Outlook

Re: Havant Local Plan

From Robert Reeds [redacted]
Date Fri 2026-09-11 16:56
To Planning Policy and Urban Design [redacted]
Cc James Bromhead [redacted]

1 attachment (769 KB)
Havant Local Plan - Waterlooville Golf Club_Representations_FINAL_Appendix.pdf;

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Good afternoon

Please see attached for the representations on behalf of Waterlooville Golf Club.

We would like to be kept informed of progress as it progresses to examination.

Many thanks

Rob

Lambert Smith Hampton

Robert Reeds MRTPI
Director - Planning Consultancy
Planning, Regeneration + Infrastructure
55 Wells Street, London, W1T 3PT
[redacted]

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From: Planning Policy and Urban Design [redacted]
Sent: Wednesday, September 9, 2026 8:14 AM
To: Robert Reeds [redacted]
Cc: James Bromhead [redacted]
Subject: Re: Havant Local Plan

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Good morning Rob

Further to our call yesterday, happy for you to submit your rep by Friday 11th as requested.

This will be recorded as a late representation but will be submitted together with the other representations received to the Inspectorate.

Kind regards, Jade

Jade Ellis MRTPI
Principal Planning Policy Officer | [redacted]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX
Advanced notice of leave: None upcoming



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From: Robert Reeds [redacted]
Sent: 08 September 2026 15:56
To: Planning Policy and Urban Design [redacted]
Cc: James Bromhead [redacted]
Subject: Havant Local Plan

CAUTION: This email came from outside of the council - only open links and attachments that you're expecting.

Good afternoon

Thanks for taking my call earlier.

I would like to request an extension to Friday 11th at 5pm, if possible.

Please do confirm.

Many thanks

Rob

Robert Reeds MRTPI
Director - Planning Consultancy
Planning, Regeneration + Infrastructure
55 Wells Street, London, W1T 3PT
[redacted]

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Havant Local Plan

Representations on behalf of:

Waterlooville Golf Club

WATERLOOVILLE GOLF CLUB

CHERRY TREE AVE, COWPLAIN

WATERLOOVILLE PO8 8AP

September 2026

DOCUMENT CONTROL

This document has been prepared and checked in accordance with the Lambert Smith Hampton Quality Assurance procedures and authorised for release.

PROJECT	Havant Local Plan
DOCUMENT TITLE	Representations on behalf of Waterlooville Golf Club
STATUS	Final
CLIENT	Waterlooville Golf Club
PREPARED BY	Lauren Stoves, Senior Planner
APPROVED BY	Rob Reeds, Director

Revision No.	Date	Details
Rev A	10/09/2026	Draft for client review
Rev B	11/09/2026	Final for submission

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1.0 EXECUTIVE SUMMARY

1.1 These representations are submitted by Lambert Smith Hampton on behalf of Waterlooville Golf Club (WGC) in response to the Havant Local Plan - Publication Building a Better Future Plan 2026.

1.2 WGC is a major landowner in Havant, occupying a significant parcel of land to the North of Havant and as such has a significant stake in how the Plan is prepared.

1.3 The Representations conclude that:

i) The Plan is unsound because it significantly under-delivers against identified housing needs and has failed to adequately justify the rejection of suitable development Sites.

ii) Waterlooville Golf Club (formerly Allocation H46: Land at Waterlooville Golf Club, and current SHELAA Reference WA05) should be included as a housing allocation because it represents a sustainable form of development and is consistent with the aims and objectives of national planning policy.

1.4 Whilst the Council has relied upon transitional arrangements associated with the December 2024 NPPF in preparing the Plan, this does not remove the requirement for the Plan to be positively prepared, justified and consistent with currently adopted national policy.

1.5 This Representation concludes that Waterlooville Golf Club should be included as a Site Allocation in the Local Plan. The Site represents a sustainable form of development, was previously identified by the Council as Allocation H46 in the previous withdrawn version of the Local Plan and its inclusion in the Plan is consistent with national and local planning policy. Regardless of the housing requirement ultimately applied through the transitional arrangements, the Council has not demonstrated why a previously accepted and sustainable development opportunity no longer forms part of the most appropriate strategy for the Borough.

2.0 INTRODUCTION AND SITE HISTORY

2.1 The Site has an area of 1.3 ha and is currently used as a golf club practice ground with the south of the site containing mature woodland. Anvil Close and Farriers Way serve the properties directly adjacent to the west of the site with Waterlooville Golf Club bounding the remainder of the site. The A3(M) is located a short distance to the south-east of the site.

2.2 The Site was included as a draft allocation in the previously withdrawn Local Plan (Pre-Submission Havant Borough Local Plan 2036) for 45 new dwellings. For completeness, the draft allocation wording is included as Appendix 1. Notwithstanding this, the Site has not been included as an allocation within the Publication Building a Better Future Plan.

2.3 The location of the Site is shown below – which includes two parcels of land which is slightly larger than the previous draft allocation. The land identified is a practice area which does not form part of the formal course and the majority of it cannot be used at all due to relationship / amenity issues with the neighbouring residential. Activities associated with this parcel of land can be accommodated elsewhere on the course and this parcel is effectively surplus to requirements.



Figure 1: Land at Waterlooville Golf Club

3.0 MATTER 1: SPATIAL STRATEGY AND HOUSING

WGC POSITION: OBJECT

THE PLAN IS NOT POSITIVELY PREPARED OR JUSTIFIED.

Policy 1: Development Strategy

Policy 6: Amount of housing

Policy 8: Five year housing land supply

3.1 The starting point in relation to the above policies within the Local Plan is that the Council is not proposing to meet its identified housing need. Policy 6 establishes a housing requirement of 7,087 dwellings over the Plan period, representing only a proportion of the Borough's objectively assessed housing need and leaving a substantial unmet requirement. The Council's preferred strategy would deliver only approximately half of identified housing needs, despite evidence demonstrating that alternative growth strategies could deliver significantly higher levels of housing provision.

3.2 WGC acknowledges that Havant faces environmental and physical constraints. However national policy does not permit housing requirements to be reduced simply because constraints exist. Paragraph 11 of the NPPF (transitional arrangements) requires local planning authorities to demonstrate that the application of policies in the Framework provides a strong reason for restricting development, or alternatively that the adverse impacts of meeting needs would significantly and demonstrably outweigh the benefits.

3.3 It is not evident from the Plan evidence base that this exercise has been undertaken in a comprehensive or robust manner. The Council's own Sustainability Appraisal has considered alternative strategies capable of delivering materially greater levels of housing growth, yet these were discounted despite their clear ability to reduce the scale of unmet housing need. The Council has therefore failed to demonstrate that its preferred strategy represents the most appropriate strategy when assessed against the reasonable alternatives.

3.4 In circumstances where the Council is proposing to plan for less than half of its identified housing need, there is an strong obligation to ensure that all sustainable and deliverable development opportunities have been properly assessed. The consequence of this approach is that sustainable development opportunities have assumed increased importance and therefore require particularly robust justification where they have been discounted.

4.0 MATTER 2: DEVELOPMENT ALLOCATIONS (WA05)

WGC POSITION: OBJECT

THE PLAN IS NOT POSITIVELY PREPARED OR JUSTIFIED.

Policy 2: Defined Settlement Boundary

Section 3: Development Allocations

4.1 The Council's approach to addressing housing need within the previous section, and in turn the list of sites in Section 3 – Development Allocations raises significant concerns regarding the justification for the Plan's site selection process.

4.2 With specific regard to Waterlooville Golf Club (Reference WA05), the site formed part of the Council's previous development strategy and was identified as Allocation H46 (Land at Waterlooville Golf Club) within the withdrawn 2019 Pre-Submission Local Plan. Through that process, the Council accepted the principle that the site could contribute towards meeting the Borough's housing requirements and formed an appropriate component of the growth strategy for Waterlooville.

4.3 The Building a Better Future Plan 2026 omits the site from the list of proposed allocations despite a materially different and more pressured housing context requiring the identification of more suitable housing sites.

4.4 Whilst it is accepted that plan-making is an iterative process and site allocations may change over time, the removal of a previously proposed allocation must be supported by clear and proportionate evidence. In the case of Waterlooville Golf Club, it is not apparent from the evidence published alongside the Plan what material circumstances have changed since its previous inclusion in the development strategy.

4.5 The Council's SHELAA confirms that its purpose is to identify sites which may be suitable, available and achievable for development and to provide a key part of the evidence base informing allocation choices. The SHELAA further acknowledges that sites previously promoted or proposed through earlier iterations of the Local Plan have been reviewed as part of the assessment process. It also sets out the following reasons as to the WA05 Waterlooville Golf Club for c. 42 dwellings has been discounted:

- **Not suitable:** Whilst the site is adjacent to the urban area and not prominent in the landscape, the site comprises part of a golf course. Development would need to comply with the adopted open space planning policy. This has not currently been demonstrated. The entire site forms part of a SINC. Noise from the A3(M) would need to be mitigated.

- **Not achievable:** It is not clear how access to the site would be achieved.

4.6 The Council's assessment of Waterlooville Golf Club within the Strategic Housing and Economic Land Availability Assessment (SHELAA) does not identify any overriding

constraint that would prevent the Site from contributing towards the Borough's housing requirements. Rather, the assessment identifies a series of matters which require further consideration and assessment. These matters do not provide a sufficiently robust basis for discounting a site that was previously identified by the Council as Allocation H46 within the withdrawn Local Plan.

Open Space Planning Policy

4.7 The SHELAA concludes that the Site is not suitable because it forms part of an existing golf course and that compliance with the Council's open space planning policy has not been demonstrated. The absence of information should not automatically be interpreted as evidence of unsuitability.

4.8 WGC considers that the loss, replacement or reconfiguration of recreational provision could be addressed within a suitably worded Site Allocation – in the same way as addressed in the former draft allocation. WGC has a significant landholding that could accommodate the transfer of the activities on this land. The SHELAA does not conclude that compliance with open space policy is impossible or incapable of mitigation

SINC

4.9 The Council identifies that the entirety of the Site falls within a Site of Importance for Nature Conservation (SINC). Whilst this designation is acknowledged, this is a blanket designation across the whole of the Site and does not adequately reflect the use of the land.

4.10 The existence of a SINC designation is not an absolute barrier to development. Development could be subject to an ecological assessment demonstrating that residential development could be achieved alongside appropriate mitigation, enhancement and habitat protection measures.

Noise

4.11 The SHELAA notes that noise arising from the nearby A3(M) would require mitigation. Again, this does not constitute evidence that the Site is unsuitable for development. Noise mitigation is a standard design and development management issue encountered on numerous residential schemes across the country and can typically be addressed through site layout, landscaping, acoustic barriers and building design measures.

Access:

4.12 The Council's achievability assessment concludes that the Site is not achievable because it is *"not clear how access to the site would be achieved".* This is not the same as concluding that suitable access cannot be achieved.

4.13 WGC considers there are multiple options for achieving a suitable access, which is clearly relevant given that the Site was previously proposed as Allocation H46. The Council has not explained how access considerations have changed since the earlier

allocation process, nor has it identified any new evidence demonstrating that the Site has become incapable of being served by an appropriate means of access.

4.14 Access could be achieved through:

- Primary vehicular access via Cherry Tree Road into the Site.
- Secondary vehicular access via Idsworth Road subject to agreement.
- Secondary vehicular access via Grassmere Way / Anvil Close subject to agreement.
- Primary pedestrian / cycle access via Grassmere Way / Anvil Close.
- Secondary pedestrian / cycle access via the established PROW running adjacent to the golf course clubhouse.

4.15 It would be reasonable to expect any Site Allocation to make this a requirement prior to finding the proposals acceptable.

Statutory Consultees

4.16 The Golf Club have discussed the allocation with Sport England and England Golf. Sport England confirmed they would not be a statutory consultee on this, as it does not affect playing field land. Golf courses do not constitute playing field land so they would not comment.

4.17 England Golf would need to be consulted as part of any future proposals. The feedback was that as long as the golf club still had equal or better practice facilities after the development then there would mean no objections. Fractice facilities are important to the club for its members and PGA professionals and as such will be accommodated at the Site.

Summary

4.18 Given the scale of unmet housing need proposed by the Plan, there is a particularly strong requirement for the Council to demonstrate that all reasonable opportunities for sustainable growth have been properly assessed. In the absence of evidence demonstrating otherwise, Waterlooville Golf Club is a deliverable and achievable Site capable of contributing towards housing delivery in a highly sustainable location adjoining the existing urban area of Waterlooville.

4.19 The Council has not identified any insurmountable constraint and has therefore failed to demonstrate why a previously allocated site no longer represents a reasonable alternative.

5.0 MATTER 3: CONSISTENCY WITH NATIONAL POLICY

5.1 Whilst the Plan has been prepared under transitional arrangements that allow the Council to rely upon the December 2024 version of the National Planning Policy Framework in respect of its housing requirement, this does not diminish the relevance of the Government's current policy objectives when assessing the suitability of development opportunities through the Local Plan process.

5.2 In considering the appropriateness of sites and the soundness of the Plan, regard should be had to the direction of national planning policy, which places significant emphasis on boosting housing delivery, making effective use of suitable land and ensuring that plans are sufficiently flexible to respond to development needs.

5.3 We therefore do not consider that the Local Plan meets the thrust of achieving sustainable development as set out in the NPPF (2026), with regards to the following plan-making policies:

- Policy S1: Positive plan-making.
- Policy S2: Producing a spatial strategy

5.4 It is also not considered that the national decision-making policies have been fully considered, including:

- Policy S3: Presumption in favour of sustainable development
- Policy S5: Principle of development outside settlements

5.5 The Inspector, in deciding whether the Site should be brought back into the Plan, is likely to have due regard to whether national planning policy would support the spatial location of development. Should the Site be progressed without an allocation, the National decision-making policies would apply including Policy S3 Presumption in favour of sustainable development. In this regard, Policy S5 should be applied as the site would fall outside of the settlement boundary without the benefit of an allocation.

5.6 Policy S5 states that only certain forms of development should be approved outside settlements. This includes Policy S51j which states that:

- *Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test27), and where the development would:*
    - *i. Be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;*

5.7 In this regard, the Council cannot demonstrate a 5 year housing land supply (the latest position is between 1.3 and 1.8 years.

5.8 With regards to accessibility, the Site is directly adjacent to the existing urban area of Waterlooville, one of the Borough's principal settlements and a focus for planned growth under Policy S1. Future residents would have access to a wide range of services, facilities, employment opportunities, schools, healthcare provision and public transport options within easy reach of the Site. With the accesses through Grassmere Way, the site is within a 5-minute walk of shops and amenities.

5.9 The Site is therefore closely related to the existing settlement both physically and functionally and cannot reasonably be characterised as isolated or unsustainable development.

5.10 Accordingly, if the Site were to come forward as a planning application outside the Local Plan process, it would likely satisfy the underlying objectives of Policy S5. The Site represents a sustainable extension to an existing settlement, is capable of integrating with the surrounding urban area and would contribute towards the delivery of market and affordable housing in a location where residents would not be reliant on private vehicle use for day-to-day needs.

5.11 It is a site which aligns with the fundamental principles that underpin both Policy S1 and Policy S5 of the NPPF 2026. The Site's inclusion as an allocation would not conflict with the sustainable development objectives of the Plan.

5.12 The Council's position gives rise to an apparent inconsistency whereby the Site adjoins the urban area of Waterlooville, was previously proposed for allocation by the Council itself, and would appear to accord with the objectives of Policy S5 if assessed on its planning merits, yet has been omitted from the development strategy without a clear evidence-based justification. This undermines the extent to which the Plan can be regarded as justified when assessed against reasonable alternatives.

6.0 PROPOSED MODIFICATIONS

6.1 Having regard to the above representation, we respectfully request that the Inspector directs the Council to modify:

Policy 2: Defined Settlement Boundary and associated Policy Map

6.2 Amendment of the settlement boundary within the Policy Maps which would then bring the Site into the Defined Settlement Boundary.

Section 3: Development Allocations

6.3 We request the addition of the below:

Proposed Allocation XX: Land at Waterlooville Golf Club, Waterlooville

The Site comprises part of Waterlooville Golf Club. The Site adjoins the existing urban area and occupies a sustainable location with access to employment opportunities, schools, community facilities, healthcare provision, public transport and local services.

The Site has the potential to deliver a minimum of 45 dwellings, including affordable housing, together with publicly accessible green infrastructure, biodiversity enhancements and associated infrastructure.

Allocation XX: Land at Waterlooville Golf Club

Planning permission will be granted for a comprehensive residential-led development at Waterlooville Golf Club providing a minimum of 45 dwellings where development:

a. Provides a safe and suitable means of access for all users and demonstrates that the local highway network can accommodate the proposed development;
b. Delivers a high-quality residential development which integrates successfully with the existing urban area of Waterlooville.
c. Provides a mix of dwelling types, sizes and tenures, including affordable housing in accordance with Policy HN3.
d. Demonstrates how the loss of existing golf course land and any associated recreational facilities complies with the Council's open space policies, including through reprovision, replacement facilities, qualitative improvements or other appropriate mitigation measures.
e. Protects and enhances ecological interests associated with the Site and delivers measurable biodiversity net gain along with retaining important trees, hedgerows, woodland features and ecological corridors.
f. Is informed by appropriate ecological assessment and demonstrates that development would not result in unacceptable harm to the Site of Importance for Nature Conservation (SINC).

g. **Incorporates appropriate design responses and mitigation measures to address noise arising from the A3(M), ensuring acceptable living conditions for future occupants.**
h. **Prioritises walking, cycling and public transport connections to surrounding residential areas, Waterlooville Town Centre, local schools, employment areas and community facilities.**
i. **Delivers a comprehensive landscape strategy which retains the Site's key landscape features and reinforces the settlement edge.**

The Council will support the delivery of Land at Waterlooville Golf Club as a sustainable urban extension to Waterlooville. The development will contribute towards meeting housing needs within the Borough, including affordable housing provision, whilst delivering landscape, ecological and recreational enhancements.

6.4 Should the Inspector not choose to bring the Site back into the Plan, then Policy 2 should be amended to accord with the provisions set out in the NPPF Policy S5 Principle of development outside settlements. Currently, this is very restrictive and fails to take account of the significant unmet need for housing with Havant. The policy needs to set out criteria by which windfall development that is outside but adjacent to the settlement boundary would be permitted.

7.0 CONCLUSIONS

7.1 Waterlooville Golf Club represents a sustainable and deliverable development opportunity adjacent to one of the Borough's principal settlements. The Site was previously identified by the Council as Allocation H46 and the evidence accompanying the Publication Plan does not demonstrate that any material change in circumstances has occurred to justify its omission. The WA05 assessment identifies matters requiring further assessment and mitigation rather than insurmountable constraints. As such, the Site remains a reasonable alternative capable of contributing towards housing delivery and reducing the scale of unmet housing need within the Borough.

7.2 At present we do not consider the plan to be sound, as measured against the tests of soundness set out in the NPPF. WGC would like to participate in any hearing sessions held at the examination in public on the matters raised in our representations and that we would like to remain informed.

Lambert Smith Hampton

September 2026

H46 | Land at Waterlooville Golf Club

The Site

8.85 The site has an area of 1.3 ha and is currently used as a golf club practice ground with the south of the site containing mature woodland. Anvil Close and Farriers Way serve the properties directly adjacent to the west of the site with Waterlooville Golf Course bounding the remainder of the site which includes mature woodland adjacent to the north-east boundary. The A3(M) is located a short distance to the south-east of the site.

Site Opportunities & Constraints

- This is a greenfield site.
- The site is within Waterlooville Golf Course SINC.
- There is an area of woodland adjacent to the southern part of the site.
- Bechstein's bat may be found on and surrounding the site with a maternity roost likely to be present.
- Site is underlain by heavy clay.
- Potential noise from the A3(M).
- There is potential for landfill and associated gases.
- The site is in Groundwater SPZ 1c for the Bedhampton and Havant Springs.

H46 | Land at Waterlooville Golf Club

Residential development of about 45 dwellings will be permitted where:

a. Sufficient information is submitted to address the site-specific planning considerations. This is to be agreed at the pre-application stage and is expected to include the following:
   i. Ecological Assessment;
   ii. Flood Risk Assessment;
   iii. Drainage Strategy;
   iv. Contaminated Land Investigation Report (to include gas monitoring);
   v. Noise Impact Assessment.

b. An appropriate means of access is established to the satisfaction of the Highway Authority.

c. The design and layout:
   i. Provides appropriate mitigation measures, including buffers, with regard to Bechstein's bat in line with Policy E15;
   ii. Responds to the noise impact of the A3(M) to the south;
   iii. Provides appropriate separation and protection to the adjoining woodland;
   iv. Addresses the impact on the Waterlooville Golf Course SINC in line with Policy E14.