Winchester City Council

Portsmouth City Council, Havant Borough Council and Gosport Borough Council

Your Ref:
Contact:
PlanningPolicy@Winchester.gov.uk
[redacted]

6 November 2025

Dear Lucy, David and Jayson,

Subject: Response to Joint Letter on Housing and Employment Need in South East Hampshire

Thank you for your joint letter dated 13 October 2025 regarding the housing and employment needs in South East Hampshire and the request for assistance under the Duty to Cooperate.

Winchester City Council acknowledges the significant unmet housing need of 18,347 homes and employment floorspace shortfall of 19,973 square metres across the Gosport, Havant, and Portsmouth local authority areas. We appreciate the detailed evidence and collaborative work that has gone into quantifying these figures and identifying the constraints that are faced by your authorities.

Housing unmet need

We strongly agree with the fundamental point that was made at the start of the joint meeting that addressing these housing figures requires a coordinated and strategic approach. However, it is important to re-iterate that this responsibility does not rest solely with Winchester City Council and nor should it be constrained to housing market areas as suggested.

You will know that around 40% of the City Councils geography is covered by the South Downs National Park Authority and they are also likely to have an unmet housing need. As there is a growing wider unmet housing need across Hampshire, we strongly feel that all Hampshire councils have a role to play and we all need to work collaboratively to plan strategically for this unmet housing need. Winchester City Council will continue to make this point in the representations that we will make to yours and other Local Plans in the coming months on other Local Plan consultations in Hampshire.

Meeting the unmet housing need

Thank you for providing the Appendix 2 to the joint letter that sets out in a table which Local Planning Authorities you have approached in respect of housing and employment unmet need which was a key point that we made at the joint meeting.

It is recognised that there are Local Planning Authorities in Hampshire that are located in different housing market areas (a point that has been made in the table that has been included in Appendix 2). However, we consider that at the Local Plan examination you should be able to demonstrate to a Local Plan Inspector that you have left 'no stone unturned' in responding to the significant unmet need you have identified. In view of this we would strongly encourage Portsmouth, Gosport and Havant to be proactive and to approach other Local Planning Authorities in Hampshire which are located outside of your Housing Market Areas. I know there is a difference of opinion on this matter, but it remains our professional opinion that such an approach would strengthen your case during your Local Plan Examinations as you would be able to clearly demonstrate to a Local Plan Inspector that you have done everything possible to meet the requirements of the Duty to Cooperate.

Winchester City Council have for example, been approached by other Local Planning Authorities which are located outside of our Housing Market Area. We would bring to your attention Chichester District Council which has recently successfully gone through a Local Plan examination which included a housing requirement that was below their Standard Method. As part of their evidence base under the Duty to Cooperate we are aware that they did approach local planning authorities that were located outside of their Housing Market Area. This is evidenced by the fact that we received and responded to a Duty to Cooperate letter from them. In view of this, we see no planning reason why you would all not wish to strengthen your Duty to Cooperate evidence base now by undertaking this additional step in the process. Linked to this, given the scale of the figures that have been included in this joint letter, we would also strongly encourage you all to respond like we are to any Local Plan consultations in Hampshire as this is a joint issue that all local authorities need to approach in a consistent way given the importance of this issue. This will also in our professional opinion, strengthen your case at your respective Local Plan examinations.

Employment unmet need

The Powerpoint presentation that was attached to the letter refers to an unmet employment need in square metres. However, there does not appear to be any information on the needs and supply and more importantly, what *type* of employment

land arise in each Local Authority area? This means that we cannot see if the surplus currently identified in Portsmouth and Fareham *could* meet unmet needs in Havant.

We presume that this work has been undertaken but further clarification is sought regarding the position for employment floorspace. The letter and appendix set out current headline figures of need and supply in each authority. It would be helpful if we could please have further detail on what will be needed in order to understand what is being requested, namely –

- A breakdown of the type of floorspace included in the need and supply for each local authority area, to understand if surplus land in one area is suitable to meet unmet needs in another, and be clear what unmet needs have been identified;

- Detail on how the assessment of employment need and supply for Havant Borough has responded to the designation of the Solent Freeport, including measures to ensure there is no double counting of employment needs given the exclusion of 13,935 sq m of employment floorspace at Dunsbury Park Phase 3 from Havant's supply; and

- Confirmation of the position of Gosport Council regarding employment land – i.e. is there agreement that surplus land in Gosport will be available to meet unmet needs in Havant Borough, along the lines of the letter from Portsmouth to Havant dated 21 August 2025 . It is appreciated that the amount of floorspace available may change.

As mentioned above, we presume that some of this information is already available in the various evidence base documents, but it would be helpful to have the current positions confirmed.

Winchester City Council's Local Plans

As advised at the joint meeting my team are now working on two Local Plans.

Our primary focus is to move the emerging Local Plan forward to the 6 week public consultation on the Main Modifications and then onto subsequent adoption as soon as possible next Year.

Next Local Plan

Alongside progressing work on moving the emerging Local Plan towards adoption, Winchester City Council is also committed to undertake work on the next Local Plan which will cover the period up to 2044.

This work has involved commissioning AECOM to undertake an Integrated Impact Assessment/Habitats Regulations Assessment and going out to tender to update the Employment and Retail Assessment. We are also in the very early process of reviewing briefs for various commissions such as the Strategic Housing Market Assessment, Gypsy and Traveller Accommodation Needs Assessment, Water Cycle Study and a Local Plan Viability Assessment. We have also commenced a new 'Call for Sites' which closes on the 21st November 2025.

We have been working on our new housing Standard Method figure and we have briefed Cabinet Members on the unmet housing need, however we are not in a position to start detailed work on the Settlement Hierarchy and the approach towards site selection process, this will take place after the call for sites and when the emerging local plan is adopted. No detailed work on the process on how to meet the increase in the Standard Method figure has been undertaken, and ultimately therefore, what contribution we might be able to make to unmet needs from neighbouring authorities.

Our current priority is to ensure the emerging Local Plan moves swiftly towards adoption, as I have indicated above, we are in the very early process of identifying and scoping the key issues for us and we will need to prepare a project plan. As this work has not been undertaken it is not possible at this time to provide you with any further information.

We do acknowledge the importance of planning for unmet needs across Hampshire and remain committed to working collaboratively with all of the authorities across Hampshire (and beyond). However, given the early stage of our Local Plan Review, it would be premature to make any firm commitments regarding the accommodation of unmet housing or employment need at this time as we have not yet mapped out the process that we intend to follow.

We look forward to continuing constructive dialogue and joint working with you and our neighbouring authorities and we will ensure that Portsmouth City Council, Havant Borough Council and Gosport Borough Council are all kept informed as our Local Plan Review progresses. We would be happy to meet again in due course to discuss the timetable, evidence base development, and opportunities for cooperation, including the preparation of updated Statement of Common Grounds.

Finally, our Local Plan Inspector has not requested any further information in relation to Duty to Cooperate but you can submit this joint letter to the Local Plan Inspector when Winchester City Council consults on the Main Modifications in the coming weeks.

Yours sincerely,

Adrian Fox
Strategic Planning Manager
Winchester City Council