



By email to Test Valley Borough
Council at



Enquiries to: David Hayward

Direct line:

Email:



My reference:

Your reference:

Date: 7 April 2022

RE: DRAFT LOCAL PLAN 2040

I am writing in response to Test Valley Borough Council's consultation on the Draft Local Plan 2040. Please note that this is an office-based response, prepared in consultation with the Cabinet Lead.

Havant Borough Council is committed to meeting its need for housing and boosting development in the Borough. This is a key arm of the [Council's new Corporate Strategy](#). As you are aware through discussions at various officer and member meetings of the Partnership for South Hampshire, Havant Borough Council was well advanced with a local plan with a plan period to 2037. This was a plan which met, though barely, the need for housing in Havant Borough. The plan was examined in 2021 and an interim findings report was published in November. This set out a number of concerns of the inspectors regarding the Havant Borough Local Plan. The main concern was regarding housing delivery within the plan period. The Council put forward an ambitious set of regeneration proposals together with a strategy which maximised the delivery across both brownfield and greenfield sites, seeking to meet the need for housing.

Nonetheless, due to the constrained and highly built-up nature of the Borough, any development site is highly constrained and needs multiple mitigation packages in order to be developed. For example, two greenfield sites which together represent approximately 1000 homes both need off site mitigation refuges for Solent Waders and Brent geese. Clearly the need to acquire third party land represents a significant constraint and a brake on sites coming forward. This was one of the concerns expressed by the inspectors last year.

Sites for which the inspectors noted concerns represent over 2000 new homes, or a fifth of the Borough's housing need. This is obviously a significant shortfall in supply.

Havant Borough Council will be developing a new local plan as a matter of priority. We will be looking to address as many of the constraints and supply issues as possible. Nonetheless, given that the need for housing has already risen and some of the concerns will be very unlikely to address, it will now not be possible for Havant Borough Council to meet the need for new housing in the plan period.

As such, the Council has begun discussions with neighbouring local authorities and those in the south east Hampshire housing market area. This has shown that there may be some potential to

accommodate unmet housing need. However, it will inevitably not be possible to accommodate Havant's unmet need together with the remainder of unmet need in the housing market area. It is notable in this context that in paragraph 5.12 of the Draft Local Plan it sets out that there is no need in neighbouring local authorities.

Havant Borough Council is committed to working through the Partnership for South Hampshire on the new Joint Strategy and to maximise the opportunities to accommodate unmet need in the south east of Hampshire. Nonetheless, due to the challenges, it is unlikely that this will be sufficient to meet the need for housing. As such, Havant Borough Council is formally seeking a commitment from Test Valley Borough Council to accommodate unmet need from Havant Borough in its new local plan.

If it would be helpful to discuss this matter, I'd be happy to set up a meeting to explore in more detail.

Yours sincerely

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Planning Policy Manager