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South Downs
National Park Authority

08 September 2026

Planning Policy Team
Havant Borough Council

SENT BY EMAIL

Dear Planning Policy Team,

Re: Building a Better Future – Regulation 19 consultation of the Havant Local Plan.

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Regulation 19 version of the Havant Local Plan.

The National Parks and Access to the Countryside Act 1949 – as amended by Section 245 of the Levelling Up and Regeneration Act 2023 – requires all relevant bodies (including Havant Borough Council [HBC]) to seek to further the following statutory purposes of the South Downs National Park:

1) To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area; and
2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Maintaining Effective Cooperation / Duty to Cooperate

We support HBC's continued liaison with neighbouring authorities to ensure that cross-boundary strategic priorities are fully addressed. A Statement of Common Ground (SoCG) was signed in March and April 2026 between the SDNPA and HBC setting out the authorities' strategic cross-boundary priorities and agreed positions.

Regulation 19 Public Consultation of the Havant Local Plan

The SDNPA has submitted its Regulation 19 representation (see overleaf) using the online representation form. In addition to the above and overleaf, we request the following minor modification in Policy 58b (Renewable Energy Infrastructure) – "... *to National Landscapes and* ***National*** *Parks by* ..." – for clarity.

We wish you well with the progression of your local plan.

Yours sincerely

[redacted]

Claire Tester MRTPI
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Allocation 1 – Southleigh.

Reg19 Question	SDNPA response
Do you consider the Local Plan is legally compliant?	Yes.
Do you consider the Local Plan is sound?	No - Not consistent with National Policy.
Please given details of why you consider the Building a Better Plan is not legally compliant or is unsound. Please be as a precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	The South Downs National Park Authority and Havant Borough Council signed a Statement of Common Ground (SoCG) in March and April 2026. The agreed position – as set out in SoCG Paragraph 3.28 – is that both authorities are committed to bringing this allocation forward in a way which avoids or minimises any potential adverse impacts on the South Downs National Park as per 2024 NPPF Paragraph 189. The site description acknowledges that the site is within the setting of the South Downs National Park. However, there is no policy criteria related to the South Downs National Park and development within its setting, and the requested amendments in our 2025 Regulation 18 representation to the new Havant Local Plan have not been actioned. At present, we believe the allocation is unsound as it is not consistent with national policy, in particular 2024 NPPF Paragraph 189.
Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Add policy criteria, similar to Allocation 2 (Long Copse Lane): Amend Criteria (K)(ii) in the "Infrastructure (Transport)" section to: • Protecting and enhancing the existing Public Rights of Way (PRoW) network, and exploring opportunities to connect to existing active travel routes linking north to Southleigh Forest and the South Downs National Park.

Reg19 Question	SDNPA response
	Amend Criteria (L) in the "Natural Environment" section to: • Maintain and enhance ~~the~~ green and blue infrastructure on and around the site to safeguard green and blue connections and corridors linking from north to south between the protected landscapes of the South Downs National Park and Chichester Harbour National Landscape, and between Southleigh Forest and ~~environs,~~ the A27~~,~~ and ~~the~~ undeveloped coast to the south to Warblington. Add the following criteria to the "Heritage and Landscape" section: • Positively respond to local landscape character and visual and special qualities of the area, while being sensitively located and designed to avoid or minimise any adverse impacts on the South Downs National Park. • Provide a sensitive lighting strategy which demonstrates how development will conserve and enhance the intrinsic quality of the South Downs Dark Night Skies Reserve.