

## Privacy and publication

We are unable to legally accept anonymous submissions to the consultation. You must therefore provide your consent below before you are able to submit your response.

### Privacy Notice

Any personal information that you supply to Winchester City Council will only be used for the purposes of the work required to prepare a Local Plan under the Planning Acts. We need to collect this information in order to maintain accurate records to ensure that you can be properly involved in the preparation of the Local Plan. This will include general updates on the progress on the Local Plan, sending updates/surveys/newsletters, inviting comments on the Local Plan as it moves through its statutory stages and being notified of the date of the Local Plan Examination and be invited by the Inspector to speak at the Local Plan Examination. Any comments that are received in connection with the Local Plan will be published but they will only display the person/organisation name and postcode beside them. Any information that is received, including contact details, will only be kept until the Local Plan is adopted.

As part of our statutory functions, we will share data with the Planning Inspectorate who will hold the Public Examination on behalf of the Ministry of Housing, Communities and Local Government. You have the right to see what information is held about you, to have inaccurate information corrected, to have information removed from our system unless we are required by law or a statutory purpose to keep it and the right to complain to our Data Protection Officer if you feel that your data has not been handled in accordance with the law.

Further information about how Winchester City Council uses personal information can be found on our [website](#):

### **1. Please confirm that you have read and understood the above, and you consent to your submission being published:**

(Required)

Yes, I confirm I understand that my response will be published with my name and associated representation.

## About you

Please add your personal details below. If you are acting as an agent, please also fill in your details where requested below.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publicly available, therefore we cannot accept anonymous representations. The Council will publish names and associated representations on its website but will not publish personal information such as telephone numbers, or email addresses.

You must fill in these details before you can submit the form.

### 2. What is your full name or client's name if acting as an agent?

Name of respondent (or client): (Required)

### 3. If you are representing an organisation or acting as an agent, please provide the name below.

Organisation/Agent:

### 4. What is your address?

If you are responding on behalf of an organisation, please put the organisation's address below. If you are acting as an agent, please put the company address below.

House number/name: (Required)

Street address 1: (Required)

Street address 2:

Town/area: (Required)

Postcode: (Required)

**5. What is your email address?**

(Required)

Email address:

**6. What is your phone number?**

(Required)

Phone number:

**7. Please confirm by ticking the box below that under GDPR you understand and give your consent for your personal details to be sent to the programme officer. (If you do not confirm that you are happy for your details to be shared we unfortunately cannot accept your representation at this stage of the plan making process)**

(Required)

Yes

**8. Please select the box below if you would like to be kept up to date on the developments to the Local Plan via the email you have provided?**

Yes, I would like to be kept up to date with Local Plan developments

No

## What area of the Local Plan would you like to comment on?

Policy and paragraph number: (Required)

Paragraphs 9.13, 9.20, Table H2, Policy H2

## Do you consider the supporting text and policy are:

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Havant Borough Council (HBC) continues to engage with Winchester City Council and both authorities have discussed the proposed Reg 19 Local Plan and critically have agreed a framework amendments through an updated Statement of Common Ground. This was agreed between the authorities on 11 October 2024. [These comments relate to the Reg 19 plan as published](#) for procedural reasons. Havant Borough Council would highlight to the Inspector that significant discussion and progress has been made since the publication of the Winchester District Local Plan. On the basis that the framework of amendments agreed between the authorities described in this representation and our statement of common ground are enacted in the plan, the Borough Council would fully support the soundness and legal compliance of the plan.

HBC considers that Paragraph 9.13 would be more accurate if it referenced that the local plan should provide for objectively assessed needs for housing, as well as any needs that cannot be met within neighbouring areas, in accordance with para 11 of the NPPF.

Table H2 and paragraph 9.20 reference 'an unmet needs allowance of 1,900 dwellings as a contribution towards the unmet needs of neighbouring areas in South Hampshire'. Havant Borough Council notes the position in the Regulation 19 Winchester District Local Plan as published of a 1,900 "unmet needs allowance (for unmet need in neighbouring authorities)" as set out in table H2. Havant Borough Council considers that in order for the Winchester District Local Plan to be clear, unambiguous and fully meet the 'positively prepared' and 'effective' tests of soundness, it is necessary for the plan to explicitly set out how the unmet needs allowance is to be apportioned between neighbouring local planning authorities and/or those within the housing market area.

It is considered that if a significant proportion of the unmet need allowance is apportioned explicitly to addressing unmet housing need in Havant Borough that this would represent a sizeable and significant contribution to addressing unmet need, in line with paragraphs 35 (a) and (c) of the NPPF (the 'positively prepared' and 'effective' tests of soundness).

This would also reflect the recently signed Statement of Common Ground between the two authorities. It is anticipated that as the plan proposals are tested through the examination, and discussions continue, a precise figure can be included. It is considered that such an approach would represent a sound approach, considering the additional formal request from Portsmouth City Council to accommodate unmet housing need.

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Please make sure that you put in all the evidence and information needed to support your representation.

**What modification(s) are necessary to make the policy legally compliant or sound?**

As set out in the statement of Common Ground signed on 11<sup>th</sup> October 2024, both Winchester City Council and Havant Borough Council agree that the Winchester District Local Plan would meet the ‘positively prepared’ and ‘effective’ tests of soundness if the unmet need allowance is specifically apportioned to individual local authorities. The framework for changes set out below is considered to represent the agreed position of both local authorities, reflecting our statement of common ground.

The apportionment of the unmet need allowance should be representative of the total unmet need between the two authorities, when also considering the inclusion of an 800 home allowance in the recently adopted Fareham Local Plan.

It has been agreed that based on the current unmet need allowance for housing in the Regulation 19 Local Plan (Table H2), which has not yet been tested at the Local Plan examination, to reflect the total unmet need in the housing market area would necessitate the following:

- To Portsmouth City Council: 30% apportionment of the unmet need housing allowance in the Winchester District Local Plan.
- To Havant Borough Council: 70% apportionment of the unmet need housing allowance in the Winchester District Local Plan.

This is set out in further detail in the statement of common ground, particularly footnote 13. As set out in the statement of common ground, it is accepted that the housing supply position has not yet been tested at examination. As such, the above framework for the distribution of unmet need should be revisited through the examination process in the event that:

- An additional ask is made of Winchester regarding any unmet need; or
- The housing target and/or unmet need allowance in the Winchester District Local Plan changes in the course of its examination.

This revisiting of the approach should be a collaborative exercise between Winchester City Council, Havant Borough Council and Portsmouth City Council.

**What is your suggested wording or text for the policy:**

As indicated above.

**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

No, I don't want to take part in a hearing session

