entered 18.9.26 - NOTE ONLY REVIEW FULL REP
Ref: 306388327

Hampshire County Council
Universal Services
The Castle
Winchester
Hampshire
SO23 8UD

hants.gov.uk

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

Reference: Havant_Reg19

Enquiries to: Spatial Planning

Date: 7 September 2026

Email: planningconsultations@hants.gov.uk

Dear Sir,

Havant Borough Council Local Plan Pre-Submission Consultation (Regulation 19)

Thank you for consulting Hampshire County Council on the Havant Borough Council Local Plan Regulation 19 Consultation. The County Council is providing a response as the Local Highway Authority, Lead Local Flood Authority Minerals and Waste Planning Authority. The County Council provided a response to the Regulation 18 consultation in July 2025, and has subsequently been engaged with the Borough Council in finalising policy wording prior to the pre-submission stage.

The pre-submission Plan should be updated to refer to the recently adopted Hampshire Minerals and Waste Plan (adopted July 2026) which forms part of the development plan for Havant borough.

The County Council notes that the published NPPF (August 2026) includes updated policy F8: Sustainable drainage systems and watercourses. It requires that systems should be designed in accordance with the National Standards for Sustainable Drainage Systems. The pre-submission plan Policy 28 (drainage) criteria b) is inconsistent with the standards, because the policy states surface water discharging into a combined sewer network would not be supported. The National Standards (July 2025) however include Priority 5 combined sewer as an acceptable option, albeit the lowest standard in the discharge hierarchy, to be avoided where possible. The implications of the NPPF's requirements regarding the National Standards for Sustainable Drainage Systems can be discussed with the Lead Local Flood Authority, if required.

Allocation 18: Padnell Grange

The County Council has identified one soundness issue on the pre-submission document (July 2026). This relates to the deliverability of Allocation 18: Padnell Grange, and details can be found in the accompanying Representation Form.

Allocation 1: Southleigh (2,100 homes)

The County Council is a statutory consultee on the above site allocation which has also been submitted to Havant Borough Council by applicant Bloor Homes and landowners (application reference APP/26/00324).

In terms of the site allocation (Allocation 1) and the Development Requirement k (infrastructure (transport)) (iii), at this stage the County Council will continue to engage with the Borough Council regarding the provision by the developer of a bridge. This bridge infrastructure, as required by criterion k, is set out in the Infrastructure Delivery Plan (June 2026) (evidence base reference IT01). Page 173 (T012) explains that the trigger and phasing for the deliverability of this infrastructure (a shared-use walking and cycling bridge providing a traffic-free route) is to be agreed by the Highway Authority (the County Council).

It is recommended therefore that the Borough Council engages with the County Council on the deliverability of the bridge through the Statement of Common Ground between both parties. The County Council has not provided technical comment or advice on the deliverability of the bridge as set out in Allocation 1, but support the principle of the project, with a feasible solution to supporting sustainable modes of transport to be delivered by the developer. An updated Infrastructure Delivery Plan should identify the preferred infrastructure solution, its intended transport function, delivery responsibilities, phasing arrangements and indicative costs. This can be informed by the findings of the Southleigh South-West Bridge Feasibility Study (June 2026, ref. IT07), including the different infrastructure options considered and the associated cost and delivery implications.

The County Council strongly supports a comprehensive masterplan-led approach to the delivery of Southleigh, as required in paragraph 3.16 of Allocation 1. Due to the multiple land ownership, this recognises the need for the site to be planned and brought forward comprehensively. Given that the bridge connection extends beyond the allocation boundary and interfaces with Allocation 6 (Land East of Castle Avenue), safeguarded land and the wider transport network, a whole-site masterplan is essential to safeguard land, coordinate infrastructure delivery, avoid piecemeal development, and demonstrate how the bridge and wider sustainable transport strategy will be delivered in practice.

If you wish to discuss any of the comments raised, please do not hesitate to contact us.

Yours sincerely



Emily Howbrook
Strategic Planning Manager
Universal Services

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Havant BOROUGH COUNCIL



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

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

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

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

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

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

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

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

About this representation form

The form has two parts:

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

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

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

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

Privacy Notice

The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process. More information on how we use your personal information can be found as part of the 'Planning Policy' privacy notice is available on our website at **www.havant.gov.uk/privacypolicy** or can be requested by calling 023 9244 6019.

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

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

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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.

Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate.

The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process.

Title	Mrs
First Name	Emily
Last Name	Howbrook
Address Line 1	Spatial Planning, Universal Services
Address Line 2	Hampshire County Council, The Castle, Winchester

Postcode	SO23 8UD

[redacted]

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

Job Title	Strategic Planning Manager
Organisation	Hampshire County 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:

Please note that these details are required for all representations and your information will be shared with the Planning Inspectorate.

The personal data you provide will be used to ensure that representations comply with government guidance and that they can be used as part of the Local Plan examination process.

Title	
First Name	
Last Name	
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)	

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5. Part B - Your representation(s)

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

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

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

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

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

Please provide as much detail as possible.

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

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

Policy Number	
Allocation Number	Allocation 18: Padnell Grange
Paragraph Number	
Page Number	

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

(Please select as appropriate)

	Yes	No
Legally compliant	☒	☐
Sound	☐	☒

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

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

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

The Lead Local Flood Authority (LLFA) has concerns regarding the deliverability of Site Allocation 18 (Padnell Grange) because all sites will require an acceptable surface water drainage solution. Based on a review of all the allocations, the County Council identify that Allocation 18 does not have an obvious suitable drainage outfall. On closer inspection, the County Council has learned that the solution depends on securing agreement from a third-party landowner to connect to an off-site watercourse. No feasible alternative drainage option has been identified as part of the submitted scheme (ref APP/19/00224) as of 4 September 2026.

The drainage information submitted under APP/19/00224 indicates that existing buildings on the site currently discharge surface water through a variety of arrangements, including direct discharge onto the ground surface and connections to the foul sewer. Neither of these discharge destinations is identified as an appropriate runoff destination under Standard 1 of the National Standards for Sustainable Drainage Systems (SuDS).

Infiltration testing failed due to clay ground conditions, and a sewer capacity assessment undertaken for APP/19/00224 concluded that the surface water sewer network lacks sufficient capacity. As a result, the only potentially viable discharge route is to the watercourse northeast of the site.

The current planning application (APP/26/00332) for 90 dwellings also relies on this off-site watercourse. However, it is unclear whether the applicant has secured agreement in principle from the affected landowner to install the necessary drainage infrastructure across their land.

Until evidence is provided that the landowner supports the principle of the proposed connection, the deliverability of the site remains uncertain. While a formal legal agreement would not be expected at this stage, confirmation in principle would provide confidence that a viable drainage solution can be delivered. Without such agreement, there is no identified means of providing an acceptable surface water drainage solution for the site.

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

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

The County Council recommends additional wording, under the Development Requirements heading, to ensure an achievable drainage of this site is required:

c) Incorporate surface water management systems which produce a 50% betterment on the pre-development rate of flow (PDL part) and restrict the rate of flow to greenfield rates (greenfield part)**; and demonstrate that a connection to a drainage outfall can be achieved.**

6. Examination Hearing Session Invitation

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

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

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

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

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

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

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

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



8. Future Notification

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

These milestones include:

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

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

☒ Yes, I wish to be notified

☐ No, I do not wish to be notified

Thank you for submitting your views to this important consultation.

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