# Building a Better Future Plan - Representation Form

## Part A - Personal Details

Please indicate whether you are completing this form yourself or if you are an agent completing this on behalf of a client

I am completing this form myself

## Part A - Personal Details (Completing form on own behalf)

Please provide the following personal details.
Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate.
The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process. More information on how we use your personal information can be found as part of the 'Planning Policy' privacy notice is available here.

| | |
|---|---|
| **Title** | Mr |
| **First Name** | Robert |
| **Last Name** | Comlay |



Please provide the following details where applicable and/or relevant

| | |
|---|---|
| **Job Title** | - |
| **Organisation** | On behalf of Havant Civic Society |

## Part A - Personal Details (Agent on client's behalf)

If an agent is appointed, please provide the following information:
Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate.
The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process. More information on how we use your personal information can be found as part of the 'Planning Policy' privacy notice is available here.

*No Response*

Please provide the following information about the client for whom you are completing this form on their behalf

*No Response*

## Part B - Your representation(s)

Which part of the Building a Better Future Plan does your representation relate to?
Please provide as much detail as possible.
If you wish to make a change to the Policies Map, please comment on the corresponding policy, and explain what change you would wish to make. If you would be helpful if you could show this in visual form
A full list of policies and allocations can be found in the contents page(s) of the Publication Plan - you can access this document here.

| | |
|---|---|
| **Policy Number** | 4,6 and 8 |
| **Allocation Number** | 1 (also, by way of reference, 29 |
| **Paragraph Number** | Multiple - See attachment |
| **Page Number** | Multiple - See attachment |

Do you consider the Local Plan is ...
(Please select as appropriate)

| | Yes | No |
|---|---|---|
| **Legally compliant** | X | |
| **Sound** | | X |

Please give details of why you consider the Building a Better Plan is not legally compliant or is unsound. Please be as 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.

Please refer to attachment: BABF_Havant_Civic_Society_Representations_9_September_2026.pdf for full details.

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.

Please refer to attachment: BABF_Havant_Civic_Society_Representations_9_September_2026.pdf for full details.

If you wish to upload any documents to support your representation, please do so below. Please note that there is a maximum file size of 50MB and you can upload a maximum of 10 files to include with your form.

- File: BABF_Havant_Civic_Society_Representations_9_September_2026.pdf - Download

## Examination Hearing Session Invitation

If your representation / representations are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Please note that while this will provide an initial indication of your wish to participate in examination hearing session(s), you may be asked at a later point to confirm your request to participate.
No details on the examination hearing session(s) have yet been determined and will be made available upon the submission of the Building a Better Future Plan to the Planning Inspectorate.

Yes, I wish to participate in examination hearing session(s)

## Examination Hearing Session Invitation (2)

You indicated that you wish to participate in the examination hearing session(s). Please outline why you consider this to be necessary.
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in examination hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Should the Inspector(s) have any questions on the Society's response, I have been authorised by the HCS committee to make myself available.

## Future Notification

Do you wish to be notified of any of the following milestones in the Building a Better Future Plan process?
These milestones include:

The Local Plan has been submitted for examination
The publication on the Inspector's Report
The adoption of the Local Plan

If you indicate that you wish to be notified, the email address you provided in Part A of the form will be used by the Council to notify you of these milestones.

Yes, I wish to be notified

Building a Better Future Plan – Havant Civic Society Representations

Havant Borough Council – Building a Better Future Plan

Pre-Submission (Regulation 19) Consultation, 20 July – 9 September 2026

Representations on Allocation 1 (Southleigh) and Allocation 23 (Campdown)

Submitted on behalf of: Havant Civic Society

Named representative for oral examination hearings: Bob Comlay, on behalf of Havant Civic Society

# 1. Introduction and scope

This document sets out representations on the Publication Building a Better Future Plan, focused on the deliverability of two strategic housing allocations – Allocation 1 (Southleigh) and Allocation 23 (Campdown) – together with a related, cross-cutting representation on the reliability of the transport evidence underpinning further employment intensification at New Lane, which sits on the same Strategic Road Network approach as Southleigh. It is prepared for submission via the Council's Pre-Submission Consultation Form (SmartSurvey) and as a supporting document upload, in accordance with the Regulation 19 guidance note and Statement of Representation Procedure.

The representations address the statutory tests of soundness set out in the National Planning Policy Framework – that a plan be positively prepared, justified, effective and consistent with national policy – with particular focus on the 'justified' and 'effective' tests as they apply to the evidence underpinning delivery of these two sites.

In HCS's assessment, both allocations share a common pattern that is material to soundness: each is assumed, in the Council's own housing trajectory (Appendix 1), to make no contribution whatsoever to the Plan's five-year housing land supply, and each carries a specific, identifiable infrastructure or evidence dependency that the Council's own evidence base has not yet resolved. That pattern is set out first, before the site-specific representations that follow.

## 1.1 Cross-cutting point: both sites are assumed to deliver nothing in years 1–5

Appendix 1 (Housing trajectory, p.358) sets out year-by-year delivery assumptions for every allocation in the Plan. Reading the rows for BL5 Southleigh and WA15 Campdown against the SHELAA year index confirms the following:

| Southleigh (BL5) – net dwellings/year | 25/26–30/31 | 31/32 | 32/33 | 33/34–42/43 |
|---|---|---|---|---|
| Dwellings | – | 50 | 100 | 150 p.a. |

Total to 2042/43: 1,650 dwellings (of a 2,100 capacity). Source: Appendix 1, p.358; corroborated by the SHELAA (HS05) site pro-forma for BL05, which records the identical phasing split of 0 dwellings in years 0–5, 450 in years 6–10 and 1,200 in years 11+.

| Campdown (WA15) – net dwellings/year | 25/26–30/31 | 31/32 | 32/33–38/39 | 39/40 |
|---|---|---|---|---|
| Dwellings | – | 28 | 75 p.a. | 37 |

Total to 2039/40: 590 dwellings (the full site capacity). Source: Appendix 1, p.358.

Between them, Southleigh and Campdown account for 2,240 of the Plan's 7,394-dwelling housing supply trajectory – around 30% of total planned supply – yet contribute zero dwellings to the first six years of the plan period (2025/26–2030/31), the period against which the Council's five-year housing land supply is calculated under Policy 8. In HCS's assessment, this is a material fact for examination: it confirms that neither site is relied upon, or capable of being relied upon, to meet the Borough's pressing five-year need, and that the 'effective' (deliverability) test for both allocations falls to be tested against a delivery window that only opens in year 7 of an eighteen-year plan.

## 1.2 Continuity with the withdrawn 2021 Local Plan

Both sites were allocated in Havant's previous emerging Local Plan, withdrawn following the Inspectors' Interim Findings Report (document CR18, issued to the Council in the course of that examination). In HCS's assessment, that report is directly relevant to the present examination: it is a prior, independent finding on the deliverability of these same two sites, by the same statutory process this Plan is about to enter, and the Plan as published does not appear to set out what has changed since. The representations below therefore ask, site by site, whether the specific reasons the 2021 Inspectors gave have been resolved, or simply carried forward.

On Southleigh, the 2021 Inspectors found the assumed delivery timescale unrealistic, citing evidence (a Lichfields study) that sites of 2,000+ dwellings take on average 8.4 years from validation of a first application to first completions, and concluded first completions were ‘unlikely to occur until 9-10 years from now,’ removing 400 dwellings from the Borough's assumed supply. They also recorded that the preferred access route would ‘run through third party land’ and require ‘a new rail crossing,’ with ‘only limited discussions... with Network Rail’ at that stage (CR18, paras 26–33).

On Campdown, the 2021 Inspectors recorded that the site ‘largely surrounds a scheduled Roman villa on 3 sides,’ that Historic England's objection ‘remains extant’ despite discussions ongoing since the 2019 application, and that Natural England had raised ‘significant concern as to whether [the functionally linked land's] function is capable, in principle, of being adequately replaced elsewhere,’ describing Curlew as ‘a difficult species to mitigate for.’ On that basis the Inspectors found the site did not meet the NPPF Annex 2 definition of ‘deliverable’ or ‘developable,’ and recommended removing its then-650 dwellings from supply (CR18, paras 37–40).

In HCS's assessment, it is striking that: (i) Southleigh's access strategy today still turns on an unbuilt railway crossing whose deliverability the Council's own current feasibility evidence (IT07, addressed at 2.1(a) below) continues to qualify, five years after the Inspectors flagged the same dependency; and (ii) Campdown's allocated capacity has fallen from approximately 650 to 590 dwellings, without the Plan explaining whether that reduction reflects resolution of Historic England's 2021 objection, a response to it, or an unrelated change. Neither point is asserted here as a conclusion – both are put to the Council and the Inspector as questions the Plan's soundness evidence should answer explicitly.

## 1.3 HCS raised the New Lane/SRN consultation gap addressed in Representation 3 in writing in 2022

HCS's concerns about the New Lane Industrial Estate and its relationship to the Strategic Road Network, addressed in Representation 3 below, are not new to this consultation. On 28 July 2022, the Havant Borough Residents' Alliance (HBRA) – an alliance of eleven borough residents' groups that includes HCS – met with HBC's Local Plan team (David Hayward, Emma Chisnall, Caroline Harvey, Cllr Elizabeth Lloyd and Simon

Rowberry) for a preview of the then-new Local Plan project. Although the HBRA team supplied, in advance, a consolidated list of written questions intended to inform the discussion, the Local Plan team opted not to consider or discuss those matters during the face-to-face meeting.

HBC responded in writing on 31 August 2022, sharing its response “on the understanding that they are only shared with those who attended the meeting on the 28th July,” and stating that “the responses to these questions and the presentation must not be passed onto anyone further or published.” On HCS's record, no justification for this order was received. HCS finally published the full record – HBRA's questions and HBC's responses – on its own website on 24 July 2026, coinciding with the opening of this Plan's Regulation 19 consultation and it is on that basis referred to here.

# 2. Representation 1 – Allocation 1: Southleigh

**Policy / paragraph:** Section 3, Allocation 1: Southleigh (paras 3.12–3.17, pp.89–94); Policy 4 (p.48–51, safeguarded bridge item); Policy 6 (p.59); Policy 8 (pp.67–68); Appendix 1 (p.358); Allocation 29, Interbridges West (p.154)

**Legally compliant?:** No objection raised on legal compliance (duty to cooperate / procedural matters not addressed in this representation).

**Sound?: No – not currently sound**. Objection made on the 'justified' and 'effective' tests.

## 2.1 Summary of representation

Southleigh is, by a wide margin, the largest allocation in the Plan (146.32ha, up to 2,100 dwellings) and the site on which the Plan's overall housing strategy most depends. Paragraph 3.14 records that, in line with Policy 14 (Housing Density), the Council expects the promoter to maximise delivery, but that "it is not expected to be complete before the end of the plan period and so the remaining homes will come forward after 2043." In HCS's assessment, the evidence base does not yet demonstrate that the site is deliverable at the rate, or in the form, the Plan assumes, for four connected reasons.

(a) The strategic transport link the policy relies on is not yet shown to be deliverable

Development requirement k)(iii) at Allocation 1 requires the site to provide "a new walking, cycling and public transport bridge over the railway to connect the site directly with the Emsworth Road/A27 Warblington junction (see also safeguarding under Policy 4)", and Policy 4 safeguards land for this bridge on that basis, noting only that "exact requirements are to be determined through the transport assessment for the site." Paragraph 3.17 confirms this bridge is the specific mechanism by which the Plan proposes to reconcile "reducing the need to travel" with the acknowledged need for some vehicular access to Southleigh.

The Council's own commissioned feasibility study for this crossing (IT07, Southleigh S-W Bridge Feasibility Study) tested three options. In HCS's reading of the study's reported conclusions, the option that would actually deliver the sustainable-transport (bus and active travel) link the policy describes – Option 2 – is found to be "technically feasible as a railway crossing" but "undeliverable due to land availability or development layout constraints at the present time," because the land south of the railway (including the Land east of Castle Avenue allocation, Allocation 6) does not currently accommodate the width needed for bus routing without redesign. The cheaper, deliverable option (Option 1, active-travel only, an estimated £7.1m–£9.3m) does not provide the public transport link that Development Requirement k)(vii) relies upon for the proposed South East Hampshire Rapid Transit bus route serving the site; the option that would provide full vehicular capacity (Option 3, an estimated £55m–£60m) is recorded as not supported by the highway authorities as contrary to sustainable transport policy.

In HCS's assessment, this is a direct evidential gap between what Policy 4 and the Allocation 1 development requirements assume will be delivered, and what the Council's own feasibility evidence currently supports as deliverable. Policy 8 (Five Year Housing Land Supply) requires, at criterion (d), that a proposal be "demonstrated to be deliverable in the short term" before the tilted balance applies – yet the site's principal access-strategy dependency is, on the Council's own evidence, not currently resolved.

(b) The trajectory assumes a standing start with no live application, comprehensive single-outline delivery, and multiple landowners

Paragraph 3.16 states the Council "expects a single outline planning application covering the entirety of the site" and that "piecemeal development of this site is not considered appropriate." The site profile (p.90) records that while the majority of the site is in single ownership, "a number of other parties have interests in parts of the site" and that development "should be planned and delivered comprehensively or, if this is not possible, the development of one part of the site does not prejudice the development... of the other part(s)." The SHELAA (HS05) achievability commentary likewise notes that multiple landowners create coordination challenges alongside a restrictive covenant requiring variation.

The Development Requirements for Southleigh (pp.92–93) run to over thirty separate criteria (a–ff), spanning a local centre, a primary school (with early years provision), a community centre, a comprehensive access and movement strategy including the bridge addressed above, retention of Solent Wader and Brent Goose mitigation, heritage and parkland integration around the Grade II listed Southleigh Park House, a Mineral Resource Assessment, and phasing tied to sewerage infrastructure delivery. In HCS's assessment, the 2017 non-statutory masterplan referenced at para 3.13 pre-dates – and does not discharge – this considerably expanded set of requirements, and no live planning application has yet tested whether a single comprehensive outline consent covering all of them, across multiple ownerships, is achievable on the timescale the trajectory assumes (first completions in 2031/32).

(c) Two different 'within the plan period' figures appear in the Plan's own evidence

The Allocation 1 site profile (p.90) states the site's "Indicative Yield (net)" as "2100 (of which 1,500 in the plan period)". Appendix 1 (p.358) and the SHELAA (HS05) pro-forma for BL05 both instead total 1,650 dwellings within the plan period. In HCS's assessment this is a minor but real internal inconsistency that should be corrected for clarity before submission, and it is flagged here in case it points to an unresolved change in the assumed trajectory between the site-allocation text and the appendix.

(d) The live Southleigh application's own Transport Assessment records junction capacity failures with no identified mitigation

Havant Civic Society has separately reviewed the Environmental Statement (ES) and Transport Assessment (TA) submitted with the live outline application for Southleigh (APP/26/00324, Bloor Homes, validated 3 June 2026, up to 1,800 dwellings). This is set out in detail in HCS's "Questions on, and arising from, the submitted Environmental Statement and Transport Assessment" (Bob Comlay, Havant Civic Society, 6 July 2026), filed for inclusion in the case file for APP/26/00324, and corroborated in HCS's later "Cumulative Impact of Development on the Havant SRN Junction Cluster" document (26 July 2026, lodged on the case files for APP/26/00324 and APP/23/00488 Campdown); neither document appears in the Plan's evidence library. HCS's review records that the Emsworth Road/Southleigh Road/Pook Lane junction – screened out of the Environmental Statement's assessed study area because the modelled traffic-flow increase falls below the standard IEMA threshold – collapses to between minus 33% and minus 41% Practical Reserve Capacity once development traffic is added, with the applicant's own transport consultant stating that "no immediately available mitigation scheme is clear." The same review records two further junctions on the same corridor (Horndean Road/Bartons Road and Horndean Road/Southleigh Road) as over capacity in the AM peak under every scenario tested, including the most optimistic and after the proposed signalisation mitigation, both already over capacity in the 2038 future baseline before Southleigh traffic is added.

HCS's questions also record that the applicant's mitigation scheme at the Warblington interchange is reported as achieving full capacity resolution only when modelled in isolation, without separately identifying or quantifying additional loading from Chichester District Council's committed A259-corridor housing pipeline, Amazon HGV/LGV movements between the DPO1 and DBN5 delivery stations, or overflow traffic

diverted from the Langstone interchange when saturated; and that, as of the application's validation on 3 June 2026, the mitigation scheme designs for all four off-site junctions the development affects – Horndean Road/Bartons Road, Horndean Road/Southleigh Road, Bartons Road/Eastleigh Road, and the Warblington interchange – remained marked as drafts for discussion rather than finalised, construction-ready designs, so that the TA's reported capacity outcomes depend on schemes that could still change materially before detailed design. HCS's questions further record that the Environmental Statement itself describes a previously-considered pedestrian and cycle bridge at the Southleigh Road level crossing (distinct from the Emsworth Road/Warblington bridge addressed at 2.1(a) above) as "no longer a funding priority for HBC or HCC," without identifying what active travel provision, if any, now replaces it.

In HCS's assessment, this live-application evidence reinforces, with more granular figures, the same access-strategy concern raised at 2.1(a) above from the Plan's own IT07 feasibility study: the transport dependency the Southleigh allocation and Policy 4 rely on is not yet shown, on any evidence currently before the Council, to be resolved. None of HCS's questions on APP/26/00324 (six sections of detailed technical questions, plus five further questions put to Bloor Homes and the Council in person at a Development Consultation Forum on 27 January 2026) had received a published response as of the date of this representation. HCS recommends both documents be treated by the Council and the Examining Inspector as relevant submitted documents for both the Southleigh allocation and, at Section 3 below, the Campdown allocation, notwithstanding their absence from the formal evidence library.

(e) Committed New Lane/Amazon DPO1 traffic on the same corridor is larger than assessed, and is not reliably monitored – understating the case against, and the case for, the Southleigh access strategy

The Council's own IT07 feasibility study records, among the advantages of the full vehicular crossing option (Option 3), that it "could be marked as an HGV preferred route from New Lane to A27" – recognising that a full Southleigh crossing would serve not only the site itself but also existing HGV/commercial traffic from the Havant North (New Lane) industrial estate, immediately to the north-west. Option 3 is, however, recorded in the same study as not currently supported by the highway authority, as contrary to sustainable transport policy (IT07, Sections 5, 7).

Since the 2021 Local Plan was withdrawn, the New Lane estate's traffic generation has changed materially with the occupation of the Amazon DPO1 delivery station (operational since March 2023). HCS's own review – "Havant North Industrial Estate: Traffic Signage Improvement Requirements" (V3, August 2026) – records a roughly seven-fold increase in daily vehicle movements against the site's previously assessed baseline, notes that DPO1 has no direct SRN access and routes a high proportion of its traffic through New Lane, Crossland Drive, Bartons Road and Petersfield Road (residential streets on the same corridor Southleigh's Transport Assessment must model), and records that "the Southleigh strategic link proposal, which despite providing essential relief for commercial traffic from the New Lane estate, has not yet been prioritised for funding." This point was raised with Hampshire County Council Highways via the Ward Councillor in June 2024 and, on HCS's record, has not been substantively answered.

HCS's questions on the Southleigh Transport Assessment (6 July 2026, referenced at 2.1(d) above) record two further, directly relevant gaps. First, the TA's traffic baseline is dated June 2023 and, on HCS's review, has not been shown to have been updated to reflect DPO1's subsequent expansion into Same Day delivery or the opening of the Amazon DBN5 delivery station in March 2024 – both post-dating the baseline and both generating HGV/LGV movements on corridors relevant to the junctions assessed for Southleigh. Second, of the four routes by which HCS's own analysis shows Southleigh traffic can reach the SRN – Petersfield Road, New Lane, Southleigh Road and Horndean Road – only the latter two appear to have been modelled in the submitted TA and ES; New Lane, in particular, does not appear to have been tested as a diversion or rat-

running route for Southleigh's own residents' and delivery traffic, despite the documented pattern of comparable rat-running from the adjacent DPO1 site onto the same residential corridors described earlier in this section.

In HCS's assessment, taken together this evidence matters to Southleigh's deliverability case in two connected ways. First, it suggests the committed-development baseline against which Southleigh's own Transport Assessment models cumulative impact on the Bartons Road/Horndean Road corridor (see 2.1(d) above) may itself understate a substantial, growing existing traffic source on the same network. Second, it suggests the genuine transport case for delivering a full vehicular Southleigh crossing – the very New Lane–A27 HGV relief function IT07 itself identifies as one of Option 3's advantages – has grown since the 2021 Plan was withdrawn, at the same time as that option remains, on the Council's own current evidence, unfunded and unsupported by the highway authority. Neither point is put forward here as a reason to prefer Option 3 over the sustainable-transport options; both are put forward as evidence that the wider transport baseline against which Southleigh's deliverability is being assessed may itself need updating before the Plan can be considered sound on this point.

(f) The only full-access A27 junction corridor identified in 2018 is being closed off by the current masterplan and Allocation 29, without any visible reassessment of need

HCS's questions on the Southleigh Transport Assessment (6 July 2026) record the applicant's own direct confirmation of this point: “No vehicular link between Bartons Road and a redesigned Warblington interchange (the long-proposed Southleigh Link Road) forms part of the current proposal.” This is not, on this evidence, a matter of interpretation – it is the current live application's own position.

The spine-road/A27 junction concept did not originate with the 2018 study. It traces to the Council's own 2017 masterplanning process for the area between Denvilles and Emsworth (later Southleigh): a Council update published in July 2017 confirms two public workshops were held with residents in March 2017, from which a new A27 junction and a spine road connecting the A27 to Bartons Road emerged as part of a Draft Master Plan the Council intended to adopt as a Supplementary Planning Document alongside the then-emerging Havant Local Plan 2036. That masterplan was published in full as EB13, the Southleigh Masterplan (Levitt Bernstein, December 2017), whose Illustrative Masterplan (pp.64–65) shows the same spine road on the site's east side, connecting the A27 to the south with Bartons Road to the north, and describes it explicitly as a road that “in addition to providing access to the proposal site, also acts as a relief route,” removing traffic from surrounding roads. It is this masterplan that the 2018 A27 Junction Feasibility Study's Figure 6 reproduces as the 'Emerging Master Plan for Southleigh.'

HCS has reviewed the 2018 study itself. It shows a spine route running the length of the site from Bartons Road in the north to a marked junction point at the site's southern boundary, adjacent to the railway line. Of its five options for a full vehicular A27 junction, Option 4D – an all-moves junction connected to a west-facing Warblington interchange, estimated at £31.5m – was the study's stated preferred option, with Option 4C recommended subject to further modelling; both depend on this corridor and on land 'further east of Castle Avenue' – the same land now allocated for housing as Allocation 6, which IT07 separately records as already constraining the sustainable-transport bridge option (see 2.1(a) above). Options 3, 4A and 4B had already been discounted or not recommended in the 2018 study itself, on separate engineering and cost grounds.

The Council's own subsequent technical work moved on from this position. A 'Mainland Transport Assessment Addendum – Southleigh Development Impact (Part 2)' (CampbellReith, December 2020) records that “the cost implications of the more extensive option 4D had the potential to cause viability issues at Southleigh,” and instead develops and costs a materially cheaper alternative – 'Option 1B+', an enhanced

version of Option 1B using the existing Warblington interchange with signalisation of both roundabouts and a new link including a rail crossing – at an indicative total of circa £23.0m. LinSig modelling reported in that addendum found the junction would "operate satisfactorily" for a 1,100-unit scenario and "could continue to operate satisfactorily" for the full 2,100-unit scenario. Unlike Option 2 in IT07 (see 2.1(a) above), the addendum records that "all land required is either under the control of the Southleigh land owner(s), the Local Planning Authority [or] the Highway Authorities" – i.e. this option was assessed, as of December 2020, as not dependent on third-party land acquisition.

It is this more recent, cheaper and (on the Council's own then-evidence) land-available option – Option 1B+, not the earlier and by-then-discounted Option 4D – that appears to have been dropped. The current outline masterplan for the live Southleigh application (APP/26/00324, Bloor Homes) – reproduced as Plan 3 in the Council's June 2026 Infrastructure Delivery Plan (IT01) – shows a materially different layout. Development extends close to the southern edge of the allocation boundary, and only two unlabelled-width 'Potential Future Connections' are marked by arrows crossing the allocation boundary towards the A27, rather than a defined, engineered link road of the kind Option 1B+ (or, before it, Options 4C/4D) depended upon. No width, gradient, junction design or land-take is indicated for either arrow, and neither is identified as safeguarded in the Development Requirements for Allocation 1 – which, at k)(v), leave vehicular access as a matter for the site-specific Transport Assessment to determine, with only the separate pedestrian/cycle/PT bridge safeguarded under Policy 4 (see 2.1(a) above).

The December 2020 addendum's 'satisfactory' LinSig result for Option 1B+ also cannot, on its own terms, reflect what has happened at the New Lane estate since. It pre-dates the planning application for 32 New Lane (APP/21/00200, decided 22 October 2021) that became the Amazon DPO1 delivery station – an application originally submitted for an anonymous 'last mile delivery operator' and only later identified as Amazon through HCS's own research. Since that application was decided, and since DPO1 became operational in March 2023, HCS's evidence at (e) above records a roughly seven-fold increase in daily vehicle movements at the estate. Neither the 2018 study nor the December 2020 addendum, nor therefore the "satisfactory" capacity conclusion reported for Option 1B+, could have reflected this. In HCS's assessment, this means the Council's most recent full technical assessment of A27 link options for Southleigh is not merely under-safeguarded in the current masterplan – it is, on traffic grounds alone, out of date, and a full reappraisal using current traffic data (rather than a simple reinstatement of the December 2020 conclusions) is what soundness now requires.

At the same time, the Plan allocates the adjoining land closest to the A27 in this location – Allocation 29, Interbridges West, bounded by the A27 to the north and the railway to the south, with access via the A27 slip roads – for standalone employment development (2,200 sqm). Its development requirements address flooding, ecology and general accessibility but make no reference to reserving land for, or coordinating with, a future SRN junction serving Southleigh, still less the existing-interchange enhancement that Option 1B+ specifically proposed. HCS has not identified any assessment, in the Plan or its evidence base, of whether Allocation 29's employment layout, IT01's substituted masterplan for Southleigh, and the live Southleigh application remain compatible with delivering Option 1B+ or an equivalent full vehicular A27 junction.

In HCS's assessment, this sequence – a spine-road/A27 junction publicly consulted on in 2017 and carried into a Council-commissioned feasibility study in 2018; refined in December 2020 into a specifically costed, positively modelled and (on that evidence) land-available £23m option, itself now overtaken by traffic growth its own modelling could not have foreseen; a live application whose masterplan narrows the corridor to two unspecified illustrative connections; and the Plan itself allocating the adjoining land for an unrelated use – has not been accompanied by any visible reassessment, still less further public consultation or updated

modelling, of whether a full vehicular link is still needed, and if so in what form. HCS's own evidence is that the need has grown, not diminished, since these options were last properly assessed: the case at (e) above shows the New Lane/Amazon DPO1 traffic that any such link could help relieve has increased substantially since December 2020. The Plan should not be found sound while a live application and a substituted illustrative masterplan – neither of which forms part of the adopted development plan – are, in combination with the Plan's own Allocation 29, allowed to close off the possibility of a full-access link by default, rather than by a reasoned, current and consulted-upon decision that none is required or achievable.

## 2.2 Modification sought

- Amend Development Requirement k)(iii) and the associated Policy 4 safeguarding text to require the site promoter to demonstrate a funded, consented (or clearly costed and programmed) solution for the railway crossing – including confirmation of which of the IT07 options is actually intended to be delivered and how the land/width constraint identified for Option 2 is to be resolved – before first reserved matters approval, rather than leaving “exact requirements... to be determined” at the transport assessment stage.
- Correct the internal inconsistency between the “1,500 in the plan period” figure at the Allocation 1 site profile (p.90) and the “1,650” figure in Appendix 1 and the SHELAA, and republish a single, internally consistent trajectory.
- Add a specific Southleigh transport-infrastructure monitoring trigger to Appendix 2 (Monitoring Framework), given that Policy 8's tilted-balance mechanism is itself contingent on demonstrable delivery, and this is currently the largest single component of the Borough's housing supply.
- Confirm, in the Infrastructure Delivery Plan, the costed funding package and secured/anticipated funding sources for the Southleigh bridge, primary school and sewerage phasing referred to in the development requirements, none of which HCS has been able to verify from the extracts of IT01 reviewed for this representation.
- Set out explicitly what has changed since the 2021 Inspectors' Interim Findings Report (CR18) identified the Southleigh access route as dependent on third-party land and a then-unresolved new rail crossing, and since they found the resulting delivery timescale unrealistic by reference to the Lichfields 8.4-year average for sites of this scale.
- Have regard to the junction capacity findings recorded in HCS's Cumulative Impact document (26 July 2026), including the reported minus 33%–41% Practical Reserve Capacity result at the Emsworth Road/Southleigh Road/Pook Lane junction, in assessing whether Development Requirement k) and Policy 8 criterion (c) (no significant and demonstrable adverse effect) are currently met.
- Confirm that the committed-development traffic baseline used in Southleigh's Transport Assessment reflects DPO1's actual current operating traffic on the Bartons Road/Horndean Road corridor, rather than only its originally consented/modelled figures, and review whether the Council's monitoring arrangements for that site provide a reliable basis for that baseline.
- Before treating the Southleigh masterplan as fixed, commission a full reappraisal, using current traffic data, of whether a full vehicular A27 junction – building on Option 1B+, the £23m costed and positively modelled scheme developed in the Council's own December 2020 addendum, whose LinSig conclusions pre-date and cannot reflect DPO1's traffic growth, or an equivalent – remains achievable and required; and safeguard a corridor for it, in the Allocation 1 and/or Allocation 29 development requirements, unless and until that reappraisal concludes none is required or achievable.
- Require that HCS's outstanding questions on the Southleigh Environmental Statement and Transport Assessment (submitted 6 July 2026, and the five further questions raised in person at the 27 January 2026 Development Consultation Forum) be formally answered by the applicant and published, before the

Southleigh Transport Assessment's capacity conclusions are relied upon as evidence for the deliverability of Allocation 1.

## 2.3 Wish to participate at oral examination hearings

**Hearing attendance:** Yes. Havant Civic Society wishes to be heard and will be represented by Bob Comlay.

# 3. Representation 2 – Allocation 23: Campdown

**Policy / paragraph:** Section 3, Allocation 23: Campdown (pp.139–142); Policy 4 (p.48–51); Appendix 1 (p.358)

**Legally compliant?:** No objection raised on legal compliance.

**Sound?: No – not currently sound**. Objection made on the 'justified' and 'effective' tests.

## 3.1 Summary of representation

Campdown (53.1ha, SHELAA reference WA15) is allocated for 590 dwellings. Per Appendix 1, the entirety of this yield is assumed to be delivered in a compressed nine-year window from 2031/32 to 2039/40 – 28 dwellings in the first year, then a flat 75 dwellings/year for seven years, tailing to 37 – with no contribution in the first six years of the plan. In HCS's assessment, the evidence base does not yet demonstrate that a flat, sustained 75-dwellings-a-year build-out from a standing start (no extant permission, no adopted masterplan, unlike Southleigh's 2017 document) is realistic given the number and sequencing of pre-construction dependencies the Council's own site profile and development requirements identify for this site.

(a) The site carries an unusually dense stack of pre-application/pre-permission dependencies

The Campdown site profile (pp.139–140) records: a Roman villa Scheduled Monument and the line of a Roman road crossing the north of the site, with the Long Barrow Scheduled Monument to the south and Fort Purbrook Scheduled Monument in close proximity; that the site includes high-tide feeding and/or roosting habitat identified in the Solent Waders and Brent Goose Strategy, is “of particular importance to Curlew”, and that “the provision of suitable off-site compensatory habitat for Solent Waders and Brent Geese is fundamental to the site's delivery” [Council's own emphasis, in substance]; close proximity to the A3(M); and risk of both surface water and fluvial flooding.

The Development Requirements (pp.140–142) translate these constraints into a sequence that must, in HCS's assessment, substantially precede any layout being fixed: non-invasive geophysical survey and a Written Scheme of Investigation agreed with the Council's Archaeologist (g), a targeted archaeological evaluation (h), ‘secure by design’ measures agreed through early engagement with Historic England (i), an Acoustic Design Statement addressing A3(M) noise (x), and vegetation/massing controls to protect views from the villa plateau and the setting of Fort Purbrook (y, z, bb). Securing suitable, sizeable off-site compensatory habitat land for Solent Waders and Brent Geese – described by the Council itself as fundamental to delivery – is a further, separate dependency with its own land-assembly and consenting timeline, and its status (site identified, negotiated, or still to be found) is not addressed in the Plan text reviewed for this representation.

In HCS's assessment, none of this makes the site undeliverable in principle – the SFRA (NE12), for example, considers the flood-risk element manageable through site-level avoidance – but the trajectory's assumption of a flat, sustained 75 dwellings/year from year 7 has not been shown to account for the lead-in time these dependencies, taken together, are likely to require.

(b) No site-specific costed infrastructure entry or viability test has been identified for Campdown

The Stage 2 Local Plan Viability Assessment (HS12) undertakes bespoke, site-specific viability modelling for Southleigh, reflecting its scale and strategic importance, but on HCS's review does not extend equivalent site-specific testing to Campdown, notwithstanding that Campdown is the second-largest greenfield housing allocation in the Plan and carries the heritage, ecological and noise constraints set out above. Similarly, the extracts of the Infrastructure Delivery Plan (IT01) reviewed for this representation did not evidence a costed,

site-attributed entry for Campdown's transport strategy, bus stop improvements, local convenience store or off-site habitat compensation – all of which are development requirements at this allocation.

(c) The 2021 Inspectors already found this site undeliverable for reasons the Plan does not show as resolved, and National Highways currently recommends against permission on the live application

As set out at 1.2 above, the 2021 Inspectors' Interim Findings Report (CR18) found that the predecessor Campdown allocation (then ~650 dwellings, Policy H40) "largely surrounds a scheduled Roman villa on 3 sides," that Historic England's objection "remains extant," and that Natural England had raised "significant concern as to whether [replacement functionally linked land for Curlew and other species] is capable, in principle, of being adequately replaced elsewhere." On that basis the Inspectors found the site did not meet the NPPF Annex 2 definition of "deliverable" or "developable." The current Allocation 23 site profile (pp.139–140) still records the Roman villa Scheduled Monument, the Long Barrow Scheduled Monument and Fort Purbrook Scheduled Monument as on-site or proximate constraints, and still records that off-site compensatory habitat for Solent Waders and Brent Geese (which include Curlew habitat) is "fundamental to the site's delivery." In HCS's assessment, the Plan does not itself demonstrate that Historic England's 2021 objection, or Natural England's concern about replacing functionally linked land, has been resolved; it is not clear whether the reduction in capacity from ~650 to 590 dwellings reflects a response to either objection.

Separately, and current as of this representation, National Highways' most recent formal recommendation on the live Campdown application (APP/23/00488) – file date 10 April 2026 – recommends that "the Local Planning Authority does not grant planning permission for the application... until 9 October 2026 to enable us to resolve outstanding issues," citing traffic models for the Purbrook Way/Crookhorn Lane/Stakes Hill Road, College Road, A3(M) Junction 4 slips and B2150 Hulbert Road (Asda roundabout) junctions that had, as at that date, still not been received nearly three years after consultation began in July 2023. This is recorded in HCS's Cumulative Impact document (26 July 2026, Section 3), lodged on the Council's case file for APP/23/00488. In HCS's assessment, an outstanding, current National Highways recommendation against permission for lack of traffic modelling on the live application for this allocation is directly relevant to whether Appendix 1's trajectory – first completions in 2031/32, sustained at 75 dwellings/year – is currently evidenced as achievable, and should be addressed in the Plan's soundness evidence rather than left to the separate development-management process.

## 3.2 Modification sought

- Publish or confirm, in the Infrastructure Delivery Plan (Appendix 2A), the costed infrastructure and off-site SPA/Solent Wader and Brent Goose mitigation delivery mechanism for Campdown, including whether suitable compensatory habitat land has already been identified or secured, given the Plan's own description of this mitigation as fundamental to the site's delivery.
- Undertake or confirm site-specific viability testing for Campdown equivalent to that carried out for Southleigh in the Stage 2 LPVA, given the scale of its heritage, ecological and acoustic mitigation requirements.
- Provide the evidential basis for the assumed 2031/32 start date and sustained 75-dwellings-a-year build-out rate at Campdown, cross-referenced to a realistic programme for Written Scheme of Investigation approval, archaeological evaluation, Historic England engagement and habitat mitigation land assembly; amend the trajectory in Appendix 1 if that evidence does not support the current assumption.
- Set out explicitly whether and how Historic England's objection recorded as "extant" in the 2021 Inspectors' Interim Findings Report (CR18, para 40) has been resolved, and whether the reduction in capacity from ~650 to 590 dwellings is a response to that objection or to Natural England's 2021 concern about replacing functionally linked land.

- Confirm the current status of National Highways' recommendation (NHPR 25-01, 10 April 2026) against granting permission on the live application (APP/23/00488) pending outstanding traffic models, and whether that recommendation, or its underlying modelling concerns, has any bearing on the deliverability evidence for the Allocation 23 trajectory in Appendix 1.

## 3.3 Wish to participate at oral examination hearings

**Hearing attendance:** Yes. Havant Civic Society wishes to be heard and will be represented by Bob Comlay.

# 4. Representation 3 – Cross-cutting: employment intensification at New Lane and the reliability of the Plan's transport evidence base

**Policy / paragraph:** Policy 7, Amount of Employment (paras 2.112–2.116); Policy 10, Supporting a Strong and Prosperous Economy (paras 2.143–2.149); Policy 44, Protecting Employment Uses (paras 4.427–4.432); Allocation 26, Former Colt Site and Allocation 27, Gas Holder Site, Downley Road (pp.147–150); Policy 4 and Policy 8, as they bear on the same SRN junction cluster addressed in Representation 1

**Legally compliant?:** No objection raised on legal compliance.

**Sound?: No – not currently sound**, in this specific respect. Objection made on the 'justified' test, as it applies to the transport evidence supporting continued employment intensification on the New Lane corridor.

## 4.1 Summary of representation

Unlike Representations 1 and 2, this is not a site-specific allocation objection: it is a cross-cutting evidence-base point that is, in HCS's assessment, directly relevant to the deliverability case set out for Southleigh above, because it concerns the same stretch of highway network. The Plan does not simply tolerate the change that has taken place at the New Lane Industrial Estate since the 2021 Local Plan was withdrawn – it actively plans for that change to continue. Policy 44 designates New Lane Industrial Estate as a protected existing employment area and, at paragraph 4.430, supports “intensification of land for employment uses” within it. Policy 7's identified industrial and warehousing need of 146,213 sqm is derived in part from “the recent redevelopment of existing industrial sites,” and Policy 10 commits to further “intensification, redevelopment and upgrading of existing employment sites” as a strategic economic objective. The Plan also allocates two further employment sites directly on New Lane itself – Allocation 26 (Former Colt Site, 2,860 sqm) and Allocation 27 (Gas Holder Site, Downley Road, 3,760 sqm) – adding further floorspace to the same corridor.

(a) New Lane's employment character has already shifted materially since 2021, towards more traffic-intensive uses

Paragraph 4.429 defines the employment uses protected at New Lane and the Borough's other employment areas as spanning office (Class E), general industrial (B2) and storage and distribution (B8) uses. Since the withdrawal of the 2021 Local Plan, HCS's own monitoring indicates that New Lane's occupation has shifted markedly towards the B8, storage-and-distribution end of that range, spearheaded by the construction of a very large logistics operation on the estate. In HCS's assessment, this is precisely the kind of change in trip-generating character that a robust, 'justified' evidence base ought to test before the Plan commits to further intensification on the same site – yet neither Policy 44's supporting text nor, on HCS's review, the Employment Land Review (ELR 2024 and the 2026 Addendum) appears to address it.

(b) The trip-generation methodology relied upon has a demonstrated structural gap for this kind of use

In HCS's separate work on the Havant SRN junction cluster, a review of the TEMPro/NTEM datasets that underpin standard TRICS-based transport assessments identified a structural methodology gap: NTEM has no distinct LGV/van/freight mode, meaning it is not designed to capture the trip-generating characteristics of large-scale logistics and delivery-station operations. This is a methodology-level finding, independent of any single site or application, and in HCS's assessment it is directly relevant to whether the Council can safely rely on standard TRICS/TEMPro-derived trip rates when testing further employment intensification of this kind at New Lane.

(c) Two recent New Lane/Downley Road employment consents both show a multiple-fold understatement against their own submitted TRICS 'previous use' baseline

HCS has compared the TRICS-based 'previous use' trip-generation assumptions submitted in support of two recent employment consents on the New Lane/Downley Road corridor against their approved development traffic. For Amazon DPO1 (APP/21/00200 and its Section 73 variation, APP/21/01244), the approved development trip generation represents an approximately 7.5-fold increase on the TRICS-modelled previous-use baseline. For a smaller, more recent consent at 8 Downley Road (APP/24/00606) – within the same employment area, and immediately adjacent to the Council's own Allocation 27 (Gas Holder Site, Downley Road) – the equivalent increase is approximately 3-fold. In HCS's assessment, two independent applications on the same corridor each showing a multiple-fold increase against their own TRICS previous-use baseline points to a pattern rather than a one-off methodological quirk, and is directly relevant to whether the same TRICS-based approach can be relied upon to assess further intensification at Allocation 27 itself.

(d) No evidence has been identified that continued intensification at New Lane has been tested against current SRN capacity on the same corridor relied upon by Southleigh

New Lane sits on the same Bartons Road/Horndean Road approach to the Strategic Road Network that Southleigh's own Transport Assessment must model, and which HCS's Cumulative Impact document records as already over capacity at several junctions on that corridor even before Southleigh's own traffic is added (see 2.1(d) above). HCS has not identified, in the extracts of the ELR, IT06 (Strategic Transport Assessment) or IT01 (Infrastructure Delivery Plan) reviewed for this representation, any assessment of whether the corridor has capacity to absorb further committed and Plan-allocated employment intensification at New Lane – including under Allocations 26 and 27 – on top of the traffic growth already associated with the area's recent change of character. The 8 Downley Road example at (c) above is a real-world illustration of the point: it sits immediately adjacent to Allocation 27 itself, and already shows the same TRICS-understatement pattern the Plan's own evidence base does not appear to have tested for that allocation.

In HCS's assessment, taken together (a)–(d) point to a gap in the 'justified' evidence base specifically for Policies 7, 10 and 44 as they apply to the New Lane Industrial Estate – as distinct from the Borough's other protected employment areas, which HCS does not object to on this basis. The Plan should not continue to positively encourage further intensification on this corridor without transport evidence that is independently verified against observed traffic data, rather than TRICS/TEMPro-derived assumptions alone, and without an ongoing monitoring mechanism capable of testing that evidence against reality as the corridor's traffic continues to evolve.

## 4.2 Modification sought

- Amend Policy 44's supporting text (para 4.430) to require that further intensification or redevelopment proposals specifically at the New Lane Industrial Estate be supported by transport evidence independently verified against observed traffic data, rather than relying solely on TRICS/TEMPro-derived trip rates, given the structural methodology gap and the independent evidence of TRICS-baseline divergence identified above.
- Add a New Lane-specific indicator to Appendix 2 (Monitoring Framework), tracking cumulative traffic generation from the employment area against the trip-generation assumptions relied upon in planning decisions taken since 2021.
- Confirm, in the ELR 2024/Addendum 2026, IT06 (STA) or IT01 (IDP), whether the cumulative highway-capacity implications of continuing intensification at New Lane – including under Allocations 26 and 27 – have been tested against current capacity at the same SRN-approach junctions addressed in Representation

1 (Emsworth Road/Southleigh Road/Pook Lane; Horndean Road/Bartons Road; Horndean Road/Southleigh Road).

- Recognise explicitly, in the Infrastructure Delivery Plan, that resolving New Lane's cumulative highway impact and delivering the strategic relief that Southleigh's own access strategy depends upon (see 2.1(a) and (e) above) may be the same underlying infrastructure need, and consider the two together rather than as unrelated items.

### 4.3 Wish to participate at oral examination hearings

**Hearing attendance:** Yes. Havant Civic Society wishes to be heard and will be represented by Bob Comlay.

## 5. Sources referred to

- Building a Better Future Plan (Pre-Submission, July 2026): paras 2.75–2.140 (Policies 4, 6, 8); paras 3.12–3.17 and Allocation 1 site profile (pp.89–94); Allocation 23 site profile (pp.139–142); Appendix 1, Housing trajectory (p.358); Appendix 2, Monitoring framework (pp.359–361).
- (HS05) Strategic Housing and Economic Land Availability Assessment (SHELAA) – site pro-formas BL05 (Southleigh) and WA15 (Campdown).
- (HS12) Stage 2 Local Plan Viability Assessment, Final Report DSP24873 v1.4.
- (IT01) Infrastructure Delivery Plan, including Appendix 2A/2B solution tables.
- (IT06) Strategic Transport Assessment (STA).
- (IT07) Southleigh S-W Bridge Feasibility Study.
- HCS, “Questions on, and arising from, the submitted Environmental Statement and Transport Assessment” (Bob Comlay, Havant Civic Society, 6 July 2026) – filed for inclusion in the case file for APP/26/00324; not in the BABF evidence library. HCS recommends this be submitted alongside these representations as a supporting document upload.
- A27 Junction Feasibility Study (Havant Borough Council, August 2018), including Figure 6, 'Emerging Master Plan for Southleigh' (© Havant Borough Council/Levitt Bernstein): https://havantcivicsociety.uk/wp-content/uploads/2021/01/a27-junction-feasibility-study.pdf – an authentic copy retained by HCS following the document's removal from the HBC website; predates and is not listed in the BABF evidence library.
- Mainland Transport Assessment Addendum – Southleigh Development Impact (Part 2) (CampbellReith, December 2020, Final Issue F1): https://havantcivicsociety.uk/wp-content/uploads/2021/01/southleigh-study-part-2.pdf – a contemporary HCS copy, downloaded before the original was, like the August 2018 study, apparently removed from the HBC website and effectively superseded there by the June 2026 IT07 study; not in the BABF evidence library.
- (EB13) Southleigh Masterplan (Levitt Bernstein, December 2017), Illustrative Masterplan (pp.64–65): https://www.havant.gov.uk/sites/default/files/documents/EB13%20Southleigh%20Masterplan.pdf – a previous Local Plan evidence document, still hosted on the HBC website.
- 'An update on the Draft Master Plan for the area between Denvilles and Emsworth' (Havant Borough Council with Levitt Bernstein, July 2017), recording the March 2017 public workshops and the Council's intention to adopt the Draft Master Plan as a Supplementary Planning Document: https://www.havant.gov.uk/media/7865/download?inline=

- IT01, Plan 3 ('illustrative masterplan layout for Bloor Homes' development quantum', © Bloor Homes 2025), and the equivalent masterplan submitted with APP/26/00324 (received 12 May 2026, validated 3 June 2026).
- Allocation 6 (Land east of Castle Avenue) and Allocation 29 (Interbridges West) site profiles.
- (NE12) Strategic Flood Risk Assessment (SFRA) Part 2 (Local Plan Sites).
- Employment Land Review (ELR) 2024 and ELR Addendum 2026, and Policy 7, Policy 10 and Policy 44 site profiles for Allocation 26 (Former Colt Site) and Allocation 27 (Gas Holder Site, Downley Road).
- HCS's TEMPro/NTEM methodology gap analysis (part of HCS's existing SRN cumulative-impact work) – establishes that NTEM has no distinct LGV/van/freight mode.
- HCS's own comparison of TRICS-based 'previous use' trip-generation assumptions submitted in support of two recent New Lane/Downley Road employment consents (Amazon DPO1, APP/21/00200 and APP/21/01244; and 8 Downley Road, APP/24/00606) against their approved development traffic – an HCS analytical work product, offered as independent evidence for the purposes of Representation 3 only. (Not sourced to, or dependent on, the separate and currently unresolved LGSCO complaint referenced in the draft note at 4.1(c) above.)
- Havant Local Plan Evidence Library: https://www.havant.gov.uk/planning-services/planning-policy/local-plan/local-plan-evidence-studies-and-strategies
- HCS, “Cumulative Impact of Development on the Havant Strategic Road Network Junction Cluster: Campdown (APP/23/00488) and Southleigh (APP/26/00324)” (Bob Comlay, Havant Civic Society, 26 July 2026) – lodged on HBC's planning case files for APP/23/00488 and APP/26/00324; not in the BABF evidence library. HCS recommends this be submitted alongside these representations as a supporting document upload, and referenced by name at the relevant points in the SmartSurvey form.
- Planning Inspectorate, CR18 – The Inspectors' Interim Findings Report on Havant's previous (withdrawn) emerging Local Plan: https://www.havant.gov.uk/sites/default/files/documents/CR18%20The%20Ispector's%20Interim%20Findings%20Report.pdf
- HCS's existing SRN cumulative-impact and Southleigh (APP/26/00324) technical work, referenced but not restated here.
- “Havant North Industrial Estate: Traffic Signage Improvement Requirements” (V3, August 2026, Bob Comlay, Amazon DPO1 Community Liaison Panel Resident Member) – Amazon DPO1 CLP-held document, not in the BABF evidence library; offered as corroborating context on New Lane/DPO1 traffic growth and the unfunded status of the Southleigh strategic link.
- Havant Borough Residents' Alliance, “Consolidated list of questions” (28 July 2022 meeting with HBC's Local Plan team), Section 9 (Bob Comlay, Havant Civic Society), with HBC's written responses (Emma Chisnall, HBC, 31 August 2022) – HCS-held correspondence, referred to at 1.3 above; published in full by HCS on 24 July 2026.
- Covering email chain, “HBC Response to HBRA questions submitted in advance the meeting of 28th July” (Bob Comlay/Emma Chisnall, 29 July – 31 August 2022) – HCS-held correspondence, referred to at 1.3 above, including HBC's stated condition on further sharing/publication and HBRA's unanswered request of 31 August 2022 for justification of that condition.