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By email only

07 September 2026

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Civic Offices
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Re: Havant Borough Council – Building a Better Future - Portsmouth City Council response September 2026

Thank you for consulting Portsmouth City Council (PCC) on the Publication version of Havant Building a Better Future Plan under Regulation 19. The constrained nature of Havant Borough with its limited areas for growth is noted, and bearing this in mind, the City Council offers the following comments.

Housing needs / Duty to Co-operate

Draft Policy 6: Amount of Housing sets a housing target for Havant Borough of at least 7,087 new dwellings for the plan period 2022-2043, equating to 337 dwellings per annum. If non-implementation discounts are not applied, the housing requirement for the plan period would increase to 7,394 dwellings, as set out in Table 5. This is a capacity-based target and does not meet the standard method need (2024), which identifies a housing need of 15,822 dwellings over the Plan period, equating to 879 homes per annum.

PCC has taken a similar approach to identifying its own housing target. In the Pre-Submission Portsmouth Local Plan Addendum published in 2025. A capacity-based target of at least 11,369 new homes (approximately 758 per annum) for the plan period (2025-2040) is set under draft Policy PLP16: Housing Target. At that time the standard method set a local housing need figure of 1,019 dwellings per annum for the City, which equates to 15,285 dwellings over the plan period of 2025-2040.

Both authorities have left no stone unturned in robustly identifying all sources of potential housing supply. Notwithstanding this, it is clear that both authorities have a shortfall against their respective standard method needs. Considering this, it is acknowledged that neither authority is in a position to assist the other in meeting each other's housing need at this current time. This position has been agreed in the Statements of Common Ground (SCG)

between PCC and Havant Borough Council (HBC) dated February 2026[1] and the SCG between the four South East Hampshire authorities of PCC, HBC, Gosport Borough Council and Fareham Borough Council dated March 2026[2].

PCC welcomes HBC's proactive engagement with neighbouring authorities in addressing the issue that not all of Havant Borough's housing needs can be accommodated within its administrative area. The Council supports the ongoing discussions with adjoining authorities and other local authorities within the Portsmouth Housing Market Area (HMA) to address this important cross-boundary matter through a collaborative and coordinated approach.

It should be noted that the City Council owns a significant number of residential properties within Havant Borough. For instance, the Housing Allocation Sites: 13 (Cabbagefield Row), 14 (Strouden Court) are owned by PCC. As a result, households from Portsmouth with a need for social housing can be accommodated in Havant, making the provision of affordable housing and related services a strategic cross-boundary issue for both authorities.

Please note that this letter is from PCC as a local planning authority. PCC as a site promoter in the Borough will respond separately to this consultation.

Employment Needs / Duty to cooperate

The City Council welcomes the allocation of around 42,600 sqm of employment floorspace and its role in supporting the Freeport at Dunsbury Park (Allocation 25).

Draft Policy 7: Amount of Employment and its supporting text set an employment target, the supply of employment land and key findings of the Employment Land Review and its Update. It is understood by the City Council that due to the late receipt of the Employment Land Review Update there were a number of matters that needed clarification. The two Councils have therefore worked together positively on new wording to both the Policy and its supporting text. This is set out in track changes in appendix 1 of this letter.

This section of the Plan references the formal offer of assistance from PCC of 31,261 sqm of office as set out in the Pre-Submission Portsmouth Local Plan Addendum[3] and in our letter to you dated 21 August 2025[4]. The City Council has been working on updated employment figures for its examination. Due to a number of employment losses and the withdrawal of a major investor from an office development in the City Centre the surplus of employment land that PCC can offer HBC has reduced from 31,261 m^2 to 22,743 m^2. The reduced figure is set out in the track changed version of the Policy in Appendix 1.

The Natural Environment

The two authorities are connected by a number of nationally and internationally designated nature conservation sites including Langstone Harbour and Farlington Marshes. PCC welcomes the draft Policy 21, particularly its recognition that development must protect, conserve and enhance these designated habitats and landscapes. The Council also

[1] https://media.portsmouth.gov.uk/wp-content/uploads/2026/02/Final_SCG_HBC_PCC_Feb-26_SIGNED.pdf
[2] https://media.portsmouth.gov.uk/wp-content/uploads/2026/03/Final_SCG_SEH_Mar-26.pdf
[3] https://media.portsmouth.gov.uk/wp-content/uploads/2025/11/pre-submission-local-plan-addendum-nov-2025-aa-accessible.pdf
[4] https://media.portsmouth.gov.uk/wp-content/uploads/2025/10/PCC-letter-to-HBC-21-08-25.pdf

welcomes the draft Policy 23 which requires development to avoid/mitigate recreational disturbance on Solent SPA and Ramsar sites. The Council expresses its commitment to working closely with HBC to avoid, minimise and mitigate impacts on these sites, recognising that their protection is a wider cross-boundary issue which requires a coordinated approach.

Portsmouth has a direct infrastructure relationship with Havant including its connection to the Budds Farm Wastewater Treatment Works, which is located within the Borough and is addressed in draft Policy 24. Consequently, the shared challenge of nutrient neutrality, together with the provision of infrastructure required to address nutrient capacity at the treatment works, is a matter of mutual importance and relevance to both authorities.

Policy 3: Regeneration

PCC supports a collaborative approach with HBC in the preparation and implementation of regeneration proposals for Leigh Park and other areas of the Borough where the Council is a major landowner.

Policy 4: Infrastructure and Environmental Mitigation to Support Development

The City Council welcomes the safeguarding of land at the Broadmarsh Landfill Revetment for a Flood and Coastal Erosion Risk Management Scheme, recognising its potential contribution to the protection of the adjoining Chichester and Langstone Harbours Special Protection Area (SPA). The Environmental Mitigation Sites identified in Figure 9, particularly those located close to the City boundary and A27 motorway, are also welcomed. In the longer term, consideration could be given to incorporating these sites into a wider green infrastructure corridor, linking with open spaces in Portsmouth, including Portsdown Hill.

Conclusion

Thank you for providing the City Council with the opportunity to engage with you around the Havant Local Plan. I wish you well with progressing the plan to a positive and successful conclusion.

Yours sincerely

[redacted]

Lucy Howard

Head of Planning Policy

Portsmouth City Council

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Appendix 1: Tracked changed version of the Policy 7: Amount of Employment

Policy 7: Amount of Employment

Why the policy is needed

Addressing employment need

2.112 National guidance indicates that a robust evidence base is needed to understand existing and future business needs which is to be kept under review to reflect local circumstances and market conditions. The Employment Land Review (ELR) 2024 and the ELR Addendum 2026 is consistent with the methodology for undertaking an economic needs assessment as prescribed by Planning Practice Guidance (PPG) which requires the consideration of a number of approaches to deriving the employment requirements: past take up, labour demand and labour supply.

2.113 ~~For industrial need, t~~The ELR identifies a minimum need for new industrial and warehousing floorspace of 146,213 sqm (Light Industrial, General Industrial, Storage and Distribution) based on past trends (over the most recent five year period). This reflects the level of demand seen in the recent take up of premises in the property market, as well as the recent redevelopment of existing industrial sites (where earlier on-site losses of traditional employment uses were not accounted for).

2.114 On this basis, the ELR states there is an industrial and warehousing net need in the Borough of over 146,000 sqm.

2.115 For office floorspace, Havant's office market continues to be weak with no sign that developer confidence is close to a return. The latest Valuation Office Agency (VOA) data shows that existing office floorspace in Havant has shrunk from close to 100,000 sq m in 2022 to just over 80,000 sq m in 2025. ~~with t~~he ELR identifying a range for office need over the plan period. The ELR states that recovery for the office sector in the sub-region is likely to be felt first in the larger established office areas such as the City of Portsmouth, and with Portsmouth being able to accommodate office related labour supply growth in the short to medium term, supporting office growth within the same economic market area is clearly a pragmatic response to Havant's lack of market interest and lack of land supply available for office use. ~~Nonetheless, t~~The Council's Regeneration and Economic Strategy seeks to promote a stronger economy and diversify the Borough's town centres. The ELR Update identifies a range for office needs over the plan period based on different methodologies. It recommends that the need figure taken forward in the Local Plan should be 36,000 ~~m2~~sqm in the Borough which is likely to arise in the middle and toward the end of the Plan period. Due to the lack of ~~suitable~~available sites for office development in the Borough ~~T~~the ELR ~~identifies that office provision would be needed to provide for an improved market and flexibility in market conditions, though~~ acknowledges~~ing~~ that it may be better to work with neighbouring authorities, particularly Portsmouth City Council, to address ~~particularly the short term~~office need.

2.116 On this basis, the ELR concludes that there is an office net need in the Borough of around 36,000 sqm in order to support high end economic growth.

2.117 ~~On this basis, the ELR states there is an industrial and warehousing net need in the Borough is over 146,000 sqm.~~

Employment land supply

2.118 The Council's Strategic Housing and Economic Land Assessment (SHELAA) identifies the quantum and suitability of sites which can be provided to address the Borough's need for employment development. Havant Borough does ~~-~~have sufficient available land to meet its ~~economic~~ industrial warehousing need ~~s. T~~though the existing employment areas will support the replacement and redevelopment of existing buildings and intensification of employment uses within these areas.

2.119 The Borough has a strategic site at Dunsbury Park which was designated as a Freeport Tax Site as part of the Solent Freeport in 2022. Several industrial units have already been taken up and occupied within Phases 1 and 2 of the site, with the opportunity to deliver a significant amount of employment floorspace on the remainder of the site. Given the market outlook and lack of Freeport related demand it is concluded as part of the most recent ELR update that any net additional jobs and floorspace from Phase 3 would be available and should be included within the supply available for general market activity.

2.120 There is however a lack of promoted sites for office development. The ELR notes that the office market has been challenging for a number of years and that developers are unwilling to invest speculatively in securing land allocations when they do not see a reasonable short-term development opportunity. As such, given the current market weakness and limited viability, any new office development would be in the middle to the end of the plan period, following a plan review.

Policy 7: Amount of Employment

During the period 2022 - 2043, this plan makes provision for at least 146,213 sqm of ~~industrial~~ employment land floorspace (net) across the Borough.

How the policy will be implemented

An employment requirement based on development capacity

2.121 The employment floorspace capacity for the Borough from 2022 to 2043 is shown in the table below.

Sources of employment land supply (2022-2043)	Net floorspace (sqm)
Completions 2022-25	32,216
Planning permissions as of 1 April 2025	70,969
Allocations[1]	45,745
Total employment land supply (from all sources)	148,930

Table 6: Sources of employment land supply 2022-2043

2.122 The Borough's assessed ~~employment~~ need for~~-~~ 146,~~-~~213sqm net new industrial and warehousing~~industrial~~ floorspace can be met by a small margin. However given the difficulties highlighted above, there has been no promotion of land for office development as part of the ~~p~~Plan's preparation and so there are no available sites for future office development. ~~The Council has proactively engaged with its neighbouring areas, both on a bi-lateral and multi-lateral basis with authorities of Portsmouth City, Fareham Borough and Gosport Borough being all located within the Portsmouth-focused Functional Economic Market Area (FEMA)[2]. This work has proved very productive and has resulted in formal offers of assistance from Portsmouth City and Fareham Borough respectively, this has been formalised through Statements of Common Ground[3].~~

2.123 The SHELAA highlights that the range of sites available to meet employment need favours the industrial and warehouse sectors, reflecting that this is a much stronger market in the Borough compared to the office market. There is industrial supply of over 148,930sqm of floorspace meaning that there is a choice of sites which vary in type, size and location offering a range of opportunities for the market. Compared to the need for new industrial floorspace, there is a surplus in the region of 2,000 sqm but development activity in this sector is expected to remain high and employment sites are limited. This reinforces the need for the Borough to retain all of its existing employment areas, as it will be increasingly difficult to expand the Borough's economic base with limited land availability to provide employment uses elsewhere (Policy 44 - Protecting Employment Uses).

2.124 There have been no sites which have been actively promoted for office provision. Whilst the office market is currently poor and unlikely to change in the short term, office development should continue to be directed towards town centre locations as part of the sequential approach. Regeneration proposals within the town centres are therefore encouraged to explore whether office floorspace could be provided as part of a wider mix of uses, particularly in Havant and Waterlooville town centres (Policy 3 - Regeneration).

2.125 However, it is important that the Pp~~p~~lan provides for flexibility for positive change with improving market conditions. The ~~p~~Plan therefore makes flexible allocations that could respond to either source of demand. Indeed, many businesses in Havant Borough occupy premises within existing employment areas comprise a mixture of industrial, warehouse and office uses.

2.126 However, in preparing the plan, the Council have been conscious that it is unlikely that the plan can fully meet the need for office development in particular. The Council has proactively engaged with its neighbouring and nearby authorities, both on a bi-lateral and multi-lateral basis with Portsmouth City, Fareham Borough and Gosport Borough being all located within the Portsmouth-focused Functional Economic Market Area (FEMA)[4]. This work has proved very productive and has resulted in formal offers of assistance from Portsmouth City Council (~~31,261~~ 22,743 sqm of office) ~~-~~and Fareham Borough Council (19,973 sqm of flexible employment floorspace) respectively, which has been formalised through a Statement of Common Ground[5] which will be updated before Submission~~.~~ Nonetheless, following the most recent evidence base to support this Local Plan, only the office need would be met through Statements of Common Ground.

2.127 In discussing the need for all types of employment development, the Southeast Hampshire Local Authorities have been mindful of the types of employment unmet need, the pull that Portsmouth City – particularly the city centre – will have on the office market and the Local Government Review process and its interaction with future local plans. In particular, the need in Havant is focussed towards the latter half of the plan period, following the emergence of a new unitary authority which will cover all of Southeast Hampshire. As such, the offer from Portsmouth City Council is a logical approach, reflecting an approach to planning for development over the FEMA~~functional economic area~~ and future local government geography.