	Not approached, different HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need	Not approached, different HMA	n/a
Chichester DC	Not approached, different HMA	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached, interrogation of the respective HEDNAs for the LPA's led to agreement that the authorities are in separate HMAs (SE Hants / Coastal West Sussex) (July 25)	n/a
East Hampshire DC	Approached and asked to accommodate unmet housing need (July 2025)	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached and asked to accommodate unmet housing need (January 2024)	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Eastleigh BC	Not approached, different HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need	Different FEMA, watching brief	Not approached, different HMA	n/a
Fareham BC	Approached and asked to accommodate unmet housing need (July 2025)	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached and asked to accommodate unmet housing need. 800 agreed units for Portsmouth in Fareham Local Plan (2023)	n/a
Gosport BC	n/a	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025)	Approached and asked to accommodate unmet housing need. (January 2024, August 2025) The two authorities are unable to meet each other's needs.	n/a
Hart DC	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to	Different FEMA, watching brief. HBC will respond to local plan as it comes forward to	Not approached, separate HMA	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Havant BC	Approached and asked to accommodate unmet housing need (July 2025) The two authorities are unable to meet each other's needs.	n/a	n/a	n/a	Approached and asked to accommodate unmet housing need. (January 2024, August 2025) The two authorities are unable to meet each other's needs.	n/a
Isle of Wight C	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Approached, interrogation of the respective HEDNAs for the LPA's led to agreement that the authorities are in separate HMAs (SE Hants / loW) (SoCG July 24)	n/a
New Forest DC	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Not approached, separate HMA	n/a
New Forest NPA	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond	Different FEIMA, watching brief. HBC will respond	Not approached, separate HMA	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
			to local plan as it comes forward to highlight unmet need.	to local plan as it comes forward to highlight unmet need.		
Portsmouth CC	Approached and asked to accommodate unmet housing need (July 2025) The two authorities are unable to meet each other's needs	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025). PCC has agreed to provide HBC with ~30,000 m ² of office floorspace	n/a	n/a
Rushmoor BC	Not approached, separate HMA	n/a	Different HMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to highlight unmet need.	Not approached, separate HMA	n/a
South Downs NPA	Not approached, separate HMA	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025)	Approached and asked to accommodate unmet employment need (June 2025).	Approached. The two authorities are unable to meet each other's needs. (July 2025)	n/a
Test Valley BC	Not approached, separate HMA	n/a	Different HMA, watching brief – consultation response (September 2025) asked to	Different FEIMA, watching brief. HBC will respond to local plan as it comes forward to	Not approached, separate HMA	n/a

Other LPA	Gosport Housing	Gosport Employment*	Havant Housing	Havant Employment	Portsmouth Housing	Portsmouth Employment**
Winchester CC	Approached and asked to accommodate unmet housing need. (July 2025)	n/a	Approached and asked to accommodate unmet housing need (April 2024 and June 2025) WCC agreed to provide HBC 70% of its housing surplus (currently 203 units)	Approached and asked to accommodate unmet employment need (June 2025)	Approached. Asked to accommodate unmet housing need. (January 2024) WCC agreed to provide PCC 30% of its housing surplus (currently 67 units)	n/a

*At the time of writing Gosport Borough Council have sufficient employment sites to meet their employment need and so have not approached other local authorities on this matter.

** At the time of writing Portsmouth City Council has a surplus of office floorspace and a small shortfall of manufacturing/warehousing.



Mr David Hayward
Havant Borough Council
Public Services Plaza
Civic Centre Road
Havant
PO9 2AX

Your Ref:
Contact:
PlanningPolicy@Winchester.gov.uk
Direct Line: [REDACTED]

28 October 2025

Dear David,

Subject: Response to Havant Borough Council's Letter Regarding Unmet Housing and Employment Need

Thank you for your letter dated 27 August 2025 and for the continued constructive engagement between our authorities under the Duty to Cooperate. I apologise for the delay. We are currently working to complete our current draft plan so that it can be adopted as soon as possible (which follows the transitional arrangements in the NPPF). We are also commencing work on next plan (to take us to 2044) under the new plan making arrangements. We are also engaged on a number of important Public Inquiries.

We do appreciate the comprehensive overview that you have provided in your letter regarding Havant Borough Council's position on unmet housing and employment need, and the extensive work that you have undertaken to explore all available options for accommodating development within your borough. Thank you for providing the clarification on the points that we raised in our Local Plan representations which will no doubt come under close scrutiny at your Local Plan examination.

Winchester City Council's emerging Local Plan

Our primary focus is to move the emerging Local Plan forward to the 6 week public consultation on the Main Modifications and then onto subsequent adoption as soon as possible next Year.

Next Local Plan

Alongside progressing work on moving the emerging Local Plan towards adoption, Winchester City Council is also committed to undertake work on the next Local Plan.



This work has involved commissioning AECOM to undertake an Integrated Impact Assessment/Habitats Regulations Assessment and going out to tender to update the Employment and Retail Assessment. We are also in the very early process of reviewing briefs for various commissions such as the Strategic Housing Market Assessment, Gypsy and Traveller Accommodation Needs Assessment, Water Cycle Study and a Local Plan Viability Assessment. We have also commenced a new 'Call for Sites' which closes on the 21st November 2025.

Whilst we have been working on our new housing Standard Method figure and we have briefed Cabinet Members on the unmet housing need we are not yet in a position to start detailed work on the Settlement Hierarchy and the approach towards site selection process. We have not undertaken detailed work on the process on how we are going to meet the increase in the Standard Method figure and ultimately, what contribution we might be able to make to unmet needs from neighbouring authorities.

We understand from our recent meeting at Portsmouth City Council Offices on 9th October 2025 that the unmet housing need for Havant, Portsmouth and Gosport now stands at 18,347 homes and 19,973m² of employment floorspace. We have also recently had a Duty to-cooperate meeting with New Forest District Council who have indicated that they will be shortly contacting us as they have an unmet housing need of around 7,500 homes.

A fundamental point that Winchester City Council wish to continue to make is that given the scale of the unmet housing need it is not just Winchester there are other Local Planning Authorities in Hampshire that all have a role to play in helping to meet the unmet housing need. You will know that around 40% of the City Councils geography is covered by the South Downs National Park Authority and they are also likely to have an unmet housing need. As there is a growing wider unmet housing need across Hampshire, we strongly feel that all Hampshire councils have a role to play and we all need to work collaboratively to plan strategically for this unmet housing need. Winchester City Council will continue to make this point in our Local Plan representations that we will be making in the coming months on other Local Plan consultations in Hampshire and we would continue to encourage you to do the same.

As we are prioritising work on ensuring that the emerging Local Plan moves towards swiftly towards adoption, as I have indicated above, we are in the very early process of identifying and scoping the key issues for us and we will need to prepare a project plan. As this work has not been undertaken it is not possible at this time to provide you with any further information.

We do acknowledge the importance of planning for unmet needs across Hampshire and remain committed to working collaboratively with Havant Borough Council and other neighbouring authorities. However, given the early stage of our Local Plan Review, it would be premature to make any firm commitments regarding the accommodation of unmet housing or employment need at this time as we have not yet mapped out the process that we intend to follow.

We will ensure that Havant Borough Council is kept informed as our Local Plan Review progresses, and we would be happy to meet again in due course to discuss the timetable, evidence base development, and opportunities for cooperation, including the preparation of an updated Statement of Common Ground.

Thank you again for your letter and for your continued cooperation.

Yours sincerely,

Adrian Fox

Strategic Planning Manager
Winchester City Council



Portsmouth City Council, Havant
Borough Council and Gosport Borough
Council

Your Ref:
Contact:
PlanningPolicy@Winchester.gov.uk
Direct Line: [REDACTED]

6 November 2025

Dear Lucy, David and Jayson,

Subject: Response to Joint Letter on Housing and Employment Need in South East Hampshire

Thank you for your joint letter dated 13 October 2025 regarding the housing and employment needs in South East Hampshire and the request for assistance under the Duty to Cooperate.

Winchester City Council acknowledges the significant unmet housing need of 18,347 homes and employment floorspace shortfall of 19,973 square metres across the Gosport, Havant, and Portsmouth local authority areas. We appreciate the detailed evidence and collaborative work that has gone into quantifying these figures and identifying the constraints that are faced by your authorities.

Housing unmet need

We strongly agree with the fundamental point that was made at the start of the joint meeting that addressing these housing figures requires a coordinated and strategic approach. However, it is important to re-iterate that this responsibility does not rest solely with Winchester City Council and nor should it be constrained to housing market areas as suggested.

You will know that around 40% of the City Councils geography is covered by the South Downs National Park Authority and they are also likely to have an unmet housing need. As there is a growing wider unmet housing need across Hampshire, we strongly feel that all Hampshire councils have a role to play and we all need to work collaboratively to plan strategically for this unmet housing need. Winchester City Council will continue to make this point in the representations that we will make to yours and other Local Plans in the coming months on other Local Plan consultations in Hampshire.



Meeting the unmet housing need

Thank you for providing the Appendix 2 to the joint letter that sets out in a table which Local Planning Authorities you have approached in respect of housing and employment unmet need which was a key point that we made at the joint meeting.

It is recognised that there are Local Planning Authorities in Hampshire that are located in different housing market areas (a point that has been made in the table that has been included in Appendix 2). However, we consider that at the Local Plan examination you should be able to demonstrate to a Local Plan Inspector that you have left 'no stone unturned' in responding to the significant unmet need you have identified. In view of this we would strongly encourage Portsmouth, Gosport and Havant to be proactive and to approach other Local Planning Authorities in Hampshire which are located outside of your Housing Market Areas. I know there is a difference of opinion on this matter, but it remains our professional opinion that such an approach would strengthen your case during your Local Plan Examinations as you would be able to clearly demonstrate to a Local Plan Inspector that you have done everything possible to meet the requirements of the Duty to Cooperate.

Winchester City Council have for example, been approached by other Local Planning Authorities which are located outside of our Housing Market Area. We would bring to your attention Chichester District Council which has recently successfully gone through a Local Plan examination which included a housing requirement that was below their Standard Method. As part of their evidence base under the Duty to Cooperate we are aware that they did approach local planning authorities that were located outside of their Housing Market Area. This is evidenced by the fact that we received and responded to a Duty to Cooperate letter from them. In view of this, we see no planning reason why you would all not wish to strengthen your Duty to Cooperate evidence base now by undertaking this additional step in the process. Linked to this, given the scale of the figures that have been included in this joint letter, we would also strongly encourage you all to respond like we are to any Local Plan consultations in Hampshire as this is a joint issue that all local authorities need to approach in a consistent way given the importance of this issue. This will also in our professional opinion, strengthen your case at your respective Local Plan examinations.

Employment unmet need

The Powerpoint presentation that was attached to the letter refers to an unmet employment need in square metres. However, there does not appear to be any information on the needs and supply and more importantly, what *type* of employment

land arise in each Local Authority area? This means that we cannot see if the surplus currently identified in Portsmouth and Fareham *could* meet unmet needs in Havant.

We presume that this work has been undertaken but further clarification is sought regarding the position for employment floorspace. The letter and appendix set out current headline figures of need and supply in each authority. It would be helpful if we could please have further detail on what will be needed in order to understand what is being requested, namely –

- A breakdown of the type of floorspace included in the need and supply for each local authority area, to understand if surplus land in one area is suitable to meet unmet needs in another, and be clear what unmet needs have been identified;
- Detail on how the assessment of employment need and supply for Havant Borough has responded to the designation of the Solent Freeport, including measures to ensure there is no double counting of employment needs given the exclusion of 13,935 sq m of employment floorspace at Dunsbury Park Phase 3 from Havant's supply; and
- Confirmation of the position of Gosport Council regarding employment land – i.e. is there agreement that surplus land in Gosport will be available to meet unmet needs in Havant Borough, along the lines of the [letter from Portsmouth to Havant dated 21 August 2025](#) . It is appreciated that the amount of floorspace available may change.

As mentioned above, we presume that some of this information is already available in the various evidence base documents, but it would be helpful to have the current positions confirmed.

Winchester City Council's Local Plans

As advised at the joint meeting my team are now working on two Local Plans.

Our primary focus is to move the emerging Local Plan forward to the 6 week public consultation on the Main Modifications and then onto subsequent adoption as soon as possible next Year.

Next Local Plan

Alongside progressing work on moving the emerging Local Plan towards adoption, Winchester City Council is also committed to undertake work on the next Local Plan which will cover the period up to 2044.

This work has involved commissioning AECOM to undertake an Integrated Impact Assessment/Habitats Regulations Assessment and going out to tender to update the Employment and Retail Assessment. We are also in the very early process of reviewing briefs for various commissions such as the Strategic Housing Market Assessment, Gypsy and Traveller Accommodation Needs Assessment, Water Cycle Study and a Local Plan Viability Assessment. We have also commenced a new 'Call for Sites' which closes on the 21st November 2025.

We have been working on our new housing Standard Method figure and we have briefed Cabinet Members on the unmet housing need, however we are not in a position to start detailed work on the Settlement Hierarchy and the approach towards site selection process, this will take place after the call for sites and when the emerging local plan is adopted. No detailed work on the process on how to meet the increase in the Standard Method figure has been undertaken, and ultimately therefore, what contribution we might be able to make to unmet needs from neighbouring authorities.

Our current priority is to ensure the emerging Local Plan moves swiftly towards adoption, as I have indicated above, we are in the very early process of identifying and scoping the key issues for us and we will need to prepare a project plan. As this work has not been undertaken it is not possible at this time to provide you with any further information.

We do acknowledge the importance of planning for unmet needs across Hampshire and remain committed to working collaboratively with all of the authorities across Hampshire (and beyond). However, given the early stage of our Local Plan Review, it would be premature to make any firm commitments regarding the accommodation of unmet housing or employment need at this time as we have not yet mapped out the process that we intend to follow.

We look forward to continuing constructive dialogue and joint working with you and our neighbouring authorities and we will ensure that Portsmouth City Council, Havant Borough Council and Gosport Borough Council are all kept informed as our Local Plan Review progresses. We would be happy to meet again in due course to discuss the timetable, evidence base development, and opportunities for cooperation, including the preparation of updated Statement of Common Grounds.

Finally, our Local Plan Inspector has not requested any further information in relation to Duty to Cooperate but you can submit this joint letter to the Local Plan Inspector when Winchester City Council consults on the Main Modifications in the coming weeks.

Yours sincerely,

Adrian Fox
Strategic Planning Manager
Winchester City Council



Sent jointly on behalf of
Portsmouth City Council,
Gosport Borough Council
and Havant Borough
Council

Adrian Fox
Strategic Planning Manager
Winchester City Council

By email only:



15/12/2025

Dear Adrian,

Re: Response to Joint Letter on Housing and Employment Need in South East Hampshire

We are writing following your letter of 6 November, which itself was a response to our letter to Winchester City Council on 13 October and our joint meeting with colleagues from East Hampshire District Council and Fareham Borough Council as well as ourselves.

Thank you firstly for the acknowledgement of the sizeable level of unmet need which exists in the housing market area. We wanted to take the time to respond to the specific points which you have raised.

In writing to you, we also note the recent ministerial letter highlighting that the legal requirement elements of the Duty to Cooperate will likely be rescinded in the near future and before any of our respective plans are examined. Nonetheless, the soundness requirements to discuss and collaborate on cross-boundary issues will remain.

Employment need

We note your questions in your 6 November letter. Whilst we could respond to the points you have raised, it would be more useful we feel to bring you up to date on the letter received from Fareham Borough Council alongside your own in response to our letter of 13 October.

Fareham's letter sets out:

The Council acknowledges the remaining deficit of 19,973 square metres of new employment floorspace across the three authorities and notes the request for help with this unmet need.

Fareham recognises the importance of a strong, responsive and competitive economy, alongside the delivery of housing delivery. The promotion of economic development is one of the Council's six corporate priorities.

The adopted Fareham Local Plan 2037 identifies an employment floorspace requirement across the Plan period of 121,964 square metres of employment floorspace. The Local Plan allocated seven new sites to meet this requirement, two of these sites (Faraday and Swordfish) form the strategic site at Daedalus. These seven sites are in addition to the strategic site at Welborne (allocated through the Welborne Plan). Between them, Welborne and Daedalus contribute 77% of the anticipated supply.

At point of adoption the plan identified a supply of 241,754 square metres of employment floorspace, an excess of 119,790 square metres compared to the requirement. The Inspector at the Local Plan examination recognised the value and importance of the two strategic sites and welcomed the inclusion of the additional sites to facilitate some flexibility and choice in the local market. To maximise flexibility the Local Plan does not allocate these sites for a particular use class, rather all employment allocations are for mixed employment use.

As the Council's local plan is adopted, the Council is not in a position to include any wording within the current Plan, committing some of this supply to unmet need. Fareham Borough Council is willing to commit 19,973 square metres of its employment floorspace towards Havant Borough Council's unmet need and would welcome a further dialogue with Havant Borough Council to agree how best to achieve this.

Obviously, we have been in touch with our Fareham colleagues to acknowledge the letter and express our thanks for the sizeable accommodation of unmet need which this represents together with the constructive way that they have responded to the planning challenges we collectively face. We are meeting with Fareham Borough Council on 22 January to discuss the detail of how best to formalise this through the Duty to Cooperate.

Housing need

Thank you for noting the high and extremely challenging level of unmet need which exists in our shared housing market area. This represents an extremely challenging scale of unmet need and represents a key matter to be addressed under the Duty to Cooperate.

We note your position that addressing this level of unmet need will require a coordinated and strategic approach. Whilst this might be the ideal situation, you will note that the creation of a Mayoral Combined County Authority has now been significantly delayed by two years to 2028. Critically, you will also be aware that at the Partnership for South Hampshire's December Joint Committee meeting¹, the following statement was agreed by all members of the partnership, which of course includes our three authorities as well as Winchester City Council:

PfSH approved a Spatial Position Statement in December 2023. It sets out strategic principles to guide development. It also sets out the balance between the need and

¹ www.push.gov.uk/work/our-meetings/joint-committee/

supply of new dwellings across the sub region, identifying a shortfall in supply still to be planned for of 11,771 dwellings to 2036. It recognises that some authorities are at an early stage in plan preparation, and that as part of this plan making work additional sites will be identified to meet unmet needs. The Statement sets out a two stage process to addressing needs, first identifying the authorities which should be able to meet or exceed their needs, and second by identifying broad areas of search for growth to be considered further through local plans.

Since this Statement was approved, the Government's standard method for calculating housing need has changed from a population based to a housing stock based algorithm, and the affordability ratio has also changed. As a result the housing need figures for the PFSH area as a whole have increased.

The national proposals to reintroduce statutory strategic planning will require the preparation of a Spatial Development Strategy by the proposed Mayoral Combined Authority for Hampshire and the Solent. A key output of this work will be meeting housing need. In light of this, PFSH do not intend to update the Spatial Position Statement. However, in the meantime PFSH continue to discuss the latest position to inform the preparation of each authority's local plan in accordance with the 'duty to co-operate'. This is supplemented by the preparation of Statements of Common Ground between individual authorities and groups of authorities as relevant.

As such, whilst a sub-regional or regional approach may be ideal to address such a large level of unmet housing need, there is currently no mechanism to do that, nor will there be in the near future. As such – and as noted in the collective statement – the preparation of individual local plans, supported by statements of common ground, will need to address unmet development needs.

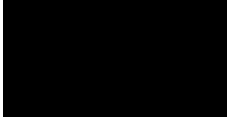
We also note your encouragement to proactively approach other local authorities, outside of the Housing Market Area. We are taking the suggestion under advisement. Nonetheless, notwithstanding this, it would only be appropriate for unmet need in this housing market area to be met further afield when opportunities to do so within or close to the housing market area cannot meet that unmet need in full. As such, this suggested approach does not negate the need for us to continue to discuss the critical cross-boundary issue of unmet housing need.

On that basis, we would strongly reiterate the need for the emerging Winchester Local Plan which will cover the period up to 2044 to address this issue robustly. We would look for a methodology to plan production which will test options which will not only include meeting the standard method as it applies to Winchester and unmet need from the South Downs National Park but also how it will address unmet need from the South East Hampshire Housing Market Area. We do hope that the work of the three local planning authorities in South East Hampshire has helped to clarify the scale of unmet need in the area to help inform the formulation of the new Winchester Local Plan.

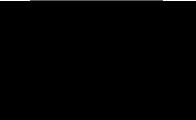
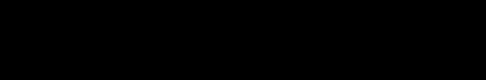
We would welcome confirmation of the timeframe for engagement and reassurance that no evidence base will be commissioned by the City Council which relates to the testing of development strategy scenarios prior to our ability to discuss this matter. We look forward to

your response on this as a critical element of Winchester City Council's emerging 2044 Local Plan by return.

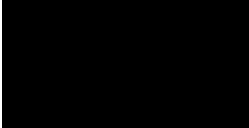
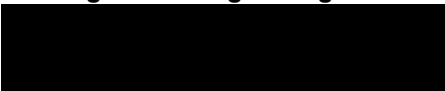
Yours sincerely



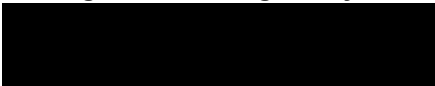
Lucy Howard
Head of Planning Policy



David Hayward
Strategic Planning Manager



Jayson Grygiel
Manager of Planning Policy





Portsmouth City Council, Havant
Borough Council and Gosport Borough
Council

Your Ref:
Contact:
PlanningPolicy@Winchester.gov.uk
Direct Line: [REDACTED]

9 January 2026

Dear Lucy, David and Jayson,

Subject: Response to Joint Letter on Housing and Employment Need in South East Hampshire

Thank you for your joint letter dated 15 December 2025 regarding the housing and employment needs in South East Hampshire and the request for assistance under the Duty to co-operate.

Written Ministerial Statement

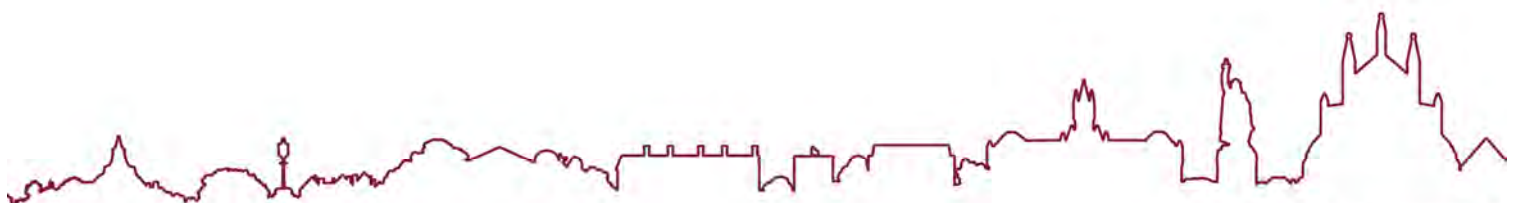
The Local Plan Inspector has undertaken an Inspector led public consultation on the Duty to co-operate/Written Ministerial Statement until the 9th January 2026. A copy of Winchester City Council's response to the Inspector led public consultation is available on the Local Plan examination website [ED44](#). Our response makes it entirely clear that our position has not changed with regard to the Duty to co-operate and the latest Written Ministerial Statement in terms of the emerging Local Plan or the next Local Plan.

Winchester City Council's Local Plans

As we have previously advised our primary focus is to move the emerging Local Plan forward to adoption as soon as possible after the receipt of the Local Plan Inspector's Report. This means that work that is associated with the next Local Plan will resume after adoption of this local plan.

Government's new 30 month timeframe for preparing Local Plans

You will be aware that the Government has just issued further guidance on a new 30 month timeframe for preparing Local Plans.



We are meeting up towards the end of February with several Hampshire authorities that will be progressing under the Government's new 30 month Local Plan timeframe. The purpose of this meeting is to 'brainstorm' what will be required of us by Government in terms of preparing a Local Plan in 30 months.

We do acknowledge the importance of planning for unmet needs across Hampshire and remain committed to working collaboratively with all of the authorities across Hampshire (and beyond) and we look forward to continuing constructive dialogue and joint working with you and our neighbouring authorities.

We would be happy to meet again in due course to discuss the timetable, evidence base development, and opportunities for cooperation, including the preparation of updated Statement of Common Grounds and as noted above we will begin that work as soon our local plan is adopted.

Yours sincerely,

Adrian Fox
Strategic Planning Manager
Winchester City Council

Appendix 5 – Letters to and from authorities in the Hampshire and Solent devolution area

Civic Offices
London Road
Basingstoke
RG21 4AH

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

Date: January 2026

Dear Sir/Madam,

Housing Need in Havant Borough

We are writing to Basingstoke and Dean Borough Council as one of the local planning authorities in the Hampshire and the Solent devolution area, as these will be covered by the same Spatial Development Strategy

The purpose of this letter is to formally update you on the progress of the Council's Local Plan – the Building a Better Future Plan, including the latest position on our housing and employment development needs. As you may be aware, the Council consulted on a full draft Regulation 18 Local Plan earlier this year and is currently working towards a Pre-Submission Regulation 19 Local Plan 2026 and submission by the end of 2026. Further information can be found at: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/building-better-future-plan>

As with most urban local planning authorities in the South East, one of the biggest challenges for the new Local Plan will be to meet Havant's own development needs. Indeed many authorities including Havant Borough have seen a substantial increase to its housing need under the 2025 standard method which increased the Borough's housing need figure from 516 to 892 dwellings per annum, equivalent to 17,840 homes over the plan period.

Housing Need and Supply

The Council's starting point is that no stone will be left unturned to meet its own need. However, Havant will be an authority which will be unable to meet the scale of its development needs. Havant Borough has a demonstrably constrained supply of land, and the least constrained areas have already been identified for development¹. The Draft Local Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum. This results in a very large unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year).

¹ HS01 Havant Borough Constraints Study. Available at <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

Whilst submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance of which 70% be apportioned to Havant Borough. This is currently expected to be 346 dwellings² per annum which would reduce unmet need to 10,276 dwellings.

To date, the Council's approach has been to focus approach has been to focus duty to cooperate discussions with the Borough's immediate neighbouring authorities³, and with other authorities within the same Housing Market Area (HMA)⁴. However, in light of the scale of unmet need that remains, Havant Borough considers that it is necessary to approach non-neighbouring authorities beyond its HMA.

Under the Duty to Cooperate, the Borough Council is formally requesting Basingstoke and Dean Borough Council to assist in meeting the unmet housing need of at least 10,276 dwellings arising from Havant Borough. As set out above, the Council is in discussions with its neighbouring authorities and other local authorities within the same housing market area.

We are of course mindful that you may have received similar requests from your own neighbouring authorities, and non-neighbouring authorities within the same Housing Market Area as you. We are conscious that your priority will be to meet your own housing needs first, and to accommodate unmet needs from your own neighbouring authorities first.

Joint working

We look forward to constructive and active discussions to effectively address unmet housing and employment needs arising from Havant Borough in due course.

Yours sincerely

David Hayward

Strategic Planning Manager

² MM49 <https://www.localplan.winchester.gov.uk/assets/inline/2683/Schedule-of-Proposed-Main-Modifications.pdf>

³ Chichester District Council, East Hampshire District Council, Portsmouth City Council, South Downs National Park Authority, Winchester City Council

⁴ Fareham Borough Council and Gosport Borough Council



Basingstoke
and Deane

Basingstoke and Deane Borough Council
Civic Offices, London Road,
Basingstoke, Hampshire RG21 4AH
www.basingstoke.gov.uk | 01256 844844
customer.service@basingstoke.gov.uk
Follow us on   @BasingstokeGov

Emailed to David Hayward

[REDACTED]
Havant Borough Council

3 February 2026

Dear David

Duty to Co-operate Formal Request: Housing

Thank you for your letter of January regarding Duty to Co-operate matters. This set out a formal request for Basingstoke and Deane Borough Council to assist in meeting the unmet housing need of at least 10,276 dwellings arising from Havant Borough. It is noted that Basingstoke and Deane Borough (BDB) and Havant Borough are not neighbouring authorities, and they do not fall within the same housing market area (HMA). However, the request has been sent given BDB's location within the wider Hampshire and Solent devolution area. The scale of the request is also noted.

It is unclear from your letter what proportion of the outlined need you are specifically requesting the borough to accommodate, especially given that you have also requested assistance from your neighbouring authorities and also those within your HMA. Havant borough is some distance from the borough. The suitability of your approach to accommodating the need within Havant Borough will be fully considered through your Local Plan process and therefore the council will not be commenting on this aspect further at this stage.

BDB council is in the early stages of updating the adopted Basingstoke and Deane Local Plan (2011-2029). A second Regulation 18 consultation has recently taken place, focusing on a revised spatial strategy. Our priority must always be to meet our own housing needs first and the draft plan sets out a draft strategy for accommodating the needs of the current NPPF in full, including the significant uplift in housing requirement to 1,152 home per annum. It includes a stepped approach due to concerns about the ability of local infrastructure to cope with the proposed high levels of growth and also due to the nature of the spatial strategy which, due to the high numbers involved, includes a number of large scale strategic sites/new settlements which will take some time to deliver new homes on the ground. The council continues to have significant concerns about whether such a high level of growth can be sustainably accommodated in the borough. This concern was reflected by stakeholders and residents through the aforementioned consultation where a very high number of objections were received.

Chief Executive Russell O'Keefe
Deputy Chief Executive Rebecca Emmett
Director of Resident Services Fiona Darby
Director of Regeneration Sarah Longthorpe
Director of Customers, Digital and Improvement Katy Sallis

It is also worth highlighting that the current high housing number in the borough, coupled with a shortage of deliverable sites, has led to the council being unable to demonstrate a full five-year housing land supply for a number of years. Whilst the council is taking proactive steps to address this, the position remains around three years. This again demonstrates the difficulty of meeting our own housing number, which was significantly increased by the 2024 NPPF, and therefore the inability to accommodate further additional homes from neighbouring areas.

I can therefore confirm that unfortunately the council does not have any scope to accommodate any unmet housing need from Havant borough. This is considering the current high housing number within this borough and the availability of suitable sites and infrastructure to deliver new homes.

As always, we welcome the ongoing dialogue between councils and are happy to assist in the production of relevant statements of common ground if that would be helpful.

Kind regards

Joanne Brombley
Planning Policy Manager



Graham Tuck
Planning Policy Manager
Eastleigh Borough Council

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 11 March 2026

By email only:

[REDACTED]

Dear Graham

Housing Need in Havant Borough

We are writing to Eastleigh Borough Council as one of the local planning authorities in the Hampshire and the Solent devolution area, as these will be covered by the same Spatial Development Strategy

The purpose of this letter is to formally update you on the progress of the Council's Local Plan – the Building a Better Future Plan, including the latest position on our housing needs. As you may be aware, the Council consulted on a full draft Regulation 18 Local Plan in Summer 2025 and is currently working towards a Pre-Submission Regulation 19 Local Plan 2026 and submission by the end of this year. Further information can be found at: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/building-better-future-plan>

As with most urban local planning authorities in the South East, one of the biggest challenges for the new Local Plan is meeting Havant's own development needs. Indeed many authorities including Havant Borough have seen a substantial increase to its housing need under the revised standard method which has increased the Borough's housing need figure from 516 to 892 dwellings, equivalent to 17,840 homes over the plan period.

Housing Need and Supply

The Council's starting point is that no stone will be left unturned to meet its own need. However, Havant will be an authority which will be unable to meet the scale of its development needs. Havant Borough has a demonstrably constrained supply of land, and the least constrained areas have already been identified for development¹. The Draft Local Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum. This results in a very large unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year).

¹ HS01 Havant Borough Constraints Study. Available at <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies>

Whilst the submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance of which 70% be apportioned to Havant Borough. This is currently expected to be 346 dwellings² which would reduce Havant Borough's unmet need to 10,276 dwellings.

The Council's approach has been to focus duty to cooperate discussions with the Borough's immediate neighbouring authorities³, and with other authorities within the same Housing Market Area (HMA)⁴. To date however, it has not been possible to accommodate any further unmet housing need other than that which has come through Winchester's Local Plan. In light of the scale of unmet need that remains; Havant Borough considers that it is necessary to approach non-neighbouring authorities beyond its HMA.

Whilst the Duty to Cooperate has been recently been removed from the legacy plan making system, local authorities will need to continue to address strategic matters where development needs cannot be met in a particular plan area. **The Borough Council is therefore formally requesting Eastleigh Borough Council to assist in meeting the unmet housing need of at least 10,276 dwellings arising from Havant Borough.** As set out above, the Council is in ongoing discussions with its neighbouring authorities and other local authorities within the same HMA.

Joint working

Our authorities have a strong track record of working together through the Partnership for South Hampshire (PfSH). We look forward to further discussion through PfSH so that the latest position on unmet housing need can inform the preparation of authorities' respective local plans.

Yours sincerely

David Hayward

Strategic Planning Manager

² MM49 <https://www.localplan.winchester.gov.uk/assets/inline/2683/Schedule-of-Proposed-Main-Modifications.pdf>

³ Chichester District Council, East Hampshire District Council, Portsmouth City Council, South Downs National Park Authority, Winchester City Council

⁴ Fareham Borough Council and Gosport Borough Council

FAO: David Hayward
Strategic Planning Manager
Havant Borough Council
By email

10 April 2026

Dear David

Housing Need in Havant Borough

Thank you for your letter dated 11 March 2026.

We note the significant increase in the Government's housing need targets for your Borough. As you note, this is a challenge faced by many Councils, including our own.

Your letter explains that you consider that the Havant Borough Local Plan will not be able to fully meet this housing need. It also sets out that, to date, discussions with neighbouring authorities in your housing market area have not led to contributions being made towards this unmet need (with the exception of a contribution of 346 dwellings by Winchester).

As a result, your letter formally requests that Eastleigh Borough Council assists in meeting Havant Borough's unmet need of 10,276 dwellings over your plan period.

There are a number of points which underpin our response to your request.

First, Eastleigh Borough's standard method housing need amounts to 18,440 homes (2024 – 2044), similar to the high need you are considering. Our Issues and Options consultation documents indicate this is likely to generate a need for 9,970 new homes on greenfield sites over this period (in addition to the significant greenfield growth we are already planning for). We need to assess the extent to which we can meet our own needs and contribute to any unmet needs, in accordance with the NPPF as a whole. Our Borough covers a relatively small area and has a range of national and local constraints (we recognise you face similar issues). Once Eastleigh Borough Council has selected its preferred sites it will be in a position to advise on the extent to which it can meet or exceed its own needs.

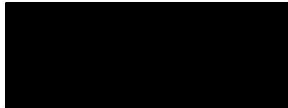
Second, Eastleigh Borough is in a separate housing market area to Havant Borough. If additional housing were to be provided in our Borough, it would do little in reality to meet housing needs arising from Havant. This geographical reality will continue to apply as we move towards a Spatial Development Strategy for Hampshire and the Solent.

Third, in the event that Eastleigh Borough were able to exceed its own needs, and therefore make a contribution to unmet needs from the wider area, there may be other authorities in our own housing market area with an unmet need which may make a call on any contribution we might be able to make.

In summary, Eastleigh Borough Council is in the process of establishing through its local plan process whether or not it can make any contribution to wider unmet housing needs. In the event that it were able to do so, for the reasons cited above, it is very unlikely that such a contribution would assist in meeting the unmet need from Havant Borough.

I hope that helps by setting out our current position. We do of course recognise the challenges you face. We will support further discussion, either in response to this letter, or through the Partnership for South Hampshire more generally.

Yours sincerely



Graham Tuck
Planning Policy Manager
Eastleigh Borough Council

Planning Policy
Hart District Council

By email only:

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 11 March 2026

Dear Sir or Madam

Housing Need in Havant Borough

We are writing to Hart District Council as one of the local planning authorities in the Hampshire and the Solent devolution area, as these will be covered by the same Spatial Development Strategy

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Whilst the Duty to Cooperate has been recently been removed from the legacy plan making system, local authorities will need to continue to address strategic matters where development needs cannot be met in a particular plan area. **The Borough Council is therefore formally requesting Hart District Council to assist in meeting the unmet housing need of at least 10,276 dwellings arising from Havant Borough.** As set out above, the Council is in ongoing discussions with its neighbouring authorities and other local authorities within the same HMA.

Yours faithfully

David Hayward

Strategic Planning Manager

² MM49 <https://www.localplan.winchester.gov.uk/assets/inline/2683/Schedule-of-Proposed-Main-Modifications.pdf>


³ Chichester District Council, East Hampshire District Council, Portsmouth City Council, South Downs National Park Authority, Winchester City Council

⁴ Fareham Borough Council and Gosport Borough Council



Re: Housing Need in Havant Borough

From Daniel Hawes [REDACTED]
Date Tue 2026-03-17 12:20
To Ellis, Jade [REDACTED] Hayward, David [REDACTED]

 1 attachment (165 KB)
HBC Hsg Need Hart Letter.pdf;

Dear David Hayward

Thank you for your letter of 11th March 2026 concerning unmet needs for housing arising in Havant Borough.

The Council is not in a position to agree to meet any unmet housing needs.

We are at the start of a new local plan process. We cannot yet demonstrate that we can meet our own housing needs. In December 2024 our local housing need figure increased from approximately 300 homes per annum to currently 771 homes per annum.

Regardless of our current local plan position, we do not consider Havant to be a 'neighbouring area' under the NPPF. Havant is on the south coast whilst Hart is on the northern boundary of Hampshire adjoining Surrey and Berkshire. The full north-south extent of East Hampshire District Council separates us. Our position is therefore that Hart is under no obligation under national policy to consider unmet housing needs arising in Havant.

You refer to the fact we are in the same area for a future Spatial Development Strategy, but we do not see that as a relevant factor at this point in time. The SDS will be a new vehicle or distributing growth around Hampshire but it is not yet in place and we are currently operating to the NPPF.

This response has been signed off by the Portfolio Holder for Planning Policy, Cllr Graham Cockrill.

Daniel Hawes
Planning Policy and Economic Development Manager
Hart District Council

[REDACTED]
Twitter: [@HartCouncil](#)
Facebook: [/HartDistrictCouncil](#)

From: Ellis, Jade [REDACTED]
Sent: 11 March 2026 11:00
To: Planning Policy <planningpolicy@hart.gov.uk>
Cc: Hayward, David [REDACTED]
Subject: External - Re: Housing Need in Havant Borough

Caution: This is an external email and was sent from outside of Hart District Council and could contain suspicious content. Please take care when clicking links or opening attachments. When in doubt, contact IT at office365@hart.gov.uk

Dear Planning Policy Team

Please see attached letter.

Please let us know if it'd be useful to discuss at all.

Kind regards,
Jade

Jade Ellis MRTPI

Principal Planning Policy Officer | [REDACTED]

Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

Advanced notice of leave: None upcoming



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Please consider completing our short [Customer Feedback Form](#) so that we know how we handled your query and can continue to improve the service that we provide.

CAUTION: This email came from outside of the council - only open links and attachments that you're expecting.

James Brewer
Planning Policy Manager
Isle of Wight Council

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 11 March 2026

By email only:

Dear James

Housing Need in Havant Borough

We are writing to Isle of Wight Council as one of the local planning authorities in the Hampshire and the Solent devolution area, as these will be covered by the same Spatial Development Strategy

The purpose of this letter is to formally update you on the progress of the Council's Local Plan – the Building a Better Future Plan, including the latest position on our housing needs. As you may be aware, the Council consulted on a full draft Regulation 18 Local Plan in Summer 2025 and is currently working towards a Pre-Submission Regulation 19 Local Plan 2026 and submission by the end of this year. Further information can be found at: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/building-better-future-plan>

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Housing Need and Supply

The Council's starting point is that no stone will be left unturned to meet its own need. However, Havant will be an authority which will be unable to meet the scale of its development needs. Havant Borough has a demonstrably constrained supply of land, and the least constrained areas have already been identified for development¹. The Draft Local Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum. This results in a very large unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year).

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Whilst the Duty to Cooperate has been recently been removed from the legacy plan making system, local authorities will need to continue to address strategic matters where development needs cannot be met in a particular plan area. **The Borough Council is therefore formally requesting Isle of Wight Council to assist in meeting the unmet housing need of at least 10,276 dwellings arising from Havant Borough.** As set out above, the Council is in ongoing discussions with its neighbouring authorities and other local authorities within the same HMA.

Yours sincerely

David Hayward

Strategic Planning Manager

² MM49 <https://www.localplan.winchester.gov.uk/assets/inline/2683/Schedule-of-Proposed-Main-Modifications.pdf>

³ Chichester District Council, East Hampshire District Council, Portsmouth City Council, South Downs National Park Authority, Winchester City Council

⁴ Fareham Borough Council and Gosport Borough Council

To

David Hayward
Strategic Planning Manager
Havant Borough Council

Via email to:

[REDACTED]

From

**James Brewer, Planning Policy
Manager**

Seaclose Offices, Newport, Isle of
Wight PO30 2QS

Tel

Email:

[REDACTED]

Web

www.iow.gov.uk

Our Ref: IWC/IPS/DTC/HBC1426

Date: 1 April 2026

Dear David

Re: Housing Need in Havant Borough

Thank you for your letter dated 11 March 2026 updating on progress of the Council's Local Plan.

Following our useful meeting on 24 March 2026 to discuss our respective emerging local plan positions, I am writing to formally respond to the request for the Isle of Wight to assist in meeting the unmet need arising from Havant Borough and also to confirm our current local plan position on the island.

Draft Island Planning Strategy

With regard to our emerging local plan, we remain at examination having submitted the Draft Island Planning Strategy in October 2024. Further hearings are scheduled for 15 & 16 April with main modifications consultation likely to take place in early summer.

Our ongoing co-operation with various nearby local authorities was reflected by the Planning Inspectors for our examination stating in their [Post Hearings letter of 11 April 2025](#) that we had met our 'Duty to Co-operate' requirements. This included agreement that the island was in a separate housing market area (HMA) to mainland authorities.

One of the key soundness concerns raised by our Inspectors was the shortfall in our submitted housing requirement (453dpa) from the standard method housing need (703dpa). As part of the proposed changes to the Draft Island Planning Strategy (subject of the aforementioned hearings in April 2026) we are therefore seeking to allocate additional sites to meet our standard method housing need (703dpa) over an initial 5 year plan period, as suggested by the Inspectors.

I can confirm that we are able to identify these additional sites within our own administrative area and for the first 5 years of the emerging plan period (2025-2030) there is no unmet need arising from the Isle of Wight.

The island will have an identified shortfall of approximately 2,100 dwellings in year 6 of the plan period onwards (2031-2037). However under the transitional arrangements for the new plan-making system, the Isle of Wight Council is required to commence plan-making before the end of 2026 for our new local plan. With a maximum 30 month preparation process, this new plan will be adopted towards the end of 2029 and that plan will therefore be able to consider the shortfall identified above.

At this stage of our local plan process for the Draft Island Planning Strategy, I would see no reason to revise the position agreed by our Inspectors that the island is in a separate housing market area to mainland authorities.

Housing Need and Supply

Looking ahead we acknowledge that, at present, there is a likely unmet need of at least 10,276 dwellings arising from Havant Borough.

Notwithstanding the Isle of Wight being in a separate HMA, the island itself is also facing a significant increase in standard method housing need figure for our next local plan. At the time of writing, our next plan (after the Island Planning Strategy) would have to plan for 1,060dpa – an increase of over 300dpa per year from the 703dpa in the Draft Island Planning Strategy (or an increase of 4,500 dwellings in a 15 year plan period).

Even the figure of 703dpa is significantly in excess of the average housing delivery on the island of 366dpa since the adoption of our current Core Strategy in 2012.

At this stage, until work on our next local plan begins in earnest, we are unable to confirm whether the island is even able to accommodate our own level of proposed growth as defined by the governments standard method housing need.

For these reasons, the island would not be able to assist in meeting unmet need arising from Havant Borough. Should this position change as work on our new local plan (post adoption of the Island Planning Strategy) progresses, then our regular communication through various officer working groups within the region will be able to discuss and review in more detail.

Should you have any further queries, please do not hesitate to contact me and we look forward to continuing to liaise and work together on various strategic and regional topics as our local plan processes move forward.

Kind regards



James Brewer
Planning Policy Manager

Planning Policy
Rushmoor Borough Council

By email only:

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 11 March 2026

Dear Sir or Madam

Housing Need in Havant Borough

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Yours faithfully

David Hayward

Strategic Planning Manager

² MM49 <https://www.localplan.winchester.gov.uk/assets/inline/2683/Schedule-of-Proposed-Main-Modifications.pdf>

³ Chichester District Council, East Hampshire District Council, Portsmouth City Council, South Downs National Park Authority, Winchester City Council

⁴ Fareham Borough Council and Gosport Borough Council



Our reference: DC265

David Hayward
Strategic Planning Manager
Havant Borough Council

By email only to:

Contact: Alice Barella (Acting Service
Manager – Planning Policy)

Email:

Date: 15th April 2026

Dear Jade,

Thank you for your letter of 11th March updating me on the progress of your local plan and housing need and supply. This is a formal response to your request to accommodate the unmet housing needs of Havant Borough Council.

As you may be aware, we adopted our Local Plan in February 2019. Having regard to the date of adoption, the Council has undertaken a review of the Local Plan and has concluded that a full update of the Local Plan policies is needed. In March 2026, we published a timetable for preparing a new Local Plan which confirms the intention to prepare a new Local Plan under the new plan-making system.

Housing Need

Using the Standard Method, Rushmoor's annual housing requirement is 599 dwellings per annum. This is a 37% increase on the adopted Local Plan housing requirement of 436 dwellings per annum. Our latest Five Year Housing Land Supply Position Statement published in March 2026 identifies sites to deliver 2,979 dwellings, equivalent to 4.74 years. Our latest Land Availability Assessment is currently still being finalised for publication, but the previous version (2024) identified a supply of 5,952 dwellings over 15 years including a windfall allowance, which equates to 397 dwellings per annum, significantly below the annual housing requirement using the Standard Method. The position has not changed significantly since 2024.

Whilst further work will be undertaken through the preparation of a new Local Plan to identify additional deliverable and developable sites, due to the highly constrained and urban nature of Rushmoor, we are unlikely to be in a position where an oversupply is identified. Additionally, the whole of Rushmoor is within 5km of the Thames Basin Heaths SPA, which means that any net residential development must be mitigated through the provision of SANG. Again, due to the highly constrained and urban nature of the borough, SANG is currently in short supply and it will continue to be a challenge to deliver sufficient SANG to accommodate housing growth in the borough moving forward. Therefore, Rushmoor is not able to accommodate any unmet housing needs of Havant Borough Council.

Ian Harrison - **Managing Director**

Karen Edwards – **Executive Director**

Yours sincerely,



Tim Mills
Executive Head of Property and Growth

Amber Trueman
Service Manager – Strategic Planning
Southampton City Council

Enquiries to: David Hayward

Direct line: [REDACTED]

Email: [REDACTED]

My reference:

Your reference:

Date: 11 March 2026

By email only:

Dear Amber

Housing Need in Havant Borough

We are writing to Southampton City Council as one of the local planning authorities in the Hampshire and the Solent devolution area, as these will be covered by the same Spatial Development Strategy.

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Joint working

Our authorities have a strong track record of working together through the Partnership for South Hampshire (PfSH). We look forward to further discussion through PfSH so that the latest position on unmet housing need can inform the preparation of authorities' respective local plans.

Yours sincerely


David Hayward

Strategic Planning Manager

² MM49 <https://www.localplan.winchester.gov.uk/assets/inline/2683/Schedule-of-Proposed-Main-Modifications.pdf>

³ Chichester District Council, East Hampshire District Council, Portsmouth City Council, South Downs National Park Authority, Winchester City Council

⁴ Fareham Borough Council and Gosport Borough Council

 Outlook

RE: Housing Need in Havant Borough

From Trueman, Amber [redacted]
Date Fri 2026-04-10 11:24
To Ellis, Jade [redacted] planningpolicy.enquires@southampton.gov.uk
<planningpolicy.enquires@southampton.gov.uk>

CAUTION: This email came from outside of the council - only open links and attachments that you're expecting.

Hi Jade,

I'm so sorry, I'd somehow missed this so thank you for chasing!

However, I'm afraid Southampton City Council is not in a position to support at this time. Whilst SLAA work is ongoing, we have not yet undertaken all the necessary assessment of sites or any viability testing to confirm likely delivery numbers. Unfortunately, even running some crude density calculations across all of our sites has not yielded a total that will meet our own housing need, let alone have any surplus to be able to support unmet need of our neighbours, so I think we too will end up with some unmet need unless we can think up some more creative options over preparation of our new local plan.

Kind Regards,

Amber Trueman
Service Manager - Strategic Planning
Transport and Planning Service
Directorate for Place
Southampton City Council

[redacted]
(She/Her/Hers)
Facebook facebook.com/SotonCC, Stay Connected [Stay Connected](#)



From: Ellis, Jade [redacted]
Sent: 10 April 2026 11:06
To: Trueman, Amber [redacted] planningpolicy.enquires@southampton.gov.uk
Subject: Fw: Housing Need in Havant Borough

You don't often get email from [redacted]

Good morning

Please could we give you a gentle nudge on this one?

Many thanks, Jade

Jade Ellis MRTPI

Principal Planning Policy Officer | [REDACTED]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

Advanced notice of leave: None upcoming



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If you are not the intended recipient, please notify the sender, and please delete the message from your system immediately.

From: Ellis, Jade [REDACTED]
Sent: Wednesday, March 11, 2026 10:59
To: [REDACTED]
planningpolicy.enquires@southampton.gov.uk <planningpolicy.enquires@southampton.gov.uk>
Cc: Hayward, David [REDACTED]
Subject: Housing Need in Havant Borough

Dear Amber

Please see attached letter.

Please let us know if you'd like to discuss at all.

Kind regards,
Jade

Jade Ellis MRTPI

Principal Planning Policy Officer | [REDACTED]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

Advanced notice of leave: None upcoming



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By email to Test Valley Borough
Council at

[REDACTED]

Enquiries to: David Hayward

Direct line:

Email: [REDACTED]

My reference:

Your reference:

Date: 7 April 2022

RE: DRAFT LOCAL PLAN 2040

I am writing in response to Test Valley Borough Council's consultation on the Draft Local Plan 2040. Please note that this is an office-based response, prepared in consultation with the Cabinet Lead.

Havant Borough Council is committed to meeting its need for housing and boosting development in the Borough. This is a key arm of the [Council's new Corporate Strategy](#). As you are aware through discussions at various officer and member meetings of the Partnership for South Hampshire, Havant Borough Council was well advanced with a local plan with a plan period to 2037. This was a plan which met, though barely, the need for housing in Havant Borough. The plan was examined in 2021 and an interim findings report was published in November. This set out a number of concerns of the inspectors regarding the Havant Borough Local Plan. The main concern was regarding housing delivery within the plan period. The Council put forward an ambitious set of regeneration proposals together with a strategy which maximised the delivery across both brownfield and greenfield sites, seeking to meet the need for housing.

Nonetheless, due to the constrained and highly built-up nature of the Borough, any development site is highly constrained and needs multiple mitigation packages in order to be developed. For example, two greenfield sites which together represent approximately 1000 homes both need off site mitigation refuges for Solent Waders and Brent geese. Clearly the need to acquire third party land represents a significant constraint and a brake on sites coming forward. This was one of the concerns expressed by the inspectors last year.

Sites for which the inspectors noted concerns represent over 2000 new homes, or a fifth of the Borough's housing need. This is obviously a significant shortfall in supply.

Havant Borough Council will be developing a new local plan as a matter of priority. We will be looking to address as many of the constraints and supply issues as possible. Nonetheless, given that the need for housing has already risen and some of the concerns will be very unlikely to address, it will now not be possible for Havant Borough Council to meet the need for new housing in the plan period.

As such, the Council has begun discussions with neighbouring local authorities and those in the south east Hampshire housing market area. This has shown that there may be some potential to

accommodate unmet housing need. However, it will inevitably not be possible to accommodate Havant's unmet need together with the remainder of unmet need in the housing market area. It is notable in this context that in paragraph 5.12 of the Draft Local Plan it sets out that there is no need in neighbouring local authorities.

Havant Borough Council is committed to working through the Partnership for South Hampshire on the new Joint Strategy and to maximise the opportunities to accommodate unmet need in the south east of Hampshire. Nonetheless, due to the challenges, it is unlikely that this will be sufficient to meet the need for housing. As such, Havant Borough Council is formally seeking a commitment from Test Valley Borough Council to accommodate unmet need from Havant Borough in its new local plan.

If it would be helpful to discuss this matter, I'd be happy to set up a meeting to explore in more detail.

Yours sincerely

David Hayward

Planning Policy Manager

