Sent jointly on behalf of
Portsmouth City Council,
Gosport Borough Council
and Havant Borough
Council

Adrian Fox
Strategic Planning Manager
Winchester City Council

By email only:
[redacted]

15/12/2025

Dear Adrian,

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

We are writing following your letter of 6 November, which itself was a response to our letter to Winchester City Council on 13 October and our joint meeting with colleagues from East Hampshire District Council and Fareham Borough Council as well as ourselves.

Thank you firstly for the acknowledgement of the sizeable level of unmet need which exists in the housing market area. We wanted to take the time to respond to the specific points which you have raised.

In writing to you, we also note the recent ministerial letter highlighting that the legal requirement elements of the Duty to Cooperate will likely be rescinded in the near future and before any of our respective plans are examined. Nonetheless, the soundness requirements to discuss and collaborate on cross-boundary issues will remain.

Employment need

We note your questions in your 6 November letter. Whilst we could respond to the points you have raised, it would be more useful we feel to bring you up to date on the letter received from Fareham Borough Council alongside your own in response to our letter of 13 October.

Fareham's letter sets out:

The Council acknowledges the remaining deficit of 19,973 square metres of new employment floorspace across the three authorities and notes the request for help with this unmet need.

Fareham recognises the importance of a strong, responsive and competitive economy, alongside the delivery of housing delivery. The promotion of economic development is one of the Council's six corporate priorities.

The adopted Fareham Local Plan 2037 identifies an employment floorspace requirement across the Plan period of 121,964 square metres of employment floorspace. The Local Plan allocated seven new sites to meet this requirement, two of these sites (Faraday and Swordfish) form the strategic site at Daedalus. These seven sites are in addition to the strategic site at Welborne (allocated through the Welborne Plan). Between them, Welborne and Daedalus contribute 77% of the anticipated supply.

At point of adoption the plan identified a supply of 241,754 square metres of employment floorspace, an excess of 119,790 square metres compared to the requirement. The Inspector at the Local Plan examination recognised the value and importance of the two strategic sites and welcomed the inclusion of the additional sites to facilitate some flexibility and choice in the local market. To maximise flexibility the Local Plan does not allocate these sites for a particular use class, rather all employment allocations are for mixed employment use.

As the Council's local plan is adopted, the Council is not in a position to include any wording within the current Plan, committing some of this supply to unmet need. Fareham Borough Council is willing to commit 19,973 square metres of its employment floorspace towards Havant Borough Council's unmet need and would welcome a further dialogue with Havant Borough Council to agree how best to achieve this.

Obviously, we have been in touch with our Fareham colleagues to acknowledge the letter and express our thanks for the sizeable accommodation of unmet need which this represents together with the constructive way that they have responded to the planning challenges we collectively face. We are meeting with Fareham Borough Council on 22 January to discuss the detail of how best to formalise this through the Duty to Cooperate.

Housing need

Thank you for noting the high and extremely challenging level of unmet need which exists in our shared housing market area. This represents an extremely challenging scale of unmet need and represents a key matter to be addressed under the Duty to Cooperate.

We note your position that addressing this level of unmet need will require a coordinated and strategic approach. Whilst this might be the ideal situation, you will note that the creation of a Mayoral Combined County Authority has now been significantly delayed by two years to 2028. Critically, you will also be aware that at the Partnership for South Hampshire's December Joint Committee meeting[1], the following statement was agreed by all members of the partnership, which of course includes our three authorities as well as Winchester City Council:

PfSH approved a Spatial Position Statement in December 2023. It sets out strategic principles to guide development. It also sets out the balance between the need and

[1] www.push.gov.uk/work/our-meetings/joint-committee/

supply of new dwellings across the sub region, identifying a shortfall in supply still to be planned for of 11,771 dwellings to 2036. It recognises that some authorities are at an early stage in plan preparation, and that as part of this plan making work additional sites will be identified to meet unmet needs. The Statement sets out a two stage process to addressing needs, first identifying the authorities which should be able to meet or exceed their needs, and second by identifying broad areas of search for growth to be considered further through local plans.

Since this Statement was approved, the Government's standard method for calculating housing need has changed from a population based to a housing stock based algorithm, and the affordability ratio has also changed. As a result the housing need figures for the PfSH area as a whole have increased.

The national proposals to reintroduce statutory strategic planning will require the preparation of a Spatial Development Strategy by the proposed Mayoral Combined Authority for Hampshire and the Solent. A key output of this work will be meeting housing need. In light of this, PfSH do not intend to update the Spatial Position Statement. However, in the meantime PfSH continue to discuss the latest position to inform the preparation of each authority's local plan in accordance with the 'duty to co-operate'. This is supplemented by the preparation of Statements of Common Ground between individual authorities and groups of authorities as relevant.

As such, whilst a sub-regional or regional approach may be ideal to address such a large level of unmet housing need, there is currently no mechanism to do that, nor will there be in the near future. As such – and as noted in the collective statement – the preparation of individual local plans, supported by statements of common ground, will need to address unmet development needs.

We also note your encouragement to proactively approach other local authorities, outside of the Housing Market Area. We are taking the suggestion under advisement. Nonetheless, notwithstanding this, it would only be appropriate for unmet need in this housing market area to be met further afield when opportunities to do so within or close to the housing market area cannot meet that unmet need in full. As such, this suggested approach does not negate the need for us to continue to discuss the critical cross-boundary issue of unmet housing need.

On that basis, we would strongly reiterate the need for the emerging Winchester Local Plan which will cover the period up to 2044 to address this issue robustly. We would look for a methodology to plan production which will test options which will not only include meeting the standard method as it applies to Winchester and unmet need from the South Downs National Park but also how it will address unmet need from the South East Hampshire Housing Market Area. We do hope that the work of the three local planning authorities in South East Hampshire has helped to clarify the scale of unmet need in the area to help inform the formulation of the new Winchester Local Plan.

We would welcome confirmation of the timeframe for engagement and reassurance that no evidence base will be commissioned by the City Council which relates to the testing of development strategy scenarios prior to our ability to discuss this matter. We look forward to

your response on this as a critical element of Winchester City Council's emerging 2044 Local Plan by return.

Yours sincerely

[redacted]

Lucy Howard
Head of Planning Policy
[redacted]

[redacted]

David Hayward
Strategic Planning Manager
[redacted]

[redacted]

Jayson Grygiel
Manager of Planning Policy
[redacted]