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:
[redacted]

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 Statement[1] 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 Statement[2] 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 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.

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[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

[redacted]

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Head of Planning Policy

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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/gblp2040evidence
		Dwellings per annum	*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).
		Dwellings per annum	*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
		Dwellings per annum	*1019*	*758*	*-261*	

						referred to in the LP Addendum as the Winchester LP is still at examination.
OVERALL		Total	38,719	20,372	**-18,347**	
		Dwellings per annum	*2,345*	*1,231*	***-1,025***	

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	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 EDNA/ELLA 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 EDNA/ELLA (2018) and internal work to date. Refresh to EDNA/ELLA currently being undertaken for Regulation 19 in early 2026. Regulation 18 EDNA/ELLA available online.
		m2 per annum	*3,887*	*4,482*	*594*	
Havant Borough Council	2023-2043 (20 years)	Total	175,199	123,775	-51,424	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.
		m2 per annum	*8,760*	*6,189*	*-2571*	
Portsmouth City Council	2025-2040 (15 years)	Total	117,400	138,746	21,346	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.
		m2 per annum	*7,827*	*9,250*	*1423*	
OVERALL		Total	358,684	338,711	-19,973	

	m2 per annum	*20,474*	*19,920*	*-553.7*	

TABLE 3: Local Plan key constraints and approaches

Gosport Borough Council	Havant Borough Council	Portsmouth City Council
• The Borough is over 80% 'built-on' with significant brownfield land resulting from a military legacy. All allocated sites are brownfield sites.	• Focusing development within established urban and developed areas across the borough[3]. Limited land outside of these urban areas remaining available for development.	• The City is almost entirely built up and all sites are brownfield.
• The council undertakes regular call for sites (most recently in March 2025) and the process has remained open to submissions.	• Given the limited land availability in Havant Borough, the Council's 'call for sites' remains open.	• The council undertakes regular call for sites, the last was undertaken in April 2025.
• 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.	• A focus on development in the borough's town centres to help sustain and enhance them[4]. The following key areas are identified for mixed use development, including housing delivery: ▪ Havant Town Centre (628 dwellings); ▪ Civic Campus, Havant (170 dwellings); ▪ Waterlooville Town Centre (337 dwellings); and ▪ Leigh Park Town Centre (45 dwellings).	• Portsmouth City Centre is allocated for large scale redevelopment of between 1,600 and 2,300 dwellings.
• All of the identified development sites in Gosport are brownfield.	• 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,	• 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

	national, or local environmental designations, or national landscape designations.	
• There is no agricultural land identified for development in the Borough.	• Agricultural land value and local landscape value are <u>not</u> considered an overarching constraint preventing an allocation	• 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. Indicative densities in draft policy are: o Above 80dph in Gosport Town Centre and Waterfront; o 50 to 100dph in identified Regeneration Areas; and o 30 to 50dph in existing suburban parts of the Borough.	• High development densities to make the most efficient use of land and promote sustainable transport accessibility i.e. : o 80 dph within Havant, Waterlooville and Leigh Park Town Centres; o 55 dph within the proposed defined opportunity areas in the Draft Local Plan; and o 40 dph elsewhere in the Borough	• High development densities to make the most efficient use of land and promote sustainable transport accessibility i.e: o High density development of at least 120dph in areas of high accessibility; o Medium density development of at least 80dph across the City's core residential areas; o Lower density development of at least 40dph in the suburban edge.
• 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.	• 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.	• 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 Gosport.	• 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	• 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

• 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 SFRA[5]). • 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).	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)	Portsea scheme will protect the majority of Portsea Island. • 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];
• 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.	• Safeguarding existing open spaces and expecting new developments to enhance them and/or provide new open spaces	• 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;
• All internationally, nationally and locally protected habitats are protected by the Local Plan.	• All international, national and local environmental designations are protected.	• The following sites are protected from development due to their nature conservation value: ○ 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 FEMA, 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**
			highlight unmet need.	highlight unmet need.		
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 FEMA, 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 / IoW) (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 FEMA, 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 FEMA, 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 FEMA, 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 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**
			accommodate unmet housing need.	highlight unmet need.		
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.