Winchester City Council

Mr David Hayward
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Havant
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Your Ref:
Our ref:
Contact: Adrian Fox
[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 check 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

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Adrian Fox
Strategic Planning Manager