

## Inspector Led Consultation – Duty to Cooperate - Responses

### **Respondents**

[Portsmouth City Council](#)

[Havant Borough Council](#)

[South Downs National Park](#)

[Wates Developments Ltd – Brightlands, Sutton Scotney](#)

[Wates Developments Ltd – Pudding Farm, Winchester](#)

[Bloor Homes](#)

[Bloor Homes](#)

[Blenheim Strategic](#)

[Bargate Homes](#)

[Chris Knowles](#)

<b>Name of respondent (or client)</b>	<b>Portsmouth City Council</b>
<b>Personal reference number</b>	BHLF-AQTS-32Q2-1
<b>Comment</b>	<p>Portsmouth City Council (PCC) has had the opportunity to review ED44 (Winchester City Council's (WCC's) Response to the Inspector's Note 17). The City Council recognises that the Written Ministerial Statement of the 27 of November 2025 states that <i>'to help drive local plans to adoption as quickly as possible and progress towards our objective of universal local plan coverage, we have decided not to 'save' the Duty, thereby removing this requirement for plans in the current system'</i>.</p> <p>The statement goes on to say however that: <i>Local planning authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas, and we expect Planning Inspectors to continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation'</i>.</p> <p>PCC believes this gives a clear steer on the importance of ongoing cross boundary collaboration especially in respect of unmet development needs. This is reflected in the statement made by WCC (which PCC welcomes) that <i>'For its part, the Council can confirm that if the legal Duty to Cooperate is withdrawn it would continue to believe the provision of 495 additional homes in the current Plan towards unmet needs in Havant and Portsmouth would remain appropriate, given the requirements in the NPPF in para. 11b and 24-27 seeking effective cooperation.'</i></p> <p>PCC will continue to work with WCC collaboratively on cross boundary issues and is currently preparing a Statement of Common Ground with WCC to support the submission of the Portsmouth Local Plan in March 2026. PCC have separately submitted comment on the Main Modifications consultation in respect of modifications MM31 (Solent Mitigation Partnership) and MM49 (Housing). As part of that representation the City Council included letters between the South East Hampshire authorities and WCC and a note of a meeting that was held on unmet development needs.</p>

<b>Name of respondent (or client)</b>	<b>Havant Borough Council</b>
<b>Personal reference number</b>	ANON-AQTS-32NB-E
<b>Comment</b>	<p>As you will be aware, Havant Borough Council and Winchester City Council have cooperated throughout the preparation of the Winchester District Local Plan, which is the subject of your examination. This is set out through the Statement of Common Ground which the Borough Council and City Council have agreed (SD08e).</p> <p>Like all Local Planning Authorities, the Borough Council has monitored carefully the recent correspondence from Government and the Planning Inspectorate regarding the withdrawal of the Duty to Cooperate as a legal requirement together with the consultation on the Draft National Planning Policy Framework.</p> <p>The Borough Council agrees with Winchester City Council's statement that should the Duty to Cooperate cease to apply as a legal compliance test before the Winchester Local Plan is adopted, then this would not raise any significant new issues for the examination. Havant Borough Council continues to welcome the contribution which the plan currently being examined will have towards unmet need both in Havant and Portsmouth, which are both within the same housing market area.</p> <p>Nonetheless, the Borough Council would wish to clarify that since the hearings, work has been ongoing within the Southeast Hampshire Housing Market Area regarding unmet need. As such, we would wish to highlight the substantial total level of unmet housing need which exists in the South East Hampshire Housing Market Area. This is set out in a letter sent jointly from Havant Borough Council alongside Portsmouth City Council and Gosport Borough Council to Winchester City Council. Similar letters were also sent to Fareham Borough Council and East Hampshire District Council. Winchester City Council's response to that letter and a follow up letter to Winchester City Council was also sent.</p>

<b>Name of respondent (or client)</b>	<b>South Downs National Park</b>
<b>Personal reference number</b>	ANON-AQTS-329Z-H
<b>Comment</b>	<p>The South Downs National Park Authority (SDNPA) wish to comment on WCC's penultimate paragraph in their response (ED44). This explains that:</p> <p><i>"Therefore, should the Duty to Cooperate cease to apply before the Winchester Local Plan is adopted, it is not considered that this change in circumstances would raise significant new issues for the current modifications consultation, or the Examination. For instance, the position regarding unmet housing need in south Hampshire is unchanged. For its part, the Council can confirm that if the legal Duty to Cooperate is withdrawn it would continue to believe the provision of 495 additional homes in the current Plan towards unmet needs in Havant and Portsmouth would remain appropriate, given the requirements in the NPPF in para. 11b and 24-27 seeking effective cooperation".</i></p> <p>As previously explained in our letter dated 22 July 2025, the SDNPA and WCC signed a Statement of Common Ground (SoCG) in August 2024. This sets out the Authorities' positions on the number of dwellings that could be delivered in the South Downs National Park (SDNP) Area of Winchester District up to 2040. In short, WCC proposed a higher figure than SDNPA calculations. As such, it was agreed in the SoCG that the "unmet need allowance" in the Winchester Local Plan 2040 could be used, if necessary, to resolve potential shortfalls in housing delivery in the SDNP Area of Winchester District.</p> <p>The SDNPA is taking a draft Regulation 19 Local Plan through Committee processes in February and March 2026 with a view to publish for comments in May/June 2026 and submit for examination in November 2026. This Regulation 19 Local Plan identifies a supply of <b>245 homes</b> to be delivered in the SDNP Area of Winchester District between 2024/25 and 2039/40 (16 years). This supply comprises:</p> <ul style="list-style-type: none"> <li>• Completions in 2024/25;</li> <li>• Extant planning permissions as of 31 March 2025;</li> <li>• A windfall calculation up to 2039/40;</li> <li>• Existing and unimplemented allocations in the adopted South Downs Local Plan (2014-33) and any made Neighbourhood Development Plans; and</li> <li>• New and potential allocations in the emerging South Downs Local Plan Review (2024-42). Please see identified "has potential" sites WI056, WI100 and WI102 in Appendix B(ii) of the South Downs Land Availability Assessment (December 2025) which are being considered for inclusion in the Draft Regulation 19 Local Plan.</li> </ul>

<b>Name of respondent (or client)</b>	<b>Wates Developments Ltd – Brightlands, Sutton Scotney</b>
<b>Personal reference number</b>	BHLF-ANON-3286-C
<b>Comment</b>	<p>Wates notes that the Written Ministerial Statement (WMS) made by Matthew Pennycook MP, Minister of State for Housing and Planning on 27 November 2025 states that the Duty to Cooperate ("the Duty") requirement will be removed from plans in the current system, and the letter of 27 November 2025 from the Minister to Paul Morrison, the Chief Executive of the Planning Inspectorate states that the Duty will cease to apply when the Regulations come into force this year.</p> <p>While it is intended that the Duty will cease to apply to existing plans in the current system, the Duty will only be removed upon commencement of the forthcoming Regulations. Furthermore, it must be noted that Inspectors should continue to examine plans in line with policies in the National Planning Policy Framework (NPPF) on 'maintaining effective cooperation' (paragraphs 24-28).</p> <p>Moreover, while it is not clear what will replace the Duty (for example whether 'aligned policies' will be required, or if Spatial Development Strategies will manage housing targets over a wider geography), but housing needs are unlikely to change significantly and are critically high in Winchester, and for its neighbours.</p> <p>The draft 2026 NPPF at its proposed policies PM10 and PM11 continues to promote cooperation across authority borders on 'strategic' and/or 'cross-border' housing needs and the Council (in whatever form it exists in the wake of Local Government Reform) will need to step up to the challenge. Changes to national policies, or processes should not be used as an excuse to stall plan making, or most importantly to stall discussions between neighbouring authorities who will need to work collaboratively to help to resolve the housing crisis.</p> <p>Wates remains of the view that the Council's decisions to include homes to address some of the unmet needs arising in neighbouring areas is, on the face of it, welcomed, as is the decision to specifically apportion this to both Havant and Portsmouth.</p> <p>However, this decision continues to be made in isolation from neighbouring authorities and the figure of 495 dwellings (split 150 homes for Portsmouth City and 345 homes for Havant Borough) – as proposed in MM 49 - does not answer the question of whether Winchester Council could do more to help meet its neighbours' needs in full. This also sets aside the continued concerns about the use of these homes as potentially some contingency in the Council's housing land supply in the event of stalled or lapsed site development.</p> <p>Co-operation should have been maximised, to ensure the effectiveness of this plan, as required by section 33a of the Planning</p>

and Compulsory Purchase Act (this has yet to be repealed), and paragraphs 24-28 of the NPPF, and this has not been achieved. It was clear from statements and discussions during the examination that cooperation was not 'maintained' during the development of the Local Plan and appears to be something to be left to the next plan (something returned to in our response to the Main Modifications).

It is unlikely then that the plan is fully sound in this regard and more home scan and should be included in the plan, now, to meet the critical housing needs of neighbouring authorities (if not the increased needs of Winchester itself).

The increased housing needs could be met, in part, through increasing the allocated number of houses in Policy SU01 'Land at Brightlands' – to its most appropriate capacity of 120 dwellings.

<b>Name of respondent (or client)</b>	<b>Wates Developments Ltd – Pudding Farm, Winchester</b>
<b>Personal reference number</b>	BHLF-ANON-328G-W
<b>Comment</b>	<p>Wates notes that the Written Ministerial Statement (WMS) made by Matthew Pennycook MP, Minister of State for Housing and Planning on 27 November 2025 states that the Duty to Cooperate ("the Duty") requirement will be removed from plans in the current system, and the letter of 27 November 2025 from the Minister to Paul Morrison, the Chief Executive of the Planning Inspectorate states that the Duty will cease to apply when the Regulations come into force this year.</p> <p>While it is intended that the Duty will cease to apply to existing plans in the current system, the Duty will only be removed upon commencement of the forthcoming Regulations. Furthermore, it must be noted that Inspectors should continue to examine plans in line with policies in the National Planning Policy Framework (NPPF) on 'maintaining effective cooperation' (paragraphs 24-28).</p> <p>Moreover, while it is not clear what will replace the Duty (for example whether 'aligned policies' will be required, or if Spatial Development Strategies will manage housing targets over a wider geography), but housing needs are unlikely to change significantly and are critically high in Winchester, and for its neighbours.</p> <p>The draft 2026 NPPF at its proposed policies PM10 and PM11 continues to promote cooperation across authority borders on 'strategic' and/or 'cross-border' housing needs and the Council (in whatever form it exists in the wake of Local Government Reform) will need to step up to the challenge. Changes to national policies, or processes should not be used as an excuse to stall plan making, or most importantly to stall discussions between neighbouring authorities who will need to work collaboratively to help to resolve the housing crisis.</p> <p>Wates remains of the view that the Council's decisions to include homes to address some of the unmet needs arising in neighbouring areas is, on the face of it, welcomed, as is the decision to specifically apportion this to both Havant and Portsmouth.</p> <p>However, this decision continues to be made in isolation from neighbouring authorities and the figure of 495 dwellings (split 150 homes for Portsmouth City and 345 homes for Havant Borough) – as proposed in MM 49 - does not answer the question of whether Winchester Council could do more to help meet its neighbours needs in full. This also sets aside the continued concerns about the use of these homes as potentially some contingency in the Council's housing land supply in the event of stalled or lapsed site development.</p> <p>Co-operation should have been maximised, to ensure the effectiveness of this plan, as required by section 33a of the Planning</p>

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It is unlikely then that the plan is fully sound in this regard and more home scan and should be included in the plan, now, to meet the critical housing needs of neighbouring authorities (if not the increased needs of Winchester itself).

The increased housing needs could be met, in part, through allocating Pudding Farm on the northern edge of Winchester.

<b>Name of respondent (or client)</b>	Tor&Co - Bloor Homes																		
<b>Personal reference number</b>	ANON-AQTS-329Q-8																		
<b>Comment</b>	<p>The NPPF requires effective cooperation and that unmet needs are accommodated “<i>where it is practical to do so</i>” (NPPF 2023 para 35 a)). The Plan, as proposed to be modified, and its evidence base, fail to meet this requirement and is therefore not positively prepared.</p> <p>The Council states in ED44 that “<i>if the legal Duty to Cooperate is withdrawn, it would continue to believe the provision of 495 additional homes in the current Plan towards unmet needs in Havant and Portsmouth would remain appropriate.</i>” However, we note the Inspector’s interim comments regarding the South Downs National Park Authority (SDNPA) allowance. The 350 dwelling ‘contribution’ was originally spread over 20 years (17.5 dpa), while SDNPA itself considered 250 dwellings to be more realistic. Evidence shows that in the first four years of the plan period, only 38 dwellings have been delivered within the SDNPA (9.5 dpa).</p> <p>Given the limited buffer that does exist, which the Inspector expressly notes could be used to address any shortfall in provision from the National Park, Table H2 should be further modified as set out below. This modification shows an annual provision of 17.5 homes in the SDNPA across the remaining 16-year housing-provision period, to better reflect the evidence base and be justified:</p> <table border="1"> <tr> <td>Unmet Needs Allowance (for unmet need in neighbouring authorities)</td> <td>495 463</td> <td>Outstanding planning permissions</td> <td>5,186</td> </tr> <tr> <td></td> <td></td> <td>Other commitments</td> <td>579</td> </tr> <tr> <td></td> <td></td> <td>Windfall development</td> <td>1,495</td> </tr> <tr> <td></td> <td></td> <td>SDNP completions, permissions and windfall</td> <td>312 280</td> </tr> </table> <p>Furthermore, any contribution to unmet housing needs across the Partnership for South Hampshire (PfSH) area prior to 1 April 2024 are already accounted for in the updated Standard Method Local Housing Need calculation at that date, including affordability adjustments. Reliance on pre-April 2024 provision does not justify reducing future planned contributions to unmet need, which remains significant.</p> <p>It is also concerning that the Plan’s limited buffer is wholly attributed to meeting unmet needs. The NPPF (2023, paragraph 86(d)) requires plans to be flexible enough to accommodate needs not anticipated at the time of preparation. As the plan only anticipates meeting the LHN calculated using a now-superseded methodology, it provides no meaningful flexibility and is inconsistent with national policy.</p>			Unmet Needs Allowance (for unmet need in neighbouring authorities)	495 463	Outstanding planning permissions	5,186			Other commitments	579			Windfall development	1,495			SDNP completions, permissions and windfall	312 280
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This is particularly problematic given Winchester's requirement to demonstrate a five-year housing land supply with a 20% buffer from 1 July. The Housing Trajectory (MM50) shows a sharp decline in delivery post-2032, with no contingency. The minimal buffer of 496 homes (4.5% of the overall requirement) is overstretched and cannot credibly support unmet need commitments of 345 homes for Havant and 150 homes for Portsmouth. Even in the absence of the Duty to Cooperate, the Council would remain fundamentally unable to demonstrate a five-year supply with a 20% buffer as of 1 July, leaving the shortfall unresolved.

<b>Name of respondent (or client)</b>	<b>Savills – Bloor Homes</b>																																																																								
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z																																																																								
<b>Comment</b>	<p>While it is acknowledged that the Levelling-Up and Regeneration Act 2023 will remove the DtC, Bloor emphasises that the National Planning Policy Framework (NPPF) continues to require effective cooperation and for unmet needs to be accommodated “<i>where it is practical to do so</i>” (2024/NPPF, para. 35(a)). This requirement is also reflected in the 2025 NPPF consultation draft at PM11, para. 1(b), demonstrating the Government’s ongoing commitment to cross-boundary collaboration. The Plan, as proposed in the Main Modifications consultation, and its supporting evidence base fail to meet this requirement and therefore cannot be considered positively prepared.</p> <p>The Council states in ED44 that “<i>if the legal Duty to Cooperate is withdrawn it would continue to believe the provision of 495 additional homes in the current Plan towards unmet needs in Havant and Portsmouth would remain appropriate</i>”.</p> <p>Bloor supports the Council’s intention to contribute towards unmet need and acknowledges its recognition that “the position regarding unmet housing need in south Hampshire is unchanged”. However, for the reasons summarised below (and set out in detail in our Matter 1 – Procedural and Legal Requirements and Matter 4 – Meeting Housing Need Hearing Statements), a contribution of 495 dwellings is considered wholly inadequate.</p> <p>Work undertaken by Intelligent Land on behalf of Bloor identifies a minimum unmet need of <b>38,994 dwellings</b> for the period 2024–2036 across the Partnership for South Hampshire (‘PfSH’) area when applying the 2024 NPPF standard methodology (see Table 1).</p> <p><b>Table 1: PfSH Housing Need and Supply 2024 – 2036</b></p> <table border="1"> <thead> <tr> <th>LPA</th><th>SM (2024) Apportioned to PfSH (dpa)</th><th>With a 5% buffer</th><th>Total Housing Need 2024-2036</th><th>Identified Supply 2024-2026</th><th>Shortfall / Surplus</th></tr> </thead> <tbody> <tr> <td><b>East Hampshire (part)</b></td><td>228</td><td>239</td><td>2,873</td><td>1,177</td><td>-1,696</td></tr> <tr> <td><b>Eastleigh</b></td><td>922</td><td>968</td><td>11,617</td><td>5,686</td><td>-5,931</td></tr> <tr> <td><b>Fareham</b></td><td>800</td><td>840</td><td>10,080</td><td>8,636</td><td>-1,444</td></tr> <tr> <td><b>Gosport</b></td><td>442</td><td>464</td><td>5,569</td><td>2,324</td><td>-3,245</td></tr> <tr> <td><b>Havant</b></td><td>892</td><td>937</td><td>11,239</td><td>3,789</td><td>-7,450</td></tr> <tr> <td><b>New Forest</b></td><td>1,501</td><td>1,576</td><td>18,913</td><td>7,455</td><td>-11,458</td></tr> <tr> <td><b>Portsmouth</b></td><td>1,021</td><td>1,072</td><td>12,865</td><td>10,434</td><td>-2,430</td></tr> <tr> <td><b>Southampton</b></td><td>1,214</td><td>1,275</td><td>15,296</td><td>14,724</td><td>-572</td></tr> <tr> <td><b>Test Valley (part)</b></td><td>402</td><td>422</td><td>5,065</td><td>2,870</td><td>-2,195</td></tr> <tr> <td><b>Winchester (part)</b></td><td>428</td><td>449</td><td>5,393</td><td>2,820</td><td>-2,573</td></tr> <tr> <td><b>Total</b></td><td><b>7,911</b></td><td><b>8,243</b></td><td><b>94,201</b></td><td><b>59,916</b></td><td><b>-38,994</b></td></tr> </tbody> </table> <p>Noting the above, Bloor considers that, based on the track record of authorities within PfSH, the actual unmet need will be <b>41,526 dwellings</b>, an increase of 2,532 dwellings beyond the figure identified</p>	LPA	SM (2024) Apportioned to PfSH (dpa)	With a 5% buffer	Total Housing Need 2024-2036	Identified Supply 2024-2026	Shortfall / Surplus	<b>East Hampshire (part)</b>	228	239	2,873	1,177	-1,696	<b>Eastleigh</b>	922	968	11,617	5,686	-5,931	<b>Fareham</b>	800	840	10,080	8,636	-1,444	<b>Gosport</b>	442	464	5,569	2,324	-3,245	<b>Havant</b>	892	937	11,239	3,789	-7,450	<b>New Forest</b>	1,501	1,576	18,913	7,455	-11,458	<b>Portsmouth</b>	1,021	1,072	12,865	10,434	-2,430	<b>Southampton</b>	1,214	1,275	15,296	14,724	-572	<b>Test Valley (part)</b>	402	422	5,065	2,870	-2,195	<b>Winchester (part)</b>	428	449	5,393	2,820	-2,573	<b>Total</b>	<b>7,911</b>	<b>8,243</b>	<b>94,201</b>	<b>59,916</b>	<b>-38,994</b>
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above. Consequently, the Council's proposed contribution of approximately **1.19%** towards unmet need is wholly insufficient, particularly as the Council acknowledges that this need will remain unchanged despite the removal of the DtC.

On this basis, the emerging Local Plan cannot be considered positively prepared.

<b>Name of respondent (or client)</b>	<b>Tor&amp;Co – Blenheim Strategic Partners</b>																		
<b>Personal reference number</b>	ANON-AQTS-3B54-Q / ANON-AQTS-3B5A-4																		
<b>Comment</b>	<p>Firstly, the NPPF expects effective cooperation and for unmet needs to be accommodated ‘<i>where it is practical to do so</i>’ (NPPF 2023 para 35 a)). The plan as proposed to be modified, and its associated evidence base, fails to meet this requirement and is not positively prepared.</p> <p>Furthermore, Winchester states within ED44 “<i>for its part, the council can confirm that if the legal Duty to Cooperate is withdrawn it would continue to believe the provision of 495 additional homes in the current Plan towards unmet needs in Havant and Portsmouth would remain appropriate.</i>”</p> <p>However, we note the Inspector’s interim comments regarding the South Downs National Park Authority (SDNPA) allowance and would highlight that the 350 dwelling ‘contribution’ was originally spread over a 20-year period (17.5 dpa). The SDNPA itself considered an allowance of 250 dwellings to be more realistic. Evidence shows that in the first four-years of the plan period only 38 dwellings have been delivered within the SDNPA (9.5 dpa). As such, and given the buffer that does exist, albeit significantly limited, which the Inspectors expressly note can be called on to address any shortfall in provision from the National Park, the figures in Table H2 should be further modified as follows. This modification shows an annual provision of 17.5 homes in the SDNPA across the remaining 16-year housing-provision period, to better reflect the evidence base and be justified:</p> <table border="1"> <tr> <td>Unmet Needs Allowance (for unmet need in neighbouring authorities)</td> <td><u>495</u> <u>463</u></td> <td>Outstanding planning permissions</td> <td>5,186</td> </tr> <tr> <td></td> <td></td> <td>Other commitments</td> <td>579</td> </tr> <tr> <td></td> <td></td> <td>Windfall development</td> <td>1,495</td> </tr> <tr> <td></td> <td></td> <td>SDNP completions, permissions and windfall</td> <td><u>312</u> <u>280</u></td> </tr> </table> <p>Again, notwithstanding the above and acknowledging the Inspector’s interim comments, we would highlight the following.</p> <p>Any contribution to unmet housing needs across the Partnership for South Hampshire (PfSH) area prior to 1 April 2024 is already reflected in the updated SM LHN Housing at that date, including affordability adjustments. Unmet need can only be assessed at a single point in time, base-dated to 1 April 2024, and previous delivery is fully accounted for within the Standard Method. Reliance on pre-April 2024 provision therefore provides no justification for reducing future planned contributions to unmet need, which remains significant.</p>			Unmet Needs Allowance (for unmet need in neighbouring authorities)	<u>495</u> <u>463</u>	Outstanding planning permissions	5,186			Other commitments	579			Windfall development	1,495			SDNP completions, permissions and windfall	<u>312</u> <u>280</u>
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It is also concerning that the entirety of the plan's limited buffer is attributed to meeting unmet needs. The NPPF (2023, paragraph 86(d)) requires plans to be flexible enough to accommodate needs not anticipated at the time of preparation. As the plan only anticipates meeting the LHN calculated using a now-superseded methodology, it provides no meaningful flexibility and is inconsistent with national policy.

This lack of flexibility is particularly problematic given the requirement for Winchester to demonstrate a five-year housing land supply with a 20% buffer from 1 July. The Housing Trajectory (MM50) identifies an acute drop post-2032 in delivery, with no contingency. The minimal buffer of 495 homes (4.5% of the overall requirement) is overstretched and cannot credibly support commitments to unmet needs from Portsmouth (150 homes) and Havant (345 homes).

<b>Name of respondent (or client)</b>	<b>Tor&amp;Co – Bargate Homes</b>																		
<b>Personal reference number</b>	ANON-AQTS-32G7-V																		
<b>Comment</b>	<p>Firstly, the NPPF expects effective cooperation and for unmet needs to be accommodated ‘<i>where it is practical to do so</i>’ (NPPF 2023 para 35 a)). The plan as proposed to be modified, and its associated evidence base, fails to meet this requirement and is not positively prepared.</p> <p>Furthermore, Winchester states within ED44 “<i>for its part, the council can confirm that if the legal Duty to Cooperate is withdrawn it would continue to believe the provision of 495 additional homes in the current Plan towards unmet needs in Havant and Portsmouth would remain appropriate.</i>”</p> <p>However, we note the Inspector’s interim comments regarding the South Downs National Park Authority (SDNPA) allowance and would highlight that the 350 dwelling ‘contribution’ was originally spread over a 20-year period (17.5 dpa). The SDNPA itself considered an allowance of 250 dwellings to be more realistic. Evidence shows that in the first four-years of the plan period only 38 dwellings have been delivered within the SDNPA (9.5 dpa). As such, and given the buffer that does exist, albeit significantly limited, which the Inspectors expressly note can be called on to address any shortfall in provision from the National Park, the figures in Table H2 should be further modified as follows. This modification shows an annual provision of 17.5 homes in the SDNPA across the remaining 16-year housing-provision period, to better reflect the evidence base and be justified:</p> <table border="1"> <tr> <td>Unmet Needs Allowance (for unmet need in neighbouring authorities)</td> <td>495 463</td> <td>Outstanding planning permissions</td> <td>5,186</td> </tr> <tr> <td></td> <td></td> <td>Other commitments</td> <td>579</td> </tr> <tr> <td></td> <td></td> <td>Windfall development</td> <td>1,495</td> </tr> <tr> <td></td> <td></td> <td>SDNP completions, permissions and windfall</td> <td>312 280</td> </tr> </table> <p>Again, notwithstanding the above and acknowledging the Inspector’s interim comments, we would highlight the following.</p> <p>Any contribution to unmet housing needs across the Partnership for South Hampshire (PfSH) area prior to 1 April 2024 is already reflected in the updated SM LHN Housing at that date, including affordability adjustments. Unmet need can only be assessed at a single point in time, base-dated to 1 April 2024, and previous delivery is fully accounted for within the Standard Method. Reliance on pre-April 2024 provision therefore provides no justification for reducing future planned contributions to unmet need, which remains significant.</p>			Unmet Needs Allowance (for unmet need in neighbouring authorities)	495 463	Outstanding planning permissions	5,186			Other commitments	579			Windfall development	1,495			SDNP completions, permissions and windfall	312 280
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It is also concerning that the entirety of the plan's limited buffer is attributed to meeting unmet needs. The NPPF (2023, paragraph 86(d)) requires plans to be flexible enough to accommodate needs not anticipated at the time of preparation. As the plan only anticipates meeting the LHN calculated using a now-superseded methodology, it provides no meaningful flexibility and is inconsistent with national policy.

This lack of flexibility is particularly problematic given the requirement for Winchester to demonstrate a five-year housing land supply with a 20% buffer from 1 July. The Housing Trajectory (MM50) identifies an acute drop post-2032 in delivery, with no contingency. The minimal buffer of 495 homes (4.5% of the overall requirement) is overstretched and cannot credibly support commitments to unmet needs from Portsmouth (150 homes) and Havant (345 homes).

<b>Name of respondent (or client)</b>	<b>Chris Knowles</b>
<b>Personal reference number</b>	ANON-AQTS-32DN-G
<b>Comment</b>	<p>Noting the inspectors invitation to comment on the council's response regarding the removal of the duty to cooperate. I note that the response only addresses unmet need and the 495 houses allocated to address Portsmouth and Havant unmet need and does not address the statement by the Minister regarding future intent; ie "Instead, the new system will rely on revised national policy and the new tier of strategic planning to ensure effective co-operation between plan-making authorities."</p> <p>Given that Welborne presents a strategic issue largely remaining ignored or with no consideration of impact on Winchester communities I feel the Ministers statement suggests closer consideration. As a tactical example, Welborne is bringing 6000 homes just a single field away from Wickham yet Winchester continue to place housing requirements on Wickham and Knowle Parish.</p> <p>A strategic effective cooperative approach between plan making authorities would suggest this no longer makes sense.</p>