

R Barrett MRTPI IHBC

c/o

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Enquiries to: David Hayward

Direct line:

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My reference:

Your reference:

Date: 15/07/2025

Dear Ms Barrett

HAVANT BOROUGH COUNCIL RESPONSE TO WINCHESTER CITY COUNCIL EXAMINATION CONSULTATION ON DOCUMENT ED37

Thank you for providing an opportunity to respond to Document ED37 (Inspector Note 15) of the Winchester District Local Plan Examination. This letter forms the response from Havant Borough Council.

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).

Local Plan start period

At the point of preparing the Statement of Common Ground, the housing need for Havant Borough was 516 per annum. Through the December 2024 planning reforms, this rose to 892 per annum (a 73% increase). Havant Borough is a small and constrained authority with significant constraints to meeting the need for both housing and employment development. This is clearly set out and accepted by our neighbouring authorities, as articulated through the Partnership for South Hampshire Spatial Position (PfSH) Statement¹ as well as our bilateral discussions and statement of Common Ground with Winchester City Council. The result of this is the accommodation of a proportion of unmet need within the Winchester District Local Plan as submitted.

Notably, the fact that it is not possible to meet the need for development in Havant Borough by a wide margin was first set out in November 2021, through our Local Plan consultation in October 2022, continuous discussions through PfSH and then a formal letter in March 2024. The updated position following the changes to the standard method was set out in a

¹ www.push.gov.uk/work/planning-and-infrastructure/push-position-statement

further formal letter to the City Council in April 2025 alongside notification of our Draft Local Plan consultation. Ultimately, whilst the need for housing has increased, there are not additional sites which can be allocated within the Borough due to the constraints which exist – as such there has been a consequently sharp increase in the level of unmet need.

I can though confirm that following both the 2024 changes to the standard method and the publication of the Borough Council's Draft Local Plan (entitled Building a Better Future) earlier this year², Havant Borough is currently able to demonstrate that 7,218 of the total need can be met. This updated position means that there is 10,622 net new homes of unmet housing need arising from Havant Borough. This is obviously a notable increase in unmet need compared to the position set out in the Statement of Common Ground due to the notable increase in housing need. We are also conscious that Havant Borough is not the only neighbouring authority to Winchester District to have unmet housing need.

We have undertaken an analysis of the impact on a change to the start date of the Winchester District Local Plan, which is set out in the annex to this letter. As can clearly be seen, changing the start date could increase the level of unmet need arising out of Havant Borough by up to 1,211 compared to the position as per the submitted Winchester District Local Plan.

It is positive therefore that the Winchester District Local Plan makes provision for accommodating a proportion of both Havant Borough and Portsmouth City's unmet housing need. Whilst this contribution by no means accommodates the full unmet need, it is a positive step in addressing this large need.

Given the recent increase in the level of unmet need which exists in the Borough, Havant Borough Council would favour the submitted Local Plan period of 2020-2040, maximising the contribution towards unmet need outside of Winchester District. The Borough Council notes and agrees with the City Council that there is not a prescribed approach through the NPPF or PPG which sets out how Local Plan start periods should be set out. As such, it is for the professional judgement associated with each Local Plan to determine what an appropriate start date should be and it is not possible to conclude that any one particular way is sound or unsound.

Policy H2

The increase in unmet need in the area to the south of Winchester District also brings further into sharp relief the necessity to address the wider need for housing - including affordable housing - and respond to the national housing crisis. It is notable that the changes to the 2024 standard method took place after the publication of the Winchester District Local Plan and it obviously took some time to ascertain the implications of the change.

² www.havant.gov.uk/planning-services/planning-policy/local-plan/building-better-future-plan - see in particular Policy 5 (Amount of Housing).

Given this situation and the increase in unmet need, the Borough Council favours releasing barriers to swiftly bringing forward sites which are suitable for development. Consequently, the Borough Council would support the deletion of Policy H2.

In coming to this conclusion, we note the City Council's comments regarding the availability of nutrient mitigation and phosphorous mitigation in particular. It is important to stress of course that other policies within the Winchester District Local Plan together with the requirements of the Conservation of Habitats and Species Regulations (2017) would ensure that no development could be permissible without sufficient suitable mitigation.

The Borough Council also notes the comment that there would only be a 2.2 year supply of mitigation. This is obviously less than would be ideal, however in the Borough Council's experience, the best way to incentivise the market to deliver mitigation is to provide a healthy supply of development schemes which require it. As well as the private market directly, PfSH (through the Solent Mitigation Partnership) of course is very active in this space. The partnership successfully acquired Local Nutrient Mitigation funding in both rounds and is deploying this to provide nutrient mitigation (including phosphorous mitigation) directly to the market. As such, it is suggested that within a two year period, the market would be able to provide adequate supply for an increase in development levels in the area.

I hope that these comments are helpful in coming to your determination on the soundness and legal compliance of the Winchester District Local Plan.

Yours sincerely

David Hayward

Strategic Planning Manager

Annex – unmet need position scenario with revised start date

	March 2024 position		Draft Building a Better Future Plan position		If Winchester District Local Plan plan starts in 2024	
	Identified housing need under previous SM (2022/23-2042/43)	Net Dwellings Completed or Committed	Identified housing need under new SM (892 dpa) (2023/24-2042/43)	Net Dwellings Completed or Committed	Identified housing need under new SM with updated affordability ratio (881 dpa) (2023/24-2042/43)	Net Dwellings Completed or Committed
	10,320		17,840		17,620	
Completions 2022-23		495		368		
Outstanding planning permissions at 1/4/23		1,524		1,142		
Allocations in Adopted Local Plan without planning permission		606		-		
Potential housing sites		1,524		4,348		
Potential housing sites where previous Inspectors' raised deliverability concern		700				
Windfall Development		1,162		1,360		
Total		6,011		7,218 (1,207 increase compared to 2022 position)		7,218 (1,207 increase compared to 2022 position)
Unmet need allowance from Winchester District Local Plan				1,330		116 (70% of 290)
Revised Total				8,548		7,334
Remaining objectively assessed housing (unmet need)	4,309		9,292 (+4,983)		10,286 (+1,211 compared to submitted Winchester District Local Plan)	