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Tony Whitty
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Chichester District Council

Enquiries to: David Hayward
[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 Hampshire[2], 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



Strategic Planning Manager