Havant
BOROUGH COUNCIL

Public Service Plaza
Civic Centre Road
Havant
Hampshire PO9 2AX

T 023 9244 6019

www.havant.gov.uk

By email only to
[redacted]

Enquiries to: David Hayward
Direct line:
[redacted]
My reference:
Your reference:
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Draft Local Plan 2042 – response from Havant Borough Council

This letter constitutes the response from Havant Borough Council to the Test Valley Borough Council 2025 consultation on the Draft Local Plan 2042. This follows our previous letter dated 7th April 2022 in response to Test Valley Borough Council's consultation on the Draft Local Plan 2040, which formally asked for a commitment from Test Valley Borough Council to accommodate unmet need from Havant Borough in its new local plan. The response below primarily focusses on the extensive levels of unmet development need in the South Hampshire sub-region and discussions to date with planning authorities in our Housing Market Area.

Havant Borough Council is committed to meeting its need for housing and boosting development in the Borough. The Council's starting point is that it will leave no stone unturned in order to meet its own housing need. However, as demonstrated by the Constraints Study which was prepared to support our Local Plan[1] there is also a very constrained supply of land in Havant Borough with the least constrained areas already identified for development.

Since 2022, Havant Borough Council has been preparing a new Local Plan, the Building a Better Future Plan. As you may be aware, the Council has recently consulted on a full draft (Regulation 18) of the plan between 6th May – 1st July 2025. The most up to date assessment of objectively assessed housing need following the publication of the new standard method in December 2024 means that the Borough's need has increased to 892 dwellings per annum, equivalent to 17,840 homes over the plan period (2023 to 2043).

Given the expected lack of suitable land within the Borough with development potential to meet identified housing need, the Strategic Housing and Economic Land Availability Assessment (SHELAA) includes a comprehensive and robust assessment of all land in the

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

Borough to ensure the Council has fully examined all opportunities for development, and has been published alongside the full draft (Regulation 18) Local Plan.

The SHELAA concludes there is a developable housing supply of 7,981 dwellings between 2023 and 2043. However, the SHELAA does not take account of the development strategy, nor the Sustainability Appraisal which is undertaken to determine whether a site should be allocated. A total of four potential development strategies were considered through the SA process covering a broad spectrum from a full environmental and brownfield focus to a full housing delivery focus. However, crucially under none of the options is it to possible to achieve delivery of the total need for housing as set out under the standard method, by some margin[2].

Housing Supply 2023-2043 (number of dwellings likely to be delivered under each development strategy option)				
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)**

Given the known constraints which the evidence base shows and the known challenge that the Borough would have to meet development needs, the emerging plan includes the following measures intended to maximise the supply of developable and deliverable sites (these are also set out within the plan itself, principally through Policy 1 (Spatial Strategy):

- High development densities to make the most efficient use of land and promote sustainable transport accessibility:
    - 80 dph within Havant, Waterlooville and Leigh Park Town Centres;
    - 55 dph within the proposed defined opportunity areas in the Draft Local Plan; and
    - 40 dph elsewhere in the Borough

[2] Further information can be found in Sustainability Appraisal which has been published as part of the Council's evidence base: https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies

- Focusing development within established urban and developed areas and brownfield sites across the borough[3]
- Greenfield development being taken forward as long as it has no unacceptable impacts on international, national or local environmental designations, or national landscape designations
- Agricultural land value and local landscape value are not considered as an overarching constraint preventing an allocation
- A focus on development in the borough's town centres to help sustain and enhance them[4]
- Given the limited land availability in Havant Borough, the Council's 'call for sites' remained open during the plan's preparation
- A pattern of development and improvements to the transport network, with housing development concentrated on sites with good access to public transport routes and/or services and facilities with the density policy reflecting this
- Sustaining existing communities and protecting them from coastal erosion and sea level rise but responding to climate change effects by not adding to the level of risk through a presumption against new housing in areas at risk now or in the future (due to the risk to the single access road on and off Hayling Island; brownfield development will continue to be accepted if the site itself is safe)

The measures above have all been folded into the Draft Local Plan and factored into the site assessment process, both in terms of the allocation of sites and the yield associated with them. The chosen development strategy (Option 2) combines and balances key national and local objectives in the most effective way and overall represents the most appropriate strategy, when considered against the alternatives. The spatial distribution of development planned for through the chosen option focuses on the existing built areas across the Borough, notably Havant and Waterlooville town centres and less constrained greenfield land. On this basis, the Plan identifies a developable housing supply of 7,218 dwellings during the plan period, averaging 361 dwellings per annum.

Following this process, there is an unmet housing need of 10,622 dwellings from Havant Borough (or 531 homes per year). The submitted Winchester Local Plan, which is at Examination, includes an 'unmet needs allowance' of 1,900 dwellings – of which 70% (equivalent to 1,330 dwellings) would be apportioned to Havant Borough. This would increase overall supply to 8,548 dwellings over the plan period, and reduce unmet need to 9,292 dwellings (or 465 homes per year).

This plan is not yet adopted and the Inspector has recently undertaken a consultation, the outcome of which could significantly reduce this contribution. Even if the Winchester plan is adopted with the submitted 'unmet needs allowance', this still obviously only represents a

[3] Based on a robust audit of land as set out through the Council's Strategic Housing and Economic Land Availability Assessment

[4] Evidenced by specific deliverability evidence base studies including the Town Centre Regeneration Appraisal Sites Report https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies and Waterlooville Town Centre SPD

modest proportion of Havant Borough's unmet need, with a large amount remaining to be accommodated which will need to discussed through the Duty to Cooperate. I can confirm that at the time of writing, there are no further commitments to accommodating Havant Borough Council's unmet housing need.

Havant Borough Council would like to emphasise our previous consultation response in the letter dated 7th April 2022 in which we formally asked for a commitment from Test Valley Borough Council to accommodate unmet need from Havant Borough in its new local plan. This is acknowledged in the Housing Topic Paper dated February 2024.

However it is concerning to note that the draft Local Plan states in paragraphs 3.34 – 3.37 that Test Valley Borough Council do not have any current requests to help meet unmet housing needs, whilst also acknowledging that this position may change as the plan continues to progress. Whilst it may be factually true that there have been no approaches from *neighbouring* authorities as is stated in the draft plan, it is misleading to not highlight the approach which has been made. Furthermore, Havant Borough Council notes that there has not been any bilateral engagement to take forward with request for assistance with unmet need since the submission of the 2022 representations.

Havant Borough Council acknowledges that unmet housing need is best addressed within the same housing market area. On this basis, the Borough Council has approached its 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 through the current consultation, other authorities closer to the Test Valley boundary may clarify their position, as is acknowledged within the plan. However given that it has not been possible to address the unmet need in the Borough within the housing market area, it is necessary to also look beyond the housing market area.

It should also be noted that neither the National Planning Policy Framework, nor the Planning Practice Guidance notes any specific methodology to discharge the Duty to Cooperate, meaning that formal letters are not necessarily required to acknowledge unmet development needs nor is the Duty limited to neighbouring authorities. The Draft Local Plan acknowledges the sizeable unmet need which has been noted through the Partnership for South Hampshire's Spatial Position Statement. As such, it is disappointing that the Draft Local Plan does not consider the requirement to explore addressing this already acknowledged unmet need from the start given that the scale of unmet need.

Due to our unmet housing need demonstrated above, Havant Borough Council would therefore like to formally reiterate our ask for a commitment from Test Valley Borough Council to thoroughly evaluate how unmet need from Havant Borough can be addressed through its new local plan. For avoidance of doubt, this representation should be considered a further formal request to accommodate unmet need under the Duty to Cooperate. We would be very happy to meet to discuss this matter and explore how unmet need can be robustly considered through the plan preparation process.

Havant Borough Council wishes to work with Test Valley Borough Council (and if needed any other authorities making unmet need requests) to explore the matters highlighted in our representations above. However Havant Borough Council also reserves the right to make formal representations at the pre-submission stage if necessary. Our authorities have a strong track record of working together through the Partnership for South Hampshire. We look forward to continuing constructive and active discussions to effectively address unmet housing and employment development needs arising from Havant Borough.

Yours sincerely



Strategic Planning Manager