

BUILDING A BETTER FUTURE

Consultation Statement

June 2026



Table of Contents

1.	Introduction	3
2.	Local Plan overview.....	4
3.	Methods of engagement.....	5
4.	Summary of main issues	13
5.	How the representations were taken into account	15
	Appendices	17
	Appendix 1: Issues and the Proposed Approach Consultation – 2022.....	17
	Appendix 2: Full Draft Plan Consultation - 2025	18
	Appendix 3: Youth Engagement Report - 2025	19

1. Introduction

- 1.1. The purpose of this document is to explain how Havant Borough Council (HBC) has consulted on the preparation of the new Local Plan – the Building a Better Future Plan (BBFP). It sets out how the Council has involved residents and key stakeholders in preparing the Local Plan in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)¹ – notably regulation 18 of those regulations - and the adopted Statement of Community Involvement (SCI)². The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters.
- 1.2. This Consultation Statement has been prepared in accordance with Regulation 22 (1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It sets out how the Council considers it has fulfilled its statutory duty to consult and engage with the public on the preparation of the new Local Plan. Regulation 22 relates to the submission of documents and information to the Secretary of State, with part (c) requiring a statement setting out the following:
 - (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
 - (ii) how those bodies and persons were invited to make representations under regulation 18,
 - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
 - (iv) how any representations made pursuant to regulation 18 have been taken into account;
 - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - (vi) if no representations were made in regulation 20, that no such representations were made;
- 1.3. This Consultation Statement starts with an overview of the preparation of the Local Plan and summarises the two Regulation 18 consultations that have taken place. The statement then sets out a list of the bodies and persons invited to make representations under Regulation 18 and details of how the bodies and persons were invited to make representations under Regulation 18 in Chapter 3. A summary of the main issues raised for each consultation is set out in Chapter 4. Chapter 5 sets out how the representations were taken into account for both of the Regulation 18 consultations.
- 1.4. This report has been prepared to support the Publication Local Plan and addresses parts i to iv of Regulation 22. A further Consultation Statement will be produced to support the submission of the Local Plan for examination and will address parts v and vi.

¹ <https://www.legislation.gov.uk/ukxi/2012/767/contents>

² <https://www.havant.gov.uk/planning-services/planning-policy/statement-community-involvement-sci>

2. Local Plan overview

Regulation 18 – 2022 - Issues and the Proposed Approach

- 2.1. The Council began preparing the new Local Plan in March 2022. An initial Regulation 18 consultation was held for 6 weeks, commencing on Monday 3rd October 2022 and finishing on Monday 14th November 2022. The Council undertook this consultation which set out the key issues for the area, and the proposed aims and approaches for addressing these through the Local Plan. The Consultation Document was split into a number of sections, which outlined the approach for each topic area. The document set out Legislation and Government Policy, local evidence and policy, the proposed approach, proposed policies and limitations to note. The findings from the consultation were used to inform the preparation of the draft plan.
- 2.2. A total of 539 consultation survey responses (19 of which were paper survey submissions) were received in relation to the consultation. In addition, 98 respondents engaged via HBCs digital engagement platform (Citizenlab), 773 people attended the six face-to-face exhibition events (of which 102 provided written qualitative feedback via comment cards available at the events) and 45 written responses from stakeholder organisations were received via email or letter.
- 2.3. Details of who the Council consulted and the methodology used, a summary of main issues raised and how the representations were taken into account will be outlined in Chapter 3, 4 and 5 respectively of this report.
- 2.4. Appendix 1 contains a detailed breakdown of the consultation including the methodology and findings from the consultation. The findings from the consultation were reported through the Council's scrutiny process, allowing members to have overview of the process and outcomes.

Regulation 18 – 2025 – Full Draft Plan

- 2.5. The Regulation 18 consultation for the draft Local Plan was held for 8 weeks, commencing on Tuesday 6th May 2025 and finishing on Tuesday 1st July 2025. The draft plan included a full suite of policies and development allocations.
- 2.6. A total of 995 consultation survey responses (7 of which were paper survey submissions) were received in relation to the consultation. Approximately 250 people attended the nine face-to-face exhibition events. Approximately 150 people took part in eight youth engagement sessions held with schools, the local college and youth groups (participants were aged between 11 and 24 years old). Furthermore, approximately 250 attendees at six Councillor-led community meetings held at locations across the borough. A total of 111 written responses, including responses from residents, statutory and non statutory stakeholders were received in response to the consultation.
- 2.7. Details of who the Council consulted and the methodology used, a summary of main issues raised and how the representations were taken into account will be outlined in Chapter 3, 4 and 5 respectively of this report.
- 2.8. Appendix 2 contains a detailed breakdown of the consultation including the methodology and findings from the consultation. The findings from the consultation were reported through the Council's scrutiny process, allowing members to have overview of the process and outcomes.

3. Methods of engagement

3.1. This section is presented to fulfil paragraphs (1)(c)(i) and (1)(c)(ii) required by Regulation 22 of The Town and Country Planning (Local Planning)(England) Regulations 2012. This section of the report will outline which bodies and persons the local planning authority invited to make representations under Regulation 18 and how those bodies and persons were invited to make representations under Regulation 18.

List of bodies and persons invited to make representations under Regulation 18

3.2. The Council consulted all bodies and persons required under Regulation 18(1) of The Town and Country Planning (Local Planning) (England) Regulations 2012.

3.3. The Statutory Stakeholders directly consulted were as follows:

'Specific consultation bodies':	Body
(a) the Coal Authority	N/A
(b) the Environment Agency	The Environment Agency
(c) the Historic Buildings and Monuments Commission for England (known as English Heritage)	Historic England
(d) the Marine Management Organisation	Marine Management Organisation
(e) Natural England	Natural England
(f) Network Rail Infrastructure Limited (company no 2904587)	Network Rail
(g) the Highways Agency	National Highways
(h) a relevant authority* any part of whose area is in or adjoins the local planning authority's area (* a local planning authority , a county council, a parish council, a local policing body)	Chichester District Council
	East Hampshire District Council
	South Downs National Park Authority
	Winchester City Council
	West Sussex County Council
	Hampshire County Council
	Isle of Wight Council
	Portsmouth City Council
	Gosport Borough Council
	Partnership for South Hampshire
	Fareham Borough Council
	Hampshire Constabulary
	Rowlands Castle Parish Council
	Horndean Parish Council
	Westbourne Parish Council
Southwick and Widley Parish Council	
Denmead Parish Council	
Newlands Parish Council	

	Southbourne Parish Council
	Emsworth Neighbourhood Planning Forum
	Stoughton Parish Council
	West Thorney Parish Council
(i)(i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003	Virgin BT
(i)(ii) who owns or controls electronic communications apparatus situated in any part of the local planning authority's area	Mobile UK
(j)(i) a Primary Care Trust established under section 18 of the National Health Service Act 2006(g) or continued in existence by virtue of that section;	Hampshire and Isle of Wight Integrated Care Board (ICB)
(j)(ii) a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989(h)	Scottish and Southern Electricity Networks
(j)(iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986	Southern Gas Networks
(j)(iv) a sewerage undertaker;	Southern Water
(j)(v) a water undertaker;	Portsmouth Water
(k) the Homes and Communities Agency	Homes England
(l) where the local planning authority are a London borough council, the Mayor of London;	N/A
'General consultation bodies':	Body
(a) voluntary bodies some or all of whose activities benefit any part of the local planning authority's area,	Sport England Langstone Harbour Board Chichester Harbour Conservancy
(b) bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area,	N/A
(c) bodies which represent the interests of different religious groups in the local planning authority's area,	N/A
(d) bodies which represent the interests of disabled persons in the local planning authority's area,	N/A
(e) bodies which represent the interests of persons carrying on business in the local planning authority's area;	Pegasus Group on behalf of Arqiva

Table 1 – List of bodies consulted.

3.4. The Council holds a mailing list of interested parties who have opted in to receive updates on the Local Plan via a link on the Council's website³, which includes, but is not limited to, residents and community groups, developers, agents, organisations and residents. Contacts on this mailing list were directly notified of the consultations. The Council also received representations from other consultation bodies that were not directly notified.

Regulation 18 – 2022 - Issues and the Proposed Approach

- 3.5. Public consultation on the Building a Better Future Consultation Document commenced on Monday 3 October 2022 and concluded on Monday 14 November 2022.
- 3.6. In preparation for the consultation period, initial discussions were held with key stakeholder groups as follows:
- A developers breakfast, focussed on the approach new development can take to climate change
 - A meeting with a wide selection of residents groups to discuss issues pertinent to the new local plan and give advance notice of the upcoming consultation (both on 28 July 2022)
- 3.7. For the consultation exercise, respondents were provided information on the proposals contained within the Consultation Document and asked for their views on these, as well as any relevant additional questions relating to the proposed policy topic area.
- 3.8. The engagement programme covered online, offline and in-person channels to inform, engage and capture feedback from a wide group of stakeholders including residents, businesses and organisations.
- 3.9. The consultation was conducted via a number of different methods:
- **Online survey** – The main method of feedback was via an online survey, which was open to all to complete and publicised widely using online and offline methods. Links to the survey were also prominently displayed on the local plan webpage on the HBC website (www.havant.gov.uk/localplan).
 - **Paper survey** – A paper version of the online survey was designed for those who are unable to access the electronic version. Responses submitted via the paper survey were uploaded to the online version and included within the final analysis of this method. Paper versions were available on request and copies were available to collect from community centres and libraries (as well as The Spring in Havant), with the ability to do so publicised using online and offline methods, such as posters at each site promoting the ability to collect paper copies. In addition, paper copies of the survey were available to collect at the face-to-face exhibition events. A phone number was also provided for those without internet access to contact the council.
 - **Digital engagement tool** – The council utilised the Citizenlab digital engagement tool to invite comments on the proposals, which were given a dedicated 'project' on Citizenlab entitled 'Building a Better Future'. Anyone was able to create an account on the Citizenlab site and submit qualitative comments in relation to the proposals, as well as view comments submitted by other users. Links to the Citizenlab tool were also prominently displayed on the Local Plan webpage on the HBC webpage.
 - **Stakeholder letters / emails** – Any stakeholder organisation was able to submit a letter or email representation to the Planning Policy Team, in addition to any member of the public wishing to provide feedback via this method. Contact details were included in each of the above engagement methods, highlighting that members of the public were able to email

³ <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-overview>

policy.design@havant.gov.uk. For those unable to access via electronic methods, the phone number for the team was also highlighted in offline methods.

- **Face-to-face exhibition events** - A series of six in-person exhibition events were held across the borough to enable members of the public to view physical materials and discuss proposals with officers. Venues were selected to enable events to be held in all areas of the borough, with timings also selected to enable a wide audience of attendees the ability to attend (i.e., both daytime and evening / weekday and weekend availability). At each event, a team of council officers were in attendance to talk to attendees through the visual materials and answer any questions they may have. Physical copies of all documentation and surveys were also made available at each exhibition event for attendees to take away. Feedback from these events was captured in the following ways:
 - Comment cards were available for attendees to note down any feedback they wished to submit on site.
 - Tablets were available for attendees to use to complete the survey and view key documentation on site.
 - The interim consultation document and business cards were given to attendees, which featured links to the online survey and Citizenlab tool to signpost them to giving feedback via these methods.

The events were held at the following dates and locations across the borough:

Date	Location
Tuesday 11 October 2022 (3pm to 7pm)	South Hayling United Reformed Church, Hayling Island
Saturday 15 October 2022 (10am to 4pm)	Meridian Centre, Havant
Thursday 20 October 2022 (3pm to 7pm)	St. George's Church Hall, Waterlooville
Thursday 27 October 2022 (3pm to 7pm)	Park Community School, Leigh Park
Tuesday 1 November 2022 (10am to 4pm)	Public Service Plaza, Havant
Thursday 3 November 2022 (3pm to 7pm)	Emsworth Baptist Church, Emsworth

Table 2: List of public exhibition events for the Regulation 18 consultation in 2022.

- 3.10. Alongside the main consultation, the council sought suggestions for sites which would be used to deliver the Plan, known as the 'call for sites'. Similarly, the council also sought suggestions for sites which could be used for environmental mitigation, known as the 'environmental call for sites'. These submissions were considered separately to the main Plan consultation. Further information on the 'call for sites' engagement is provided in paragraphs 3.30 and 3.31.

General Data Protection Regulation (GDPR)

- 3.11. The council was mindful of its data protection duties and responsibilities, and in line with this the engagement programme was designed in a manner to only collect, analyse and report on responses in line with GDPR.
- 3.12. The survey referenced the council's Privacy Policy. Data recorded via this survey will be retained in line with the relevant retention policy.
- 3.13. In addition to this, respondents were informed that the data they provide may be used for other council related projects, for example regeneration projects in the borough.

Methods of Communication

- 3.14. The consultation was publicised using a range of online and offline communication channels to reach as many stakeholders as possible. These included:
- Meetings with key stakeholder groups
 - Press / email bulletins

- Social media posts
- Dedicated webpage
- Posters
- Face-to-face exhibition events across the borough

Interim and Full Consultation Documents

- 3.15. These documents provided proposed approaches and policies for each of the themes identified for the Plan for the public and stakeholders to review and comment on throughout the consultation programme. Printed copies of all key documentation were made available at every face-to-face exhibition, on request and at public buildings (such as libraries and community centres).
- 3.16. Online copies were shared via council communication channels as listed above.

Materials

- 3.17. A full list of printed materials produced to support the consultation are detailed below:
- Consultation document – made available online, at exhibition events and at community centres / libraries
 - Interim consultation document – made available online and at exhibition events
 - Posters – large format displayed at public sites and A4 posters displayed at community centres / libraries
 - Business cards – made available at exhibition events and at community centres / libraries
 - 16 roll up banners – displayed at exhibition events
 - Exhibition event comment cards
 - Hard copies of the questionnaire – made available at exhibition events and at community centres / libraries
- 3.18. The above materials were available at face-to-face exhibitions and relevant materials were available on request from HBC.

Website

- 3.19. All information about the Plan Consultation was available on the following dedicated webpage: <https://www.havant.gov.uk/local-plan>
- 3.20. The full consultation document, the interim document, the online survey, digital engagement platform (Citizenlab) the exhibition panels, the Brownfield Register, the Housing Delivery Position Statement, Local Plan FAQs, information about the previous Local Plan and related studies and strategies were provided at this site. This was viewable at exhibition events via usage of tablets or via request to the Planning Policy Team.
- 3.21. Appendix 1 contains further detail on the methods of engagement, including images of the consultation materials and photographs from the exhibition events.

Regulation 18 – 2025 – Full Draft Plan

- 3.22. The Building a Better Future Plan consultation was conducted from Tuesday 6 May to Tuesday 1 July 2025. An eight week consultation period (longer than the typical timescales of six weeks) was selected to allow opportunity for as many people as possible to contribute.
- 3.23. A variety of consultation methods were made available to ensure as many residents, communities and stakeholders as possible are able to take part in this consultation. These methods were also designed to ensure as much as possible that seldom-heard from audiences, such as young people and those who are digitally excluded, are able to participate in a manner that was suitable.
- 3.24. The consultation was undertaken via the following methods:

- **Online survey** – The main method of feedback for those taking part in the consultation was via an online survey. This survey was designed by the Consultation and Engagement Officer in close collaboration with the Planning Policy Team. The survey was designed to capture meaningful feedback on the proposed policies and sites featured within the draft Plan, including both the level of support or opposition for each section and views on what, if any, changes should be made. The survey was designed to be as user-friendly as possible with links to relevant sections of the Plan document for context, with the ability for participants to save their progress and continue later in order to allow respondents time to formulate their response. The survey was also designed to balance the requirement to ensure that the language was as accessible, clear and understandable as possible, while also providing suitable detail so that respondents are able to provide an informed response to each question. The survey also allowed respondents to select the sections they wished to comment upon, ensuring that they could participate on any or all of the key issues they were interested in. This survey was open to anyone to complete and was publicised widely via all promotional methods (see Section).
- **Paper survey** – A paper version of the online survey was designed for those who were unable to access the online version or those who would prefer to complete via this offline method. The survey was identical to the online survey (with additional guidance on how to complete the paper version) and any responses received via paper survey were uploaded into the online survey platform so that all responses were included within the final analysis. Paper surveys were made available at all libraries, community centres and leisure centres in the borough, while were also available to collect at the Public Service Plaza and at each face-to-face exhibition event. At each of these locations, the paper survey was accompanied by a printed version of the Building a Better Future Plan leaflet and a pre-paid envelope to return to the council for free. Limited numbers of the full draft Building a Better Future Plan were also made available at these locations but were limited due to printing costs and environmental impact. In addition, a telephone number was available and promoted for those unable to collect paper versions or who needed support in responding (e.g. those unable to read the documentation). This number was manned by an officer throughout the consultation period.
- **Go Vocal** – The corporate online digital engagement platform (previously known as Citizenlab) was used as a central visual resource for the project. Pages were designed to provide a dynamic overview of the Plan, with their main function to give visitors an overview of key policies and proposed allocated sites, with links to further information and the online survey signposted throughout. Participants were also able to provide comments on specific sections via Go Vocal's ideas function, which was available to anyone to submit qualitative comments on the proposals (all participants had to create a free account on Go Vocal to contribute). Links to the Go Vocal pages were prominently displayed on the council's website.
- **Face-to-face exhibition events** – A series of in-person exhibition events were held at locations across the borough to enable visitors to view information about the draft Building a Better Future Plan, speak to officers about particular issues or concerns, and provide consultation feedback. At each event, exhibition banners were displayed to provide key information to those in attendance, while officers were available to talk through any particular issues and answer questions. All attendees were provided with materials that signposted them towards the online survey, though paper surveys with printed materials were available for collection and comment cards were available for feedback to be captured during the event. Eight events were held across the borough, with different days, times and locations chosen in an attempt to ensure that as many people as possible were able to attend (e.g. those working during the day, those with care or childcare responsibilities)

The events were held at the following dates and locations across the borough:

Date	Location
Thursday 15 th May 2025 (3pm to 7pm)	Emsworth Baptist Church, Emsworth
Wednesday 21 st May 2025 (3pm to 7pm)	St. George’s Church Hall, Waterlooville
Saturday 24 th May 2025 (10am to 4pm)	Meridian Centre, Havant
Wednesday 28 th May 2025 (10am to 2pm)	Vacant shop unit, Greywell Shopping Centre, Leigh Park
Thursday 29 th May 2025 (10am to 2pm)	Vacant shop unit, Greywell Shopping Centre, Leigh Park
Monday 2 nd June 2025 (3pm to 7pm)	Hayling Island Community Centre, Hayling Island
Thursday 12 th June 2025 (10am to 2pm)	The Springs Art and Heritage Centre, Havant
Thursday 19 th June 2025 (10am to 4pm)	Public Service Plaza, Havant
Saturday 21 st June 2025 (10am to 4pm)	St. George’s Church Hall, Waterlooville

Table 3: List of public exhibition events for the Regulation 18 consultation in 2022.

- **Stakeholder feedback** – Any stakeholder – both statutory and non-statutory – or resident was able to submit a letter or email representation to the consultation. Contact details were included within the above engagement methods, and feedback received via letters or emails was included within the general findings of the consultation.
- **Youth engagement** – Recognising the importance of engaging with younger people due to the long-term nature of the Plan, a number of youth engagement activities were undertaken in collaboration with local schools, the local college and young people involved in economic development initiatives. Further information on youth engagement activities for the Building a Better Future Plan is captured within a separate report.
- **Community networks** – Though these were primarily communication methods, meetings with community networks provided opportunities for key stakeholders to provide feedback on the proposed Plan. Points raised as part of any meetings were included as feedback on the engagement.

Methods of Communication

- 3.25. The Building a Better Future Plan consultation was accompanied by a dedicated and in-depth communications plan. The aim of this plan was to ensure as many residents, communities and stakeholders as possible were made aware of the consultation and were able to take part. This promotion sought to ensure seldom-heard from audiences, such as young people or those who are digitally excluded, were made aware of the consultation wherever possible and were able to contribute their views.
- 3.26. Through this promotion, participants were provided with information about the development of the Local Plan, the key messages of the draft plan and how they could submit their feedback to shape the plan.
- 3.27. Promotion was undertaken via both online and offline methods as follows:
- **Social media campaign** – A dedicated social media campaign was designed and undertaken to raise awareness online. Social media posts covered the key drivers of the exercise and provide different messages for different channels to maximise coverage. This campaign utilised council accounts on the following channels:
 - Facebook (including paid-for advertising)
 - Twitter
 - Instagram
 - LinkedIn
 - Next Door

- Press releases and e-newsletters
 - Local publications – articles were published in issues of the following publications that are published locally:
 - The News, Portsmouth
 - Hayling Herald
 - The Ems Newspaper
 - The Waterlooville Ratepayer
 - PO9 Publication
 - Meon Valley Matters
 - Posters – both large format and smaller posters displayed in locations such as libraries, community centres and town centres
 - Written materials available at public locations such as libraries, community centres and the council offices.
 - Inclusion on the HBC 'Have Your Say' webpage (www.havant.gov.uk/haveyoursay) and Local Plan webpages on the HBC website (www.havant.gov.uk/localplan).
 - Promotion via external partners, stakeholders and networks
 - Information provided via local Councillors
- 3.28. Promotion conducted via these methods provided high level information about the Building a Better Future Plan, signposted participants to further details and links to the channels through which residents could contribute their views via both online and offline methods.
- 3.29. Appendix 2 contains further detail on the methods of engagement, including images of the consultation materials and photographs from the exhibition events. Appendix 3 contains details of the youth engagement sessions.

'Call for Sites' Engagement

- 3.30. There have been several 'calls for sites' where landowners and developers were invited to submit or promote sites for consideration. Like most authorities, Havant Borough Council encouraged this within specific time periods, such as the two Regulation 18 consultations. However, given the high level of housing need in Havant Borough and the limited availability of sites, the 'call for sites' has been continued to be publicised on the Council's website and left open to enable interested parties to submit potential sites for consideration at any time.
- 3.31. In addition, the Council undertook further engagement with a number of developable site promoters following the Council's Strategic Flood Risk Assessment (SFRA) Sites Review in November 2025.

4. Summary of main issues

- 4.1. This section is presented to fulfil paragraph (1)(c)(iii) required by Regulation 22 of The Town and Country Planning (Local Planning)(England) Regulations 2012. This section of the report will outline a summary of the main issues raised by the representations made pursuant to Regulation 18.

Regulation 18 – 2022 - Issues and the Proposed Approach

- 4.2. The Issues and the Proposed Approach consultation required respondents to rank their top themes that they think the plan should place greater emphasis on. The top themes chosen were:
- 67% of survey respondents agreed with the proposed approach to avoid or mitigate significant effects on the natural environment
 - 66% of survey respondents agreed with the proposed approach to protect, conserve, and enhance sites with local nature designations
 - 85% of survey respondents agreed with the proposed approach to cover the retention and enhancement of existing open spaces and the creation of new spaces in new developments
 - 40% of survey respondents agreed with the proposed approach to recognise, protect, and enhance designated landscapes
- 4.3. Across the consultation, the four above themes were referenced with strong feeling from respondents, particularly in terms of how often they were discussed, the inter-locking relationship they have as four themes, and their influence and impact upon other themes in the consultation.
- 4.4. Reducing the impact of development on the natural environment was chosen as the top priority by survey respondents (52% chose this amongst their top five priorities) for the Plan to place greater emphasis upon. Protecting, conserving, and enhancing the borough's local nature designations was chosen as the second highest priority by survey respondents (39%). Retaining and enhancing open spaces ranked third, with 35% of survey respondents choosing this within their top five priorities. Recognising, protecting, and enhancing designated landscapes although not in the top five themes overall, was ranked fifth in themes chosen as the most important priority.
- 4.5. Across the consultation, the infrastructure theme was strong, with securing the timely provision of infrastructure highlighted as a priority for respondents throughout the survey. When consultation respondents were discussing infrastructure, this was in relation to:
- Transport: particularly the road network, but also but also mentioned regarding public transport and active travel routes
 - Water: particularly sewage and wastewater
 - Health: such as GP surgeries, hospitals, and pharmacies
 - Education: particularly schools (primary and secondary)
- 4.6. Infrastructure capacity and pollution concerns often meant either respondents were against development unless infrastructure provision was planned for or considered alongside new housing developments, upgraded or expanded beforehand (and therefore meet demand and address pollution concerns), or it meant that respondents opposed development generally (particularly if they felt that upgrades or expansion to infrastructure provision was not achievable.)
- 4.7. Across the consultation, climate change, flood risk and low carbon design themes were also strong, particularly in terms of how often they were discussed, the relationship between the themes and their influence and impact upon other themes in the consultation.
- 4.8. Managing the flood risk to the borough was chosen as the fifth top priority by survey respondents (31% chose this amongst their top five priorities) for the Plan to place greater emphasis upon. The

council meeting climate change targets, although not in the top five themes overall, was ranked as fourth amongst the most important priorities for survey respondents. Just under half (47%) of survey respondents selected low carbon design either as first or second choice for further focus in the Plan (out of five options), making this score rank second highest.

Regulation 18 – 2025 – Full Draft Plan

- 4.9. The main issues raised from this consultation were regarding the Development Strategy and unmet development need. For those responding through the online survey, it was a mandatory question to provide views on the Draft Local Plan's Spatial Strategy as this sets out the overall approach of the plan. Views on the vision set out in the Spatial Strategy were broadly split between those for and against - 40% of respondents indicated that they support the vision compared with 46% of respondents indicating their opposition to the strategy. It should also be noted that just under a third of respondents (29%) indicated that they strongly oppose the vision, though this should be considered alongside a similar rate (27%) who somewhat supported the strategy.
- 4.10. The consultation material made clear the large deficit between the need for development - both housing and employment - and the supply over the plan period. This has been a focus of the feedback from a number of stakeholders.
- 4.11. The issue of unmet development need has been particularly highlighted through responses to letters under the Duty to Cooperate from neighbouring authorities and also a key theme in responses from the development industry. At the same time as the consultation took place, the Council also wrote to neighbouring and nearby local authorities in the same housing market area highlighting how the plan was taking steps to minimise the level of unmet need but also the large unmet need that remained even with those steps in place. This has led to ongoing discussions with those authorities regarding this key issue.
- 4.12. In addition, 111 written responses were received from stakeholders: 25 from developers and agents, 60 from resident and non-statutory stakeholders and 26 from statutory stakeholders. These written responses provided a range of recommendations for amendments to existing policies, as well as recommendations for new policies.

5. How the representations were taken into account

- 5.1. This section is presented to fulfil paragraph (1)(c)(iv) required by Regulation 22 of The Town and Country Planning (Local Planning)(England) Regulations 2012. This section of the report will outline how any representations made pursuant to Regulation 18 have been taken into account.

Regulation 18 – 2022 - Issues and the Proposed Approach

- 5.2. This section of the report outlines how the representations received in the Regulation 18 Issues and Proposed Approach 2022 consultation were taken into account in preparing the Regulation 18 full draft plan.
- 5.3. The consultation on the proposed approaches, alongside further research and evidence studies, was fundamental in forming the 2025 Regulation 18 full draft plan, in particular the overall development strategy which guides the plan. The Council developed four Development Strategy options, ranging from a fully brownfield focussed option seeking to fully maximise environment protection, to a housing delivery market driven option with limited expectations for development quality or environmental considerations. The consultation established that there was a strongly expressed local drive to maximise environmental protection - both for people and nature itself. This guided the Council away from the two options that sought to prioritise housing delivery over all other matters. The chosen strategy seeks to positively address the reality of climate change and the precarious state of the natural environment.

Regulation 18 – 2025 – Full Draft Plan

- 5.4. This section of the report outlines how the representations received in the Regulation 18 Full Draft Plan 2025 consultation were taken into account in preparing the Publication Plan. A number of changes were made to the plan following analysis of the representations received during the consultation period. An overview of the changes are detailed below.

New Policies and Site Allocations

- 5.5. As a result of the representations received, eight new policies were included in the plan, comprising three strategic policies and a suite of heritage policies.
- 5.6. A 'Green and Blue Infrastructure' strategic policy was added to the plan as a result of the representation received from Natural England recommending that a specific policy on green and blue infrastructure was included to set out more detailed expectations and include a range of tools, guidance and frameworks in helping to achieve this.
- 5.7. The draft plan contained a 'Health and Climate Change' strategic policy, however following a review of the policy by the Council and in light of Hampshire County Council's recommendation that the Plan would benefit from an overarching healthy lifestyles and ill-health prevention policy, it was decided that these two topics should be split into two separate policies; a Climate Change policy and a Health policy.
- 5.8. The draft plan contained one policy relating to heritage, titled 'Heritage and the Historic Environment'. Following the representation from Historic England recommending the need to review and revise the Plan's approach to heritage, as the policy was considered very high level and that a more locally tailored suite of heritage policies was recommended. This representation was taken into account meaning that in addition to the existing policy, five new heritage policies were added to the Publication Plan. The policies are as follows: Conservation Areas, Listed Buildings, Archaeology,

Locally Listed Buildings and Non-Designated Heritage Assets, and Improvements in Energy Performance of Historic Assets.

- 5.9. In addition to the new policies, the Council have identified and allocated a new site, Land south of Havant Road (Horse's Field), in the Publication Plan. This follows a detailed site promotion submitted in the 2025 consultation which showed how the constraints facing the site could be addressed. The inclusion of this site will further boost housing supply.

Policy Updates

- 5.10. A number of changes were made to the plan in response to the representations received during the consultation. This has included policy wording changes, including adding and/or removing criterions from policies, strengthening wording choices and amending supporting text to further explain how the policies will be implemented and to point to specific guidance. Similarly, amendments were made to allocation policies, including amending, adding or removing key site features or allocation requirements that the development must overcome.

Evidence Base Updates

- 5.11. As a result of the representations received, a number of updates were made to the evidence base informing the Local Plan.
- 5.12. The Council has updated the Strategic Housing and Economic Land Availability Assessment (SHELAA), the Housing Needs Analysis and the Employment Land Review (ELR) in order to give the most up to date information regarding housing and employment need.
- 5.13. A number of representations commented on viability. The Council has provided an updated Viability Assessment.
- 5.14. Updates have also been carried out to the following evidence based documents after the 2025 Regulation 18 consultation:
- The Strategic Flood Risk Assessment (Local Plan Sites)
 - Town Centres and Retail Study
 - Open Space Strategy
 - Indoor Built Sports Facility Strategy
 - Local Green Spaces and Destination Open Spaces in Havant
 - Infrastructure Delivery Plan
- 5.15. The Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) have been reviewed and updated following changes that have been made to the Plan following the analysis of the representations received from the consultation.

Ongoing Engagement

- 5.16. In response to the representations received from the Regulation 18 consultation, the Council has continuously been engaging with neighbouring authorities and statutory consultees through the Duty to Cooperate and producing Statements of Common Ground with regard to changes made to the Plan. This shows how the Council has been continually taking into account the representations received.

Appendices

Appendix 1: Issues and the Proposed Approach Consultation – 2022

See report published as a separate file.

Appendix 2: Full Draft Plan Consultation - 2025

See report published as a separate file.

Appendix 3: Youth Engagement Report - 2025

See report published as a separate file.