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Enquiries to: David Hayward
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My reference:
Your reference:
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Dear Adrian

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 recent Duty to Cooperate meeting on the 24th June 2025. Your subsequent letter dated 2nd July 2025 specifically challenges the unmet development need arising out of Havant Borough. This letter addresses the questions raised and provides the City Council with further reassurance that Havant Borough is leaving no stone unturned in order to effectively address its own development needs.

We have now concluded the most recent set of Duty to Cooperate discussions, which included a formal request to accommodate unmet housing and employment need, with all authorities in the Portsmouth Housing Market Area (HMA)[1], as well as the South Downs National Park Authority.

I can confirm that we have similarly received requests to accommodate unmet housing need under the Duty to Cooperate from Gosport Borough Council and Portsmouth City Council.

Duty to Cooperate

As you will know, the 'duty to cooperate' is a legal requirement of the local plan process. At the point of examination, appropriate evidence will need to be provided to demonstrate that the duty to cooperate has effectively been discharged for the plan being examined. The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) do not provide a fixed format for how the duty to cooperate should be discharged, nor prescribe which authorities should be cooperated with in the preparation of local plans.

[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 Chichester District Council.

As highlighted above, 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.

Test Valley Borough Council (TVBC)'s current draft Regulation 18 Local Plan sets out which that they have not been approached by any of their neighbouring Local Planning Authorities in terms of assisting with any Partnership for South Hampshire (PfSH) unmet housing need. However, Havant Borough Council's approach to them as a non-neighbouring authority is noted in TVBC's Duty to Cooperate Topic Paper[2]. This reflects Havant Borough's response to TBVC's Draft Local Plan consultation in 2022 which highlighted that it would not be possible for Havant Borough to meet its housing need. We will be formally responding to their current consultation on their draft Regulation 18 Local Plan in due course and will reiterate our position regarding unmet need.

In relation to the South Downs National Park, you will be aware that paragraph 189 of the 2024 NPPF states that national parks have the highest status of protection in relation to landscape and scenic beauty, and that the scale and extent of development within these designated areas should be limited. In this regard, the South Down National Park Authority's response dated 26th June 2025 confirms they are unable to accommodate any unmet needs arising from Havant Borough.

Finally, Winchester's Local Plan Inspector recently concluded a consultation on the implications of changing the plan period (WCC examination document ED37) which may affect the unmet needs allowance and the amount that can be apportioned towards Havant Borough's unmet housing need. In response to this consultation, you will be aware that the Council has set out its support for the submitted Local Plan period of 2020-2040 which maximises the contribution towards unmet need outside of Winchester District. This in turn, will reduce the extent to which Havant Borough would need to request further contributions from Winchester City Council and other authorities moving forwards.

Housing requirements

The majority of housing need figures for each local authority in South Hampshire have significantly increased as a result of the 2024 changes to the standard method. It is acknowledged that this represents a significant challenge for Local Plans across the sub-region. Indeed, Havant Borough has seen an increase from 516 to 892 dwellings per annum (an increase of 72%).

The table attached as an annex to the consultation response on Winchester City Council (WCC) examination document ED37 illustrates the profound impact that the increase to the standard method has had on our unmet need position which has more than doubled (from 4,309 to 9,292 dwellings). Significant work that has been undertaken to identify available sources of housing supply in the context of the constraints that exist in Havant Borough. It is unlikely that there will be any new sites that can substantively increase our supply.

[2] Draft Test Valley Local Plan 2042 Duty to Cooperate Topic Paper June 2025 – see Table 1 Strategic Planning Matter 1a: Housing

Indeed, we are acutely aware of the wider unmet need arising out of southeast Hampshire having received similar Duty to Cooperate requests from Portsmouth City Council and Gosport Borough Council respectively.

Havant – acknowledgement of unmet need

Through our ongoing duty to cooperate discussions, we have emphasised how the Council is leaving no stone unturned in order to address its own housing need. Your letter dated 2nd July 2025, specifically challenges the unmet housing need position arising out of Havant Borough.

Havant Borough first highlighted that that it would be an authority highly unlikely to meet its housing need following receipt of the previous Local Plan Inspectors Findings in November 2021[3]. Since then, numerous PfSH officer and member meetings discussed development need and development constraints. This culminated in the approval of the PfSH Spatial Position Statement in December 2023[4], which confirms an unmet need of 2,603 dwellings for Havant Borough up to 2036. To reiterate Winchester City Council are recorded as being part of the approval of this document[5]. Significantly, the position to 2036 does not provide for the minimum 15 year period as required by the NPPF and we need to plan to 2043.

Whilst the unmet housing need position has since changed, we have kept you up to date through PfSH together with bi-lateral meetings since then. Notably our meetings on 2nd November 2023, and the 24th June 2025 have covered housing need and supply, with the changes summarised in the annex to the consultation response on WCC examination document ED37.

On a bi-lateral basis, we have also set out the robust approach to identifying all sites to deliver housing in Havant Borough. This has included a comprehensive audit of land across Havant Borough to ensure that opportunities for development have been fully examined.[6]. Indeed, this included approaching landowners to ascertain whether there are any additional sites not already included in the SHELAA. We are therefore disappointed that Winchester City Council is not accepting of the unmet need figure of 9,292 dwellings.

The housing supply positions presented in the Council's Sustainability Appraisal (SA) provide an indication of the amount of development that could be delivered under each development strategy option having regard to:

a. the characteristics of sites themselves (i.e. the type of land that would be affected by development eg brownfield or greenfield; any nature conservation, heritage or other protective designations etc);
b. locational matters (i.e. where development should take place in relation to other facilities, infrastructure needs etc) and
c. qualitative requirements (eg density and quality requirements for housing).

[3] This was confirmed in an email to Steve Opacic, Strategic Planning Projects Officer on 17/11/21
[4] PfSH Joint Committee 6 December 2023
[5] This is set out in the minutes to the PfSH Joint Committee meeting of 6 December 2023 which are available at www.push.gov.uk/wp-content/uploads/2023/12/Minutes-of-PfSH-Joint-Committee-6-December-2023.pdf
[6] See paragraphs 3.15-3.16 of the Council's 2024 Strategic and Economic Land Availability Assessment for more detail https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

As you are aware from our meeting, the SA which accompanies the Regulation 18 Local Plan tested four potential development strategies which ranged from a full environmental and brownfield development focus (Option 1), to one with a full housing delivery focus with few environmental considerations (Option 4).

Simple Overview of the 4 Development Strategy Options Considered



Environmentally Driven
More interventionist

Housing Delivery Driven
More laissez-faire

The table presented at our recent Duty to Cooperate meeting shows the expected housing supply under each of the strategy options. This was produced based on analysis of different sources of housing supply in the Council's SHELAA including variables of developable sites with the exception of Option 4. Further information is provided for each of the options below.

Sources of housing supply	Option 1	Option 2	Option 3	Option 4
Completions 2023/24	368	368	368	368
Commitments	1,142	1,142	1,142	1,142
Broad locations considered suitable under the strategy option	1,003	2,406	2,406	2,406
Site allocations considered suitable for allocation under the strategy option	821	1,906	2,669	4,282
Small sites with the urban area	29	37	37	37
Windfall	1,360	1,360	1,360	1,360
Total housing supply	**4,723**	**7,218**	**7,981**	**9,594**
Supply against standard method plan requirement of 17,840	**(13,117)**	**(10,622)**	**(9,859)**	**(8,246)**

As will recall from our recent Duty to Cooperate meeting, the four options represent the following:

- Option 1 restricts development to established urban and developed areas and brownfield sites across the borough, with a particular focus on development within the town centres.

  The housing supply only includes developable SHELAA sites on previously developed land including the town centre broad locations.

- Option 2 represents the proposed development strategy which maximises development in established and urban areas and on brownfield sites; and greenfield development where it has no unacceptable impacts on international, national or local environmental designations. Sustaining existing communities and protecting them from coastal erosion and sea level rise; responding to the effects of climate change by not adding to the level of flood risk through a presumption against new housing in areas at risk of flooding, now or in the future. Due to the flood risk to the single access road on and off the island, this includes greenfield sites on Hayling Island, which may not themselves be at risk. Brownfield development on the island would continue to be acceptable if the site itself is safe.

  In supply terms, this translates to all developable sites in the SHELAA, both greenfield and brownfield, excluding greenfield sites located on Hayling Island.

- Option 3 actively supports greenfield development in most locations, except where restricted by environmental law (e.g. Habitat Regulations). As with the above, existing communities would be sustained and protected from from coastal erosion and sea level rise; responding to the effects of climate change by not adding to the level of flood risk through a presumption against new housing in areas at risk of flooding, now or in the future However, housing development on Hayling Island on sites that are not themselves at flood risk would be considered acceptable, despite the flood risk to the access road.

  The supply position under this option includes all developable sites in the SHELAA, both greenfield and brownfield, including greenfield sites on Hayling Island.

- Option 4 represents a fully market-led position driven by housing need.
  The housing supply position is not directly comparable with the SA option. It includes both all developable and discounted housing sites from the SHELAA. It should be noted that a number of the reasons for discounting the SHELAA sites include NPPF footnote 7 constraints (e.g. within a National Landscape designation, current day risk of tidal flooding, land in use as mitigation for protected species).

For completeness, we would recommend referring to the SA for a full description of the alternative development strategies considered. It is also our intention to provide a detailed explanation of this analysis and the development strategy options considered alongside our Regulation 19 Local Plan consultation.

We trust that this provides Winchester City Council reassurance that the Council is taking a robust and comprehensive approach to leaving no stone unturned in order to address its own housing need. Indeed, even if the Council was able to demonstrate that Option 3 was an appropriate development strategy, there would only be a further supply of 763 dwellings

to meet need (10,622 – 9,859 = 763 dwellings). As such, there would still be a very significant level of unmet housing need arising out of Havant Borough.

We would be grateful if the City Council could clarify whether it accepts that unmet need arises out of Havant Borough in principle, thus necessitating discussions under the Duty to Cooperate as to how this need can be accommodated rather than whether it exists. The Borough Council accepts of course that the precise amount of unmet need will fluctuate between now and the examination due to, for example, annual data returns on housing completions. We reiterate the offer made at our recent meeting to go through the available development sites in Havant Borough so that Winchester colleagues can fully scrutinise our site assessment process.

For completeness, I can confirm that we will also be publishing a nutrients budget as part of the Council's Habitat Regulations Assessment accompanying the Council's Regulation 19 Local Plan in due course.

Hayling Island

In the letter dated 2nd July 2025 it is stated *"that without further information confirming that future development cannot take place on Haying Island, we remain unable to agree the unmet housing need figure of 9,292 dwellings"*. We understand from our meeting that the information sought would be commentary from the Environment Agency regarding this element of the development strategy. Building on the information in the section above, I would reiterate that if all available development sites on the island are developed, the housing need for Havant Borough would still not be met by a wide margin.

Nonetheless, I can confirm that in their response to the Draft Local Plan consultation, the Environment Agency have stated:

"Thank you for consulting the Environment Agency on your 'Building a Better Future Plan', we feel that issues within our remit have been well recognised within the document and are pleased that this generally translates forward into clear and robust policies to ensure that the environment is protected as development in the Borough is forthcoming.

We have the following comments that we hope you find useful in further developing the plan.

Policy 1 - We support the approach set out in Policy 1 (i) that seeks to sustain existing communities whilst not increasing risk by avoiding new housing in areas at risk of flooding now or in the future. The extent to which the Local Plan uses the available evidence to avoid allocating development in areas at risk of flooding and coastal erosion is a particular strength in its approach to building resilience to climate change within the Borough.

Policy 4 - We welcome the safeguarding of land in Policy 4 (l) that integrates the Local Plan with Flood and Coastal Erosion Risk Management Strategies and Schemes within the Borough. This integration is also evident in the approach to development on Hayling Island – this precautionary approach considering uncertainties around funding and viable standards of protection of future schemes will build resilience into the Local Plan with respect to climate change. Any regeneration proposals on Hayling Island (and within the

wider Borough) will need to meet the requirements of the relevant local and national policies on flood risk and coastal change."

We trust the Environment Agency's response provides the City Council with the reassurance that is needed to take discussions regarding unmet need forward.

Havant – Employment need and supply

Thank you for acknowledging our unmet need position on employment need. We note that Winchester City Council does not currently have any spare employment capacity to assist Havant Borough Council. I also note that the Council will be commissioning an updated Employment Study to support the Local Plan Review, but this study is not yet commissioned. I should be most grateful if you could please keep us updated on the progress of this work. Perhaps it would be useful to convene a further meeting before the study is commissioned in order to ensure the methodology for it will include a higher growth option?

Winchester – Housing need and supply

It is acknowledged the National Park covers around 40% of Winchester District which represents a major constraint to development. It is also noted that the City Council's housing need figure has increased from 676 homes to 1,128 homes per year. This would equate to 16,920 dwellings across a 15 year period. This compares with the theoretical capacity of approximately 62,359 dwellings outside of the National Park shown in the Council's SHELAA. This would be sufficient to meet Winchester's housing need figure by more than 3.6 times. This may offer a simplistic view of the District's potential to accommodate housing supply, but does paint a picture of the potentially suitable development land within Winchester District, starkly contrasting with the position in Havant Borough.

As an example, the 2023 PfSH Spatial Position Statement identifies East of Botley for strategic-scale development within Winchester District, to be considered further through the Local Plans. Given the lead in times for large sites, it is disappointing that this strategic option for growth was not taken forward in the Winchester City Council Regulation 19 Local Plan. In this regard, it should be noted that the Government's New Towns Taskforce is focused on exploring locations for new towns, with locations supported by existing infrastructure wherever possible.

The strategic options within Havant Borough at Southleigh together with Havant and Waterlooville Town Centres have all been earmarked for development for some time, and are reaffirmed in the Council's Draft Local Plan with the potential to provide nearly 2,400 homes by 2043[7].

You will also be aware of the Constraints Study[8] which identifies areas of least constraint both within and around Havant Borough itself, as well as our immediate authorities including that of Winchester. The findings of this analysis conclude that there are two broad parcels north of the South Downs National Park that are less constrained, including one

[7] Southleigh would deliver 1,650 dwellings by 2043 and will continue delivering beyond the end of this period.
[8] https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

very large parcel which spans Winchester and East Hampshire District. Whilst it is acknowledged that these are relatively remote, it should be acknowledged that providing social and physical infrastructure alongside new homes would be an option, particularly when comprehensively planning for new settlements through a Local Plan.

It is noted the City Council has a constraint to development in terms of the limited availability (albeit, still in excess of two years) of mitigation for both phosphorous and nitrogen which may constrain the level of housing development that can take place in the short term. However, in our experience, the private market will be incentivised to provide appropriate mitigation (including phosphorous) mitigation. We also note the work you are undertaking with PfSH to upgrade Winchester City Council owned Waste Water Treatment Plants. As such, there is a reasonable prospect that there will be an available supply of mitigation for both phosphorous and nitrogen in due course as the market adapts to higher development rates.

Winchester Local Plan Review

Thank you the update on the Winchester City Council Local Plan – which confirms that it is expected that the Council will start a review of the next Local Plan during Quarter 2 (June – September 2025).

We welcome the City Council's willingness to work and cooperate with Havant Borough Council and our neighbouring authorities. Please can you advise how you will be comprehensively engaging with us in the preparation of the Local Plan Review at the early stages, prior to formal engagement under Regulation 18?

Our previous letter asked you to set out the process by which your authority would look to respond to the high level of unmet housing and employment need arising from Havant Borough. May we suggest this takes a staged approach given the early stages of the Local Plan Review? In particular, we would appreciate early sight of your emerging project plan for the Local Plan. We'd wish to confirm that any options tested through Sustainability Appraisal, Transport Assessment and other evidence base studies include a scenario where unmet needs are planned for, in addition to meeting Winchester's development needs.

I look forward to continuing our constructive and active discussions to effectively address unmet needs and look forward to meeting you further to discuss the Local Plan Review timetable and an updated Statement of Common Ground to support Havant Borough's Regulation 19 Local Plan in due course.

Yours sincerely

[redacted]

Strategic Planning Manager