Entered 18.9.26 - NOTE ONLY - REVIEW FROM REP - Ref: 306381467

SLR Consulting Limited

9 September 2026

Online submission only

Planning Policy
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

SLR Project No.: 402.064845.00001

Dear Planning Policy,

RE: Representation to Havant Borough Council draft Building a Better Future Plan: Regulation 19 Consultation

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On behalf of our client, Bellway Homes, we write in response to the Havant Borough Council (HBC) draft Building a Better Future Plan: Regulation 19 Consultation. Bellway Homes have a legal interest in land known as 'Land at Palk Road' in Havant ("the site"). This representation will therefore focus on 'Allocation 8: Palk Road' in the consultation document.

The site's location and boundaries are shown in the image below.



The site is proposed for allocation under 'Allocation 8: Palk Road' in the consultation document for 83 dwellings. We are fully supportive of this allocation.

The consultation document explains that:

- "For Havant borough, the most up to date assessment of objectively assessed housing need (based on the local housing need – 2024 standard method) is 15,822 dwellings over the plan period, which equates to 879 homes per annum";
- "The average annual delivery rate between 2006 and 2025 was 329 dwellings per annum";
- "Around 40% of the Borough's overall housing need will be met and this will result in a large shortfall of housing delivery over the plan period in the region of 9,500 dwellings"; and
- "Future development is focussed as much as possible on the borough's existing urban areas, brownfield sites and regeneration areas".

Policy 6: Amount of housing confirms that during the plan period 2022 – 2043, the plan makes provision for at least 7,087 new dwellings across the borough, averaging 337 dwellings per annum.

It is evident that the Council are falling significantly short of their housing requirement set by the Government. This site will therefore make a valuable contribution towards the shortfall, providing much needed new housing in the borough.

Policy 1 in the consultation document sets out the development strategy, which includes maximising development in established urban and developed areas and on brownfield sites across the borough; and development densities which make efficient use of land while taking account of the local character context; and promoting development where good accessibility between homes, jobs and services by a wide choice of modes exists or can be achieved.

The site is a brownfield site in the urban area adjacent to Bedhampton railway station and within walking and cycling distance of Havant town centre. It is therefore in line with the Council's spatial development priorities of focusing development in such areas.

A planning application is currently under determination (ref. APP/22/01231) for the "redevelopment of a brownfield site to include the provision of 4no. apartment blocks comprising of 83 no. residential dwellings (use class C3 residential), parking, public open space, landscaping and other associated works, including demolition of existing buildings on site, with access from Palk Road". We understand there are currently no significant objections from the Council's Consultees and the remaining highway-related matters are currently being worked through in liaison with HCC Highways and the Council. There are no technical reasons that would inhibit development at the site and this is also confirmed in HBC's SHELAA (June 2026) and SFRA (May 2026), which forms part of the evidence base for the draft Local Plan. Specifically, the SFRA states *"the site would contribute to meeting the substantial need for housing in the borough, on a site within the established urban area, bringing sustainability benefits. Although the area at risk is not insignificant, it is considered that risk can be avoided at the site level.*

Flood risk at this site has also been considered extensively through a planning application (reference APP/22/01231), including through site specific hydraulic modelling".

The proposed development would bring about a multitude of benefits, including:

- Provision of 83 new homes to add to the much-needed housing stock of the borough, at a time when HBC has a severe housing land supply shortfall;
- The site is in a highly sustainable location, within walking distance of Havant town centre (the main settlement in the borough) and adjacent to Bedhampton railway station. Havant town centre can be accessed by foot, bicycle, train, or bus. Havant has a wide range of amenities including food shops, other retail opportunities, schools, GP surgeries and many more. It is also considered a hub for employment opportunities, with many industrial, commercial and retail units as well as a good transport network connecting to larger towns and cities;
- Suitable mix of apartment sizes to cater to varying needs, including a mixture of 1 and 2-bed apartments;
- The proposal makes efficient use of an underused brownfield site, in which the NPPF[1] confirms that proposals for which should be approved, unless substantial harm would be caused;
- Generous amounts of attractive public open space and play provision, including a riverside walk and landscaping beside the Hermitage Stream to enhance this area and create a meaningful improvement to the existing situation;
- Removal of a noise-generating, unsightly and unneighbourly use and replacing it with 83 high-quality homes which are in-keeping with the surroundings;
- Ecological enhancements and a significant net gain in biodiversity; and
- Economic benefits through employment during the construction phase, long-term local expenditure and support for shops and services, as well as CIL and S106 contributions

The scheme will assist the Council in contributing towards its housing requirement in the shorter-term, given its small-medium scale which can be delivered quicker than larger strategic sites. It is important for Local Plans not to be too reliant upon larger strategic sites and including a good supply of small-medium sites is critical to the five-year supply.

The proposed layout plan submitted with the application is included below.

[1] The 2024 version in which the draft Local Plan is set to be examined under.



Allocation 8 in the consultation document also includes a list of requirements which any development proposal should have regard to - the application currently submitted to the Council addresses, or is capable of, addressing these requirements.

Overall, we support the proposed 'Allocation 8: Palk Road' in the consultation document and request that this is retained in the emerging draft plan. We also welcome the Council's approach to delivering new homes in sustainable and appropriate locations, including prioritising the urban areas, brownfield sites and regeneration areas, such as the land at Palk Road.

We consider the allocation of the site in the draft Local Plan to be sound, being positively prepared, justified, effective and consistent with national policy.

Should you wish to discuss further, please do not hesitate to contact us.

Yours faithfully,

Laura Black
BSc (Hons); MRTPI
Associate Planner – Planning & ESIA
[redacted]
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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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About this representation form

The form has two parts:

Part A - Personal Details - this only needs to be completed once for each form submission.

Please note that representations are not confidential and will be published on the Council's website. However, personal details, other than the respondent's name and/or organisation will be redacted. Personal details will be sent to the Planning Inspectorate in line with the Privacy Notice.

Part B - Your representation(s) - please fill in a separate submission for each representation you wish to make.

Please also use Part B as appropriate to request to be notified of stages of the Local Plan examination and adoption, and to request to participate in the examination hearings.

Privacy Notice

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 on our website at **www.havant.gov.uk/privacypolicy** or can be requested by calling 023 9244 6019.

A copy of each representation will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector), Representation(s) will also be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012). This includes publication on the LPA's website.

More information on how the Planning Inspectorate uses your personal information can be found on our website at:
www.gov.uk/government/publications/planning-inspectorate-privacy-notices

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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

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	Ms
First Name	Laura
Last Name	Black
Job Title	Associate Planner
[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)	Bellway 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	8
Paragraph Number	
Page Number	

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

(Please select as appropriate)

	Yes	No
Legally compliant	✓	☐
Sound	✓	☐

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.

Please refer to accompanying representation letter.

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.

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.

☐ 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.

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.

☑ Yes, I wish to be notified

☐ No, I do not wish to be notified

Thank you for submitting your views to this important consultation.

Please use the pre-paid envelope provided with this survey to post your response back to Havant Borough Council by 9 September 2026.