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Claire Tester
South Downs National Park Authority

*By email only:*
[redacted]

**Enquiries to:** David Hayward
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**My reference:**
**Your reference:**
**Date:** 10 August 2026

Dear Claire

**UPDATE FROM HAVANT BOROUGH COUNCIL ON UNMET DEVELOPMENT NEEDS**

As you will be aware, the Publication (Regulation 19) Building a Better Future Plan was published on Monday 20 July and is currently subject to public consultation until 5pm on Wednesday 9 September 2026. Thank you for your collaboration on the bi-lateral Statement of Common Ground between our two authorities which supports this consultation. The purpose of this letter is to formally update you on the latest position on our housing and employment development needs.

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. Havant Borough Council will submit its Local Plan under the legacy plan making system, to be examined under the 2024 National Planning Policy Framework (NPPF).

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) confirms that local planning authorities continue to be under a duty to cooperate with each other on strategic matters.

Throughout the plan's production, the Council has continued to take a robust and extensive approach to collaboration and engagement with its neighbouring authorities particularly in respect of unmet development needs. This is set out in detail in the Statement of Cooperation[1] which forms part of the evidence base to the Plan. This has also taken the form of collective discussions with South East Hampshire authorities (including Gosport Borough Council and Portsmouth City Council) as all three authorities have unmet

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

development needs in the same housing market area. More recently, this has also included engagement with authorities in the Hampshire and the Solent Combined County Authority area.

The purpose of this letter is to formally update you on the Borough's housing and employment need and supply position at Publication (Regulation 19) stage.

**Housing need and supply**

The Council has left no stone unturned to meet as much housing need as sustainably possible through the Plan, in line with the National Planning Policy Framework (NPPF). The Strategic Housing and Economic Land Availability Assessment (SHELAA) includes a comprehensive and robust assessment of land to ensure the Council has fully examined all opportunities for development. This was updated in June 2026 and has been published as part of the evidence base for the plan[2]. The monitoring data in the Plan has a base date of 1 April 2025, but it has been necessary to re-base the start of the plan period to 2022 ensure that the Plan is up to date on adoption.

The Publication Building a Better Future Plan makes provision for at least 7,087 new dwellings for the plan period (2022 to 2043), averaging 337 dwellings per annum. The housing need for the Borough using the standard method is currently 879 dwellings per annum, equivalent to 15,822 dwellings over the remaining plan period (2025-2043).

As of 1 April 2025, there remains a supply of 5,908[3] new dwellings remaining to be delivered by the Plan. This would result in an unmet housing need figure of 9,914 dwellings. However, with an unmet need allowance of 345 dwellings from the adopted Winchester District Local Plan 2020-2040 this reduces Havant Borough's unmet need to 9,569 dwellings.

Given the scale of unmet housing need that exists, the Borough has also engaged with other authorities in the Hampshire and the Solent devolution area. The Statement of Cooperation documents this and shows that it has not been practicable to secure any further commitments towards unmet housing need at this time. The Statement of Cooperation also highlights the various statements of common ground agreed with other local authorities, and how we have had ongoing discussions regarding the unmet need from the Borough.

Nonetheless, given the scale of the issue, we continue to seek collaborative discussions on a bilateral and multilateral level with other authorities to try and address this key issue. In the medium term of course, this will be further addressed by the Spatial Development Strategy undertaken by the Hampshire and the Solent Combined County Authority. However in the meantime, we would continue to ask that should there be new opportunities to work together to further boost the supply of housing, that this is discussed as a matter of priority.

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[2] https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

[3] Excluding 1,179 completions which took place during 2022/23 to 2024/25

**Employment need and supply**

Our previous letter dated 12th June 2025 highlighted that the Borough had an unmet need of 51,424 sq. m for employment floorspace over the plan period. The Council has since 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) which resulted in formal offers of assistance from Portsmouth City and Fareham Borough respectively.

More recently, the Council published an Employment Land Review Update[4] which concludes the Borough's assessed employment need for 146,213 sq m for net new floorspace can be met by a small margin. However, all of the supply identified is industrial floorspace and the Council is advised to pursue accommodating the Borough's office need, at least in the short to medium term elsewhere in the FEMA, and in particular Portsmouth City. As such, the Council will be undertaking further discussions with Portsmouth City Council and Fareham Borough respectively but there is no longer a formal ask for assistance from your authority in respect of unmet employment need.

**Joint working**

Our authorities have a strong track record of working together and we look forward to continuing constructive and active discussions to effectively address unmet development needs arising from Havant Borough.

I look forward to receiving any response to our Publication Building a Better Future Plan consultation in due course. In the meantime, please let us know if it would be helpful to arrange a meeting to discuss our unmet housing need or any element of the Publication Plan in more detail?

Yours sincerely

[redacted]

**Strategic Planning Manager**

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