Entered 18.9.26 -
NOTE ONLY - REVIEW DIRECTLY FROM REP
Ref: 306385403

Havant BOROUGH COUNCIL



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

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Havant
BOROUGH COUNCIL

Part A - Personal Details

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

☑ I am completing this form myself

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

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

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

2. Please provide the following personal details.

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Title	Mrs
First Name	Heather
Last Name	Stevens
Address Line 1	East Hampshire District Council
Address Line 2	PO Box 310

Postcode	GU32 9HN
[redacted]	

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

Job Title	Planning Policy Manager
Organisation	East Hampshire District Council

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

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

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First Name	
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Organisation	
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Postcode	
Telephone Number	
Email Address	

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

Title	
First Name	
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5. Part B - Your representation(s)

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Please provide as much detail as possible.

If you wish to make a change to the Policies Map, please comment on the corresponding policy, and explain what change you would wish to make. If you would be helpful if you could show this in visual form

A full list of policies and allocations can be found in the contents page(s) of the Publication Plan.

Policy Number	5 Green and Blue Infrastructure
Allocation Number	
Paragraph Number	
Page Number	

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

(Please select as appropriate)

	Yes	No
Legally compliant	✓	☐
Sound	✓	☐

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

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

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East Hampshire District Council supports the policy approach to green and blue infrastructure and biodiversity enhancement. However, the Council suggests that the supporting text could recognise the importance of chalk streams and associated groundwater-fed habitats where relevant.

Chalk streams are a nationally important and internationally rare habitat, and their protection, restoration and enhancement should form part of the wider blue infrastructure network and nature recovery objectives of the Plan.

9. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

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The Council considers this a worthwhile enhancement given the increasing emphasis on chalk stream protection and wider nature recovery objectives.



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A BETTER FUTURE

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Havant
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A full list of policies and allocations can be found in the contents page(s) of the Publication Plan.

Policy Number	6 Amount of Housing
Allocation Number	
Paragraph Number	2.104 onwards in this chapter
Page Number	59-63

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

(Please select as appropriate)

	Yes	No
Legally compliant	✓	☐
Sound	✓	☐

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

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

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The Council remains concerned about the significant level of unmet housing need that will arise through the progression of the Havant Local Plan. This concern has been consistently raised throughout the plan preparation process, alongside requests from Havant Borough Council for East Hampshire District Council (EHDC) to assist in accommodating this unmet need. EHDC has, throughout, been clear that it is not in a position to accommodate the full extent of that unmet need.

In previous correspondence, the Council has stated that it "will give due consideration to the unmet housing and employment needs of your authorities" and that:

"At this time, it is currently unknown whether EHDC will be able to meet its own disaggregated housing needs and therefore, through due assessment, will need to consider the extent to which it can meet unmet needs from elsewhere through its Local Plan. Should a surplus of housing capacity be identified as part of a suitable development strategy, it is envisaged that unmet needs arising from the South Downs National Park within East Hampshire would be prioritised."

All relevant correspondence has been published on the Council's website.

In May 2026, the Council resolved to move from the 'legacy' planning system to the 'new' planning system and to begin strategic preparation for future plan-making as part of the transition to the forthcoming unitary authorities. As a result, the Council is not currently at a stage in the plan-making process where it can determine

whether it will be able to accommodate unmet housing needs arising from neighbouring authorities.

Notwithstanding this position, the Council remains concerned about the scale of the unmet housing need identified through the Havant Local Plan. However, it recognises that this position is largely a consequence of the substantial increase in housing requirements introduced by the Government in 2024, rather than any failure by Havant Borough Council to identify and allocate appropriate development sites. EHDC acknowledges that Havant Borough Council has sought to maximise housing delivery within the constraints of its administrative area. Even the identification of one or two additional sites would make only a marginal contribution towards addressing the approximately 9,500 dwellings of unmet housing need arising from Havant, which sits within the context of a combined unmet housing need for the South East Hampshire area of just over 18,000 homes (Oct 2025).

The Council would, however, draw attention to the presentation of the housing figures within the policy. The explanation of how the housing requirement, supply position and resulting unmet need have been calculated could be clearer. The Council considers that the Plan would have benefited from being supported by a Housing and Sites Background Paper setting out the evidence underpinning the housing requirement, site selection process, deliverability assumptions and resulting housing trajectory.

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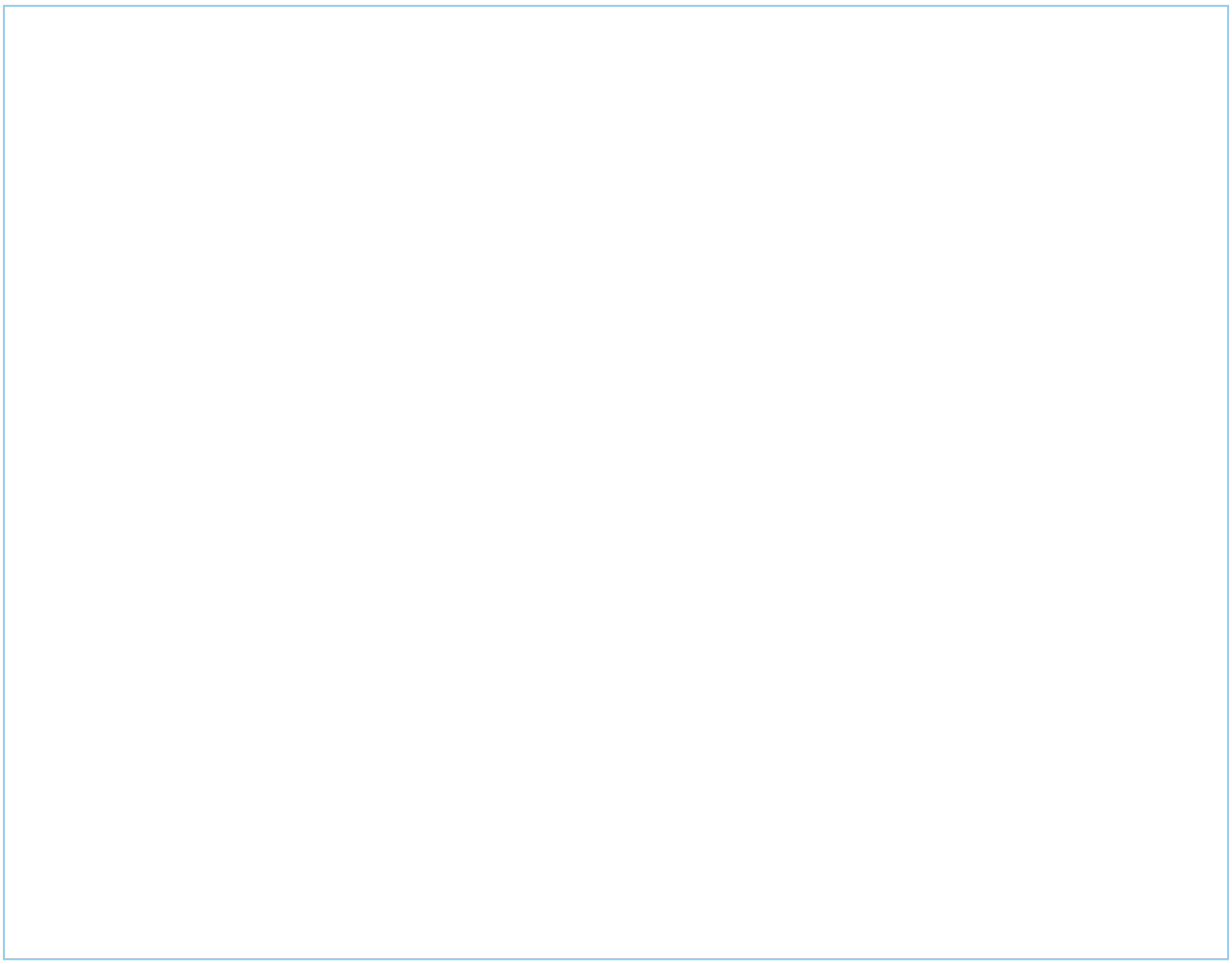
An explanation of the calculations that result in an unmet need of 9500 homes has been provided to the Council, but it should be available as part of the document or supporting background papers.



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Policy Number	7 Amount of Employment
Allocation Number	
Paragraph Number	
Page Number	64

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

(Please select as appropriate)

	Yes	No
Legally compliant	✓	☐
Sound	✓	☐

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

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In November 2025, EHDC responded to a request from Portsmouth City Council, Havant Borough Council and Gosport Borough Council, submitted in October 2025, seeking assistance in addressing unmet housing and employment needs. The request identified a combined unmet need of 18,347 dwellings and an employment floorspace shortfall of 19,973 sqm across the three authorities.

In relation to the request for assistance with unmet employment needs, EHDC stated:

"To date, Havant Borough is the only authority to have formally requested assistance with unmet employment needs. However, we support the positive joint working between your authorities that has reduced the amount of unmet employment needs but appreciate there remains a modest deficit. EHDC has commissioned an update to its Housing and Economic Development Needs Assessment (HEDNA) and Employment Land Review (ELR), which will inform our position on employment land provision and any potential capacity to assist neighbouring authorities."

Following this correspondence, Havant Borough Council informed EHDC on 13 February 2026 that discussions between the authorities had confirmed that Fareham Borough Council was able to accommodate the identified unmet employment need of 19,973 sqm of employment floorspace. Havant subsequently confirmed that it no longer required further discussions with EHDC regarding the potential for East Hampshire to accommodate this need.

The Regulation 19 consultation material indicates that there is no longer an unmet employment floorspace requirement. However, it is unclear from the supporting documentation whether Havant is now meeting its employment needs in full within the borough or whether part of the requirement continues to be accommodated by Fareham or another neighbouring authority.

For example, Policy 7 and paragraph 2.117 state that Havant can meet its identified employment need with a small margin of flexibility. However, paragraph 2.118 goes on to state that discussions with neighbouring local planning authorities resulted in offers of assistance, formalised through Statements of Common Ground, without explaining what was agreed or whether any employment requirement is ultimately being met outside the borough.

A review of the employment allocations indicates that the total floorspace aligns with the figures presented in Policy 7, suggesting that Havant is now meeting its own employment needs. However, this conclusion is not explicitly stated and can only be reached by undertaking calculations and making assumptions. The supporting evidence would benefit from greater transparency by clearly explaining how the identified employment requirement is being met and whether any cross-boundary provision remains.

EHDC has now completed updates to its Housing and Economic Development Needs Assessment (HEDNA) and Employment Land Review (ELR). However, it has not yet determined whether it can meet its own disaggregated housing and employment needs and therefore cannot currently confirm whether it has capacity to accommodate unmet needs arising elsewhere. This will be considered through the preparation of the East Hampshire Local Plan. Should a surplus of housing or employment capacity be identified as part of an appropriate development strategy, EHDC's priority would be to address unmet housing and employment needs arising from the South Downs National Park within East Hampshire.

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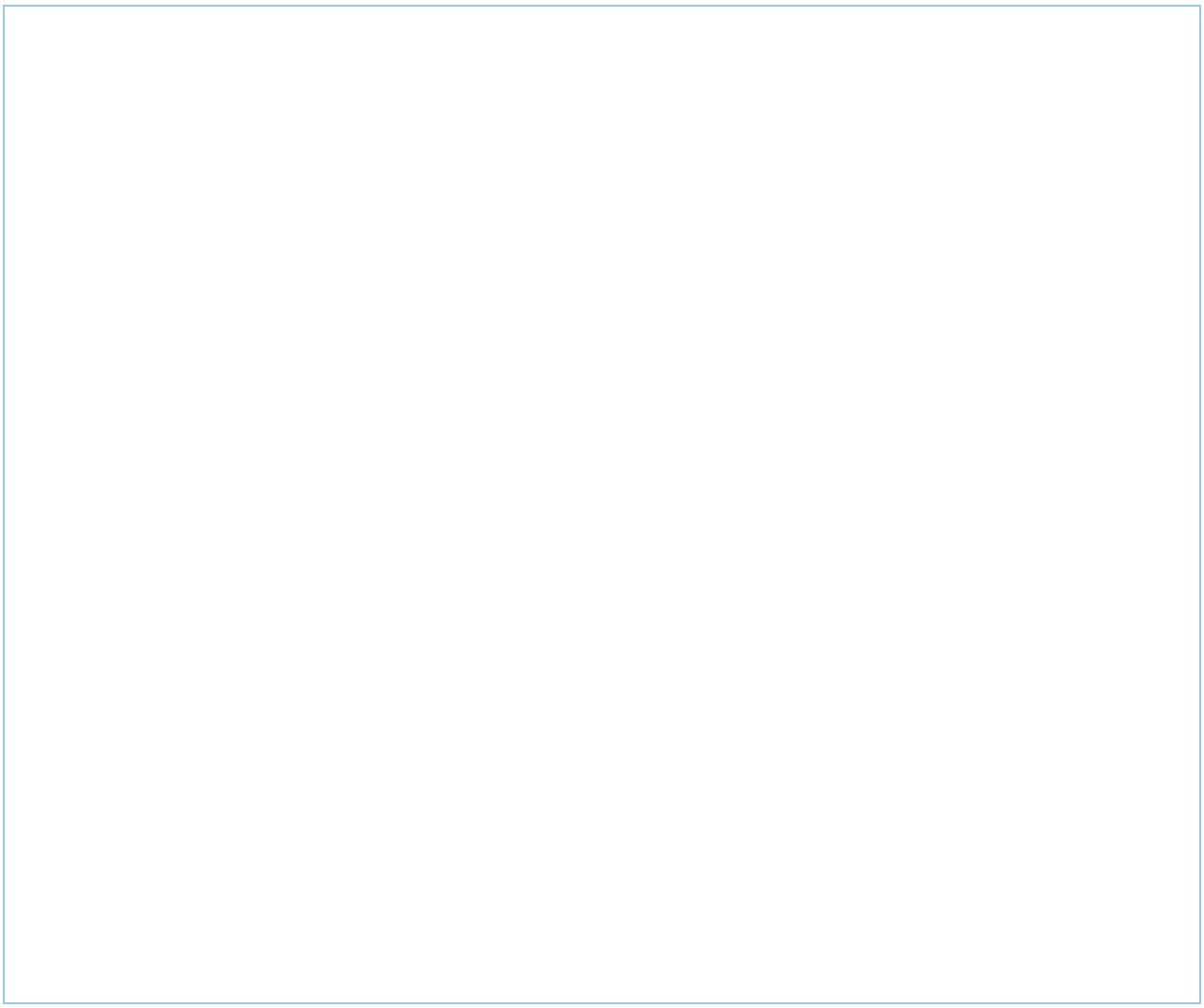

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If you wish to comment on more than one part of the plan, please complete and submit a form for each part of the Plan you wish to comment on.

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

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Havant
BOROUGH COUNCIL

Part A - Personal Details

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

☑ I am completing this form myself

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

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

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

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

2. Please provide the following personal details.

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Title	Mrs
First Name	Heather
Last Name	Stevens
Address Line 1	East Hampshire District Council
Address Line 2	PO Box 310

Postcode	GU32 9HN
[redacted]	

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

Job Title	Planning Policy Manager
Organisation	East Hampshire District Council

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

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

4. If an agent is appointed, please provide the following information:

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Title	
First Name	
Last Name	
Job Title	

Organisation	
Address Line 1	
Address Line 2	
Postcode	
Telephone Number	
Email Address	

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

Title	
First Name	
Last Name	
Organisation (if applicable)	

5. Part B - Your representation(s)

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

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

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

6. Which part of the Building a Better Future Plan does your representation relate to?

Please provide as much detail as possible.

If you wish to make a change to the Policies Map, please comment on the corresponding policy, and explain what change you would wish to make. If you would be helpful if you could show this in visual form

A full list of policies and allocations can be found in the contents page(s) of the Publication Plan.

Policy Number	Policy 43 Gypsies, Travellers and Travelling Showpeople
Allocation Number	
Paragraph Number	
Page Number	291-292

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

(Please select as appropriate)

	Yes	No
Legally compliant	✓	☐
Sound	✓	☐

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

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

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

The Council notes that the Havant Borough Gypsy and Traveller Accommodation Assessment (GTAA), 2026, identifies no need for Traveller pitches over the plan period. As such, there is no provision made in the Local Plan.

There has been correspondence between East Hampshire and Havant about assistance with potential unmet Traveller accommodation need emerging from East Hampshire.

- **18 August 2023:** EHDC wrote to Havant and its neighbouring authorities asking for assistance in meeting its potential unmet Traveller accommodation needs.
- **October 2023:** Havant responded that it was likely to be **very difficult** to accommodate additional Traveller pitches because the borough is heavily constrained and struggling to meet its own housing needs. It also noted that its own updated GTAA was expected to show only one pitch of need (which has since been met).
- **2 July 2025:** EHDC made a **formal Duty to Cooperate request** asking Havant to consider whether Traveller accommodation could be provided on two proposed strategic allocations—**Site Allocation 1 (Soughleigh)** and **Allocation 25 (Campdown)**—to help meet East Hampshire's unmet need. The letter states:

"Please consider this a formal request from East Hampshire for your assistance with unmet needs for Traveller accommodation..."

- **10 September 2025:** Havant replied that its **2024 GTAA identified no unmet need** within Havant because its earlier one-pitch requirement had already been met through permission at Long Copse Lane, Emsworth. Havant said it had not had any Traveller sites promoted and that requiring pitches on its strategic housing sites would reduce land needed to meet Havant's own housing requirement, potentially increasing its own unmet need. However, it agreed to continue discussions with East Hampshire. East Hampshire District Council

Whilst this specific discussion reached a conclusion at a point in time, provision of Traveller accommodation remains a cross boundary consideration, as documented in the East Hampshire Duty to Co-operate Framework 2025.

It is noteworthy that there is a high need in East Hampshire outside of the South Downs National Park (approx. 64 pitches and 53 Travelling showpeople plots over the plan period), as such, it is recommended that there is recognition of high need in neighbouring authorities within the plan, and within this policy.

9. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put

forward your suggested revised wording of any policy or text. Please be as precise as possible.

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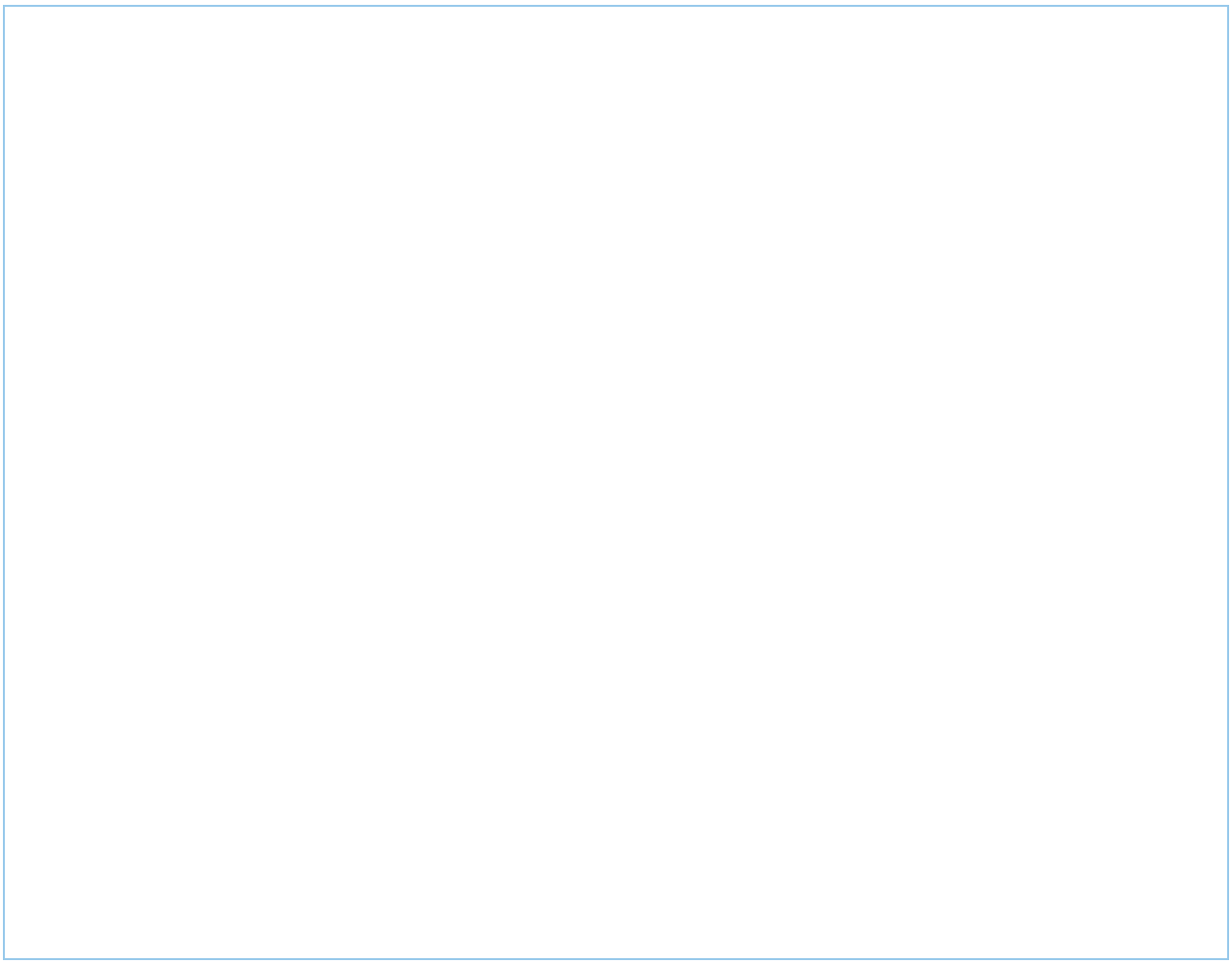

6. Examination Hearing Session Invitation

11. If your representation / representations are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in examination hearing session(s), you may be asked at a later point to confirm your request to participate.

No details on the examination hearing session(s) have yet been determined and will be made available upon the submission of the Building a Better Future Plan to the Planning Inspectorate.

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

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

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

12. If you indicated that you wish to participate in the examination hearing session(s), please outline why you consider this to be necessary.

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



Havant
BOROUGH COUNCIL

8. Future Notification

13. Do you wish to be notified of any of the following milestones in the Building a Better Future Plan process?

These milestones include:

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

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

☑ Yes, I wish to be notified

☐ No, I do not wish to be notified

Thank you for submitting your views to this important consultation.

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

Havant BOROUGH COUNCIL

Entered 18.9.26 - NOTE ONLY - REVIEW DIRECTLY FROM REP Ref: 306385403



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

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Havant
BOROUGH COUNCIL

Part A - Personal Details

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

2. Please provide the following personal details.

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First Name	Heather
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Address Line 1	East Hampshire District Council
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Postcode	GU32 9HN
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3. Please provide the following details where applicable and/or relevant

Job Title	Planning Policy Manager
Organisation	East Hampshire District Council

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

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Title	
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Last Name	
Job Title	

Organisation	
Address Line 1	
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Postcode	
Telephone Number	
Email Address	

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

Title	
First Name	
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Havant
BOROUGH COUNCIL

5. Part B - Your representation(s)

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Policy Number	Policy 48 Protecting Existing Community Facilities
Allocation Number	
Paragraph Number	
Page Number	311

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

(Please select as appropriate)

	Yes	No
Legally compliant	✓	☐
Sound	✓	☐

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

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

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"Where a community facility is confirmed or nominated as an Asset of Community Value, this will be taken as demonstration that there is a need for the facility."

It is not clear that designation as an Asset of Community Value (ACV) necessarily demonstrates an ongoing need for the facility, particularly as ACV listings expire after a 5-year period and may not reflect current levels of demand or community use and take into consideration any changes to the community infrastructure locally. Clarification would be helpful on how historic or expired ACV designations would be treated where a planning application is submitted.

It is also advised that the terminology used in policy wording is the same as the terminology used in the ACV guidance. 'Confirmed' is used throughout, however a facility is only 'listed' as an ACV.

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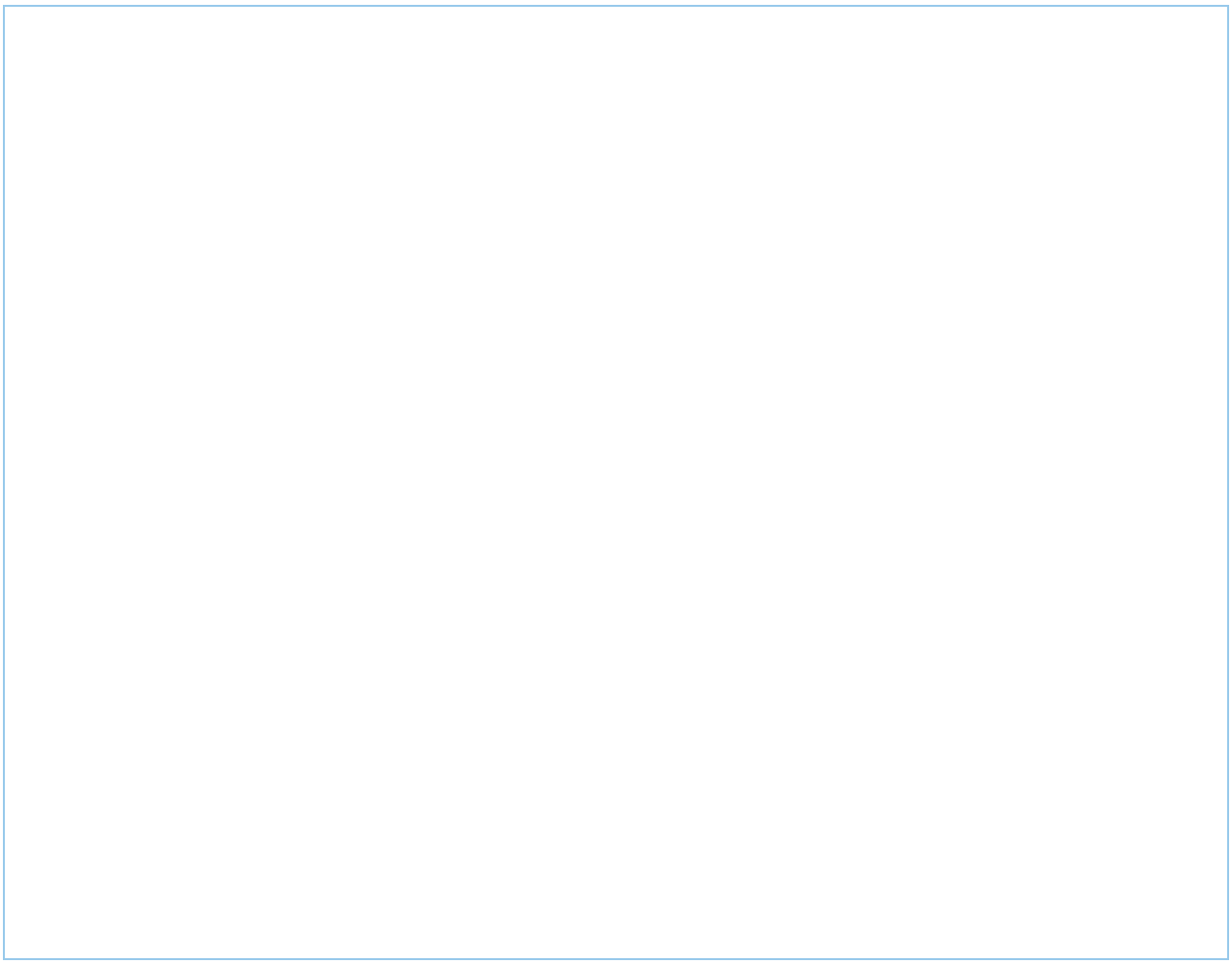

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☑ Yes, I wish to be notified

☐ No, I do not wish to be notified

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Havant BOROUGH COUNCIL

Entered 18.9.26 -
NOTE ONLY - REVIEW
DIRECTLY FROM REP
Ref: 306385403



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Havant
BOROUGH COUNCIL

Part A - Personal Details

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

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Title	
First Name	
Last Name	
Job Title	

Organisation	
Address Line 1	
Address Line 2	
Postcode	
Telephone Number	
Email Address	

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

Title	
First Name	
Last Name	
Organisation (if applicable)	

Havant
BOROUGH COUNCIL

5. Part B - Your representation(s)

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A full list of policies and allocations can be found in the contents page(s) of the Publication Plan.

Policy Number	Policy 57 Sport and Recreation Facilities
Allocation Number	
Paragraph Number	4.535
Page Number	

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

(Please select as appropriate)

	Yes	No
Legally compliant	✓	☐
Sound	✓	☐

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

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

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

"Future provision will also need to be designed to be multi-purpose to provide greater flexibility going forward."

The expectation that all future provision should be designed to be multi-purpose may not always be realistic. Some sports facilities are designed for a specific activity and cannot easily be adapted for other uses. It may be better to encourage multi-purpose provision where appropriate, while recognising that some facilities will need to remain specialist in nature.

9. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

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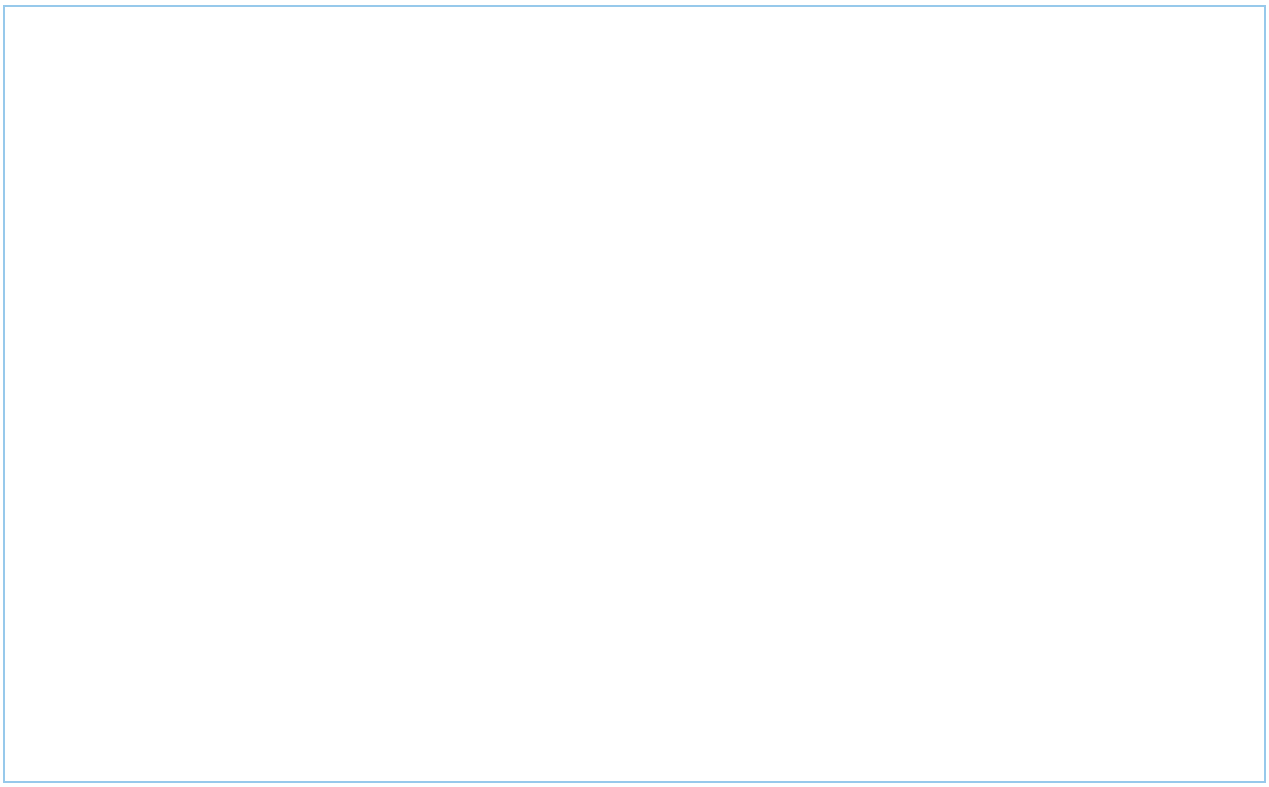

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☑ No, I do not wish to participate in examination hearing session(s)

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☑ Yes, I wish to be notified

☐ No, I do not wish to be notified

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