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WHITE PEAK Planning

[redacted]

Our Ref: 2023.003

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

By email only to: policy.design@havant.gov.uk

9th September 2026

Dear Planning Policy Team,

Re: Written Representations to the Havant Publication Building a Better Future Local Plan

On behalf of Bloor Homes Limited and Landowners[1], please find appended the representations to the Havant Publication Building a Better Future Local Plan.

Given the number of policies on which we wish to comment, the representations have been tabulated and ordered by policy number. Please also note that additional comments have been made in respect of the evidence base that has informed the draft Local Plan.

Yours sincerely,

[redacted]

Robert White
Director

For and on behalf of White Peak Planning Ltd.

Appended: Written Representations to Havant Publication Building a Better Future Local Plan

[1] Philip Dymoke White, Fiona Elizabeth White and Alexander Stuart Dymoke White (Trustees of Philip White's Leydene Settlement); Giles Alexander Lee Dobson, Hugh Lynton Wernham and St Andrew Trustees Limited (Trustees of the Katie Wernham Legacy Fund); Hugh Lynton Wernham; Giles Alexander Lee Dobson, Robert Newnham Stuart White and Charles Robert Hutton (Trustees of Robert White's Leydene Settlement); and Alexander Stuart Dymoke White, Emelia Louise Gore Browne and Annabel Madeleine White

Representations on behalf of Bloor Homes Limited and Landowners – 'Building a Better Future' Havant Draft Local Plan Consultation

WHITE PEAK Planning

The following representations are submitted jointly on behalf of Bloor Homes Limited and Landowners (Philip Dymoke White, Fiona Elizabeth White and Alexander Stuart Dymoke White (Trustees of Philip White's Leydene Settlement); Giles Alexander Lee Dobson, Hugh Lynton Wernham and St Andrew Trustees Limited (Trustees of the Katie Wernham Legacy Fund); Hugh Lynton Wernham; Giles Alexander Lee Dobson, Robert Newnham Stuart White and Charles Robert Hutton (Trustees of Robert White's Leydene Settlement); and Alexander Stuart Dymoke White, Emelia Louise Gore Browne and Annabel Madeleine White)). The representations use the term "Bloor Homes" when referring collectively to Bloor Homes Limited and the Landowners.

Policy	**Comments**	**Support/ Comment**	**Request to comment at Examination or through Written Statement**
Policy 1	Bloor Homes warmly supports this policy. As promoter and developer of the Southleigh site, Bloor Homes has adopted a responsible and constructive approach to development, working with the Council and engaging with residents and local stakeholders: an expectation set out in paragraphs 2.41 to 2.48 of the Policy 1 supporting text. Bloor Homes has undertaken comprehensive consultation - including a Development Consultation Forum - to inform the preparation of an outline planning application for the development. It has also entered into a Planning Performance Agreement to formally structure the preparation and consideration of the planning application. The proposed development at Southleigh has now been submitted to the Council for consideration, evidencing Bloor Homes' commitment to delivering new homes in Havant. The proposed development is critical to the delivery of Havant's Development Strategy and is an exemplar of the approach set out in Policy 1 to achieve sustainable growth; make efficient use of land; enable well-connected communities and achieve climate change resilience.	Support	Written Statement
Policy 4: Infrastructure and Environmental Mitigation to	Bloor Homes supports the Council's commitment to plan for, and secure the delivery of, essential infrastructure and environmental mitigations in a timely manner to support high quality new development. Bloor Homes has a strong track-record of delivering high quality development including the infrastructure necessary to meet the need that	Comment	Examination

Support Development.	it generates. It is committed to adopting this approach in bringing forward the Southleigh site. **<u>Supporting text</u>** To assist the Council in preparing its Local Plan, Bloor Homes offers the following comments and suggestions as refinements to the policy and its supporting text. Paragraphs 2.86-2.88 of the supporting text refer to the Community Infrastructure Levy (CIL). In drafting the text, it is important to reflect that the Council has a responsibility to ensure that all requests for the provision of infrastructure to support new development meet the CIL tests as set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and replicated at paragraph 58 of the NPPF 2024. It may be helpful to include the NPPF text by way of a reminder to all plan users. "*Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development."* It may also be appropriate to reference paragraph 59 of the NPPF which provides for circumstances in which particular circumstances justify the need for a viability assessment and the need for viability evidence underpinning plan policies to reflect the recommended approach set out in national planning practice guidance. Bloor Homes considers that this may warrant a short additional paragraph within the policy text. Additionally, the Council has a key role to play in ensuring that provisions and financial contributions towards infrastructure secured via legal agreements or by condition are		

	not also included within the CIL levy through careful monitoring of infrastructure spending as set out in its annual Infrastructure Funding Statement. It may be appropriate to add a sentence onto the existing paragraph 2.87 to reflect this. It is also suggested that the supporting text might be expanded to refer to the requirement for the Council, as the CIL charging authority, to keep its charging schedule under review and to ensure that levy charges remain appropriate over time. As per paragraph 45 of NPPG Community Infrastructure Levy, this involves taking account of changes in market conditions - for example reflecting site viabilities and zero rates - and ensuring that charges are appropriate to the identified funding gap for the infrastructure needed to support the development of the area. It is requested that a more detailed plan is provided for Figure 9 as the plan shown in the consultation is difficult to interpret. Suggested wording might be included along the lines set out below: **The Council, as CIL charging authority, is required to annually produce an Infrastructure Delivery Plan, to keep its charging schedule under review and to ensure that levy charges remain appropriate over time. This will involve taking account of changes in market conditions – which will impact site viabilities and zero rates - and ensuring that charges are appropriate to the identified funding gap for the infrastructure needed to support the development of the area. Review of a Local Plan will most likely be a trigger for review as it will involve a substantive reassessment of the evidence base.** It is also suggested that Paragraph 2.81 of the accompanying text to Policy 4 could be amended to refer to the potential use of Compulsory Purchase Order powers by acquiring authorities (e.g. the Council, authorised public bodies, and statutory undertakers) to support the delivery of strategic infrastructure where necessary. Given that such powers sit with acquiring authorities rather than developers themselves, this represents an important potential mechanism for facilitating land assembly and		

	infrastructure delivery and should be appropriately flagged.. Proposed revised text is suggested as follows: *2.81 The provision of strategic infrastructure can involve coordination across a range of partners* ***and the use of Compulsory Purchase Order powers****. Where development is strategic in nature,* ***and there is clear evidence that it is required,*** *it may require contributions or grant funding from a variety of sources due to the scale and cost. The Council will therefore continue to work to access funding opportunities from Government and other external sources of funding to support infrastructure delivery, not only to support the planned development, but to improve the quality of life for existing residents and to support local businesses.* Additionally, paragraph 2.89 refers to statutory undertakers and other service and infrastructure providers, which are consulted on planning applications to confirm their requirements and specifications, and the use of conditions to secure delivery of infrastructure. By way of example, such undertakers include Water Companies consulted in respect of clean and foul water disposal capacity. Bloor Homes works effectively and proactively with these providers, often prior to the submission of planning applications, to identify infrastructure requirements and ensure that these are reflected in site viability calculations. We would highlight that it remains vital that the Council continues to ensure that conditions attached to planning permissions accurately reflect - and do not over-state – requirements, so as to ensure that development is not delayed and that viability and delivery of essential new development put at risk. Whilst it is vital that infrastructure comes forward at pace with the need generated by new development, it is also necessary to reflect the commercial realities of developers. The construction of new homes remains a challenging market. There must be sufficient certainty, and construction must be sufficiently progressed, to give certainty around funds generated to deliver and maintain the required infrastructure. This necessitates early dialogue with developers regarding infrastructure and to establish realistic triggers		

	for its delivery. It may be appropriate to reflect this as part of existing paragraph 2.91 of the policy text, which addresses the issue of phasing. **Policy 4** Policy 4 rightly seeks to ensure that land is safeguarded in the Plan for infrastructure. Criterion (l) to (o) establish where land is to be safeguarded through the Plan for the delivery of infrastructure (a) – (j). In relation to these elements of safeguarded land, the policy also specifies: "Proposals which undermine the prospect of the delivery of these schemes will not be permitted". Bloor Homes would caution against including this additional wording, as safeguarding the land for the provision of schemes is sufficient in this context. The additional wording could be misleading or imply an expectation that schemes, which adjoin or incorporate the safeguarded land, have a direct obligation to provide the infrastructure. The infrastructure itself may need to be provided through a variety of mechanisms including CIL, a number of pooled s106 legal agreements, a combination of other funding sources and, where necessary, land assembly facilitated through CPO powers. If solely required to be delivered by a single development, this may not be sufficiently directly related to the proposed development, contrary to the CIL Regulation 122(2) tests. This could potentially put the Council in a difficult position with regard to the soundness of the Policy. The Havant Railway Footbridge and Warblington Railway Footbridge, safeguarded under **criterion (o),** are identified in the Council's Infrastructure Delivery Plan (Refs T003 and T004) as separate, wider schemes with their own delivery bodies (HCC and Network Rail) and funding streams. Neither is necessitated by development at Southleigh, and their safeguarding under Policy 4 should not be read as establishing any requirement for Southleigh to deliver or fund either scheme. The extent, if any, to		

	which Southleigh's transport impacts relate to the Warblington level crossing should be addressed through the site-specific Transport Assessment. **Criterion (o)** of this Policy also refers to the need for land to be safeguarded for "a new walking, cycling and public 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)". Bloor Homes consider that this wording is helpful. It provides scope for a developer to demonstrate an appropriate link based on need and anticipated use, if required. Could the wording be tweaked, however, to reflect the need for viability considerations in the context of the wider infrastructure need and constraints. We would also suggest some additional wording be added to clarify that it should only be provided if it can be demonstrated that it is required. Also, could the Allocation text and Infrastructure Delivery Plan text be altered to reflect that the link could be an active travel link or ped / cycle connection only, but only if required and that any such requirement should be determined through a transport assessment. Please also see our representations to **Policy Allocation 1: Southleigh** in this regard. **<u>Proposed amendment</u>** The amendment proposed to **Policy 4 (o) Transport Mitigation** is as follows: *'An ~~new walking, cycling and public transport bridge~~ **active travel link or pedestrian / cycle connection, if required,** ~~walking, cycling and public transport bridge~~ over the railway connecting Southleigh (Allocation 1) directly with the Emsworth Road/A27 Warblington junction (exact requirements to be determined through transport **and viability** assessment**s** for **the Local Plan and** the site)".*		

	Paragraph 3.17 of the **Allocation 1: Southleigh Delivery** text quotes Policy 4 (n). Please could this be amended to reflect the revision to Policy 4 (n) (Policy 4(o) as it now is)? Additionally, the Infrastructure Delivery Plan refers to the proposal to continue to safeguard land for a direct access to the A27 junction with a link *road* to the strategic site. Please could this also be amended to refer to an active travel link or ped / cycle link, the need or otherwise to be established through a transport assessment. The land safeguarded for this link is shown on the Policies Map and referred to in Policy 4 '*in support of a) - j), land is safeguarded through this Plan, as shown on the Policies Map'*. Please can the annotation of the safeguarded land on the Policies Map also reflect the Policy 4 (o) wording i.e. the exact requirements **and need for an** active travel link or ped / cycle link are still to be determined. Site-specific Infrastructure Bloor Homes would suggest that to align with paragraph 59 of the NPPF, the wording under 'Site-specific infrastructure and preceding Criteria (p-t) might be amended to allow for viability matters. The suggested amendment might read as follows: **"Developers will be required to provide or where appropriate make a financial contribution towards the provision of infrastructure which is needed to make the development acceptable in planning terms subject to viability."** **Criterion (s)** From previous experience, it is suggested that these delivery elements may not necessarily be known at the point at which planning permission is granted and as such it is tentatively suggested that this could be construed as unreasonable. Would it be		

	possible to amend, or preferably, delete this criterion? Alternative means could be put in place, to get development going, which would ultimately delay delivery.		
Policy 5: Green and Blue Infrastructure	Bloor Homes is encouraged by inclusion of this topic within its own plan policy as a means of emphasising a commitment to the delivery and enhancement of green and blue infrastructure within the District. The inclusion of high quality multi-functional green and blue infrastructure, particularly the country park, has been a key design principle for the Southleigh site.	Support	Written Statements
Policy 6: Amount of Housing	Bloor Homes welcomes and supports Policy 6. Given the acknowledged shortfall in housing delivery across the plan period, the importance of delivering allocated housing sites is recognised to be critical. The proposed Southleigh Allocation (Allocation 1) is deliverable and will make a significant contribution to the housing provision set out in this policy. The Southleigh interest is a key strategic site for Bloor Homes as set out in its Business Plan. An outline planning application has been submitted for the site, following comprehensive public and stakeholder engagement, evidencing Bloor Homes' commitment to its delivery. Bloor Homes has been recognised by the Home Builders Federation as a 5 star-rated home builder for the seven years. This achievement reflects a gold standard within the industry and a commitment to quality. Bloor Homes has a proven track record of delivering large-scale mixed-use developments across the country, including within East Hampshire District and other districts within Hampshire.	Support.	Examination
Policy 8: Five Year Housing Land Supply	We would suggest that this policy reflects the 2024 NPPF and as such, could potentially be removed from the plan without detriment to the Council's intentions.	Comment.	Written Statements

Policy 9: New Homes for Sustainable Communities	Bloor Homes welcomes and supports the approach to housing mix contained within this draft policy. It particularly supports its recognition of the contribution that the Southleigh site will make to delivering a range of different types and sizes of new homes contributing to the fostering of balanced, inclusive and sustainable communities within Havant.	Support.	Written Statements
Policy 10: Supporting a Prosperous and Sustainable Economy	Bloor Homes supports Policy 10. It is particularly encouraged to note the recognition of the potential for developers to collaborate with the Council and other organisations to provide local training opportunities within the construction sector. The Allocation 1: Southleigh site will provide a unique opportunity on this regard. The construction of new homes forms an important economic sector in its own right and supports a prosperous economy. The Council may wish to consider whether this could be added as a criterion, similar to that for employment land set out in Criterion (a). A suggested criteria has been included below to assist. **Proposed Amendment** ***i) Support effective delivery of new homes within the borough on a range of sites as set out in Policy 5.***	Comment.	Written Statements
Policy 11 Climate Change	Bloor Homes supports the principle of this policy and recognises the crucial role that new development can play in addressing the challenges of climate change. As a national priority, there is a need to follow the direction of national policy as set out in the NPPF and Ministerial Statements. This will provide consistency and certainty for developers, leading to effective implementation of climate change resilience measures. As a matter of detail only, Bloor Homes wishes to flag the need for climate change measures to be tested to determine feasibility and viability. This will ensure that the policy meets the NPPF soundness tests. Additionally, Bloor Homes has made a series	Comment.	Examination

	of detailed comments on the later plan policies relating to climate change resilience (Policies 16-19)_and we would draw your attention to them in the interests of supporting the Council and evolving suitably robust and deliverable policies. Bloor Homes recommends that the Council include a reference to the need for testing to determine feasibility and viability in respect of all of the listed criterion (a) to (m). This could be in the form of an additional sentence at the end of the policy to this effect and would ensure that the policy meets the tests of soundness.		
Policy 12 Health	Bloor Homes supports the overarching objectives of this policy and the incorporation of a Health Impact Assessment for development. Policy 12 aims to ensure that development facilitates healthy and inclusive communities. This involves delivery of development, which is high quality, sustainable and environmentally sensitive. The policy's emphasis on creating environments which make it easier for people to lead healthy lifestyles is particularly relevant to Southleigh. The scale of the allocation provides a significant opportunity to embed opportunities for physical activity within the design of the new community, including through walkable neighbourhoods, attractive active travel routes, multifunctional open spaces, opportunities for informal recreation and access to formal sports and recreational facilities. Bloor Homes also supports the reference to Sport England's Active Design Guidance. The principles contained within the Guidance provide a useful framework for ensuring that opportunities for physical activity are considered comprehensively through the masterplanning and detailed design process.	Support	Written Statements

Allocation 1: Southleigh	Bloor Homes supports the inclusion of the Southleigh Allocation in the draft plan. We confirm that the indicative net yield of 2,100, with 1,500 within the plan period, is realistic and deliverable. Subject to the planning process, delivery could be earlier, and the number of outlets could be increased, hence this is a fairly conservative estimate. Bloor Homes is confident that, subject to planning permission being granted, this will make a substantial contribution towards the Council's housing requirement (nearly 30%) and that this is critical given the development constraints within the borough. It will provide a mix of homes to meet the needs of different community groups, including for families and those requiring an affordable home. The Southleigh Site is currently subject to an outline planning application submitted by Bloor Homes and forms for the majority of the proposed Allocation 1 : Southleigh. As evidenced in the application submission, the site can come forward without prejudice to the remaining areas of land within the draft allocation or the proposed access points from the allocation. The reference at criterion (e) to a design statement is welcome. High-quality design through masterplans, design guides or codes are a proven method, as set out in paragraphs 77 of the NPPF, by which strategic allocations can be assessed and delivered. Where there is split land ownership within an allocation this method enables and expedites the development process. By way of example, Bloor Homes have achieved outline planning permission for up to 1,000 homes at Sandleford Park East which sits within an allocation for up to 1,500 homes known as Sandleford Park in Newbury, West Berkshire. They are well progressed with Reserved Matters work, whilst the developer for the remaining 360 homes (Sandleford Park West) has worked to a slower timeframe. **Site Description** The Site Description includes a bullet point in Key Features as follows:	Support/ with detailed policy comments	Examination

	"~~There is an opportunity to achieve higher densities around the local centre~~." We wonder if this may have been included in error as it relates to design matters and should be taken out? The allocation will be well-connected and promote healthy lifestyles. The active travel connections and green space will provide good opportunities for exercise and recreation to facilitate a healthy community. The walkable and cyclable neighbourhood with new footpaths and cycle routes, improvements to existing walking and cycling routes, co-location of facilities, access to existing facilities in Havant and Emsworth and access to the countryside. It will involve local services and facilities to support the proposed scale of development, including a school, new local centre and transport hub. It will deliver a comprehensive multi-functional green infrastructure network beneficial to the existing and new community. This will involve the creation of a community parkland, which will form a unique site benefit, biodiversity net gain and the retention of existing valuable habitats on-site involving semi-natural habitat, trees and hedgerows. The Site Description specifies that 'the vast majority of the site is in single ownership but a number of other parties have interests in parts of the site. It indicates that the site 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 (and associated infrastructure) of the other part(s). This flexibility is welcomed but It is noted that this is not included in the Development Requirements section of the policy. Furthermore, the supporting text at paragraph 3.16, specifies that a new community must be planned comprehensively and that the Council expect this to be via a single outline planning application covering the entirety of the site. Would it be possible to amend this text to reflect the Site Description text?		

	Key Features The site is defined as being a "Greenfield Site in Agricultural Use**"**. There are farm buildings currently in use within the draft allocation, so it is suggested that to avoid challenge this be amended to "**Predominantly** Greenfield Site in Agricultural Use". The Site Description now states that the site "lies within the setting of the south of the South Downs National park". Add any comments? SDNP." The Site Description also refers to residential and commercial properties towards the centre of the site on Southleigh road and that these are outside the allocation. Bloor Homes understands why this amendment may have been made. As some of these properties are within the allocation, please could the text be changed to "~~The~~ **A number of these** existing residential and commercial uses are outside of the allocated site." Paragraph 3.17 references Policy 4. Bloor Homes asks that this be amended to reflect the need to consider both transport and viability assessments when determining the exact requirements and need for a potential active travel connection from Southleigh to the south west. **Proposed amendments** ***Paragraph 3.16*** *The Council is committed to the delivery of a comprehensive sustainable development on this key site* ~~*and expects a single outline planning application covering the entirety of the site*~~*. Piecemeal development of the site is not preferred* ~~*considered appropriate*~~*, although it is acknowledged that such a large site is likely to come forward in phases. We would expect this to be done in a masterplan approach, in addition to the requirements set out in the allocation.* ***Paragraph 3.17*** *… In terms of transport infrastructure specifically, Policy 4 n) specifically safeguards land for "an active travel link or ped/cycle way , if required, to*		

	*the south west to serve Southleigh (BL5) (exact requirements**, need and justification for such** to be determined through transport **and viability** assessments for the Local Plan and the site)".* **Development Requirements:** Criteria (a) to (e) reflect the Council's Principles of development for the Site. Bloor Homes has reflected on the Site's key role in delivering the Council's Development Strategy, the principles for this set out in Policy 1 and whether it would assist plan soundness if the Principles of Development for the Southleigh site reflect those in Policy 1? Could Criteria (a) be changed to reflect a delivery of a sustainable community; whilst criteria (b) addresses the efficient use of land and good design? Criteria (c) already addresses good connections and Criteria (d) addresses green infrastructure. Criteria (e) also covers design and could be combined into Criteria (b). To assist this point, some proposed wording might be as follows: ***Criteria (a) Provide a sustainable community that responds to the need for growth within environmental and infrastructure limits. effects of climate change.*** ***Criteria (b) Provide a well-designed new community with a strong sense of place through the use of appropriate design tools.*** **Infrastructure (Community)** Criterion (g) refers to the need to "Provide open space within the parkland of Southleigh Park House". It is considered important that this is distinguished from Allocation 5: Southleigh Park House, which includes a small area of the historic parkland at its southern extent, and is not being promoted or brought forward for development by Bloor Homes. The following minor amendment to Criterion (g) is therefore proposed:		

	g) Provide open space land within the parkland ~~of~~ to the south of Allocation 5: Southleigh Park House. **Infrastructure (Transport)** Bloor Homes also wishes to make a few comments and suggestion in respect of the sustainable transport options. Regarding sustainable transport options involving direct connections to the south of the A27 and railway line, please could criterion K (iii) be amended to align with the requirements set out in Policy 4: Infrastructure and Environmental Mitigation to Support Development. This is to allow for further investigation into the need and format for a link over the railway to ensure that the policy requirements stay within the bounds of the soundness tests. It would greatly assist if the wording was to be changed to clarify that the requirement for a bus and**/or** active travel **link** ~~bridge~~ over the railway from Emsworth Road/A27 Warblington junction into the site ***if required, justified by evidence, and demonstrated to be viable and proportionate*** in the context of the wider infrastructure requirements for Southleigh**,** may be appropriate as opposed to a requirement to provide both connections. **Proposed amendment** *Infrastructure (Transport) K* *iii) provide ~~a new walking, cycling and public transport bridge a bus and/or an~~ active travel or ped/cycle **link** ~~bridge~~ over the railway to connect the site directly with Emsworth Road/A27 Warblington junction, **if required, justified by evidence, and demonstrated to be viable and proportionate to the development**.* Criterion K (iv) also refers to the requirement for the Site to provide a connection to Emsworth via the Washington Road underpass. However, this would likely require an access route through the Coldharbour Farm site. It is noted that the Coldharbour Farm has been removed from this version of the plan and that this site already has planning		

	permission. It is not clear, therefore, how this element would be facilitated or meet the soundness tests. While the allocation boundary extends to land adjacent to the Coldharbour Farm site, Bloor Homes' land interests do not include the land required to facilitate this connection. There is currently no direct footpath connection between the Site and the recreation ground, and any future connection along the south-eastern edge of the Site would require agreement with third parties, including Havant Borough Council as the owner of the recreation ground, as well as the adjoining landowner who controls the adjacent area of Allocation 1. Therefore, please can this requirement be deleted from Allocation 1. *iv) Providing pedestrian connections to the A259 via the National Cycle Network Route 2 underpass ~~and to Emsworth via the Washington Road underpass~~* Bloor Homes have also noted a concern regarding Criterion K (vi). It is requested that the text here be altered to allow for appropriate off site cycle route improvements to be brought forward in line with the findings of the transport assessment process to ensure that the optimal solution is provided. *vi)* ***Providing improvement to off-site cycling routes identified as part of the transport assessment process*** *~~Local Cycling and Walking Infrastructure Plan (LCWIP) routes within the site and connections outside of the site~~* As a final point on transport, Criterion K vii) relates to the South East Hampshire Rapid Transport to Havant bus station. As there are no firm plans for this element, it is suggested that this may need to be removed as a requirement to ensure the policy is sound. ~~xii. Providing a bus route to serve the site as part of the future South East Hampshire Rapid Transport extension from Havant town centre~~ Bloor Homes notes that additional requirements have been inserted into the policy relating to the railway line. Bloor Homes queries whether the elements listed below		

	should be included, as they relate to elements which are the responsibility of Network Rail to ensure operational safety of railway infrastructure, including risk of trespass? ~~viii) Avoiding or mitigation negative impacts on the operational safety of the Warblington Station level crossing~~ ~~ix) Providing suitable fencing to minimise the risk of trespass on the railway line.~~ **Heritage and Landscape** Bloor Homes considers that Criterion aa) should provide an appropriate degree of flexibility in relation to the retention and future use of buildings of historic interest. The reference to retained buildings of 'historic interest' is broad and could be interpreted as requiring the retention of buildings irrespective of their significance, condition, suitability for reuse or viability. It is therefore suggested that Criterion aa) is amended to recognise that buildings of historic interest should be retained and reused **where appropriate and viable**, having regard to their significance and the findings of more detailed heritage assessment and design work. A suggested revised wording for Criterion aa) is as follows: *aa) Retain buildings with historic interest (notably Southleigh Farm)* ***where appropriate and viable****, and provide appropriate uses for them in order to create a sense of place and link to the area's agricultural heritage;* **Homes for All** Bloor Homes has reflected on Paragraph 147 of the NPPF, which indicates that plans should optimise development density . It notes that density is important consideration in development design and currently a consideration within Design and Access Statements which will be a requirement for the Southleigh Site. The Council should be reassured that this matter will be fully attended to and may wish to consider		

	alternative wording. A suggestion is set out below in this regard. dd) **Demonstrate that the capacity of the development has been optimised in response to site specific constraints and housing needs.** ~~Provide a density analysis to show that the level of housing has been maximised in the confines of sustainable development.~~		
Allocation 29 : Interbridges West	Bloor Homes supports the in-principle inclusion of Interbridges West within the Local Plan and consider that its inclusion provides an appropriate opportunity to support the delivery of the Plan's objectives and wider development strategy, subject to there being no requirement for an alternative land use, necessary to support the Council's wider growth strategy.	Comment	Written Statements
Policy 13: High Quality Design	Bloor Homes supports the Council's aim to achieve high quality design. It notes that this is a key aspect of sustainable development It also notes that this will often involve the need to achieve a balance between conflicting factors, for example, an efficient development density in an accessible location may need to respond to site specific constraints such as local character or utility considerations. Site viability may also be a consideration that will need to be factored into decision making. Bloor Homes would suggest that the Council may wish to consider how the policy wording might be nuanced to reflect these complexities. By way of some detailed points, paragraph 4.20 and 4.21 of the supporting text references the Council's fabric first approach, incorporating Passivhaus principles and climate change mitigation through low carbon design approach. Bloor Homes comments in relation to Policy 16 also apply here. The Council could opt to follow the national approach to carbon reduction as set out in the Building Regulations, as a sustainable and realistic means of addressing climate change.	Comment	Examination

Policy 14: Housing Density	Bloor Homes recognises the importance attributable to the efficient use of land. In respect of appropriate housing densities for development sites, land must be used efficiently. This is a typical commercial obligation on most development sites. There is, however, a need for flexibility to respond to site specific circumstances and ensure high quality design which respects an area's prevailing character and secures well-designed, attractive and health places, as set out in paragraph 129 of the NPPF. Whilst paragraph 4.26 of the supporting text recognises the need for flexibility in response to character and site constraints , this should also be reflected in the policy wording. Any density targets should therefore be expressed as objectives to be sought or achieved, rather than as prescriptive requirements. The requirement to set out density calculations will become a maths exercise, which will detract from good design and planning. For example, the requirement for SuDS treatment can result in significant land take; applying accessibility standards can result in larger properties and reduce densities; oversized highway infrastructure can dominate a layout and reduce net developed area. Density standards must be realistic otherwise they will over-estimate the infrastructure necessary to serve a development and potentially render development unviable. Density must also be weighed against required size and type of homes to meet local and market needs. For example, over emphasis on higher density development may result in a higher mix of flats for which there is no market. By way of example, the Council's 2017 Denvilles-Emsworth Masterplan, which relates to the Allocation 1: Southleigh site, proposes a range of densities, with lower densities on the western edge of the site which bounds the Denvilles area of Havant. This demonstrates the importance of allowing density to respond to the character and context of different parts of a strategic allocation. Additionally, the policy refers to the term "net development area". It is noted that this is not defined in the Glossary and is subject to varying definitions across the industry. Could this potentially lead to confusion? If the term is to be retained, it is suggested	Comment.	Examination

	that it is clearly defined in the Glossary to provide certainty and consistency in the application of the policy. Overall, it is suggested that the Council might wish to focus on a design-led approach and as such might consider removing this policy from the Plan. References to density within Policy 13 should provide sufficient comfort that this matter will be addressed as part of a design strategy. Alternatively, if the policy is retained, it is suggested that the density target should be expressed as an indicative target which can be applied flexibly having regard to site-specific circumstances, character, design and viability.		
Policy 15: High Quality New Homes	Bloor Homes is supportive of the Council's intention to provide high quality homes which meet the needs of those in need of a new home. Bloor Homes is sympathetic to, and supportive of, the right kind of specialist accommodation. To avoid challenge and ensure effective delivery, such provision should be both evidenced and needs based. Use of a blanket approach to these units in an area could result in construction of a product with a very limited market. Even where a person is looking for such a property, the chances of that specific bungalow, maisonette, apartment or house meeting their specific need is very limited. As an example, Bloor Homes now have two Local Planning Authorities requesting 10% of all open market housing to be M4(3) (Accessible) on strategic scale sites. Due to high land values and problems with upper flood accommodation in maisonettes and flats (see below), one of these would result in a 47no two storey houses with compromised internal layouts. To add to the complexity, Bloor Homes cannot currently find an independent Fire Engineer to sign off M4 (3) apartments blocks on the basis that they need a full-time warden in attendance should occupiers need assistance to exit the building: this is a post Grenfell problem. This is having a significant implication for build complexity, management and delivery. This also leads to impacts on density, particularly to achieve level access and is not an efficient use of land.		Examination

	The policy should include some flexibility to ensure that homes provided meet locally identified needs, with particular regard to the need for M4 (3) Wheelchair accessible standard. It should also recognise that there is no need for the proportions to be the same for affordable and market homes. For market homes, the standards utilise more land and result in layouts which are less saleable i.e. that are more expensive to build and hence less affordable due to a higher price tag. It is critical that these homes are meeting specific needs otherwise they might not be desirable to the eventual end users. Anecdotally, Bloor Homes often finds that prospective purchases do not understand why properties are over-sized in different ways to meet these standards. Additionally, such properties can lower density which conflicts with the Council's density policy. Bloor Homes also consider that it is appropriate for the policy to be specific as to which adaptable standards are required to be met to give certainty for developments. This has significant implications for the detailed design of homes, for example, storage units and kitchen design. Additionally building regulations hinders the practical delivery of flats to these standards and this is creating challenges in the development industry as well as adding extra build cost in an increasingly difficult market. In this regard and on a rolling basis, this is particularly important for sites within the Council's five year housing land supply. **Suggested amendment:** …Residential development is expected to include the provision of: a) New homes which meet the Nationally Described Space Standards (or future equivalent); and Paragraph 4.48 of the policy supporting text refers to a minimum requirement of 1 square metre per bedroom of outdoor space to be provided for flats but that it may be possible to provide a reduced amount of balcony space where there is easy access to public open space or communal amenity space. It is suggested that this paragraph		

	could be worded to make it clearer that there are alternatives to the provision of outdoor space, for example in circumstances where properties are located in close proximity to open spaces. **4.48 For flatted developments, outdoor space should be provided either as set out in the Borough's Design Guide or through easy access to public open space or communal amenity space.**		
Policy 16: Low Carbon Development	Policy 16 sets out the Council's objective for delivering low carbon development, setting out energy performance targets and renewable energy requirements for new residential development, as well as sustainable design and reporting requirements for non-residential development. Bloor Homes supports the Council's objective for delivering low carbon homes. It would suggest that there are some potential issues in respect of feasibility, deliverability and viability which need to be considered to ensure that the policy is robust from challenge and deliverable. In essence, the policy should align nationally set standards (i.e. the Building Regulations) which have been identified by the Government as the optimal means of working towards achieving zero carbon standards in new development. It is unclear how proposals for carbon offsetting set out at 4.80 of the supporting text could be fairly assessed or payments judged to meet the lawful tests for contributions to meet the need generated by new development. **Written Ministerial Statement (WMS) – December 13th - Local Energy Efficiency Standards Update –** As noted in the consultation, in December 2023 the Government released a WMS[1] which sets out clarity on the development and application of local energy efficiency standards in the context of advancing national	Comment	Examination

[1] https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123

	policy. The WMS notes that the introduction of Part L 2021 supersedes the 2015 WMS which set guidance for Local Authorities to not set energy efficiency standards beyond Code for Sustainable Homes Level 4. The WMS goes onto note that the 2025 Future Homes Standard (FHS) will mean, *'that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes'.* The WMS states, *'the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale.'* It is noted that the Council is awaiting the resolution on ongoing legal action before confirming the requirements of this policy. In this context, it is also relevant to note the approach taken through the examination of the Bristol Local Plan, where the Inspector considered the relationship between local energy performance requirements and the 2023 Written Ministerial Statement (WMS) referred to above. The examination process resulted in modifications to Bristol's proposed net-zero policies, including a requirement for development to achieve a 100% reduction in regulated carbon emissions only. This reason for the change is noted as the 2023 WMS set out above.[2]		

[2] EXA002.1 - Local Plan – Schedule of Suggested Main Modifications. Version 2 – published 25/09/2024

	In this context it is considered that as proposed Policy 16 contradicts the Government's WMS and as such the space heating, total energy use and energy performance requirements should be removed or reconsidered to align with the 2023 Future Homes and Buildings Standard Consultation[3] and WMS which describes Net Zero Ready development. **Regulated and unregulated energy** It is noted that in setting a total energy consumption target the policy relates to both regulated and unregulated energy. While we support the delivery of low carbon development it is considered any targets should be restricted to regulated energy only. Developers only have the ability to influence the regulated energy demand through design and specification of materials and systems and renewable energy technologies. This is recognised in the policy with an additional allowance for unregulated energy where justified. However, the unregulated energy consumption, (often referred to *as* 'plug in load') of development is ultimately the function of the residents or occupiers use of the building, which cannot be influenced by the developer and therefore setting a targets for energy, energy generation and energy offsetting which include unregulated energy is not appropriate. For example, post 2025 one of the greatest demands for unregulated energy in new homes will be to charge an electric vehicle. It is unreasonable to assume that a developer should effectively meet the cost of mitigating energy and carbon from charging an electric vehicle. Similarly non-residential building uses, including commercial uses can include significant process loads, e.g. refrigeration, it is again unreasonable to assume that a developer should effectively meet the cost of mitigating energy and carbon from these uses. The responsibility of unregulated		

[3] https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation#performance-requirements-for-new-buildings

	energy use and emissions therefore should sit with the building residents and occupiers. The Governments Future Homes and Buildings Standard Consultation published in December 2023[4] states in reference to setting energy intensity targets, '*We consider that metrics which include unregulated loads are not a suitable because designers and housebuilders have little or no control over these end uses of energy.'* In addition, as noted above, the examination of the Bristol Local Plan has revised their Policy NZC2 to relate to regulated emissions only. In this context it is recommended that Policy 15 only considers requirements which relate to regulated emissions only, in line with the principles set out in the 2023 WMS and the recent examination and modifications to the Bristol Local Plan Review. **Renewable Energy Demand and Offsetting** Policy 16 sets out an objective for development to include on-site renewable energy generation to meet residual energy demand, with any remainder being addressed through a carbon offset fund. While Bloor Homes supports the provision of renewable energy as part of new development this should be provided in the context of national guidance and Building Regulations. The Government's December 2023 WMS notes that Council's should not set targets beyond national policy and where justified these should relate to the buildings Target		

[4] https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation#performance-requirements-for-new-buildings

	Emissions Rate, i.e. the carbon emissions of the development. In this context setting an onsite energy generation target is not consistent with the Government's approach to net zero buildings. We support the use of offsetting to tackle residual emissions where this has been appropriately evidenced and tested. At this stage no offsetting methodology or cost is set out in the Policy and therefore is open to interpretation and carries an uncertain cost. Understanding the method and potential costs of this requirement is key to this element of the policy being consistent with the requirements of the NPPF. Any offsetting Policy set out should include the costs proposed, as well as the methodology for assessment. The calculation of offsetting should be based on residual carbon emissions to follow the principles set out in the 2023 WMS, this should include consideration of the reduction in grid based carbon emissions. In this regard, the approach examined and established through the Warwick District Council Net Zero Development Plan Document and Supplementary Planning Document[5] provides a suitable methodology for assessing residual operational emissions and offsetting contributions, and that could also be applied here. In this context, without detail of how this policy would be implemented we recommend that this element of the policy is revised. **Viability** The Stage 1 viability assessment provided alongside the draft Plan includes an uplift of 5% to cover either • *'Net zero operational energy compliance - assuming detailed specification requirements aligning with the Low Energy Transformation Institute (LETI)*		

[5] https://www.warwickdc.gov.uk/info/20799/development_plan_documents

	based on energy use intensity (EUI) targets (space heating demand target of <15kWh/m^2/yr and an operational energy use target of <35kWh/m^2/yr. • *Carbon reduction approach (non-LETI) towards net zero development – we assume this approach is intended to go beyond the forthcoming FHS 2025 but is intended to retain a carbon reduction metric.'* While the space heating and energy performance requirement allowed for as part of the viability assessment exceeds the requirement set out in the Policy, the Policy includes additional requirements around onsite residual energy generation, offsetting and whole life carbon assessment and reduction of embodied carbon. These are not considered as part of the viability assessment and consequently the policy is not consistent with the requirements of the NPPF. We would therefore recommend consideration is given to the Future Homes Hub report, Ready for Zero, prepared to inform the 2025 FHS sets out costs for a range of potential specifications[6]. The CS4 specification, similar to the proposed requirements of Policy 15 includes greater detail on the design and specification upgrades, identifying a cost uplift of c.19% beyond Part L 2021, well in excess of the allowance currently included. **Whole Life Carbon Assessment** Bloor Homes recognises that with improving operational building standards, aside from a building users operational energy use, embodied carbon is the largest potential carbon impact from development. We support the general principles noted in Policy 15 to design to reduce the embodied carbon from. We would note that this requirement needs to be specific to the detailed stage of applications, it is likely the level of information required to prepare an informed WLCA will not be available at the outline application stage.		

[6] Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf

	Summary Given the issues noted above we do not believe the draft Policy currently meets the requirements of the NPPF and is inconsistent to national guidance and we would recommend the Policy is redrafted to be consistent with the Government's net zero development strategy and December 2023 WMS. The Future Homes and Buildings Standards which will set future building carbon targets, as well as tackling issues with the performance gap. It is recommended additional energy intensity targets, energy performance targets, and demand management requirements are removed, having regard to the examination modifications to the Bristol Local Plan Review. In this context some modifications to Policy 16 are recommended below. ***Proposed amendments to Policy 16: Low Carbon Development*** *All development must embed the Energy Hierarchy within the design of buildings by prioritising a fabric first approach, layout and landscaping in order to minimise energy demand for heating, lighting and cooling. All development must take opportunities to reduce the embodied carbon content through the careful choice, use and sourcing of materials. A Sustainability Statement will be required to be submitted which demonstrates how these measures have been incorporated.* *All development will be expected to achieve the relevant minimum standards set out below.* ***Residential development -** Planning permission for new dwellings (including replacement dwellings) will be granted where:* *a) The principles of Passivhaus design (solar gain, natural ventilation or ventilation with heat recovery) and fabric performance have been incorporated into the layout and design;* ~~*b) The predicted space heating demand of the homes is less than 30 kWh/m2/year;*~~		

	~~*c) The total energy consumption of the building(s) is less than 40 kWh/m2/year; and*~~ ~~*d) Remaining energy demand is met through on-site renewable energy generation, with any remainder being addressed through the carbon offsetting fund.*~~ *e) For developments of 150 or more dwellings (gross), a whole life carbon assessment must be submitted* ***with detailed applications*** *which* ~~*demonstrates how both operational and*~~ ***assesses*** *embodied emissions* ~~*have been reduced compared to a 'do nothing' approach.*~~ ***Commercial and non-residential development*** *g) Planning permission for new commercial and non-residential development over 1000sqm (gross) will be granted where:* *i. BREEAM 'Excellent' standard is achieved.* *ii. For developments of 5,000 sqm or more (gross),* ***as part of detailed applications*** *a whole life carbon assessment must be submitted which* ~~*demonstrates how both operational and*~~ ***assesses*** *embodied emissions* ~~*have been reduced compared to a 'do nothing' approach.*~~		
Policy 17: Overheating	Policy 17 sets out a requirement for development to consider the potential risks of overheating as a result of climate change. Bloor Homes recognise the challenge Climate Change poses, and all new homes undergo an overheating assessment in line with the requirements of the Building Regulations to consider potential risks of overheating, and mitigation in line with the cooling hierarchy. For context Part O of the Building Regulations offers two routes to compliance introduced in 2021, a simplified method, or through dynamic thermal modelling such as the CIBSE TM59 modelling proposed in the Policy. The current Future Homes and Building Standards consultation includes a call for evidence on overheating and the methodology proposed. Overheating is therefore an issue which is undergoing further consultation and consideration will therefore need to be given to potential changes to national requirements and guidance.	Comment	Examination

Policy 18: Sustainable Construction Methods, Materials and Waste	Policy 18 sets out a series of construction methods, materials principles and waste strategy for development. The requirements set out are intended to be a set of minimum standards for development, and developers are encouraged to aim higher. Bloor Homes supports the use of sustainable construction methods, sustainable materials, and minimising waste from construction activities. However, the list of requirements set out in the Policy are not fully justified at this stage, setting out requirements which are not likely to be appropriate for residential development. In particular, it is recommended the following points are reconsidered. ***c) Optimises the use of sustainable construction materials, green walls and roofs, rainwater harvesting systems and greywater use.*** This point includes a number of separate requirements: • *Optimising the use of sustainable construction materials;* • *Green walls and roofs; and* • *Rainwater harvesting and greywater use.* We would note that these are a series of separate requirements which individually have design, feasibility and viability requirements, which are not noted in the viability assessment. For example, the requirement for green walls and roofs is generally not applicable for all types of development and development scenarios due to design, feasibility and viability issues. Consideration needs to be given to where this may be most applicable. Similarly, the application of rainwater harvesting and greywater use can have a significant cost for residential development, as well as space requirements for equipment which are not feasible. No allowance has been included as part of the viability assessment for the provision of green walls, rainwater harvesting or greywater use. ***e) Uses locally sourced and environmentally friendly materials wherever possible.***	Comment	Examination

	Bloor Homes aims to make use of a range of sustainable materials and considers options for locally sourcing materials. In general, developers have commercial agreements with material providers which is entirely reasonable when building at scale on a national basis. This means that it is not appropriate or feasible for policy to control commercial matters at the local scale. In addition, build cost assumptions used in viability assessments are generally based on blended market data across a wider geographic area, rather than an assumption that materials will be locally sourced. A requirement to use locally sourced materials could therefore have implications for the viability underpinning development. This criterion should be deleted. f) Submits a sustainability statement to demonstrate… This element of the policy is aspirational and it is suggested that this is not realistically deliverable when building at scale. g) The development reduces the level of construction waste, minimises environmental pollution… This element of the policy is aspirational and it is suggested that this is not realistically deliverable when building at scale. ***h) The incorporation of modular construction techniques is considered***. While the use of modular construction can provide sustainability benefits, i.e. reduced waste and embodied carbon, it is still a specialist method with limited application in residential development at this stage. We would note the lack of developers using modular construction means delivery of this requirement would likely not be feasible and would potentially have a cost implication which is not considered as part of the viability assessment. Modular design also requires a high level of standardisation which may impact on design and therefore other design policy requirements which have not been considered holistically. Requiring this as a consideration for development is therefore not considered appropriate due to potential design, feasibility and cost implications and we would recommend this is deleted.		

	In this context we would propose these elements are amended as follows. **<u>Proposed amendments</u>** *c)* ***Considers*** ~~*Optimises*~~ *the use of sustainable construction materials, green walls and roofs, rainwater harvesting systems and greywater use* ***where feasible and viable****. –* *e) delete criterion* *f) delete criterion* *g) delete criterion* *h) delete criterion*		
Policy 19: Water Efficiency	Policy 19 sets out water efficiency requirements for new homes and non-residential development. Bloor Homes supports the objective of Policy 19, and reducing water demand in new homes. It welcomes alignment with the Building Regulations Part G higher water efficiency standard. In 2024 the Future Homes Hub published Water Ready, setting out a roadmap for water efficient homes which proposes changes to Part G. We would recommend the policy includes reference to future updates to Part G.	Comment.	Written Statements
Paragraph 4.191 supporting text to Policy 24: Water Quality Effects	Together with additional text in the Council's Nutrient Neutrality Position Statement (from which this is derived) this suggests that a credit reservation agreement is required (on the basis of the outline nutrient budget) prior to outline Planning Permission. Bloor Homes asks that consideration should be given to the commercial implications and practicalities of requiring developers to incur the significant cost of reserving credits prior to owning a site and having certainty that outline planning permission will be	Comment	Examination

	granted, as this may not be possible. It is recommended that this element of the policy text is taken out. This is impractical for very large, phased projects due inter alia to the difficulty in accounting for the effects of SuDS (which have a significant effect on the residual mitigation liability) at outline stage. It would also have broader adverse effects on nutrient mitigation supply as it may require large quantities of credits to be tied up in credit reservation agreements for many years, until the actual mitigation liability is finally determined at subsequent planning stages. Mitigation providers are unlikely to agree to 'reserve' large quantities of credits in these circumstances, when a significant proportion thereof may ultimately be surplus to project needs. **Proposed amendment** 'Given the geographical nature of Havant Borough, most third party mitigation schemes are located outside of the Borough. In such cases, the developer will be required to enter into a form of contract or agreement with the mitigation provider to secure the required capacity to mitigate their development. ~~This may be in the form of an upfront payment (similar to how the Council's mitigation scheme is secured at Warblington), or an agreement which effectively reserves the required capacity until planning permission has been granted. In the case of the latter, the local planning authority may need to impose a Grampian condition that requires evidence that the nitrogen mitigation has been secured prior to the commencement of development. The applicant will be required to provide proof of payment or other evidence that the credits have been secured in order to discharge the condition.~~'		

Policy 20: Biodiversity Net Gain	Bloor Homes supports the approach to ensuring that development leaves the natural environment in a measurable better state than it was beforehand. It has a couple of more detailed points it would like to raise as follows: **For criterion (e) (iii)** whilst statutory credits are noted in the legislation and guidance as a last resort, these may be included in a unilateral s106 planning agreement submitted with appeal documentation and as such they would not be agreed by the Council. Please can the wording be amended to allow for such circumstances. **Criterion (f)** provides for situations where the Council wishes to include additional requirements beyond the statutory minimum and provides for such additional information to be requested via the Council's Local Validation Checklist. It is requested that as the validation checklist will not be subject to robust testing, that this is addressed via the plan review or potentially removed from the policy. **Proposed amendment** ~~(e) In addition to the statutory minimum requirements, an application is accompanied by the additional information included on the local validation list to ensure confidence that the development's BNG requirement can be fulfilled and the development in question delivered.~~ **Paragraph 4.142** For development proposals required to provide BNG, paragraph 4.142 requires a statement on the amount of on-site BNG considered to be 'significant' for. Please would the Council provide some clarification as to the nature of this statement. There is a concern that provision of additional statements could delay the determination and delivery processes.	Comment	Examination

Policy 31 Trees, hedgerow and woodland	Bloor Homes recommends that Criterion (c) is tweaked to allow for exceptional circumstances in which there may be loss or deterioration of ancient woodland and ancient or veteran trees.	Comment	Written Statements
Policy 38: Affordable Housing	Bloor Homes has several points it would like to raise in regard to Policy 38. It is recognised that viability constraints have an impact on the delivery of affordable homes and it may bolster the policy if it were to touch on this aspect. It would also assist in ensuring that the policy fully reflects viability comments within the NPP'F. Paragraph 59 recognises that viability will be a matter which applicants may need to address at the planning application stage and therefore there should be scope and allowance for this in the policy. Aligned with Chapter 5 of the NPPF, paragraphs 61 -68 and Chapter 12 paragraphs 131-141, the policy may also benefit from some flexibility to allow for specific local needs to be met whilst also responding to local character. Given the funding challenges faced by Registered Providers, Bloor Homes are having difficulty securing Registered Providers for sites at this time. It would assist the delivery of homes if the policy could offer some flexibility in responding to these circumstances. This situation is being faced by most housebuilders and has been widely reported in the press. The policy text would benefit from recognition that alternative tenures could be considered if it can be evidenced that there is no interest from Registered Providers as part of an affordable housing cascade mechanism. Some suggested amendments have been set out below to assist the Council. ***Subject to viability*** ~~*P*~~*planning permission for residential development resulting in a net gain of 10 or more dwellings…*	Comment	Examination

Policy 39	Bloor Homes supports the policy approach to provide choice and deliver a range of dwelling types and sizes to meet local need and foster balanced and integrated communities. Paragraphs 4.386 and 4.387 could potentially lead to an expectation around housing mix for market and affordable homes which does not reflect the latest evidence. In particular, the market housing mix should not be overly prescriptive, as housing needs and market conditions will naturally change over the plan period and Housing Needs Assessments represent only a snapshot in time. As such it is suggested that the wording is amended to signpost to the latest analysis but omitting quoting figures from the October 2023 Housing Needs Analysis which may not be the most up to date source once the plan has been adopted. Proposed wording for paragraph 4.385 is as follows; *"Paragraph 4.385 Havant Borough Council recognises the need for the market to provide a choice for the current and future residents with varied housing types and sizes. This should be established with reference to the latest available housing needs evidence, whilst allowing flexibility to respond to changing market conditions and needs over the plan period. The housing mix for affordable housing differs from the market housing mix figures due to the need to reduce the wait time and respond adequately to the residents' targeted categories. The latest analysis is set out in the Council's Housing Needs Analysis 2023."*	Comment	Examination
Policy 42 (36): Self and custom build	Bloor Homes recognises the need to fully provide for a range size and types of homes, including for self and custom-build. Bloor Homes requests that consideration is given to some difficulties that it has experienced in relation to the marketing of self and custom-build plots. The policy requires plots of 200+ dwellings to have 5% overall dwellings as plots. Priority is to be afforded to those on the self-build register for a minimum of 3 months before marketing more widely to others, then released if not sold after 12 months. This	Comment	Examination

	is a significant proportion of new homes for a site such as Southleigh and ultimately once effected in policy adds considerable additional cost, time, resource and complexity to an already burdened planning system - with limited benefit. Overall, Bloor Homes are concerned that the policy could generate a large oversupply that could inadvertently delay the wider delivery of much needed homes. The Council may wish to consider further work to determine preferred locations for self-build so that it can tailor this policy accordingly. With respect to Allocation 1: Southleigh, Bloor Homes queries whether delivery of 5% is realistic. Bloor Homes' has wide ranging experience of delivering large sites and their experience is that self/custom-build units are not welcomed by other future residents or the residents of existing neighbouring properties. Delivery numbers are often very small due to the small market, health and safety difficulties, and higher proportionate delivery costs and bureaucratic requirements. There are wider implications for delivery as well due to the additional 'paperwork' associated with discharging the requirements for self and custom build, which in Bloor's experience has created extra costs, delayed delivery of units and confused purchasers. Bloor can provide further information of our experience of self and custom build if this would assist, as to date this has not delivered any homes. Additionally regarding criterion (c) it should be clear that where there is no demand for serviced plots, planning permissions, including conditions and planning agreements should allow for reversion to alternative uses i.e. the need for a new planning application for such plots should be precluded. This is so as to avoid undue cost and risk. The risk has huge implications for build programmes otherwise and is not workable in practical terms. There is also a need to avoid the complications associated with varying the original planning permission or requiring a new planning permission if an outline has expired.		

Policy 44 Employment Uses	The policy provides for situations in which existing employment uses outside of employment areas may be lost. It is suggested that an additional criterion be added to allow for situations in which the loss of employment uses may be welcome due to them currently operating in such a way as to present amenity (or other difficulties) for surrounding or planned future uses.	Comment.	Written Statement
Policy 45 Town, District and Local Centres	Bloor Homes notes that Southleigh is identified within Policy 45 for a proposed new Local Centre as part of the Southleigh Strategic Site. It is therefore important that the policy provides sufficient flexibility to support the delivery of a new centre and allow its role and mix of uses to evolve in response to the needs of the new community and market conditions. The requirements of Policy 45 are currently expressed as applying to all defined Town, District, and Local Centres, without distinguishing between established centres and new centres proposed as part of strategic allocations. In the case of Southleigh, the detailed mix and format of uses within the Local Centre will need to be established through the masterplanning and deliver of the allocation and may need to evolve over time in response to demand and viability. It is therefore suggested that Policy 45 is amended to recognise the specific circumstances of new Local Centres, including Southleigh, and to ensure that the requirements of criteria (a) and (c) are applied flexibly where justified by the detailed masterplan, evidence of need, market conditions, and viability. Proposed amendments to Policy 45 are as follows: a) *Class E uses are proposed at ground floor level where appropriate to the role and function of the centre;*	Comment	Written Statement

	b) *Residential development is located above ground floor only unless otherwise justified having regard to the role and function of the centre;*		
Policy 47 Food, Drink and Entertainment Uses	Bloor Homes notes that Southleigh is identified as a new Local Centre under Policy 45 and that the Local Centre could potentially accommodate a range of food, drink, and entertainment / leisure uses. In this context, consideration should be given to the application of Policy 47 to the Southleigh allocation, particularly given the proposed location of the new primary school in proximity to the Local Centre. Criterion c) of Policy 47 restricts new or changes of use to hot food takeaways or fast food outlets outside of designated town centres where the premises is within 400 metres of a primary or secondary school or college. The policy and supporting text should provide clarity that the 400 metre restriction does not apply to designated Local Centres, including the proposed Southleigh Local Centre, consistent with the stated purpose of this policy. This is particularly important in the context of Southleigh, where proximity of the proposed primary school could otherwise have a consequential impact on the range of uses capable of responding to the needs of the new community and market conditions, subject to the other requirements of Policy 47 relating to amenity and environmental impacts. It is therefore suggested that Policy 47 and its supporting text are amended to clarify the position in respect of designated Local Centres, including the proposed Southleigh Local Centre. Suggested amended wording for Criterion c) of Policy 47 is as follows: c) *Planning permission will only be granted for new or changes of use to hot food takeaways or fast food outlets outside of designated town, **district and local***	Comment	Examination

	centres if the premises is not within 400 metres of the boundaries of a primary or secondary school or college.		
Policy 53 Accessibility, Transport and Parking	Bloor Homes broadly supports Policy 53 in its vision-led approach, which is consistent with Hampshire County Council's Local Transport Plan 4 and national planning policy. However, it is considered that criterion d(v) would benefit from clarification to ensure that the policy is applied flexibly and proportionately, particularly in relation to strategic allocations. As currently worded, the requirement for development to contribute to the delivery of "identified improvements to the wider pedestrian, cycle, public transport and/or road networks" could potentially be interpreted as requiring contributions towards a broad range of infrastructure identified through the Council's wider evidence base, irrespective of whether such infrastructure is necessary to mitigate the transport impacts of a particular development. This is particularly relevant to Southleigh, given the range of wider transport interventions identified within the evidence base. The requirement to deliver or contribute towards identified wider transport mitigation should be based on the site-specific Transport Assessment and must meet the CIL tests as set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and replicated at paragraph 58 of the NPPF. **Proposed Amendments** It is suggested that Criterion D(v) is amended as follows: *"The development contributes to the delivery of identified improvements to the wider pedestrian, cycle, public transport and/or road networks**, where necessary to mitigate the impacts identified within a site-specific Transport Assessment and where***	Comment	Examination

	such contributions are necessary, directly related to the development, and fairly and reasonably related in scale and kind".		
Policy 56 Provision of POS in New Development	**Outdoor Sports** Bloor Homes supports the overarching approach to the provision of public open space set out in Policy 56 and the Council's objective of ensuring that new development delivers high-quality, accessible and appropriately located open spaces. Bloor Homes considers, however, that the policy would benefit from a clearer distinction between the provision of public open space and the provision of formal sports and recreation facilities. Policy 56 currently refers to the provision of "amenity green space, outdoor sports and play provision" in accordance with the Fields in Trust quantitative and design guidance. The results in an element of overlap with Policy 57: Sport and Recreation Facilities. Policy 57 specifically addresses the provision of sport and recreation facilities and requires development to provide or contribute towards new or improved sports, leisure and/or recreation facilities which are fit for purpose, publicly accessible and meet current and future demand. The supporting text confirms that this includes both indoor and outdoor facilities. Bloor Homes therefore considers that there would be merit in removing references to outdoor sports from Policy 56. This would avoid duplication between Policies 56 and 57 and provide a clearer policy framework for the consideration of sports provision through the dedicated sports and recreation policy. This would not reduce the importance of sports provision or the requirement for development to make appropriate provision for sport. Rather, it would ensure that the requirement is considered under the policy specifically concerned with sports and	Comment	Examination

	recreation facilities, allowing the Council to have regard to the relevant evidence base, including the Havant Playing Pitch Strategy, Indoor Sports Facilities Strategy, and relevant Sport England guidance. This approach would also ensure that Policy 56 remains focussed on the provision of public open space, including parks and gardens, amenity green space and play provision, whilst Policy 57 provides the appropriate policy mechanism for considering formal sport and recreation facilities. **Proposed Amendments** We suggest the following amendments to Policy 56 : Criterion a): *"a) Residential developments will be permitted where they provide amenity green space, ~~outdoor sports~~ and play provision in accordance with Fields in Trust quantitative and design guidance, as set out below. Nonetheless, applicants should also approach the design of on-site public open space considering site context and the nature of the development and the need for measures such as Biodiversity Net Gain..."* We suggest that the remainder of criterion a) including the Council's stated flexibility in applying the quantitative standards having regard to the type and location of development, site characteristics, and existing provision should remain unchanged. If adopting the above change, we would suggest that it would also be appropriate to remove the row referring to Outdoor Sports and Recreation from the 'Minimum Guidelines for Open Space, Outdoor Sports and Play Space in New Developments' table within the policy. Within Paragraph 4.512 of the supporting text, it is also suggested to refer to Policy 57 for matters relating to formal sports and recreation:		

	4.512 Residential development will be required to provide open space in line with the standards outlined in the policy which are based on Fields in Trust guidance and the Open Space Strategy and associated addendum, other than the provision of formal sports and recreation facilities which are addressed separately through Policy 57: Sport and Recreation Facilities…. **Allotments and Community Gardens** Bloor Homes also considers that a minor amendment should be made to the categorisation of allotments and community gardens within Policy 56. The current policy categorises allotments within the "Courts, Greens, Tracks and Trails" typology. However, the Fields in Trust guidance identifies allotments and growing spaces as examples of Amenity Green Space. This is also consistent with the Council's Open Space Strategy Addendum, which treats allotments and community gardens separately. Bloor Homes therefore suggests that the definition within the inset table of Policy 56 is amended so that allotments and community gardens are incorporated within Amenity Green Space.		
Policy 57 Sport and Recreation Facilities	Bloor Homes supports the overarching objective of Policy 57 and agrees that new development should contribute towards the provision of sports, leisure and recreational facilities which are fit for purpose, publicly accessible and capable of meeting current and future demand. The scale of Southleigh provides an opportunity to make a significant contribution towards this objective through the delivery of a comprehensive range of formal and informal recreational facilities. Bloor Homes considers that the precise mix of facilities should, however, be established through the most up-to-date evidence of local and	Comment	Examination

	development-generated demand and through engagement with relevant sporting bodies and facility providers. This approach is supported by the Council's Playing Pitch Strategy and Indoor Sports Facilities Strategy. The Playing Pitch Strategy recommends the use of the Sport England Playing Pitch Calculator to determine the need for playing pitches and inform developer contributions. Similarly, the Indoor Sports Facilities Strategy provides a useful assessment of the current and future demand. It identifies a small deficit in swimming pool water space which is expected to increase through to 2043, supporting the identification of swimming provision as an infrastructure priority. Conversely, the Strategy identifies a surplus of sports hall provision and concludes that there is no need to build additional courts before 2043. It also concludes that there is no need for an additional indoor bowls facility. Bloor Homes therefore considers that Policy 57 should be applied flexibly and in accordance with the most up-to-date evidence. In particular, where a contribution towards off-site sports, leisure or recreation facilities is sought, this should be directly related to an identified requirement arising from the development and should have regard to the latest evidence of existing capacity and projected demand. This will ensure that contributions are directed towards facilities which will provide the greatest benefit to existing and new residents, and will support the delivery of a sustainable and viable sports and recreation offer at Southleigh.		
Policy 59 Employment and Skills Plans	Bloor Homes welcomes and supports this policy, which seeks to support residents' access to employment and skills training.	Comment	Written Statement

	Developers often have their own apprenticeship initiatives, which can also assist in providing access to employment and skills training. It is suggested that the wording is amended to include for such initiatives. *'Development proposals for residential developments of 50 dwellings or more (gross) and commercial developments of at least 2,000sqm floorspace (gross external area) will be permitted where they provide a site specific Skills and Employment Plan,* ***or equivalent initiative****, to support the Borough's residents to access employment and skills training.'*		
Policy 60 (54): Community New Development Officers	An indication of the level of contribution and/or ratio of officer to development should be provided within the policy to assist developers, allow for viability considerations and to ensure that the CIL tests are met.	Comment.	Written Statements

The following representations are made in respect of the supporting Local Plan Evidence Base documents.

Infrastructure Delivery Plan Stage 1 Local Plan Viability Assessment Stage 2 Local Plan Viability Assessment	Bloor Homes is supportive of the Council's continued progress towards adoption of the Local Plan and recognise the important role that the evidence base supporting the Plan plays in demonstrating how the infrastructure and other requirements associated with the proposed growth will be delivered. Bloor Homes is also supportive of the principle that development should make an appropriate contribution towards infrastructure required to mitigate the impacts of growth. The comments below are therefore intended constructively, to assist the Council in ensuring that the infrastructure requirements identified through the Plan's evidence base are appropriately evidenced, deliverable and capable of being secured through the planning process in accordance with the CIL tests as set out in	Comment	Examination

Southleigh S-W Bridge Feasibility Study Strategic Transport Assessment Open Space Strategy Open Space Strategy Addendum Playing Pitch Strategy Assessment Report Indoor Sports Facilities Strategy Healthy Borough Assessment Local Green Spaces and Destination	Regulation 122(2) of the Community Infrastructure Levy Regulations 2010, and provide a robust evidence base in support of draft Policy 4: Infrastructure and Environmental Mitigation to Support Development, and draft Allocation 1: Southleigh within the Plan. It is recognised that the evidence base documents supporting the Local Plan, including the Infrastructure Delivery Plan (IDP), do not form part of the Development Plan itself. However, where these documents are relied upon to identify infrastructure and other requirements associated with specific allocations, and particularly where those requirements are intended to inform Section 106 obligations, it is important that there is a clear evidential basis demonstrating that the requirements are justified and, where relevant, meet the statutory tests for planning obligations. In particular, where development costs and developer contributions are proposed, there should be a clear relationship between the requirement identified, the additional demand generated by the development and the scale of the cost or contribution sought. Bloor Homes would therefore welcome further clarification from the Council on the evidence underpinning the assumptions that inform the requirements and associated development costs, particularly given the implications for viability. This includes the Infrastructure Delivery Plan, Stage 1 and Stage 2 Local Plan Viability Assessments, the Southleigh S-W Bridge Feasibility Study, Strategic Transport Assessment, Open Space Strategy and Addendum, Playing Pitch Strategy Assessment Report, Indoor Sports Facilities Strategy, Healthy Borough Assessment, and Local Green Spaces and Destination Open Spaces in Havant Borough. In the context of the Local Plan Viability Assessment, Bloor Homes would welcome clarification on: • How the affordable housing values and proposed tenure splits have been arrived at, given their role in informing the policy basis and the current market conditions;		

Open Spaces in Havant Borough	• How the proposed Section 106 contribution (for financial and capital works) rate per dwelling has been calculated; and • How the enabling infrastructure rate has been calculated, particularly in the context of abnormal costs associated with development. Bloor Homes considers that further discussion and clarification of these matters would assist in ensuring that the requirements identified through the Local Plan's evidence base are appropriately evidenced and provide a robust and transparent basis for implementation of the Plan, as well as understanding how any identified costs meet the requisite CIL tests and the appropriate apportionment of costs across development sites. Clarity on the CIL charging rate for Southleigh and timings for the implementation of such are critical in the context of viability matters. It is Bloor Homes and the landowners' view that the Southleigh allocation be zero rated for the purposes of CIL based on the information published to date, but we reserve our right to make further submissions on all viability matters in due course. **Education** Bloor Homes supports the provision of appropriate education infrastructure to meet the needs arising from the strategic growth proposed through the Local Plan. The IDP appropriately recognises the significant scale of growth proposed at Southleigh and identifies the need for additional primary and secondary school capacity. In relation to Southleigh, the IDP identifies a new 3FE primary school, with an indicative cost of £14.5 million, together with potential expansion of secondary provision, currently identified at an indicative cost of £9.25 million. Both are identified as being funded through future developer contributions.		

	Bloor Homes would welcome some further clarification regarding the assumptions underpinning the costs identified in the IDP and the methodology which will be used to translate those costs into developer contributions. This would assist in demonstrating that contributions sought from individual developments are proportionate to the additional demand generated and meet the relevant statutory tests. In particular, it is noted that there has been a significant increase in the education cost assumptions used by Hampshire County Council compared with previous figures and available benchmarking. The review would benefit from further explanation of the basis for these increases, particularly in relation to secondary school provision. Similarly, the IDP identifies a 5% threshold in considering school capacity. This differs from the 2% benchmark identified by the Department for Education and the basis for adopting the higher threshold would benefit from clarification. Bloor Homes therefore suggests that the Council, in conjunction with Hampshire County Council, reviews and provides further clarification on the assumptions underpinning the education requirements and associated costs. This would provide greater certainty for developers and the Council alike and help ensure that future contributions are demonstrably necessary, directly related to development and fairly and reasonably related in scale and kind. **Healthcare** Bloor Homes supports the provision of appropriate healthcare infrastructure to support the population growth proposed through the Local Plan. The IDP appropriately identifies the potential requirement for additional primary care capacity and recognises the role that developer contributions may play in supporting the delivery of healthcare infrastructure.		

	However, the IDP could provide greater clarity regarding the methodology for identifying additional healthcare capacity required as a consequence of development and the basis upon which any developer contribution would be calculated. In particular, there would be benefit in distinguishing between additional capacity required specifically as a result of planned development and wider investment or improvement in the existing healthcare facilities. The methodology for establishing additional GP capacity would benefit from further clarification, including the assumptions regarding the extent to which the population of new development represents additional demand on existing GP services, where it is considered that many of the future residents at Southleigh could move from within the local area and may already be registered with a local practice. Bloor Homes therefore suggests that the Council and relevant healthcare bodies continue to work together to establish a transparent and proportionate methodology for identifying the additional healthcare requirements arising from individual developments. This would provide greater certainty regarding the level and purpose of any future Section 106 contribution and help ensure that contributions meet the relevant statutory tests. **Transport** Bloor Homes support the Council's objective of securing appropriate transport infrastructure alongside the growth proposed through the Local Plan, including measures which improve the operation of the highway network and support sustainable transport. The IDP identifies the Hulbert Road / Fitzwygram Way roundabout bus-priority scheme (T012) as an infrastructure requirement associated with Southleigh, with an indicative cost of £7.655 million and developer funding identified as the funding source.		

	Bloor Homes would welcome further consideration of the attribution of this particular scheme to the Southleigh allocation. It is noted that the available transport evidence appears to associate the need for the intervention principally with traffic arising from the Dunsbury Hill Farm / Dunsbury Park allocation and resulting delays on the Fitzwygram Way approach. It is also noted that the junction is more than 5km from Southleigh and that only a limited proportion of Southleigh traffic would be expected to use the junction. In addition, the proposed bus services associated with Southleigh would not utilise the roundabout or benefit from the proposed bus-priority scheme. On this basis, Bloor Homes suggests that the Council reviews whether T012 is appropriately identified as a Southleigh infrastructure requirement within Appendix 2B of the IDP. If the scheme is retained as a Southleigh requirement, it would be helpful for the IDP to provide further evidence demonstrating the specific impact attributable to Southleigh and the basis upon which a proportionate contribution towards the scheme would be established. Alternatively, given the evidence presently available, consideration should be given to identifying the scheme within the infrastructure requirements associated with Dunsbury Park / Dunsbury Hill Farm, where the need for the intervention appears more directly related to the development identified within the transport evidence. **Sports and Recreation** Bloor Homes supports the identification of green infrastructure, open space, and sports infrastructure necessary to enable Southleigh to develop as a sustainable and well-integrated community. Clarification would be welcomed regarding the cost base used for the indicative costs identified for swimming pool lane provision. The current figures appear to correspond		

	with costs contained within an earlier iteration of the IDP, and it would therefore be helpful for the Council to confirm the relevant cost base date and its proposed approach to inflationary uplift. Bloor Homes acknowledges and supports the identification of swimming provision as an infrastructure priority. The Indoor Sports Facilities Strategy identifies a current small deficit in swimming pool lanes, which is expected to increase through to 2043. Any contribution sought from Southleigh should nevertheless be proportionate to the demand generated by the development and based upon a transparent and up-to-date assessment of need and cost.		
Strategic Transport Assessment	Bloor Homes supports the Strategic Transport Assessment's (STA) move away from a traditional "predict and provide" approach towards a vision-led methodology, including the principles of "Decide and Provide" and "Monitor and Manage". This approach is consistent with Hampshire County Council's Local Transport Plan 4 and national policy, and places appropriate emphasis on reducing car dependency, improving public transport reliability, and delivering high-quality walking, wheeling, and cycling connections. This approach is also consistent with the transport strategy being pursued through the Southleigh planning application. The application-level assessment similarly seeks to establish a sustainable transport-led strategy for the new community, including enhanced bus services, active travel connections and measures to support bus priority. **<u>Southleigh Strategic Mitigation Package</u>** The STA identifies a mitigation package which is primarily focussed on sustainable transport measures, including Local Cycling and Walking Infrastructure Plan (LCWIP) routes, walking and cycling improvements, Bus Service Improvement Plan	Comment	Examination

	(BSIP) measures, station interchange improvements, the emerging Havant Area Strategy, and Travel Plan measures. The STA however, identifies two junction improvement schemes within its mitigation package: the A27 Warblington Interchange and the Hulbert Road / Fitzwygram Way roundabout. In respect of the latter, we have separately commented on its identification as a Southleigh infrastructure requirement within the IDP and we consider that the evidence does not presently justify its attribution to the allocation. The A27 Warblington Interchange, however, is directly relevant to Southleigh and is considered further below. **A27 Warblington Interchange** Bloor Homes welcomes the STA's identification of improvements to the A27 Warblington Interchange as part of the strategic mitigation package. The proposed intervention is materially consistent with the mitigation identified within the Southleigh Transport Assessment submitted as part of the outline planning application, which considers a linked signalisation scheme for the northern and southern dumbbell roundabouts at the Warblington Interchange, including internal stop lines and associated changes to the circulatory arrangement. The STA identifies the intervention as supporting bus priority and active travel at the A27/Emsworth Road junction. This is particularly relevant to Southleigh given the role of the interchange in supporting the bus corridor between Havant and Emsworth and improving movement across the A27. Bloor Homes therefore considers that the STA provides useful confirmation of the strategic role of the Warblington Interchange improvements and their relationship with the sustainable transport strategy for Southleigh.		

	Sustainable Transport Connections Bloor Homes also welcomes the STA's specific recognition of the importance of improving active travel and public transport connections from Southleigh towards Havant Town Centre, across the railway towards Warblington School and towards Emsworth. This is consistent with the approach being taken through the Southleigh Transport Assessment, which includes: • an internal network of walking and cycling routes; • improvements to Southleigh Road; • improvements to the Purbrook/Emsworth cycle route; • improvements associated with LCWIP Route 371; • enhancement of Service 27 to provide an hourly service between Emsworth and Havant; • a proposed new 30-minute frequency Southleigh–Havant–Emsworth bus service; and • a proposed bus gate at Normandy Way. Bloor Homes considers that these measures provide a strong basis for establishing a sustainable transport-led new community and are consistent with the vision-led approach advocated within the STA. The STA's recognition of the need for connections towards Havant, Warblington School and Emsworth is also welcomed. Bloor Homes notes, however, that some of these connections extend beyond the boundary of the current Southleigh planning application. The outline application proposals do not prejudice the delivery of such connections should they subsequently be demonstrated to be required, but their		

	precise form and delivery mechanism will need to be considered through the wider Local Plan and development process.		
Havant Playing Pitch Strategy Reviews (2023 and 2024)	Bloor Homes has reviewed the Havant Playing Pitch Strategy Review 2023 Assessment Report and the Havant Playing Pitch Strategy Review 2024 Assessment Report. Bloor Homes considers that these documents provide an important and useful evidence base for considering the provision of outdoor sports facilities within the Borough. The Reviews were prepared in accordance with Sport England guidance and provide an assessment of existing provision, current and future demand and opportunities for improvements. Bloor Homes supports the Council's use of this evidence base to inform the emerging Local Plan and the consideration of infrastructure requirements arising from new development. Of particular relevance to Southleigh, the 2024 Review identifies Allocation 1 as the Borough's strategic housing site and refers to the use of the Sport England Playing Pitch Calculator to calculate additional demand generated by housing growth. The Review recommends that the Calculator is used to identify team generation rates and the need for playing pitches as planning applications are agreed and that it should be used by the Council to determine developer contributions. Bloor Homes strongly supports this approach and considers that it should be reflected in Policy 56 and the subsequent planning process for Southleigh. A site-specific Playing Pitch Calculator assessment would provide a robust basis for establishing the appropriate mix and quantum of formal sports provision required to serve the new community. The Strategy also provides useful evidence regarding the appropriate mix of facilities. For example, in relation to rugby, the 2024 Review identifies additional demand but recommends that this is addressed through developer contributions towards	Comment	Examination

	improvements to the quality of existing grass pitches. This illustrates the benefit of considering development-generated demand alongside the existing supply of facilities rather than assuming that all demand should result in new on-site provision. Bloor Homes therefore suggests that the Council works with Sport England to prepare a site-specific Playing Pitch Calculator assessment as the development proposals progress. This should consider the allocation as a whole, whilst allowing the appropriate proportionate requirements for individual land interests to be established. Bloor Homes considers that this approach will help ensure that Southleigh provides a high-quality and sustainable sports offer which is appropriately matched to local need and is capable of being effectively managed and maintained in the long term. Bloor Homes also notes that the 2024 Playing Pitch Strategy, the Indoor Sports Facilities Strategy and the emerging Local Plan use different housing growth assumptions. For consistency, Bloor Homes considers that the Council should ensure that a consistent and clearly explained housing growth assumption is used when translating the evidence into site-specific infrastructure requirements.		
Indoor Sports Facilities Strategy	Bloor Homes has reviewed the Indoor Sports Facilities Strategy published in April 2026 and considers that it provides a useful and up-to-date assessment of the Borough's requirements for indoor sports facilities. Bloor Homes supports the identification of swimming provision as an infrastructure priority. The Strategy identifies a small existing deficit in swimming pool water space which is anticipated to increase through to 2043. This provides support for the identification within the Infrastructure Delivery Plan of a contribution towards swimming provision associated with future population growth. The Strategy also provides useful evidence in relation to other facility types. In particular, it identifies a surplus of sports hall provision both currently and when	Comment	Examination

	projected to 2043 and concludes that there is no need to build additional courts before 2043. It similarly concludes that there is no need for an additional indoor bowls facility. Bloor Homes considers that these findings should be reflected in the implementation of Policy 57. In particular, the Council should ensure that any requirement for contributions towards new or improved indoor sports facilities is supported by the most up-to-date evidence of demand and capacity. The Strategy also identifies current demand for at least nine padel courts. Bloor Homes considers that this provides an interesting opportunity for consideration as part of the future sports facility offer at Southleigh, subject to further engagement with relevant sporting organisations and consideration of the viability and management of such facilities. More generally, Bloor Homes supports the use of the Strategy to inform the emerging Local Plan and considers that the evidence should be reviewed periodically as Southleigh progresses, ensuring that infrastructure requirements remain aligned with the latest evidence of participation, capacity and demand.		
Havant Borough Open Space Strategy and 2026 Addendum	Bloor Homes has reviewed the Havant Borough Open Space Strategy and the 2026 Addendum. Bloor Homes supports the Council's objective of ensuring that new development provides high-quality, accessible and multifunctional open spaces which contribute towards health and wellbeing, biodiversity, recreation and the quality of the public realm. The 2026 Addendum is welcomed as an update to the earlier evidence base and provides a useful opportunity to ensure that the Council's approach reflects the latest national guidance and the 2024 Fields in Trust standards. The Addendum identifies an existing and projected shortfall in designated equipped play areas and an existing shortfall in allotment provision. Bloor Homes considers that	Comment	Examination

	Southleigh provides an opportunity to make an important contribution towards addressing these needs through the provision of appropriately located and well-designed facilities as part of the development's green infrastructure and community facilities. Bloor Homes also welcomes the Addendum's recognition that outdoor sports and recreation is assessed through the Council's separate Playing Pitch Strategy. In this context, Bloor Homes considers that the emerging Local Plan should ensure a clear distinction between general open space provision and formal outdoor sports provision. The latter is appropriately considered through the Playing Pitch Strategy, where local supply, participation and development-generated demand can be assessed in greater detail. Bloor Homes therefore supports the use of the Open Space Strategy and Addendum to inform the provision of parks, amenity green space, natural and semi-natural areas, play and allotments at Southleigh, whilst suggesting that the quantitative requirements for formal outdoor sports are established through the Playing Pitch Strategy and Sport England Playing Pitch Calculator. Bloor Homes also notes that the Addendum correctly identifies allotments and community gardens separately from outdoor sports and recreation. The corresponding definitions within Policy 56 should therefore be amended so that allotments and community gardens are included within the Amenity Green Space typology, rather than within the Courts, Greens, Tracks and Trails category. Subject to these points, Bloor Homes considers that the updated evidence provides a useful basis for planning the open space and recreational infrastructure required to support Southleigh.		