Added 18.9.26
NOTE ONLY - FULL REVIEW FORM REP
Ref: 306375885



# 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.

Havant
BOROUGH COUNCIL

## 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 | |

**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 Land Planning & Development |
| [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 | BDW Trading Ltd (c/o Barrat David Wilson Homes Southampton) |

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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 | **12, 14, 15, 16, 38** |
| Allocation Number | |
| 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.**

**Policy 12 – Health Impact Assessment (HIA)**

The proposed requirement for an HIA for all residential schemes of 100 dwellings or more has not been carried forward from the adopted Core Strategy. The adopted strategy promotes health and wellbeing, but does not impose a blanket application-validation requirement for an HIA. The Plan should demonstrate a proportionate evidence-based justification for the new requirement and avoid duplication where the relevant health matters are already addressed through the Design and Access Statement, Sustainability Statement and other application material.

**Policy 14 – Housing Density**

Policy 14 is unsound as drafted because the "defined opportunity areas" to which the 55 dph minimum applies are not defined within the policy or on the Policies Map. It is therefore unclear whether the requirement applies to Allocation 6. The Plan should identify the areas precisely and explain the basis for their boundaries. The policy should also expressly recognise that an optimised density will depend on site-specific constraints, character, infrastructure, viability, market conditions and the ability to secure a high-quality, deliverable scheme. These considerations should not be confined to supporting text or treated solely as an exception to a rigid minimum.

**Policy 15 – High-quality New Homes**

The 25% M4(2) requirement requires clear, current and locally specific evidence of need, including how the need will be met across market and affordable housing. The policy

should allow a proportionate response where the prescribed quantum or distribution is not achievable because of site circumstances, design constraints, viability, delivery considerations or the absence of identified market or occupier need. A clear mechanism is required for applicants to justify an alternative provision, rather than leaving this only to informal pre-application discussion.

**Policy 16 – Low Carbon Development and whole life carbon assessment**

Criterion d) is unduly absolute. On-site renewable generation will not always be feasible or appropriate, for example because of site layout, shading, roof form, heritage or townscape effects, grid constraints or other technical considerations. The policy should require on-site renewable energy only where feasible and viable, with justified alternative measures and, where appropriate, off-site solutions available.

The whole life carbon assessment requirement has not been shown to be supported by a national policy requirement or a clear local evidence base. In particular, the "do nothing" comparator is undefined and provides no consistent or meaningful baseline against which development can be assessed. This risks uncertainty and inconsistent decision making. The Council should explain the evidence, methodology, baseline and decision-making purpose. If retained, any requirement should be proportionate and capable of being met through the Sustainability Statement required by Policy 16 and the sustainable construction information sought under Policy 18, using a recognised and consistent methodology.

**Policy 38 – Affordable Housing**

The Plan does not clearly explain the evidence base supporting the proposed minimum tenure split of at least 41% social rent and at least 32% affordable rent. The Council should identify the Housing Needs Analysis/Addendum and viability evidence relied upon, and demonstrate that the prescribed mix is deliverable having regard to registered-provider appetite, funding, local nomination requirements and scheme viability. The policy should also provide flexibility to agree a different tenure mix where robust, up-to-date evidence demonstrates that the specified mix cannot be delivered or would prejudice viability and delivery.

## 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.**

- **Policy 12** – amend the HIA requirement so that an HIA is required only where it is proportionate to the scale, nature and location of the proposal and where a likely significant health effect is identified. Confirm that relevant health information may be provided through existing supporting documents where this avoids duplication.

- **Policy 14** – define the opportunity areas on the Policies Map (or by a clear schedule) and confirm whether Allocation 6 is included. Amend criterion b) to read: "Development within the defined opportunity areas should seek to achieve an optimised density of around 55 dph across the net development area, having regard to site-specific constraints, character, infrastructure, viability, market conditions and the delivery of a high-quality scheme." Apply equivalent flexibility to all density criteria.

- **Policy 15** – amend criterion c) to require 25% M4(2) only where supported by current, locally specific evidence of need and where feasible and viable. Add a criterion allowing an alternative quantum and/or distribution where justified by site-specific constraints, design, viability, delivery considerations or evidence of need.

- **Policy 16** – replace criterion d) with: "Remaining energy demand should, where feasible and viable, be met through on-site renewable energy generation. Where this is not feasible or appropriate, the Sustainability Statement should demonstrate the alternative measures proposed, including any agreed off-site solution." Delete criterion e), unless the Council provides a robust evidence base, defined baseline and recognised methodology. If retained, propose that it be amended to require a proportionate assessment within the Sustainability Statement and Policy 18 information, rather than a separate mandatory assessment against an undefined 'do nothing' approach.

- **Policy 38** – identify the evidence base for criteria b)vi-viii and amend the policy to allow the tenure mix to respond to up-to-date evidence of local need, registered-provider requirements, funding and viability. Add wording confirming that an alternative tenure mix will be accepted where it is supported by robust evidence and enables the scheme to remain deliverable.

## 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 BDW Southampton 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.**