Added 18.9.26
NOTE ONLY - FULL REVIEW DIRECT FROM REP
Ref: 306374999

Havant BOROUGH COUNCIL



Publication Building a Better Future Plan (Regulation 19) Representation Form

This is the final consultation before the plan is formally submitted for an Examination by an independent Inspector. At this stage, comments can only be made about whether the Plan is legally compliant and/or sound.

We highly recommend that you refer to the supporting guidance note when completing your response, as this provides further information about what is meant by soundness and legal compliance as well as assistance in completing each question.

The supporting guidance note can be found online at www.havant.gov.uk/localplan or can be requested by calling 023 9244 6019.

All representations must be returned by 5.00pm on 9 September 2026.

Once completed, please use the pre-paid envelope provided with this survey to post your response back to Havant Borough Council by the above date.

If you have any questions about this survey, please contact our Planning Policy Team at 023 9244 6019.

If you wish to comment on more than one part of the plan, please complete and submit a form for each part of the Plan you wish to comment on.

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Part A - Personal Details

1. Please indicate whether you are completing this form yourself or if you are an agent completing this on behalf of a client – please select one option.

I am completing this form myself	
I am an agent completing this form on behalf of a client	X

If you are completing this form yourself, please go to Section 3 below.

If you are an agent completing this form on behalf of a client, please go to Section 4 (on page 4).

Section 3. Personal Details (Completing form on own behalf)

2. 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.

Title	
First Name	
Last Name	
Address Line 1	
Address Line 2	
Postcode	

Telephone Number	
Email Address	

3. Please provide the following details where applicable and/or relevant

Job Title	
Organisation	BDW Trading Limited (care of Barratt David Wilson Homes Southampton)

Once you have completed this section, continue to page 6 of this form.

Section 4. Personal Details (Agent on client's behalf)

4. 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.

Title	Mr
First Name	Peter
Last Name	Cleveland
Job Title	Head of Planning
Organisation	Henry Adams LLP
[redacted]	

[redacted]

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

Title	
First Name	
Last Name	
Organisation (if applicable)	Barratt David Wilson Homes

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5. Part B - Your representation(s)

Please complete this section of the form for each representation you wish to make on the Building a Better Future Plan.

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

This form allows you to submit one representation on the Building a Better Future Plan. If you wish to submit a representation on a separate part of the Plan, please complete this form in its entirety and then start a new form for your separate representation.

6. 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.

Policy Number	
Allocation Number	6 – Land East of Castle Avenue
Paragraph Number	
Page Number	

7. Do you consider the Local Plan is ...

(Please select as appropriate)

	Yes	No
Legally compliant		
Sound		X

8. 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.

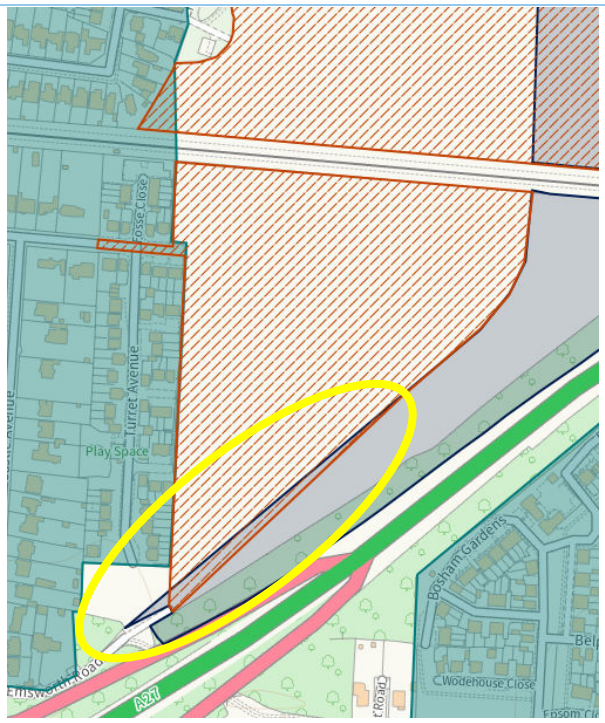
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

You are welcome to attach additional pages to your response form.

Barratt David Wilson Homes (BDWH) support the principle and scale of the residential allocation of Land East of Castle Avenue. As mainland site with very limited constraints lying adjacent to the Havant settlement boundary, key transport corridors and the strategic Southleigh Allocation 1, BDWH considers it makes a valuable contribution in terms of the Council's development strategy and land supply.

However, BDWH considers that Development Requirement p) and safeguarding details on the policy map make the policy unsound for the following reasons:

1. Development Requirement P states that *"Planning permission will be granted where proposals p) Do not prejudice the access arrangements for Southleigh Strategic Site (Allocation 1); land to the south of the site is safeguarded for this purpose through Policy 4."* The Policy Map shows that the safeguarded land does not entirely lie to the south of Allocation 6 but instead cuts through a small part of the southern areas of the Land East of Castle Avenue site. This is shown in the map extract below.



Policy 4: Infrastructure and Environmental Mitigation to Support Development states that *"land is safeguarded through the plan, as shown on the Policies Map, for … a new walking, cycling and transport bridge over the railway connecting Southleigh (Allocation 1) directly with the Emsworth Road/A27 Warblington junction (exact requirements to be determined through transport assessment for the site)… Proposals which undermine the prospect of the delivery of these schemes will not be permitted."*

The Southleigh Allocation is the largest allocation in the plan and is intended to deliver a mixed use community for around 2,100 dwellings and associated infrastructure over a long period. The site is not expected to deliver all the homes in the plan period, partially because of expected long lead in times. Infrastructure provision is seen as vital to the site and the Council expects the site to be planned on a comprehensive basis. Unfortunately, the site is not in single ownership and there is a recognition that where it is not possible to be delivered comprehensively, parts may come forward if it does not prejudice the development (and associated infrastructure). Requirement K) of Allocation 1 requires the site to provide a comprehensive access and movement strategy that includes "*providing a new walking, cycling and public transport bridge over the railway to connect the site directly with the Emsworth Road/A27 Warblington junction*

Para 3.16 of Allocation 1 states that the Council expects a single outline planning application covering the entirety of the Southleigh site. Piecemeal development is considered inappropriate and a masterplan approach is expected to be used. Para 3.17 of Allocation 1 is of particular relevance for Allocation 6. It states:

"The outline planning application … will need to be informed by the applicant's own detailed technical assessment of the impact of the site and its infrastructure needs… Policy 4 n) specifically safeguards land for "a new walking, cycling and public transport bridge over the railway connecting Southleigh (Allocation 1) directly with the Emsworth Road/A27 Warblington junction".

Without certainty, the safeguarded land on Allocation 6 will need to be protected from development for some considerable time. There is also potential for the design to be compromised in the long run with the possibility of Land Left Over after Planning (LLOAP) situations arising.

Allocation 1 (vii) also requires the provision of a bus route to serve the site, as part of future South East Hampshire Rapid Transport extension from Havant town centre. There are no details of the potential alignment of this route and BDWH are concerned that Allocation 6 could be expected in the future to help deliver this new transport corridor. This could act as a blight, and in combination with the safeguard land in the south could reduce the site capacity and also remove the ability to provide a high quality design response for Land East of Castle Avenue.

BDWH are concerned that the delivery of Allocation 6 could be significantly delayed by Allocation 1 and the need address issues around the Transport Assessment work, detailed bridge design, new bus routes and masterplanning requirements.

BDWH are also very concerned that the development of Allocation 6 could be tied to the delivery of Allocation 1 via site specific requirements, Policy 4 and the Policies Map. Long lead in times, complicated land interest situations and technical requirements could take many years to resolve, leaving the progression and delivery timeframes for Allocation 6 uncertain.

As a result of the uncertainty created, potential delays to delivery and possible negative impacts on site capacity and design, BDWH consider Allocation 6 to not be positively prepared or effective.

2. The Plan indicates that the majority of the intended new dwellings (114) are expected to come forward before 2033, with the remainder in the period 2034 to 2043. (Table on page 61). Early delivery of the site will be important to enable Havant to meet its development needs and BDWH considered a more positive approach would be for the site to fully deliver inside Years 1 to 11. Resolving uncertainty around the safeguarded land and bus route will help ensure that the site can effectively contribute to the Council's 5 yr housing land supply and the delivery pipeline.

9. 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.

You are welcome to attach additional pages to your response form.

To be positively prepared and effective, BDWH request the following modifications be made to Allocation 6:

1. Amend Design Requirement p) to reflect the fact that the safeguarded land passes through part of the site:

2. Clarify that the presence of the safeguarded land will not delay delivery of Allocation 6 and that delivery of the site is not tied to the progression and delivery of Allocation 1.

3. Provide guidance as part of the requirements for Allocation 6 to ensure that the impact of the safeguarded land and potential new bus routes on the site design and capacity is minimised so that a high quality scheme can be delivered..

6. Examination Hearing Session Invitation

11. 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.

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

No, I do not wish to participate in examination hearing session(s)

If you do not wish to participate in examination hearing session(s), please continue to page 13 of this form.

12. If 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.

To enable the Inspector to fully understand the concerns of Barratt David Wilson Homes and to be able to contribute to discussions on the suggested modifications to the policy.

8. Future Notification

13. 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.

X Yes, I wish to be notified

No, I do not wish to be notified

Thank you for submitting your views to this important consultation.